

Computation of §1.752-7 Liability Reduction (in millions)

1. Basis of A's PRS interest	\$5
2. Less adjusted value of A's PRS interest	
Value of PRS interest	3
A's share of nonrecourse debt	<u>1</u>
Total	<u>(4)</u>
3. Difference between 1 and 2	1
4. Remaining built-in loss	
from §1.752-7 liability	<u>2</u>
5. §1.752-7 liability reduction	
(lesser of 3 or 4)	\$1

Gain/Loss on Sale of A's PRS Interest (in millions)

1. Amount realized on sale	
Value of PRS interest	\$3
A's share of nonrecourse debt	<u>1</u>
Total	<u>\$4</u>
2. Less basis of PRS interest	
Original	\$5
§1.752-7 liability reduction	<u>\$1</u>
Difference	<u>(\$4)</u>
3. Gain/Loss	0