

# COMPARISON OF FATCA TIMEFRAMES



Milestone	Withholding Agents other than Participating FFIs and Deemed-Compliant FFIs		Withholding Agents that are Participating FFIs		Withholding Agents that are Registered Deemed-Compliant FFIs		Withholding Agents Subject to Reporting Under Model I IGA
	Announcement 2012-42	Proposed Regulations	Announcement 2012-42	Proposed Regulations	Announcement 2012-42	Proposed Regulations	
<b>Deadline for Implementation of New Individual and Entity Account-Opening Procedures</b>	January 1, 2014	January 1, 2013 – See Reg. § 1.1471-1(b)(48)	Later of January 1, 2014 or effective date of FFI Agreement	Later of July 1, 2013 or effective date of FFI Agreement – Prop. Reg. § 1.1471-1(b)(24)	Later of January 1, 2014 or date of registration	Date of registration	January 1, 2014 – Annex I, Section III for individual accounts and Annex I, Section V for entity accounts
<b>Deadline for Due Diligence of Preexisting Accounts and Obligations of Prima Facie FFIs</b>	June 30, 2014	December 31, 2013 – Prop. Reg. § 1.1471-2(a)(4)(ii)(B)	Later of June 30, 2014 or 6 months after effective date of FFI Agreement	1 year after effective date of FFI Agreement – Prop. Reg. § 1.1471-4(c)(3)(i)	must meet preregistration obligations	must meet preregistration obligations	n/a
<b>Deadline for Due Diligence of Preexisting Entity Accounts and Obligations (other than of Prima Facie FFIs)</b>	December 31, 2015	December 31, 2014 – Prop. Reg. § 1.1471-2(a)(4)(ii)(A)	Later of December 31, 2015 or 2 years after effective date of FFI Agreement	2 years after effective date of FFI Agreement – Prop. Reg. § 1.1471-4(c)(3)(i)	must meet preregistration obligations	must meet preregistration obligations	December 31, 2015 – Annex I, Section IV.E.1.
<b>Deadline for Due Diligence of Preexisting High Value Individual Accounts</b>	n/a	n/a	Later of December 31, 2014 or 1 year after effective date of FFI Agreement	Later of June 30, 2014 or 1 year after effective date of FFI Agreement – Prop. Reg. § 1.1471-5(g)(3)(i)(A)	must meet preregistration obligations	must meet preregistration obligations	December 31, 2014 – Annex I, Section II.E.1.
<b>Deadline for Due Diligence of Preexisting Individual Accounts (other than High Value Accounts)</b>	n/a	n/a	Later of December 31, 2015 or 2 years after effective date of FFI Agreement	Later of June 30, 2015 or 2 years after effective date of FFI Agreement – Prop. Reg. § 1.1471-5(g)(3)(i)(B)	must meet preregistration obligations	must meet preregistration obligations	December 31, 2015 – Annex I, Section II.C.1.
<b>Deadline for Reporting With Respect to US Accounts for 2013 and 2014 Calendar Years</b>	n/a	n/a	March 31, 2015	September 30, 2014 with respect to 2013 calendar year – Prop. Reg. § 1.1471-4(d)(7)(v)(B)	must meet preregistration obligations	must meet preregistration obligations	September 30, 2015 – Article 3, Paragraph 5
<b>Effective Date of FFI Agreements</b>	n/a	n/a	Later of January 1, 2014 or date of registration	Later of July 1, 2013 or effective date of FFI Agreement – Prop. Reg. § 1.1471-1(b)(24)	n/a	n/a	n/a