



Canada Revenue Agence du revenu
Agency du Canada

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Attention: Dwaine T. Cook
Chief Tax Accountant

February 7, 2020

Dear Sir:

Re: North Carolina State University

We are writing in response to your letter of January 31, 2020, concerning renewal of the Letter of Exemption issued to the above-named organization under Article XXI, Paragraph 1 of the Canada-United States Income Tax Convention (1980) (the Convention).

We have reviewed your application and have determined that the organization continues to meet the requirements of Article XXI(1) of the Convention. Accordingly, a new exemption letter is issued hereunder. The identification number remains **172850**.

This exemption is applicable only in respect of interest, dividends, royalties and and capital gains income paid or credited to the above named organization. In circumstances where the organization has arranged, under contract or otherwise, with others for the performance of a services in Canada, e.g., artists, athletes etc., those persons may be subject to Canadian withholding on account of tax on any income accruing to them in respect of such service performed in Canada. Clarification in each instance should be obtained from the appropriate Tax Services Office prior to payment being made, whether to the exempt organization or direct to the persons performing the service.

The payer(s) concerned should be furnished with a photocopy of this Letter of Exemption as their authority for making payment(s) of interest, dividends, royalties and and capital gains income without deduction for Canadian withholding on account of tax. Canadian sourced income, other than that noted as being exempt, may be subject to Canadian withholding taxes.

Should this exemption be withdrawn for any reason, you are required to so advise the payer immediately.

This Letter of Exemption is due to expire on **April 1, 2023**. To renew, application by letter should be made at least three months prior to the expiry date. A notarized statement to the effect that there has been no change in the organization's mode of operation, the above noted exempted Canadian sourced income, or in its tax-exempt standing with the Internal Revenue Service since the last exemption renewal letter was issued will need to accompany the application for renewal.

In the meantime, should there be any change in the name or purposes of the organization or in its tax-exempt status under Section 501(c)(3) of the Internal Revenue Code, we are to be advised immediately.

Yours sincerely,

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P. Vendette
Assistant Director
Non-Resident Withholding Section
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