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Bell Helicopter did not export it to the purchaser until later that year. Tax Court held the helicopter was not export property because Bell Helicopter did not export the helicopter within one year as required under Treas. Reg. § 1.993-3(d)(2)(i)(b). [38] See also PLR 8436028, 1984 WL 267617 (IRS PLR) and Rev. Rul. 72-581, 1972-2 C.B. 461.

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