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New York, New York 10019



1515 Broadway
New York, New York 10036

January 2006

Certain Federal Income Tax Information Regarding the Separation of Viacom Inc.

On December 31, 2005, Viacom Inc. was separated into two public companies. In connection with the separation, Viacom Inc. changed its name to CBS Corporation. Each share of Viacom Inc. common stock was converted into the right to receive common stock of CBS Corporation as well as common stock of a new corporation which inherited the historic name of "Viacom Inc." For purposes of this letter, we will refer to this new corporation as "New Viacom." The separation was described in detail in the Prospectus-Information Statement dated November 28, 2005, which was provided to all shareholders.

As a result of the separation, each share of Viacom Inc. class A common stock that was outstanding on December 31, 2005 was converted into the right to receive 0.5 of a share of CBS Corporation class A common stock (NYSE: "CBS.A") and 0.5 of a share of New Viacom class A common stock (NYSE: "VIA"). In addition, each share of Viacom class B common stock that was outstanding on December 31, 2005 was converted into the right to receive 0.5 of a share of CBS Corporation class B common stock (NYSE: "CBS") and 0.5 of a share of New Viacom class B common stock (NYSE: "VIA.B"). Cash will be paid in lieu of fractional shares.

Viacom obtained a private letter ruling from the Internal Revenue Service on November 22, 2005 that stated that the former shareholders of Viacom Inc. will not recognize any gain or loss for income tax purposes upon receipt of the New Viacom common stock (except in connection with the cash received in lieu of fractional shares). Shareholders will, however, recognize gain or loss upon a subsequent sale of the shares of CBS Corporation or New Viacom received as a result of the separation and distribution.

An example and worksheet are enclosed to help you to determine the tax basis in the CBS Corporation and New Viacom common stock you received as well as to determine any gain or loss for cash paid in lieu of fractional shares. Based on the January 3, 2006 trading prices, the companies believe that 39.65% of your pre-separation federal income tax basis in your Viacom Inc. class A common stock should be allocated to your CBS Corporation class A common stock and 60.35% should be allocated to your New Viacom class A common stock. Likewise, 39.63% of your pre-separation tax basis in your Viacom class B common stock should be allocated to you CBS Corporation class B common stock and 60.37% should be allocated to your New Viacom class B common stock. If you hold shares of Viacom Inc. stock with different tax bases, you must allocate your tax basis on a "block-by block" basis.

United States Treasury Department Regulations require that you sign and attach to your federal income tax return that includes December 31, 2005, a statement of certain information about the distribution of the CBS Corporation and New Viacom common stock. A sample statement is enclosed.

The information in this letter, the sample statement and worksheet does not constitute tax advice. In addition, these materials do not purport to be complete or to describe the tax consequences that may apply to particular categories of shareholders. Each shareholder should consult his or her own tax advisor as to the tax consequences of the separation and distribution under U.S. federal, state, local and foreign tax laws. To ensure compliance with requirements imposed by the IRS, we inform you that any information deemed to be U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

**ATTACHMENT TO U.S. FEDERAL INCOME TAX RETURN
FOR THE PERIOD INCLUDING DECEMBER 31, 2005**

Statement Regarding the Conversion of the Common Stock of Viacom Inc. into the Common Stock of CBS Corporation (“CBS”) and the Common Stock of Viacom Inc. (“New Viacom”)

Filed in Accordance with Treasury Regulation § 1.355-5(b) and § 1.368-3(b)

1. I owned Viacom Inc. common stock on December 31, 2005. On such date the common stock of Viacom Inc. was converted into the right to receive CBS common stock and New Viacom common stock.

2. The names and addresses of the distributing and controlled corporations are:

CBS Corporation	Viacom Inc.
51 West 52 nd Street	1515 Broadway
New York, New York 10019	New York, New York 10036
EIN: 04-2949533	EIN: 20-3515052

3. On December 31, 2005, I held _____ shares of Viacom Inc. class A common stock with an aggregate tax basis of \$_____ and _____ shares of Viacom Inc. class B common stock with an aggregate tax basis of \$_____.

4. On December 31, 2005, my shares of Viacom Inc. common stock were converted into the right to receive: _____ whole shares of CBS class A common stock, _____ whole shares of CBS class B common stock, _____ whole shares of New Viacom class A common stock, and _____ whole shares of New Viacom class B common stock. Cash was paid in lieu of fractional shares. December 31, 2005 was not a business day, so January 3, 2006, was the first trading date after the separation. On January 3, 2006, the CBS class A common stock (NYSE: “CBS.A”) traded in the range of \$25.60 to \$27.37; the CBS class B common stock (NYSE: “CBS”) traded in the range of \$25.60 to \$27.40; the New Viacom class A common stock (NYSE: “VIA”) traded in the range of \$38.67 to \$41.95; and the New Viacom class B common stock (NYSE: “VIA.B”) traded in the range of \$38.65 to \$42.10.

5. On November 22, 2005, the Internal Revenue Service issued a private letter ruling that held that distribution of the New Viacom common stock was a transaction under Section 355 of the Internal Revenue Code of 1986, as amended.

Signature

Print Name:

Social Security No.:

Date: