

**ESTIMATED REVENUE EFFECTS OF THE SUBSTITUTE AMENDMENT FOR S. 1637,  
 THE "JUMPSTART OUR BUSINESS STRENGTH ('JOBS') ACT"**

Fiscal Years 2004 - 2013

[Millions of Dollars]

Provision	Effective	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2004-08	2004-13
<b>Provisions Relating to Repeal of Exclusion for Extraterritorial Income</b>													
1. Repeal of exclusion for extraterritorial income [1] .....	toa DOE	2,783	4,541	5,093	5,312	5,520	5,778	6,010	6,287	6,569	6,843	23,249	54,736
2. Deduction relating to income attributable to United States production activities .....	tyea DOE	-1,214	-3,046	-3,403	-4,986	-5,828	-6,648	-8,003	-9,169	-10,404	-12,270	-18,477	-64,971
<b>Total of Provisions Relating to Repeal of Exclusion for Extraterritorial Income .....</b>		<b>1,569</b>	<b>1,495</b>	<b>1,690</b>	<b>326</b>	<b>-308</b>	<b>-870</b>	<b>-1,993</b>	<b>-2,882</b>	<b>-3,835</b>	<b>-5,427</b>	<b>4,772</b>	<b>-10,235</b>
<b>General Transition for Repeal of Exclusion for Extraterritorial Income .....</b>	<b>tyea DOE &amp; before 2007</b>	<b>-2,448</b>	<b>-3,229</b>	<b>-2,819</b>	<b>-804</b>	<b>---</b>	<b>---</b>	<b>---</b>	<b>---</b>	<b>---</b>	<b>---</b>	<b>-9,300</b>	<b>-9,300</b>
<b>International Tax Provisions</b>													
<b>A. International Tax Reform</b>													
1. 20-year foreign tax credit carryover; 1-year foreign tax credit carryback .....	[2]	-165	-214	-271	-338	-500	-686	-858	-995	-1,166	-1,363	-1,488	-6,556
2. Apply look-through rules for dividends from noncontrolled section 902 corporations .....	tyba 12/31/02	-585	-77	-51	-23	-6	-1	[3]	[3]	[3]	[3]	-742	-743
3. Repeal the 90% limitation on the use of foreign tax credits against the AMT .....	tyba 12/31/04	---	-265	-395	-376	-361	-348	-338	-329	-249	-286	-1,397	-2,947
4. Recharacterize overall domestic loss .....	lf tyba 12/31/06	---	---	---	-57	-680	-713	-756	-793	-829	-862	-737	-4,690
5. Interest expense allocation rules .....	tyba 12/31/08	---	---	---	---	---	-908	-2,487	-2,586	-2,689	-2,797	---	-11,467
6. Determination of foreign personal holding company income with respect to transactions in commodities .....	teia 12/31/04	---	-4	-10	-10	-10	-10	-11	-11	-11	-11	-34	-88
<b>B. International Tax Simplification</b>													
1. Repeal of rules applicable to foreign personal holding companies and foreign investment companies, personal holding company rules as they apply to foreign corporations, and include in subpart F personal service contract income, as defined under the foreign personal holding company rules .....	[4]	---	-25	-65	-73	-81	-91	-102	-114	-128	-143	-244	-822
2. Expand the subpart F de minimis rule to the lesser of 5% of gross income or \$5 million .....	[4]	---	-15	-143	-157	-173	-190	-209	-230	-253	-279	-488	-1,649
3. Attribution of stock ownership through partnerships in determining section 902 and 960 credits .....	tyba DOE	[3]	-1	-3	-3	-3	-3	-3	-3	-3	-3	-10	-25
4. Limit application of uniform capitalization rules in the case of foreign persons .....	tyba 12/31/04	---	-125	-278	-79	-27	-8	-12	-14	-16	-18	-509	-577
5. Eliminate secondary withholding tax with respect to dividends paid by certain foreign corporations .....	pma 12/31/04	---	-2	-3	-3	-3	-3	-3	-3	-3	-3	-11	-26

Provision	Effective	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2004-08	2004-13
6. Eliminate 30% tax on certain U.S.-source capital gains of nonresident individuals .....	tyba 12/31/03	-1	-2	-2	-2	-3	-3	-3	-3	-3	-3	-10	-25
<b>C. Additional International Tax Provisions</b>													
1. Subpart F exception for active aircraft and vessel leasing income .....	[5]	---	---	---	-46	-187	-237	-289	-333	-382	-440	-233	-1,914
2. Look-through treatment of payments between related CFCs under foreign personal holding company income rules .....	[4]	---	-77	-217	-234	-255	-262	-291	-312	-336	-360	-783	-2,344
3. Look-through treatment under subpart F for sales of partnership interests .....	[4]	---	-39	-91	-96	-101	-106	-111	-116	-122	-129	-327	-911
4. Election not to use average exchange rate for foreign tax paid other than in functional currency .....	tyba 12/31/04	----- <i>Negligible Revenue Effect</i> -----											
5. Revision of foreign tax credit rules with respect to "base differences" .....	tyea DOE	-4	-14	-15	-17	-19	-21	-24	-27	-30	-34	-69	-205
6. Modification of exceptions under subpart F for active financing income .....	[4]	----- <i>Negligible Revenue Effect</i> -----											
7. United States property not to include certain assets of controlled foreign corporations .....	[4]	---	-3	-20	-21	-22	-23	-24	-25	-27	-29	-66	-194
8. Provide equal treatment for interest paid by foreign partnerships and foreign corporations doing business in the U.S. ....	tyba 12/31/03	-1	-2	-2	-2	-2	-2	-2	-2	-3	-3	-9	-21
9. Foreign tax credit treatment of deemed payments under section 367(d) .....	atar 8/5/97	-22	-4	-5	-5	-5	-5	-5	-5	-5	-5	-41	-66
10. Modify FIRPTA rules for REITs .....	tyba DOE	[3]	-2	-7	-10	-12	-14	-15	-17	-19	-21	-31	-117
11. Temporary rate deduction for certain dividends received from controlled foreign corporations .....	[6]	2,713	146	-2,511	-1,376	-903	-599	-413	-327	-288	-211	-1,931	-3,769
12. Exclusion of certain horse-racing and dog-racing gambling winnings from the income of nonresident alien individuals .....	wma DOE	-1	-2	-3	-3	-3	-3	-3	-3	-3	-3	-11	-25
13. Reduce withholding tax applicable to dividends paid to Puerto Rico companies to 10% .....	Dpa DOE	-1	-5	-7	-8	-9	-10	-10	-11	-12	-13	-30	-86
14. Require Commerce Department report on adverse decisions of the World Trade Organization .....	DOE	----- <i>No Revenue Effect</i> -----											
15. Study of impact of international tax law on taxpayers other than large corporations .....	DOE	----- <i>No Revenue Effect</i> -----											
<b>Total of International Tax Provisions .....</b>		<b>1,933</b>	<b>-732</b>	<b>-4,099</b>	<b>-2,939</b>	<b>-3,365</b>	<b>-4,246</b>	<b>-5,969</b>	<b>-6,259</b>	<b>-6,577</b>	<b>-7,016</b>	<b>-9,201</b>	<b>-39,267</b>
<b>Interaction.....</b>		<b>13</b>	<b>14</b>	<b>16</b>	<b>17</b>	<b>19</b>	<b>21</b>	<b>245</b>	<b>620</b>	<b>646</b>	<b>674</b>	<b>79</b>	<b>2,285</b>
<b>Domestic Manufacturing and Business Provisions</b>													
<b>A. General Provisions</b>													
1. Modifications to qualified small issue bonds - increase capital expenditure limit from \$10 to \$20 million (maximum bond limit remains at \$10 million, change manufacturing deduction) .....	bia DOE	-2	-8	-16	-25	-33	-41	-49	-57	-65	-72	-84	-368
2. Expensing of investment in broadband equipment (sunset after 12 months).....	eia DOE	-97	-122	3	30	25	21	20	18	15	12	-161	-76

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3. Change the definition of "production period" with regard to the natural aging process for distilled liquors for purposes of the capitalization rules under section 263A .....	ppba DOE	-35	-143	-126	-91	-56	-21	-3	-3	-3	-3	-451	-484
4. Section 355 "active business test" applied to chains of affiliated corporations .....	generally da DOE	-3	-6	-7	-7	-8	-8	-9	-9	-10	-11	-31	-78
5. Exclusion of certain indebtedness of small business investment companies from acquisition indebtedness .....	[7]	[8]	-1	-1	-1	-1	-1	-1	-1	-1	-1	-5	-11
6. Modified taxation of imported archery products [9] .....	asbmpoia 12/31/03	[8]	-1	-1	-1	-1	-1	-1	-1	-1	-1	-4	-8
7. Modify cooperative marketing to include value-added processing involving animals .....	tyba DOE	[8]	-1	-2	-4	-5	-6	-7	-9	-10	-11	-12	-55
8. Extend declaratory judgment relief to farm cooperatives .....	pfa DOE	----- Revenue Effects Included in Line Above -----											
9. Repeal personal holding company tax (sunset 12/31/08) .....	tyba 12/31/03	-98	-185	-192	-196	-200	-91	---	---	---	---	-871	-962
10. Extend phaseout of section 179 .....	tyba 12/31/02	-99	-54	-47	-16	8	2	-2	-5	-8	-10	-208	-231
11. 5-year NOL carryback for 2003 NOLs if taxpayer elects out of bonus depreciation as modified; extend temporary suspension of 90% limit on minimum tax NOLs.....	NOLs gi tyei 2003	-10,020	1,575	1,294	991	632	465	339	253	176	124	-5,528	-4,171
12. Extension and modification of the R&E credit (sunset 12/31/05).....	epoia 6/30/04 & epoia 12/31/04	-464	-3,806	-2,698	-1,234	-899	-539	-129	---	---	---	-9,101	-9,769
<b>B. Manufacturing Relating to Films</b>													
1. Special rules for certain film and television production (sunset taxable years beginning after 12/31/08) .....	pca DOE	-88	-254	-339	-320	-218	-2	225	338	296	144	-1,219	-218
2. Modification of application of the income forecast method of accounting .....	ppisa DOE	-132	-142	-88	-44	-28	-24	-24	-28	-31	-35	-434	-576
<b>C. Manufacturing Relating to Timber</b>													
1. Deduction of the first \$10,000 of qualified reforestation costs .....	epoia DOE	-10	-49	-37	-25	-11	-1	2	8	13	20	-132	-90
2. Election to treat cutting of timber as sale or exchange .....	DOE	-1	-2	-4	-7	-10	-11	-15	-17	-20	-21	-24	-108
3. Permit capital gain treatment for outright sales of timber by landowner .....	sota DOE	----- Negligible Revenue Effect -----											
4. Modified safe-harbor rules for timber REITs .....	tyba DOE	---	[8]	[8]	-1	-1	-2	-2	-3	-4	-5	-2	-18
<b>Total of Domestic Manufacturing and Business Provisions .....</b>		<b>-11,049</b>	<b>-3,199</b>	<b>-2,261</b>	<b>-951</b>	<b>-806</b>	<b>-260</b>	<b>344</b>	<b>484</b>	<b>347</b>	<b>130</b>	<b>-18,267</b>	<b>-17,223</b>
<b>Additional Provisions</b>													
<b>A. Provisions Designed to Curtail Tax Shelters</b>													
1. Clarification of the economic substance doctrine and related penalty provisions .....	teia DOE	256	1,164	1,282	1,157	1,197	1,323	1,472	1,672	1,906	2,172	5,056	13,601
2. Proposals relating to reportable transactions and tax shelters .....	[10]	30	76	119	120	124	131	139	150	164	179	469	1,232
3. Modification to the substantial understatement penalty .....	tyba DOE	---	---	7	15	23	26	30	34	38	38	45	211

Provision	Effective	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2004-08	2004-13
4. Impose a civil penalty on failure to report interest in foreign financial accounts .....	DOE	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	1	3
5. Actions to enjoin conduct with respect to tax shelters .....	DOE	----- <i>Negligible Revenue Effect</i> -----											
6. Understatement of taxpayer's liability by income tax return preparer .....	dpa DOE	----- <i>Negligible Revenue Effect</i> -----											
7. Frivolous tax submissions .....	[12]	3	3	3	3	3	3	3	3	3	3	15	30
8. Regulation of individuals practicing before the Department of Treasury .....	ata DOE	----- <i>No Revenue Effect</i> -----											
9. Extend statute of limitations for undisclosed listed transactions .....	[13]	---	---	2	2	2	2	2	2	2	2	6	16
10. Deny deduction for interest paid to the IRS on underpayments involving certain tax motivated transactions .....	tyba DOE	---	---	1	1	3	4	4	4	4	4	5	25
11. Authorize additional \$300 million per year to the IRS to combat abusive tax avoidance transactions [14] .....	DOE	----- <i>No Revenue Effect</i> -----											
<b>B. Other Corporate Governance Provisions</b>													
1. Affirmation of consolidated return regulation authority .....	[15]	----- <i>Negligible Revenue Effect</i> -----											
2. Declaration by chief executive officer relating to Federal annual income tax return of a corporation .....	rfa DOE	----- <i>Negligible Revenue Effect</i> -----											
3. Denial of deduction for certain fines, penalties, and other amounts .....	apoia 4/27/03 generally	176	10	10	10	10	10	10	10	10	10	216	266
4. Denial of deduction for punitive damages .....	dpoia DOE	10	29	30	31	32	33	34	35	36	37	132	307
5. Criminal tax fraud package .....	uaoataoa DOE	---	---	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	5
<b>C. Enron-Related Tax Shelter Provisions</b>													
1. Limitation on transfer or importation of built-in losses .....	ta 2/13/03	128	123	136	149	164	180	198	218	240	264	700	1,800
2. No reduction of basis under section 734 in stock held by partnership in corporate partner .....	da 2/13/03	12	16	24	29	33	35	33	32	33	34	114	281
3. Repeal of special rules for FASITs .....	on 2/13/03	----- <i>Negligible Revenue Effect</i> -----											
4. Expanded disallowance of deduction for interest on convertible debt .....	diia 2/13/03	6	88	90	94	96	98	101	103	106	109	374	891
5. Expanded authority to disallow tax benefits under section 269 .....	aa 2/13/03	3	9	10	10	11	11	12	12	13	14	43	105
6. Modification of CFC-PFIC coordination rules .....	[16]	18	20	8	4	5	6	8	10	12	15	55	106
<b>D. Provisions to Discourage Expatriation</b>													
1. Tax treatment of inversion transactions .....	[17]	172	137	140	168	202	242	290	348	418	493	819	2,610
2. Impose mark-to-market on individuals who expatriate .....	[18]	32	84	80	74	71	67	61	57	54	51	341	631
3. Excise tax on stock compensation of insiders in inverted corporations .....	generally 7/11/02	16	7	7	7	7	7	7	7	7	7	42	75
4. Reinsurance agreements .....	rra 4/11/02	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	2	5
5. Reporting of taxable mergers and acquisitions .....	aa DOE	1	2	3	3	3	3	3	3	3	3	12	27
<b>E. International Tax</b>													
1. Clarification of banking business for determining investment of earnings in U.S. property .....	DOE	---	20	17	17	18	19	20	21	22	23	72	177
2. Prohibition on nonrecognition of gain through complete liquidation of holding company .....	doo/a DOE	[11]	13	15	17	19	21	23	25	27	29	64	189



Provision	Effective	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2004-08	2004-13
20. Extension of Customs User Fees													
a. Extend passenger and conveyance processing fee through 9/30/13 [14]	DOE	---	105	331	348	365	383	402	423	444	466	1,149	3,267
b. Extend merchandise processing fee through 9/30/13 [14]	DOE	---	679	1,234	1,308	1,386	1,470	1,558	1,651	1,750	1,855	4,607	12,891
21. Deposits to stop the running of interest on potential underpayments	dma DOE	55	96	-6	-6	-6	-6	-6	-7	-7	-7	133	100
22. Private debt collection (net of outlays) [22]	DOE	---	59	150	137	121	111	111	111	111	111	467	1,022
23. Add vaccines against Hepatitis A to the list of taxable vaccines [23]	[24]	2	9	9	9	9	9	9	9	9	9	36	81
24. Exclusion of like-kind exchange property from nonrecognition treatment on the sale or exchange of a principal residence	sopra DOE	[11]	11	13	15	17	19	21	23	25	27	56	171
25. Modify qualification rules for tax-exempt property and casualty insurance companies and definition of insurance company	tyba 12/31/03	54	120	134	136	138	140	143	147	152	158	582	1,323
26. Provide that deductions for charitable contributions of patents or similar property may not exceed the donor's basis; provide that donor may receive a right to certain payments by the donee	cma 10/1/03	300	307	320	333	347	361	376	392	408	425	1,606	3,570
27. Repeal the 10% rehabilitation credit for non-historic buildings	eii tyba 12/31/03	4	121	81	86	97	106	115	123	134	144	389	1,011
28. Increase age limit under section 1(g)	tyba 12/31/03	9	26	31	36	53	59	45	60	71	80	155	470
29. Holding period for preferred stock	tyba DOE	----- Negligible Revenue Effect -----											
<b>Total of Additional Provisions</b>		<b>1,592</b>	<b>4,306</b>	<b>6,436</b>	<b>6,980</b>	<b>7,812</b>	<b>8,591</b>	<b>9,401</b>	<b>10,298</b>	<b>11,269</b>	<b>12,309</b>	<b>27,124</b>	<b>79,008</b>
<b>Protection of United States Workers From Competition of Foreign Workforces [23]</b>		----- No Revenue Effect -----											
<b>Other Provisions</b>													
<b>A. Provisions Relating to Housing</b>													
1. Treatment of qualified mortgage bonds (10-year rule, sunset 1 year after the date of enactment)	bia DOE	-16	-45	-56	-54	-53	-51	-49	-48	-46	-45	-224	-463
2. Premiums for mortgage insurance (sunset 12/31/05)	apoaai tyba DOE	---	-407	-45	---	---	---	---	---	---	---	-452	-452
3. Increase in historic rehabilitation credit for certain low-income housing for the elderly	ppisa DOE	-1	-9	-9	-9	-10	-10	-11	-11	-12	-12	-38	-94
<b>B. Provisions Relating to Bonds</b>													
1. Modifications of authority of Indian tribal governments to issue tax exempt bonds (sunset 12/31/05)	bia DOE	-4	-16	-29	-32	-31	-30	-30	-29	-29	-28	-111	-257
2. Bonds related to use of forest land (1.5 billion cap; bond authority sunsets 12/31/06)	bi 180da DOE	-3	-8	-15	-25	-32	-34	-34	-34	-34	-34	-83	-252
<b>C. Provisions Relating to Depreciation</b>													
1. Special placed in service rule for bonus depreciation for certain property subject to syndication	sa DOE	-3	-24	8	6	4	4	4	2	1	---	-10	---
2. Extended placed in service date for bonus depreciation for certain aircraft (excluding aircraft used in the transportation industry)	tyba DOE	---	-1,265	-175	576	346	271	194	54	---	---	-519	---

Provision	Effective	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2004-08	2004-13	
3. 7-year recovery period for certain track facilities.....	ppisa DOE & before 2007	-8	-20	-24	-21	-12	-8	-7	-3	3	8	-85	-92	
4. Special provision relating to minimum tax and general business credits (general business credit provision expires after 2004).....	tyea 12/31/03	-1047	-590	82	78	74	71	66	63	61	57	-1,404	-1,086	
<b>D. Expansion of Business Credit</b>														
1. New markets tax credit for Native American reservations.....	ima 12/31/03	---	-3	-6	-9	-10	-11	-11	-11	-8	-4	-28	-73	
2. Ready reserve-national guard employee credit added to general business credit, credit capped at \$7,500 per employee, no double benefits (280c rule).....	pia DOE	-55	-78	-60	-50	-42	-37	-35	-33	-32	-30	-285	-452	
3. Rural investment tax credit.....	emi tyba DOE	-5	-20	-30	-42	-51	-63	-72	-83	-91	-100	-148	-557	
4. Qualified rural small business investment credit.....	[25]	-3	-10	-9	-9	-10	-10	-10	-10	-11	-10	-40	-90	
5. Provide a 15% tax credit for certain expenditures for maintaining railroad tracks.....	epoid tyba 12/31/04 & tybb 1/1/08	---	-57	-112	-106	-90	-61	-40	-23	-5	[8]	-365	-492	
6. Railroad revitalization and security investment credit.....	epoid tyba 12/31/04 & tybb 1/1/08	---	-52	-108	-128	-116	-66	-22	[8]	[8]	[8]	-404	-492	
7. Special allocation of the railroad revitalization and security investment credit for New York City rail projects.....	epoid tyba 12/31/04 & tybb 1/1/08	---	-32	-66	-78	-71	-41	-14	[8]	[8]	[8]	-246	-300	
<b>E. Miscellaneous Provisions</b>														
1. Exclusion of gain or loss on sale or exchange of certain Brownfield sites from unrelated business taxable income.....	paa 12/31/04	---	1	1	1	-6	-17	-26	-35	-45	-56	-3	-181	
2. Civil rights tax relief.....	jsoa 12/31/02	-11	-43	-24	-25	-26	-28	-29	-30	-32	-34	-129	-282	
3. Exclude from gross income and employment taxes payments made to individuals under NHSC Loan Repayment Program and certain State loan repayment programs .....	tyba 12/31/03	[8]	-2	-2	-2	-4	-5	-6	-8	-11	-14	-10	-54	
4. Certain expenses of rural letter carriers.....	tyba 12/31/03	[8]	-2	-3	-3	-3	-3	-3	-4	-4	-4	-11	-29	
5. Method of accounting for naval shipbuilders.....	ceia DOE	-25	-42	-67	-113	-63	-31	-45	-16	-21	-32	-310	-455	
6. Permit life insurance companies tax-free distributions from policyholder surplus accounts.....	tyba 12/31/03 & tybb 1/1/06	-27	-54	-54	-51	-48	-48	-48	-49	-51	-52	-234	-482	
7. Payment of dividends on stock of cooperatives without reducing patronage dividends .....	tyba DOE	[8]	[8]	[8]	-1	-1	-1	-1	-2	-2	-3	-2	-11	
8. Special rules for livestock sold on account of weather-related conditions.....	tyba 12/31/03	---	---	---	-8	-3	-3	-3	-4	-4	[8]	-11	-25	
9. Tax treatment of certain motor vehicle dealer transitional assistance as an involuntary conversion .....	pra 12/12/00	-86	-109	-10	-2	3	3	3	3	3	3	-204	-189	
10. Expansion of designated renewal community area based on 2000 census data.....	[26]	-10	-25	-10	-10	-10	-9	---	8	9	10	-65	-47	
11. Reduction of holding period to 12 months for purposes of determining whether horses are section 1231 assets.....	tyba 12/31/04	---	-4	-8	-8	-8	-7	-6	-7	-8	-8	-28	-64	
12. Blue ribbon commission on comprehensive tax reform.....	[27]	----- No Revenue Effect -----												
13. Distributions by an S corp to an employee stock ownership plan .....	1/1/98	[8]	[8]	[8]	[8]	[8]	[8]	[8]	[8]	[8]	-1	-1	-2	-5

Provision	Effective	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2004-08	2004-13
14. Temporary accumulated earnings tax safe harbor rule (sunset 12/31/08) .....	tyba 12/31/03	---	-1	-3	-6	-8	-10	-8	-6	-4	-2	-19	-49
<b>F. Revenue Provisions</b>													
1. Grant Treasury regulatory authority to address foreign tax credit transactions involving inappropriate separation of foreign taxes from related foreign income.....	teia DOE	---	---	[21]	1	2	2	2	2	2	3	3	14
2. Nonattribution of activities of contract manufacturers under foreign base company sales income rules.....	[28]	2	436	325	221	157	56	38	-57	-112	-198	1,141	868
3. Freeze of provision regarding suspension of interest where Secretary fails to contact taxpayer.....	tyba 12/31/03	---	---	46	184	186	187	189	191	193	194	416	1,370
4. Include in income certain nonqualified deferred compensation, including compensation funded with assets located outside the United States .....	adi tyba 12/31/04	-5	133	122	42	21	20	18	139	182	167	313	839
5. Deferral of certain stock option and restricted stock option gains prohibited [29] .....	after 12/31/04	---	11	6	2	1	1	1	5	7	6	20	40
6. Increase in withholding from supplemental wage payments in excess of \$1 million .....	pma 12/31/03	99	12	44	5	[30]	[30]	[30]	4	7	8	159	178
7. Capital gain treatment on sale of stock acquired from exercise of statutory stock options to comply with conflict-of-interest requirements .....	sa DOE	[30]	1	1	1	1	1	1	1	1	1	3	6
8. Determination of basis of amounts paid from foreign pension plans.....	dooa DOE	2	12	13	14	15	15	16	16	17	17	56	137
<b>Total of Other Provisions .....</b>		<b>-1,206</b>	<b>-2,312</b>	<b>-277</b>	<b>339</b>	<b>102</b>	<b>47</b>	<b>22</b>	<b>-15</b>	<b>-77</b>	<b>-193</b>	<b>-3,359</b>	<b>-3,573</b>
<b>Extension of Certain Expiring Provisions</b>													
<b>A. Extensions</b>													
1. Parity in the application of certain limits to mental health benefits (sunset 12/31/05) [31] .....	DOE	----- <i>Estimate to be Provided by the Congressional Budget Office</i> -----											
2. Extend present-law work opportunity tax credit and welfare-to-work tax credit through 12/31/04; beginning 1/1/05, combine and modify the WOTC and WWTC as provided in S. 1180 (sunset 12/31/05) .....	wpoifibwa 12/31/03	-84	-245	-250	-126	-60	-34	-15	-3	[8]	---	-764	-817
3. Qualified zone academy bonds (include new construction, sunset 12/31/05) .....	oia 12/31/03	-3	-9	-22	-33	-38	-39	-39	-39	-39	-39	-105	-300
4. Increase in limit on cover over of rum excise tax revenues (from \$10.50 to \$13.25 per proof gallon) to Puerto Rico and the Virgin Islands (sunset 12/31/05).....	abiUSa 12/31/03	-67	-84	-18	---	---	---	---	---	---	---	-169	-169
5. Expand charitable contribution allowed for scientific property used for research and for computer technology and equipment; and temporary extension of enhanced deduction for qualified computer contributions (sunset for taxable years beginning after 12/31/05).....	cmd tyba 12/31/03	-67	-133	-63	-1	-1	-1	-1	-1	-1	-1	-265	-270
6. Above-the-line deduction for teacher classroom expenses capped at \$250 annually (sunset 12/31/05) .....	tyba 12/31/03	-74	-233	-117	---	---	---	---	---	---	---	-424	-424

Provision	Effective	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2004-08	2004-13
7. Expensing of "Brownfields" environmental remediation costs (sunset 12/31/05) .....	epoia 12/31/03	-146	-263	-93	32	38	39	34	30	26	22	-433	-281
8. Modifications to Liberty Zone bond provisions [32]:													
a. Extend authority to issue Liberty Zone bonds (sunset 12/31/09); add municipal assistance corporation to eligible advance refunding bonds.....	bia DOE	1	-4	-18	-34	-47	-58	-65	-65	-65	-65	-102	-421
b. Expansion of New York Liberty Zone tax benefits (extension of advance refunding bonds (sunset 12/31/05)).....	DOE	---	-6	-15	-16	-15	-12	-10	-8	-6	-4	-52	-92
9. Suspension of section 809 related to the reduction in policyholder dividends for mutual life insurance companies (sunset 12/31/05).....	tyba 12/31/03	-24	-45	-19	-2	---	---	---	---	---	---	-89	-89
10. Tax incentives for investment in the District of Columbia (sunset 12/31/05) .....	[33]	-74	-87	-56	-18	-12	-17	-62	-74	-42	-42	-247	-484
11. Combined employment tax reporting.....	do/a DOE	----- No Revenue Effect -----											
12. Treatment of nonrefundable personal credits under the individual alternative minimum tax (sunset 12/31/04) [34] .....	tyba 12/31/03	-53	-214	---	---	---	---	---	---	---	---	-267	-267
13. Tax credit for electricity production from wind, closed-loop biomass, and poultry litter -- facilities placed in service date (sunset 12/31/04).....	fpisa 12/31/03	-2	-5	-7	-8	-9	-10	-11	-11	-11	-9	-30	-82
14. Suspension of 100 percent-of-net-income limitation on percentage depletion for oil and gas from marginal wells (sunset 12/31/04).....	tyba 12/31/03	-31	-17	---	---	---	---	---	---	---	---	-47	-47
15. Indian employment tax credit (sunset 12/31/05).....	1/1/05	---	-25	-34	-10	---	---	---	---	---	---	-68	-68
16. Accelerated depreciation for business property on Indian reservation (sunset 12/31/05).....	1/1/05	2	-150	-266	-101	19	70	111	90	48	5	-497	-173
17. Disclosure of tax return information to carry out administration of income contingent repayment of student loans (sunset 12/31/05) [35] .....	1/1/05	----- No Revenue Effect -----											
18. Allow employers to transfer excess defined benefit plan assets to a special account for health benefits of retirees; modify minimum cost requirement (sunset 12/31/13) .....	tyea DOE	---	---	18	38	40	40	40	40	40	40	97	298
19. Tax credit for qualified electric vehicles (sunset 12/31/06).....	ppisa 12/31/03 [36]	-2	-3	-4	-1	1	[21]	[21]	[21]	[21]	[21]	-8	-8
20. Deduction for clean-fuel vehicles (sunset 12/31/06) .....	ppisa 12/31/03 [37]	-32	-87	-136	-12	48	32	23	12	3	---	-219	-150
<b>B. Revenue Provisions</b>													
1. Treatment of donations of motor vehicles, boats, and airplanes .....	cma 6/30/04	3	47	251	253	256	258	261	263	266	269	809	2,127
2. Addition of vaccines against influenza to list of taxable vaccines [23] .....	[38]	10	52	54	56	58	59	59	60	61	62	229	530
3. Change the tax treatment of contingent convertible debt instruments [39].....	diio/a DOE	---	11	25	39	51	61	62	55	50	45	126	399
4. Increase continuous levy for certain Federal payments.....	DOE	---	8	14	16	19	19	20	21	22	23	57	162
<b>Total of Extension of Certain Expiring Provisions .....</b>		<b>-643</b>	<b>-1,492</b>	<b>-756</b>	<b>72</b>	<b>348</b>	<b>407</b>	<b>407</b>	<b>370</b>	<b>352</b>	<b>306</b>	<b>-2,468</b>	<b>-626</b>

Provision	Effective	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2004-08	2004-13
Reserve for Possible Adjustments .....		---	---	---	---	---	---	---	---	---	---	---	-1,000
<b>NET TOTAL .....</b>		<b>-10,239</b>	<b>-5,149</b>	<b>-2,070</b>	<b>3,040</b>	<b>3,802</b>	<b>3,690</b>	<b>2,457</b>	<b>2,616</b>	<b>2,125</b>	<b>783</b>	<b>-10,620</b>	<b>69</b>

Joint Committee on Taxation

NOTE: Details may not add to totals due to rounding. Date of enactment is assumed to be March 31, 2004.

Legend for "Effective" column:

- |  |   |  |
|--|---|--|
| aa = acquisitions after  | Dpa = dividends paid after                                | pra = payments received after  |
| adi = amounts deferred in  | dpoia = damages paid or incurred after                    | rfa = returns filed after  |
| aoa = acquisitions occurring after   | eia = expenses incurred after                             | rma = requests made after  |
| apoaai = amounts paid or amounts accrued in                                  | eii = expenses incurred in                                | rra = risk reinsured after   |
| abiUSa = articles brought into the United States after                       | emi = expenditures made in                                | sa = sales after   |
| apoamt30da = amounts paid or accrued more than 30 days after                 | epoia = expenditures paid or incurred after               | signing bonuses paid after   |
| apoia = amounts paid or incurred after                                       | epoid = expenditures paid or incurred during              | sota = sales of timber after   |
| asbmpoia = articles sold by the manufacturer, producer,<br>or importer after | fpisa = facilities placed in service after                | soo/a = sales occurring on or after  |
| ata = actions taken after  | gi = generated in   | sopra = sales of principal residences after  |
| atar = amounts treated as received   | iaeio/a = installment agreements entered into on or after | tada = transfers and distributions after   |
| bi = bonds issued  | ima = investments made after                              | ta = transactions after  |
| bia = bonds issued after   | leia = leases entered into after                          | teia = transactions entered into after   |
| cma = contributions made after   | joso = judgments or settlements occurring after           | toa = transactions occurring after   |
| cmd = contributions made during  | lf = losses for   | to/a = transactions on or after  |
| coio/a = cancellations of indebtedness on or after                           | NOLs = net operating losses                               | tyba = taxable years beginning after   |
| da = distributions after   | oyo/a = open years on or after                            | tybb = taxable years beginning before  |
| DA = dispositions after  | padoa = purchases and dispositions occurring after        | tybo/a = taxable years beginning on or after   |
| diia = debt instrument issued after  | pao/a = payments accrued on or after                      | tyea = taxable years ending after  |
| diio/a = debt instrument issued on or after                                  | pca = productions commencing after                        | tyei = taxable years ending in   |
| dma = deposits made after  | peo/a = positions established on or after                 | uaoataoa = underpayments and overpayments<br>attributable to actions occurring after |
| do/a = disclosures on or after   | pfa = pleadings filed after                               | wma = wagers made after  |
| DOE = date of enactment  | paa = property acquired after                             | wpoifibwa = wages paid or incurred for individuals<br>beginning work after           |
| dooa = distributions on or after   | pma = payments made after                                 | 180da = 180 days after   |
| doo/a = distributions occurring on or after                                  | pia = payments incurred after                             |  |
| dpa = documents prepared after   | ppba = production periods beginning after                 |  |
|  | ppisa = property placed in service after                  |  |

- [1] Includes estimate for binding contract relief.
- [2] Effective for excess foreign taxes that may be carried forward to any taxable year ending after the date of enactment. Carryback period effective for credits arising in taxable years beginning after the date of enactment.
- [3] Loss of less than \$1 million.
- [4] Effective for taxable years of foreign corporations beginning after December 31, 2004, and for taxable years of U.S. shareholders with or within which such taxable years of such foreign corporations end.
- [5] Effective for taxable years of foreign corporations beginning after December 31, 2006, and for taxable years of U.S. shareholders with or within which such taxable years of such foreign corporations end.
- [6] Effective for the first taxable year of an electing taxpayer ending 120 days or more after the date of enactment.
- [7] Effective for debt incurred by a small business investment company after December 31, 2003, with respect to property acquired by such company after such date.
- [8] Loss of less than \$500,000.

[Footnotes for Table #04-2 075 R3 are continued on the following page]

**Footnotes for Table #04-2 075 R3 continued:**

- [9] Proposal would result in a 10-year decrease in outlays of approximately \$9 million from the Federal Wildlife Restoration Fund.
- [10] Effective dates for provisions relating to reportable transactions and tax shelters: the penalty for failure to disclose reportable transactions is effective for returns and statements the due date of which is after the date of enactment; the modification to the accuracy-related penalty for listed or reportable transactions is effective for taxable years ending after the date of enactment; the tax shelter exception to confidentiality privileges is effective for communications made on or after the date of enactment; the material advisor and investor list disclosure provisions applies to transactions with respect to which material aid, assistance or advice is provided after the date of enactment; the failure to register tax shelter penalty applies to returns the due date for which is after the date of enactment; the investor list penalty applies to requests made after the date of enactment; the penalty for aiding and abetting the understatement of tax liability applies to activities after the date of enactment; and the penalty on promoters of tax shelters is effective for activities after the date of enactment.
- [11] Gain of less than \$1 million.
- [12] Effective for submissions made and issues raised after the first list is prescribed under section 6702(c).
- [13] Effective for taxable years with respect to which the period for assessing deficiencies did not expire before October 1, 2003.
- [14] Estimate is subject to review by the Congressional Budget Office.
- [15] Effective for all taxable years, whether beginning before, on, or after the date of enactment.
- [16] Effective for taxable years of foreign corporations beginning after February 13, 2003, and for taxable years of U.S. shareholders with or within which such taxable years of such foreign corporations end.
- [17] Effective for certain transactions completed after March 20, 2002, and would also affect certain taxpayers who completed transactions before March 21, 2002.
- [18] Generally effective for U.S. citizens who expatriate or long-term residents who terminate their residency on or after January 1, 2004.
- [19] Estimate is preliminary and subject to change pursuant to the receipt of additional information.
- [20] Generally effective for start-up and organizational expenditures incurred after the date of enactment.
- [21] Gain of less than \$500,000.
- [22] Breakout of Outlay effects Net of Offsetting Receipts:
- |                                      | <u>2004</u> | <u>2005</u> | <u>2006</u> | <u>2007</u> | <u>2008</u> | <u>2009</u> | <u>2010</u> | <u>2011</u> | <u>2012</u> | <u>2013</u> | <u>2004-08</u> | <u>2004-13</u> |
|--------------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|----------------|----------------|
| Private sector debt collection ..... | ---         | ---         | -19         | -50         | -45         | -40         | -37         | -37         | -37         | -37         | -114           | -302           |
- [23] Estimate does not include potential outlay effects, which are the responsibility of the Congressional Budget Office.
- [24] Effective for vaccines sold and used beginning on the first day of the first month beginning more than four weeks after the date of enactment.
- [25] Effective for gain or loss on the sale, exchange, or other disposition of property acquired by the taxpayer after December 31, 2004.
- [26] Effective as if included in the "Community Renewal Tax Relief Act of 2000."
- [27] Effective within 45 days of the date of enactment.
- [28] Effective for taxable years of controlled foreign corporations beginning on or after the date of enactment, and to taxable years of U.S. shareholders with or within which such taxable years of foreign corporations end.
- [29] Estimate includes interaction with provision relating to nonqualified deferred compensation.
- [30] Gain of less than \$500,000.
- [31] This provision will have a negligible effect on penalty excise tax receipts. However it will have an indirect effect on income tax receipts through increases in employer-contributions for health insurance and corresponding decreases in cash wages. The table shows this indirect revenue effect, which was estimated by the Congressional Budget Office.
- [32] The New York City Liberty Zone is defined as all business addresses located on or south of Canal Street, East Broadway (east of its intersection with Canal Street), or Grand Street (east of its intersection with East Broadway) in the Borough of Manhattan, New York, NY.
- [33] Generally effective January 1, 2004, except for the bond provision which is effective for obligations issued after the date of enactment.
- [34] The "Economic Growth and Tax Relief Reconciliation Act of 2001" provides that the child tax credit and adoption tax credit are allowed for purposes of the alternative minimum tax for 2002 through 2010.
- [35] Estimate provided by the Congressional Budget Office.
- [36] Phase-out of credit is eliminated in 2004 through 2006, with full expiration on December 31, 2006.
- [37] Phase-out of deduction is eliminated in 2004 through 2006, with full expiration on December 31, 2006.
- [38] Effective for vaccines sold and used on or after the later of the first day of the first month beginning more than four weeks after the date of enactment, or the date on which the Secretary of Health and Human Services lists the vaccine in the Vaccine Injury Compensation Trust Fund.
- [39] The proposal would not apply to certain instruments issued after March 3, 2004, including those with a binding agreement in effect on such date.