

**JOINT COMMITTEE ON TAXATION**  
**April 18, 2008**  
**JCX-33-08**

**ESTIMATED REVENUE EFFECTS OF THE TAX PROVISIONS CONTAINED IN TITLES VI, VIII, AND X OF H.R. 3221,  
THE "FORECLOSURE PREVENTION ACT OF 2008,"  
AS PASSED BY THE SENATE ON APRIL 10, 2008**

**Fiscal Years 2008 - 2018**

*[Millions of Dollars]*

Provision	Effective	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2008-13	2008-18
<b>VI. Tax-Related Provisions</b>														
1. Forgo bonus depreciation and increased section 179 for 4-year NOL carryback and temporary suspension of AMT 90% NOL limitation .....	NOLs ai tyei 2008 through 2009	-960	-16,659	-7,928	5,430	4,293	2,957	2,119	1,623	1,268	1,001	801	-12,867	-6,054
2. Liberalization of mortgage revenue bonds and volume cap increase (\$10.93 billion) and temporary AMT exception (individual and corporate) for mortgage revenue bonds and multifamily housing bonds, and include set aside for small states.....	bia DOE & bib 1/1/11	-25	-110	-192	-216	-217	-204	-190	-176	-163	-163	-163	-965	-1,822
3. Credit for buyers of homes in foreclosure.....	DOE	-56	-815	-648	-111	---	---	---	---	---	---	---	-1,630	-1,630
4. Increase standard deduction by State and local property taxes; cap at \$500 (\$1,000 for joint returns) (sunset 1/1/09) .....	tybi 2008	-74	-1,402	---	---	---	---	---	---	---	---	---	-1,476	-1,476
5. Election to partially refund AMT and R&E credits in lieu of certain other business provisions.....	ppisa 12/31/07 in tyea 12/31/07	-39	-1,782	169	99	56	36	25	16	14	14	14	-1,460	-1,378
6. Election to amend returns with hurricane-related casualty losses for Louisiana, Mississippi Alabama, Texas, and Florida.....	DOE	-619	-174	-16	---	---	---	---	---	---	---	---	-808	-808
7. Waive the commencement date requirement for certain GO Zone extension property.....	ppisa 12/31/07	---	-92	-173	-72	-6	-1	3	6	8	10	10	-344	-308
8. Temporary relief for Kiowa County, KS and surrounding area														
a. Suspension of certain limitations on personal casualty losses.....	laa 5/4/07	-4	-3	---	---	---	---	---	---	---	---	---	-8	-8
b. Extension of replacement period for nonrecognition of gain.....	grooa 5/4/07	[1]	-1	-1	[1]	[1]	[1]	[1]	[1]	[1]	[1]	[1]	-2	-2
c. Employee retention credit for employers affected by May 4 storms and tornados.....	wpoia 5/4/07 & before 1/1/08	-3	-7	-1	[1]	---	---	---	---	---	---	---	-11	-11

Provision	Effective	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2008-13	2008-18
d. Special allowance for certain property acquired on or after May 5, 2007 (sunset equipment 12/31/08 and sunset structures 12/31/09).....	ppisa 5/5/07	-25	-14	-5	1	1	1	1	1	1	1	1	-42	-36
e. Increase in expensing under section 179.....	DOE	[1]	[1]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[1]	[1]
f. Expensing for certain demolition and clean-up costs (sunset 12/31/09).....	apoia 5/4/07	[1]	[1]	---	---	---	---	---	---	---	---	---	[1]	[1]
g. Treatment of public utility property disaster losses.....	DOE	[1]	[2]	[2]	[2]	---	---	---	---	---	---	---	[1]	[1]
h. Treatment of net operating losses attributable to storm losses.....	DOE	-5	-2	1	1	[2]	[2]	[2]	[2]	[2]	[2]	[2]	-5	-1
i. Treatment of representations regarding income eligibility for purposes of qualified rental project requirements.....	DOE	----- Negligible Revenue Effect -----												
j. Special rules for use of retirement funds (generally sunsets 12/31/08).....	DOE	[1]	-3	1	[2]	[1]	[1]	[1]	[1]	[1]	[1]	[1]	-3	-3
<b>Total of Tax-Related Provisions .....</b>		<b>-1,810</b>	<b>-21,064</b>	<b>-8,793</b>	<b>5,132</b>	<b>4,127</b>	<b>2,789</b>	<b>1,958</b>	<b>1,470</b>	<b>1,128</b>	<b>863</b>	<b>663</b>	<b>-19,621</b>	<b>-13,537</b>
<b>VIII. REIT Investment Diversification and Empowerment</b>														
1. Conforming REIT subsidiary asset test.....	tyba DOE	[1]	-1	-2	-4	-7	-8	-7	-6	-6	-4	-3	-22	-49
2. Holding period under safe harbor.....	sma DOE	4	36	19	6	2	12	-54	-66	-19	-4	-3	79	-69
3. Determining value of sales under safe harbor.....	sma DOE	[1]	-1	-3	-6	-8	-10	-9	-8	-7	-6	-4	-27	-61
4. Conformity for health care facilities.....	tyba DOE	[1]	-1	-4	-9	-15	-17	-16	-14	-12	-10	-7	-46	-105
<b>Total of REIT Investment Diversification and Empowerment [3] .....</b>		<b>4</b>	<b>39</b>	<b>12</b>	<b>-13</b>	<b>-29</b>	<b>-21</b>	<b>-94</b>	<b>-102</b>	<b>-46</b>	<b>-25</b>	<b>-19</b>	<b>-8</b>	<b>-294</b>
<b>X. Clean Energy Tax Stimulus</b>														
A. Extension of Clean Energy Production Incentives														
1. Extension and modification of the renewable energy production tax credit (sunset 12/31/09)....	epasa 12/31/07 & ppisa 12/31/08	-11	-125	-290	-373	-394	-399	-403	-413	-423	-425	-440	-1,592	-3,696
2. Extension and modification of the solar energy and fuel cell investment tax credit (sunset 12/31/16 and 12/31/17).....	DOE	-12	-125	-188	-224	-203	-194	-207	-218	-211	-128	-65	-946	-1,774
3. Extension and modification of the residential energy-efficient property credit (sunset 12/31/09).....	tyba 12/31/07	-7	-47	-71	---	---	---	---	---	---	---	---	-126	-126

Provision	Effective	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2008-13	2008-18
4. Clean renewable energy bonds (\$400 million additional issuance authority) (sunset 12/31/09).....	bia DOE	-2	-10	-22	-26	-26	-24	-22	-21	-19	-18	-16	-110	-206
5. Extension of the special rule to implement FERC restructuring policy (sunset 12/31/09).....	DOE	-229	-290	-39	90	90	90	90	109	72	16	---	-287	0
<b>B. Extension of Incentives to Improve Energy Efficiency</b>														
1. Extension and modification of the credit for energy-efficiency improvements to existing homes (sunset 12/31/09).....	epoia 12/31/07	-196	-796	-828	---	---	---	---	---	---	---	---	-1,819	-1,819
2. Extension of the tax credit for energy-efficient new homes (sunset 12/31/10).....	hpa 12/31/08	---	-22	-30	-16	-8	-8	-7	-5	-3	-1	---	-86	-102
3. Extension of the energy-efficient commercial building deduction (sunset 12/31/09).....	ppisa DOE	-31	-165	-76	6	5	5	4	3	3	2	1	-256	-242
4. Extension and modification of the energy-efficient appliance credit (sunset 12/31/09) [4].....	apa 12/31/07	-74	-108	-65	-36	-26	-11	-2	---	---	---	---	-320	-323
<b>Total of Clean Energy Tax Stimulus .....</b>		<b>-562</b>	<b>-1,688</b>	<b>-1,609</b>	<b>-579</b>	<b>-562</b>	<b>-541</b>	<b>-547</b>	<b>-545</b>	<b>-581</b>	<b>-554</b>	<b>-520</b>	<b>-5,542</b>	<b>-8,288</b>
<b>NET TOTAL .....</b>		<b>-2,368</b>	<b>-22,713</b>	<b>-10,390</b>	<b>4,540</b>	<b>3,536</b>	<b>2,227</b>	<b>1,317</b>	<b>823</b>	<b>501</b>	<b>284</b>	<b>124</b>	<b>-25,171</b>	<b>-22,119</b>

Joint Committee on Taxation

NOTE: Details may not add to totals due to rounding. Date of enactment is assumed to be June 1, 2008.

Legend for "Effective" column:

ai = arising in

apa = appliances produced after

apoia = amounts paid or incurred after

bia = bonds issued after

bib = bonds issued before

epasa = electricity produced and sold after

epoia = expenditures paid or incurred after

DOE = date of enactment

grooa = gains realized on or after

hpa = homes purchased after

laa = losses arising after

NOLs = net operating losses

ppisa = property placed in service after

sma = sales made after

tyba = taxable years beginning after

tybi = taxable years beginning in

tyea = taxable years ending after

tyei = taxable years ending in

wpoia = wages paid or incurred after

[1] Loss of less than \$500,000.

[2] Gain of less than \$500,000.

[3] REIT estimates are measured against present law and sunset for taxable years beginning after five years after the date of enactment. The sum of provision estimates for each year do not add to the total for the year because of interactions among the provisions.

[4] Estimate is based upon proposed Energy Star standards for 2007.