ESTIMATED REVENUE EFFECTS OF THE CHAIRMAN'S MODIFICATION TO THE CHAIRMAN'S MARK OF THE "TAX CUTS AND JOBS ACT," SCHEDULED FOR MARKUP BY THE COMMITTEE ON FINANCE ON NOVEMBER 15, 2017

Fiscal Years 2018 - 2027

[Billions of Dollars]

Provision	Effective	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018-22	2018-27
I. Tax Reform for Individuals													
 A. Simplification and Reform of Rates, Standard Deductions, and Exemptions 													
1. 10%, 12%, 22%, 24%, 32, 35%, and 38.5% income													
tax rate brackets (sunset 12/31/25) [1][2]	tyba 12/31/17	-89.8	-130.9	-136.3	-141.7	-147.1	-153.1	-159.0	-165.5	-50.3	[3]	-645.8	-1,173.8
2. Modify standard deduction (\$12,000 for singles, \$24,000													
for married filing jointly, \$18,000 for HoH) (sunset	1 10/01/15	70.0	0.4.4	0	00.5	00.5	0.7.4	00.4	404.5	20.0		444.0	50 4 0
12/31/25) [2]	tyba 12/31/17	-58.3	-84.1	-86.6	-89.7	-92.6	-95.1	-98.1	-101.6	-30.8	[3]	-411.2	-736.9
3. Repeal of deduction for personal exemptions (sunset	4-1-10/21/17	02.0	120 1	142.5	147.4	153	158.8	164.6	170.5	51.7		(75.0	1 220 6
12/31/25) [2]	tyba 12/31/17	93.9	138.1	5.5	8.3	10.4	138.8	164.6	170.5 20.1	25.6	31.5	675.0 27.2	1,220.6 134.0
B. Treatment of Business Income of Individuals	tyba 12/31/17	0.8	2.2	3.3	8.3	10.4	12.9	10.7	20.1	23.0	31.3	21.2	134.0
Allow 17.4% deduction of certain domestic non-service													
passthrough income of individuals, capped at 50 percent of													
taxpayer's share of total wages paid by the business.													
Exceptions (1) allow the deduction for service passthrough													
income for individuals below taxable income threshold,													
and (2) provide the wage cap does not apply for individuals													
below taxable income threshold. Threshold is taxable													
income below \$500,000 for joint filers, \$250,000 for all													
other individuals, phased out over next \$100,000 for joint													
filers and \$50,000 for all others (sunset 12/31/25) [4]	tyba 12/31/17	-24.5	-41.6	-43.9	-45.3	-46.1	-45.1	-46.1	-44.5	-22.0	-3.1	-201.3	-362.2
2. Disallow active pass-through losses in excess of \$500,000													
for joint filers, \$250,000 for all others (sunset 12/31/25)	tyba 12/31/17	10.2	16.5	16.6	17.2	17.8	18.2	18.8	19.5	5.9	-3.5	78.4	137.4
C. Reform of the Child Tax Credit													
1. Modification of child tax credit: \$2,000 not indexed;													
refundable up to \$1,000 indexed up to nearest \$100 base													
year 2017; \$2,500 refundability threshold not indexed;													
\$500 other dependents not indexed; phase outs													
\$500K/\$500K not indexed; increase to less than 18 years old (sunset 12/31/25) [2]	tyba 12/31/17	-31.9	-68.0	-69.7	-71.0	-72.3	-75.6	-77.0	-78.1	-40.6		-313.0	-584.3
Ord (SurfSet 12/31/23) [2]	ty 0 a 12/31/11	-31.7	-00.0	-09.7	-/1.0	-12.3	-75.0	-77.0	-/0.1	-40.0		-515.0	-504.5

Provision	Effective	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018-22	2018-27
2. Require valid Social Security number of each child													
to claim refundable portion of child credit (otherwise													
\$500 dependent credit) (sunset 12/31/25) [2]	tyba 12/31/17		3.2	3.0	2.9	2.9	2.9	2.9	2.8	2.8	0.5	12.0	23.9
D. Simplification and Reform of Deductions and Exclusion	S												
1. Repeal of itemized deductions for taxes not paid or													
accrued in a trade or business, interest on home													
equity debt, non-disaster casualty losses, tax													
preparation expenses, and certain miscellaneous													
expenses (sunset 12/31/25) [2]	tyba 12/31/17	58.6	104.9	109.1	115.5	121.9	128.7	136.1	143.6	59.2		510.1	977.7
2. Increase percentage limit for charitable contributions													
of cash to public charities (sunset 12/31/25)	cmi tyba 12/31/17 -					Estim	ate Includ	ed in Item	I.D.1				
3. Repeal of overall limitation on itemized deductions	·												
(sunset 12/31/25)	tyba 12/31/17 -					Estim	ate Includ	ed in Item	I.D.1				
4. Modify exclusion of gain from sale of a principal	•												
residence (sunset 12/31/25)	saea 12/31/17	[5]	0.1	0.1	0.1	0.1	0.1	0.1	0.1	[5]		0.4	0.8
5. Repeal exclusion for employer-provided bicycle commu													
fringe benefit (sunset 12/31/25)		[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]		[5]	[5]
6. Repeal exclusion for employer-provided qualified	•											. ,	
moving expense reimbursements													
(sunset 12/31/25) [6][7]	tyba 12/31/17	0.4	0.6	0.6	0.6	0.6	0.6	0.6	0.7	0.2		2.7	4.8
7. Repeal of deduction for moving expenses (other	y												
than members of the Armed Forces) (sunset													
12/31/25)	tyba 12/31/17	0.6	0.8	0.9	0.9	1.0	1.0	1.1	1.1	0.3		4.2	7.6
8. Modification to wagering losses (sunset 12/31/25)		[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]		0.1	0.1
E. Double Estate, Gift and GST Tax Exemption Amount	•					. ,		. ,		. ,			
(sunset 12/31/25)	dda & gma 12/31/17	-1.2	-8.1	-8.8	-9.1	-9.6	-10.1	-10.7	-11.1	-11.0	-3.3	-36.8	-83.0
F. Repeal of Alternative Minimum Tax on Individuals													
(sunset 12/31/25)	tyba 12/31/17	-8.0	-97.2	-85.4	-90.0	-95.0	-99.5	-104.4	-110.0	-79.7	[3]	-375.6	-769.1
G. Reduce ACA Individual Shared Responsibility											r- 3		
Payment Amount to Zero [2][8][9]	pdtnc ba cy 2018		6.5	10.2	28.8	37.5	41.2	44.1	46.8	50.1	53.2	83.0	318.4
H Other Provisions													
1. ABLE to Work Act (sunset 12/31/25)	tyba 12/31/17	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]
2. ABLE Financial Planning Act (sunset 12/31/25)		[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]
3. Extend time limit for contesting IRS levy (sunset 12/31/		[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]
4. Individuals held harmless on improper levy on	-/ [*v]	[-]	ردا	[-]	[-]	[~]	[~]	ردا	[-]	ردا	[-]	[-]	[2]
retirement plans (sunset 12/31/25)	laaitrtia 12/31/17 -					Ne	gligible R	evenue Ef	fect				
5. Treatment of certain individuals performing services						110	0	200	,				
in the Sinai Peninsula of Egypt (sunset 12/31/25)	spo/a 6/9/15	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]		[3]	[3]
6. Modification of user fees for installment agreements	-r	[-]	[0]	[-]	[-]	[~]	[~]	ردا	[-]	ردا		[-]	[2]
(sunset 12/31/25)	[11]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]
7. Extend the limitations period with respect to excluding	[11]	[~]	[~]	[~]	[~]	[~]	[ب]	رحا	[~]	ری	[-]	ادا	ری
amounts received by wrongfully incarcerated individual	.												
(sunset 12/31/25)		[3]										[3]	[3]
(Buildet 12/31/23)	DOL	[2]										[2]	[2]

Provision	Effective	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018-22	2018-27
8. Treatment of student loans discharged on account of													
death or disability (sunset 12/31/25)	doia 12/31/17	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	-0.1
9. Double the deduction for educator expenses (sunset													
12/31/25)	tyba 12/31/17	[3]	-0.2	-0.2	-0.2	-0.2	-0.2	-0.2	-0.2	-0.1		-0.8	-1.5
10. Simplified filing requirements for individuals over 65 years of age (sunset 12/31/25)	tyba DOE -						- No Reve	nue Effect					
 Sense of the Senate to improve customer service and protections for taxpayers by reinstating appropriate IRS 													
funding levels (sunset 12/31/25)	DOE -						- No Reve	nue Effect					
12. Return preparation programs for low-income taxpayers (sunset 12/31/25)	DOE -						- No Reve	nue Effect					
13. Allow 529 contributions for the in utero (sunset 12/31/25)14. Mississippi River Delta flooding relief (sunset	tyba 12/31/17	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	-0.1
12/31/25) [12]	DOE	-0.2	[3]	[5]	[5]	[3]	[3]	[3]	[3]	[3]	[3]	-0.2	-0.2
Total of Tax Reform for Individuals		-49.4	-157.2	-142.4	-125.3	-117.7	-114.3	-110.5	-105.8	-38.7	75.3	-591.6	-885.9
II. Business Tax Reform													
A. Tax Rates													
1. 20% corporate tax rate in 2019 and thereafter	tyba 12/31/18	-15.2	-99.0	-138.6	-141.9	-143.2	-147.7	-152.5	-157.0	-163.1	-171.0	-537.9	-1,329.2
Reduction of dividends received deduction percentages	tyba 12/31/18	-13.2	0.4	0.5	0.5	0.6	0.6	0.6	0.6	0.6	0.7	2.0	5.1
B. Repeal of Alternative Minimum Tax on Corporations [2]	tyba 12/31/16 tyba 12/31/17	-15.3	-8.3	-4.5	-4.7	-1.3	-1.3	-1.3	-1.3	-1.2	-1.1	-34.0	-40.3
C. Small Business Reforms	tyou 12/31/17	13.3	0.5	4.5	7.7	1.5	1.3	1.5	1.3	1.2	1.1	34.0	40.5
1. Increase section 179 expensing to \$1 million with a													
phaseout range beginning at \$2.5 million and expand													
definition of qualified property	ppisi tyba 12/31/17	-3.5	-6.3	-4.3	-2.6	-2.0	-1.5	-1.1	-0.9	-0.9	-0.8	-18.8	-24.0
Simplified accounting for small business		-8.7	-6.9	-2.6	-1.6	-1.3	-1.2	-1.2	-1.3	-1.4	-1.4	-21.1	-27.6
D. Cost Recovery, etc.	[]		-										
Limit net interest deductions to 30% of adjusted													
taxable income, carryforward of denied deduction	tyba 12/31/17	24.6	39.2	30.6	30.4	29.2	28.7	28.4	30.4	32.8	34.2	153.8	308.1
2. Provide 100% bonus depreciation for five	ppisa &												
years [14]	sppoga 9/27/17	-36.2	-40.4	-23.3	-13.4	-11.0	8.8	22.3	14.9	10.6	6.4	-124.3	-61.3
3. Expand eligibility for 100% expensing to film, television,	11 -8												
and live theater (sunset 12/31/22)	Ppisa 9/27/17	-0.8	-1.6	-1.3	-1.0	-0.8	0.3	1.3	1.0	0.7	0.6	-5.5	-1.7
4. Modifications to depreciation limitations on luxury	ī												
automobiles and personal use property	ppisa 12/31/17 -					Estim	ate Includ	ed in Item	II.D.2				
5. Modifications of treatment of certain farm property	ppisa 12/31/17	[3]	[3]	[3]	-0.1	-0.2	-0.3	-0.2	-0.1	[3]	[3]	-0.4	-1.1
6. Modification of net operating loss deduction	lai tyba 12/31/17	13.0	12.7	10.0	13.8	21.1	27.0	25.5	17.4	9.5	5.9	70.5	155.9
7. Repeal like-kind exchanges except for real property	generally eca 12/31/17	0.6	1.0	1.3	1.8	2.3	2.9	3.7	4.5	5.6	6.7	7.0	30.5
8. Applicable recovery period for real property [15]	ppisa 12/31/17	-0.4	-0.8	-0.9	-1.0	-1.2	-1.3	-1.2	-1.4	-1.6	-1.3	-4.4	-11.1
9. Amortization of research expenses, no phase in	apoia 12/31/25									26.3	35.8		62.1
10. Expensing of certain costs of replacing citrus plants	-												
lost by reason of a casualty (sunset 12/1/27)	apoia DOE	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]

Provision	Effective	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018-22	2018-27
E. Business-Related Deductions													
1. Repeal of deduction for income attributable to domestic													
production activities	tyba 12/31/18	-0.3	3.4	7.9	8.7	9.1	9.5	10.0	10.3	10.5	11.5	28.8	80.7
2. Limitation on deduction by employers of expenses for	•												
fringe benefits:													
a. Meals (with modification) and entertainment													
expenses [16]	apoia 12/31/17	1.6	2.0	2.1	2.1	2.2	2.3	2.4	2.5	2.8	2.9	10.0	22.9
b. Qualified transportation fringes [17]	apoia 12/31/17	1.3	1.5	1.7	1.7	1.8	1.8	1.8	1.9	1.9	2.0	7.9	17.4
F. Accounting Methods													
1. Certain special rules for taxable year of inclusion (in													
general)	tyba 12/31/17	1.9	2.0	1.6	1.6	0.6	0.2	0.2	0.2	0.2	0.2	7.8	8.9
2. Certain special rules for taxable year of inclusion	•												
(related to original issue discount)	tyba 12/31/17	1.3	2.1	1.5	1.5	0.9	0.2	0.2	0.3	0.3	0.3	7.4	8.7
G. Business Credits	•												
1. Modification of credit for clinical testing expenses for													
certain drugs for rare diseases or conditions	apoii tyba 12/31/17	0.5	1.4	1.8	2.2	2.6	3.1	3.7	4.2	4.8	5.3	8.6	29.7
2. Modification of rehabilitation credit	[18]	[5]	0.2	0.4	0.5	0.5	0.5	0.6	0.6	0.6	0.6	1.5	4.3
3. Repeal of deduction for certain unused business credits	tyba 12/31/17 -					Ne	gligible Re	evenue Eff	ect				
4. Provide a tax credit to certain employers who	•												
provide family and medical leave (sunset 12/31/19)	tyba 12/31/17	-0.7	-1.5	-1.1	-0.5	-0.3	-0.2					-4.1	-4.3
H. Banks and Financial Instruments	•												
Limitation on deduction for FDIC premiums	tyba 12/31/17	0.8	1.8	1.4	1.4	1.4	1.5	1.5	1.5	1.6	1.6	6.8	14.5
2. Repeal of advance refunding bonds	ar bia 12/31/17	0.4	1.1	1.4	1.7	1.9	2.0	2.0	2.1	2.1	2.1	6.5	16.8
3. Cost basis of specified securities determined without													
regard to identification	seaoda 12/31/17	0.3	0.4	0.4	0.2	0.2	0.2	0.2	0.2	0.3	0.3	1.5	2.7
I. Compensation													
Modification of limitation on excessive employee													
remuneration, with transition rule	tyba 12/31/17	0.2	1.4	0.8	0.8	0.9	0.8	0.8	0.8	0.8	0.8	4.1	8.3
2. 20% excise tax on excess tax-exempt organization	•												
executive compensation	tyba 12/31/17	0.3	0.4	0.4	0.4	0.4	0.4	0.4	0.4	0.4	0.3	1.7	3.6
3. Treatment of qualified equity grants	[19]	-0.2	-0.3	-0.2	-0.2	-0.1	-0.1	[5]	[5]	-0.1	-0.1	-1.0	-1.2
J. Insurance													
Net operating losses of life insurance companies	tyba 12/31/17					Estimo	ate Include	ed in Item	II.D.6				
2. Repeal of small life insurance company deduction	tyba 12/31/17	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	0.1	0.2
3. Adjustment for change in computing reserves	tyba 12/31/17	0.2	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.6	1.3
4. Repeal of special rule for distributions to shareholders	•												
from pre-1984 policyholders surplus account	tyba 12/31/17	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]
5. Modification of proration rules for property and	-												
casualty insurance companies	tyba 12/31/17	0.2	0.3	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	1.1	2.2
6. Repeal of special estimated tax payments	tyba 12/31/17	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]
7. Capitalization of certain policy acquisition expenses	tyba 12/31/17	0.4	1.5	2.1	2.2	2.4	2.5	2.7	2.9	3.1	3.2	8.6	23.0
8. Tax reporting for life settlement transactions		[3]	[3]	[5]	[5]	[5]	[5]	[5]	[5]	0.1	0.1	[5]	0.2

Provision	Effective	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018-22	2018-2
9. Clarification of tax basis of life insurance contracts	generally teia 8/25/09-					Estimo	ite Include	ed in Item	II.J.8				
10. Exception to transfer for valuable consideration rules	-												
K. Partnerships													
1. Tax gain on the sale of a partnership interest on look-thru													
basis	saea 12/31/17	[5]	0.2	0.3	0.3	0.4	0.5	0.5	0.5	0.5	0.6	1.2	3
2. Expand the definition of substantial built-in loss for													
purposes of partnership loss transfers	topia 12/31/17	[5]	[5]	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.2	C
3. Charitable contributions and foreign taxes taken into	-												
account in determining limitation on allowance of													
partner's share of loss	tyba 12/31/17	[5]	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.2	0.2	0.5	
L. Tax-Exempt Organizations	ř												
Excise tax based on investment income of private													
colleges and universities	tyba 12/31/17	0.2	0.2	0.2	0.2	0.3	0.3	0.3	0.3	0.3	0.3	1.2	2
2. Name and logo royalties treated as unrelated business	.,												
taxable income	tyba 12/31/17	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.3	0.8	2
3. Unrelated business taxable income separately computed	generally												
for each trade or business activity	tyba 12/31/17	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.4	1.6	3
4. Repeal tax-exempt status for professional sports leagues	tyba 12/31/17	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	
5. Modification of taxes on excess benefit transactions	cy ou 12/01/11	[6]	[0]	[0]	[0]	[0]	[0]	[0]	[0]	[0]	[0]	[0]	
(intermediate sanctions)	tyba 12/31/17 -					Ne	olioihle R	evenue Eft	ect				
6. Exception to private foundation excess business holdings	ty ou 12, 51, 1,					1,0,	511,51010 11	2,70,70,70					
rules for philanthropic business holdings	tyba 12/31/17	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	ı
7. Charitable deduction not allowed for amounts paid in	tyou 12/31/11	[6]	[0]	[0]	[0]	[0]	[0]	[0]	[0]	[0]	[0]	[5]	
exchange for college athletic event seating rights	cmi tyba 12/31/17	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.9	
Repeal substantiation exception for charitable	ciii tyoa 12/31/17	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.7	
contributions reported by donee organization	cmi tyba 12/31/16 -					Ne	olioihle R	evenue Eft	ect				
M. Retirement Savings	ciii tyou 12/31/10					1,0	51151010 11	evenue Bjj	cci				
Conformity of contribution limits for employer-sponsored	pyba &												
plans	tyba 12/31/17	0.1	0.1	0.1	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.7	
Repeal of special rule permitting recharacterization	ty 0 a 12/31/17	0.1	0.1	0.1	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.7	
of IRA contributions	tyba 12/31/17	[5]	[5]	[5]	[5]	[5]	0.1	0.1	0.1	0.1	0.1	0.2	
3. Length of service awards for public safety	cy ou 12/01/11	[6]	[0]	[0]	[0]	[0]	0.1	0.1	0.1	0.1	0.1	0.2	
volunteers [20]	tyba 12/31/17	[3]	[3]	[3]	[3]	[3]	[3]	-0.1	-0.1	-0.1	-0.1	-0.1	_(
4. Extended rollover period for certain plan loan offsets	tyba 12/31/17 -	[2]			 [2]			evenue Eff					
N. Other Provisions	ty ou 12, 51, 1,					1,0,	511,51010 11	2,70,70,70					
Modify tax treatment of Alaska Native Corporations and													
Settlement Trusts	[21]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	-(
Modification of low income housing	generally	[2]	[~]	[~]	[2]	[2]	[5]	ادا	[-]	[2]	[2]	ادا	`
program	12/31/17 -					No	olioihle R	evenue Fft	ect				
3. Expansion of qualifying beneficiaries of an electing small	12,31/1/					110,	5.18101C M	c.come Ejj	-				
business trust, and modify charitable contribution	1/1/18 feoqb &												
deduction for electing small business trusts	tyba 12/31/17 fc	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	-0.1	-(
acquetion for electing small business trusts	tyva 12/31/11/10	[3]	[3]	[3]	[3]	[3]	[3]	ری	[3]	[3]	[3]	-0.1	-(

Provision	Effective	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018-22	2018-27
4. Craft Beverage Modernization and Tax Reform	generally												
(sunset 12/31/19)	1/1/18	-1.6	-1.5	-1.1								-4.2	-4.2
5. Exempt amounts paid for aircraft management services													
from the excise taxes imposed on transportation by air	apa DOE	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]
6. Create qualified opportunity zones	DOE	-1.2	-1.7	-1.6	-1.7	-1.6	-1.5	-1.5	-1.6	8.1	2.7	-7.7	-1.6
7. Deny deduction for settlements subject to a nondisclosure													
agreement paid in connection with sexual harassment	apoia DOE	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]
8. Uniform treatment of expenses in contingency fee													
cases	eacpoii tyba DOE	[5]	0.1	0.1	0.1	0.1	[5]	[5]	[5]	[5]	[5]	0.4	0.5
9. Expand provision relating to the non-deductibility													
of fines and penalties	apoiooa DOE	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	0.1	0.1
Total of Business Tax Reform	•••••	-35.6	-94.0	-111.7	-95.3	-82.8	-59.4	-48.5	-64.7	-42.3	-48.9	-419.5	-683.4
III. International Tax Reform													
A. Establishment of Participation Exemption System for													
Taxation of Foreign Income													
1. Deduction for dividends received by domestic													
corporations from certain foreign corporations	[22]	-17.6	-26.3	-18.2	-20.1	-20.5	-20.4	-21.7	-22.7	-23.3	-24.6	-102.8	-215.5
2. Special rules relating to sales or transfers involving	dri tyba &												
certain foreign corporations	Ta 12/31/17	0.2	0.2	0.5	0.8	1.2	1.4	1.6	1.5	1.7	2.2	2.9	11.3
3. Treatment of deferred foreign income upon transition													
to participation exemption system of taxation and													
mandatory inclusion at two-tier rate (5-percent rate													
for illiquid assets, 10-percent rate for liquid assets)	[23]	45.2	21.5	5.9	6.5	7.5	15.9	29.9	41.6	18.8	-8.1	86.7	184.8
B. Rules Related to Passive and Mobile Income													
1. Current year inclusion of global intangible low-taxed													
income, with deduction, by United States shareholders	[22]	19.6	24.6	9.7	9.4	9.0	8.6	8.9	8.9	15.1	21.3	72.3	135.0
2. Deduction for foreign-derived intangible income derived													
from trade or business within the United States	tyba 12/31/17	-1.3	3.7	6.8	6.4	0.3	-11.4	-15.8	-19.9	-17.8	-15.3	15.9	-64.4
3. Special rules for transfers of intangible property from													
controlled foreign corporations to United States													
shareholders	[24]	-3.9	-7.3	-8.9	-12.1	-8.3	-0.9	1.7	1.8	1.9	1.9	-40.6	-34.1
C. Other Modifications of Subpart F Provisions													
1. Elimination of inclusion of foreign base company	5007	0.1	0.2	0.2	0.2	0.4	0.4	0.4	0.5	0.5	0.6		4.0
oil related income	[22]	-0.1	-0.3	-0.3	-0.3	-0.4	-0.4	-0.4	-0.5	-0.5	-0.6	-1.4	-4.0
2. Inflation adjustment of de minimis exception for	[22]	F23	F23	F23	F23	123	F23	[2]	[27	F27	[2]	0.2	0.4
foreign base company income	[22]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	-0.2	-0.4
3. Repeal of inclusion based on withdrawal of previously	[22]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]
excluded subpart F income from qualified investment	[22]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]
4. Modification of stock attribution rules for determining status as a controlled foreign corporation	[32]					Entim	ato Inclui-	d in Itam	III A 1				
status as a controlled foreign corporation	[23]					Estimo	ие тснав	a in Hem I	111.A.1				

Provision	Effective	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018-22	2018-27
5. Modification of definition of United States shareholder	[22]	0.2	0.2	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.8	1.4
6. Elimination of requirement that corporation must be													
controlled for 30 days before subpart F inclusions apply	[22]	[5]	0.1	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	0.2	0.4
7. Look-thru rule for controlled foreign corporations													
made permanent	[25]			-0.8	-1.2	-1.3	-1.4	-1.5	-1.7	-1.8	-2.0	-3.3	-11.8
8. Corporations eligible for deduction for dividends from													
controlled foreign corporations exempt from subpart F to													
investments in United States property	[22]	-0.1	-0.2	-0.2	-0.2	-0.2	-0.2	-0.2	-0.2	-0.2	-0.2	-1.0	-2.0
D. Prevention of Base Erosion													
1. Denial of deduction for interest expense of United States													
shareholders which are members of worldwide affiliated													
groups with excess domestic indebtedness	tyba 12/31/17	0.5	0.8	0.7	0.8	0.7	0.9	1.0	0.9	1.2	1.3	3.5	8.8
2. Limitation on income shifting through intangible													
property transfers	Ta tyba 12/31/17	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.2	0.2	0.2	0.5	1.3
3. Certain related party amounts paid or accrued in													
hybrid transactions or with hybrid entities	tyba 12/31/17 ·					Estima	te Include	d in Item I	II.A.1				
4. Termination of special rules for domestic international													
sales corporation	tyba 12/31/18		0.3	0.5	0.6	0.6	0.6	0.6	0.7	0.7	0.7	2.0	5.3
5. Surrogate foreign corporations not eligible for													
reduced rate on dividends	dpa 12/31/17	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.3	0.7
E. Modifications Related to Foreign Tax Credit System													
1. Repeal of section 902 indirect foreign tax credits;													
determination of section 960 credit on current year													
basis	[22]					Estima	te Include	d in Item I	II.A.1				
2. Separate foreign tax credit limitation basket for													
foreign branch income	tyba 12/31/17					Estima	te Include	d in Item I	II.B.1				
3. Acceleration of election to allocate interest, etc., on a		0.0	0.5		0.4								
worldwide basis	tyba 12/31/17	-0.3	-0.6	-0.7	-0.4							-2.0	-2.0
4. Source of income from sales of inventory determined													
solely on basis of production activities	tyba 12/31/17	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.3	0.5
F. Inbound Provisions													
Base erosion and anti-abuse tax	apoaa 12/31/17	3.8	9.3	11.4	12.1	12.6	13.4	14	14.6	20.2	26.3	49.2	137.6
G. Other Provisions													
Taxation of passenger cruise gross income of foreign													
corporations and nonresident alien individuals	tyba 12/31/17	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.4	0.7
2. Restriction on insurance business exception to passive	1 10/01/15	0.4	0.4	0.4	0.4	0.4	0.4	0.4	0.0	0.0	0.5	0 -	
foreign investment company rules	tyba 12/31/17	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.2	0.2	0.2	0.5	1.1
3. Repeal of fair market value method of interest			0.1	0.1	F ===		F = -	p ===					
expense apportionment	tyba 12/31/17	[5]	0.1	0.1	[5]	[5]	[5]	[5]	[5]	[5]	[5]	0.2	0.2
4. Treatment of sourcing rules for U.S. territories	tyba 12/31/18		[3]	-0.1	-0.1	-0.1	-0.1	-0.1	-0.1	-0.1	-0.1	-0.3	-0.6

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Provision	Effective	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018-22	2018-27
5. Repeal exclusion applicable to certain passenger													
aircraft operated by a foreign corporation	tyba 12/31/17	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	0.1	0.2
Total of International Tax Reform		46.7	26.5	6.9	2.8	1.7	6.6	18.6	25.7	16.7	3.6	84.2	154.5
IV. Revenue-Dependent Repeals							No Rever	nue Effect					
NET TOTAL		-38.3	-224.7	-247.2	-217.8	-198.8	-167.1	-140.4	-144.8	-64.3	30.0	-926.9	-1,414.8

Joint Committee on Taxation

NOTE: Details may not add to totals due to rounding. The date of enactment is generally assumed to be December 1, 2017.

Legend for "Effective" column:

apa = amounts paid after

apoia = amounts paid or incurred after

apoaa = amounts paid or accrued after apoii = amounts paid or incurred in

ar = advance refunding

bia = bonds issued after

cmi = contributions made in

DOE = date of enactment

da = distributions after

dda = decedents dying after

doia = discharges of indebtedness after

dpa = dividends paid after

dri = dividends received in

eacpoii = expenses and costs paid or incurred in

eca = exchanges completed after

fc = for charitable

feoqb = for expansion of qualifying beneficiaries

gma = gifts made after

laaitrtia = levied amounts, and interest thereon,

returned to individuals after

lai = losses accrued in

pdtnc = payments due to non-coverage

ppisa = property placed in service after

Ppisa = productions placed in service after

ppisi = property placed in service in

pyba = plan years beginning after

saea = sales and exchanges after

 $seaoda = sales, \ exchanges, \ and \ other$

dispositions after

spa = services performed after

spo/a = service provided on or after

sppoga = specified plants planted or

grafted after

ta = transactions after

Ta = transfers after

topia = transfers of partnership interests

after

tyba = taxable years beginning after

Footnotes for JCX-57-17:

2] Estimate includes the following outlay effects:	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>	<u>2025</u>	<u>2026</u>	2027	<u>2018-22</u>	<u>2018-27</u>
10%, 12%, 22%, 24%, 32, 35%, and 38.5% tax brackets		1.0	1.1	1.2	1.2	1.2	1.2	1.2	1.3	[26]	4.4	9.3
Modify standard deduction		9.4	9.7	10.2	10.4	10.5	10.6	10.7	10.9	[26]	39.7	82.5
Repeal personal exemptions	-10.8	-15.9	-16.3	-16.6	-16.9	-17.2	-17.4	-17.7	-5.3		-76.6	-134.2
Alternative inflation measure		-0.3	-0.6	-1.3	-1.6	-2.1	-2.5	-3.1	-3.6	-4.1	-3.9	-19.3
Modification of child tax credit		18.0	18.4	18.3	18.3	20.3	20.2	20.2	20.2		73.0	153.3
Require valid Social Security number of each child to claim refundable portion												
of child credit (otherwise \$500 dependent credit)		-3.2	-3.0	-2.9	-2.9	-2.9	-2.9	-2.8	-2.8	-0.5	-12.0	-23.
Repeal of itemized deductions for taxes not paid or accrued in a trade or												
business, interest on home equity debt, non-disaster casualty losses and												
certain miscellaneous expenses		-0.5	-0.4	-0.4	-0.4	-0.4	-0.4	-0.4	-0.4		-1.6	-3.
Repeal of alternative minimum tax on corporations	10.8	3.8	-0.4	-0.3							13.9	13.
Reduce Amount of the ACA Individual Shared Responsibility Payment to Zero		-6.2	-12.9	-28.2	-35.2	-38.4	-40.7	-43.1	-45.2	-47.8	-82.5	-297.
3] Loss of less than \$50 million.												
4] Estimate includes the following budget effects:	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018-22	2018-2
Total Revenue Effect (SECA interaction)	-1.3	-1.8	-1.6	-1.3	-0.9	1.7	2.7	1.9	0.4		-6.8	-0.
On-budget effects	-0.2	-0.4	-0.3	-0.3	-0.2	0.3	0.6	0.4	0.1		-1.4	[3
Off-budget effects	-1.0	-1.4	-1.2	-1.0	-0.7	1.4	2.2	1.5	0.3		-5.4	[3
5] Gain of less than \$50 million.												
6] Estimate includes the following budget effects:	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018-22	2018-2
Total Revenue Effect	0.4	0.6	0.6	0.6	0.6	0.6	0.6	0.7	0.2		2.7	4.
On-budget effects	0.3	0.4	0.5	0.5	0.5	0.5	0.5	0.5	0.1		2.2	3.
Off-budget effects	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1			0.6	1.
7] Estimate includes policy that retains exclusion under section 217(g) (related to members of	of the Arn	ned Forces).									
B] Estimate provided by the Joint Committee on Taxation staff in collaboration with the Cor	ngressiona	l Budget (Office.									
P] Estimate includes the following budget effects:	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018-22	2018-2

[10] Effective with respect to: (1) levies made after the date of enactment; and (2) levies made on or before the date of enactment provided that the nine-month period has not expired as of the date of enactment.

6.5

6.5

0.1

10.2

9.4

0.8

28.8

26.9

1.9

37.5

35.2

2.3

41.2

38.8

2.4

44.1

41.4

2.7

46.8

43.9

2.9

50.1

47.2

2.9

53.2

50.4

2.8

83.0

78.0

5.0

318.4

299.6

18.7

[11] Effective for agreements entered into on or after the date that is 60 days after date of enactment.

Total Revenue Effect.

On-budget effects....

Off-budget effects....

- [12] Applies to the "Mississippi River Delta flood area" defined as the area with respect to which a major disaster has been declared by the President under section 401 of the Robert T Stafford Disaster Relief and Emergency Assistance Act before September 3, 2016, by reason of severe flooding occurring in Louisiana during August of 2016.
- [13] The expansion of the threshold allowing the use of the cash method, the creation of an exemption from the requirement to use inventories, and the expansion of the exception from the uniform capitalization rules are effective for taxable years beginning after December 31, 2017. The expansion of the exception from the requirement to use the percentage of completion method is effective for contracts entered into after December 31, 2017, in taxable years ending after such date. The threshold applicable to each provision is indexed for inflation for taxable years beginning after December 31, 2018.
- [14] Estimate contains interaction with the section 179 expansion in II.C.1.

Footnotes for JCX-57-17 continued:

[15] Estimate includes the following provisions: for nonresidential real property, reduce the applicable recovery period to 25 years from 39 years; for residential rental property, reduce the applicable recovery period to 25 years from 15 years; for qualified improvement property, reduce the applicable recovery period to 10 years from 15 years.

[16] Estimate includes the following budget effects:	2018	<u>2019</u>	<u>2020</u>	2021	<u>2022</u>	2023	<u>2024</u>	<u>2025</u>	<u>2026</u>	<u>2027</u>	2018-22	2018-27
Total Revenue Effect	1.6	2.0	2.1	2.1	2.2	2.3	2.4	2.5	2.8	2.9	10.0	22.9
On-budget effects	1.3	1.6	1.7	1.8	1.8	1.9	2.0	2.1	2.4	2.4	8.2	19.0
Off-budget effects	0.3	0.4	0.4	0.4	0.4	0.4	0.4	0.4	0.4	0.4	1.8	3.9
[17] Estimate includes the following budget effects:	2018	2019	<u>2020</u>	2021	2022	2023	2024	<u>2025</u>	<u>2026</u>	<u>2027</u>	2018-22	2018-27
Total Revenue Effect	1.3	1.5	1.7	1.7	1.8	1.8	1.8	1.9	1.9	2.0	7.9	17.4
On-budget effects	1.0	1.2	1.3	1.3	1.4	1.4	1.5	1.5	1.5	1.6	6.4	13.9
Off-budget effects	0.3	0.3	0.3	0.3	0.4	0.4	0.4	0.4	0.4	0.4	1.6	3.5

- [18] Generally effective for amounts paid or incurred after December 31, 2017, with a transition rule providing that for buildings owned or leased at all times after December 31, 2017, the 24-month period for making qualified rehabilitation expenditures begins no later than 180 days after the date of enactment, and the repeal is effective for such expenditures paid or incurred after the end of the taxable year in which such 24-month period ends.
- [19] Effective for options exercised or restricted stock units settled after December 31, 2017. The penalty for failure to provide a notice is effective for failures after December 31, 2017.

	1	5	1									
[20] Estimate includes the following budget effects:	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>	<u>2025</u>	<u>2026</u>	<u>2027</u>	2018-22	<u>2018-27</u>
Total Revenue Effect	[3]	[3]	[3]	[3]	[3]	[3]	-0.1	-0.1	-0.1	-0.1	-0.1	-0.5
On-budget effects	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	-0.1	-0.1	[3]	-0.3
Off-budget effects	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	-0.1	[3]	-0.2

- [21] Generally, taxable years beginning after December 31, 2016. The deduction for contributions to a Settlement Trust is effective for taxable years for which the Native Corporation's refund statute of limitations period has not expired, with a one-year waiver of the refund statute of limitations period in the event that the period expires before the end of the one-year period beginning on the date of enactment.
- [22] Effective for taxable years of foreign corporations beginning after December 31, 2017, and to taxable years of United States shareholders with or within which such taxable years of foreign corporations end.
- [23] Effective for the last taxable year of foreign corporations beginning before January 1, 2018, and all subsequent taxable years of foreign corporations and for the taxable years of a United States shareholder with or within which such taxable years end.
- [24] Effective for distributions made in taxable years of foreign corporations beginning after December 31, 2017, and for taxable years of United States shareholders with or within which such taxable years of foreign corporations end.
- [25] Effective for taxable years of foreign corporations beginning after December 31, 2019, and to taxable years of United States shareholders with or within which such taxable years of foreign corporations end.
- [26] Increase in outlays of less than \$50 million.