JOINT COMMITTEE ON TAXATION August 2, 2012 JCX-70-12

ESTIMATED REVENUE EFFECTS OF THE CHAIRMAN'S MARK AS MODIFIED TO THE PROVISIONS OF THE "FAMILY AND BUSINESS TAX CUT CERTAINTY ACT OF 2012," SCHEDULED FOR MARK UP BY THE SENATE COMMITTEE ON FINANCE ON AUGUST 2, 2012

Fiscal Years 2013 - 2022

[Millions of Dollars]

Provision	Effective	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2013-17	2013-22
I. Individual Proposals													
1. Increase AMT exemption amount to \$50,600 (\$78,750) in 2012 and \$51,150 (\$79,850) in 2013													
and allow personal credits against the AMT (sunset													
12/31/13)	tyba 12/31/11	-104,099	-37,448	9,308								-132,240	-132,240
2. Above-the-line deduction of up to \$250 for													
teacher classroom expenses (sunset 12/31/13)	tyba 12/31/11	-273	-189									-462	-462
3. Discharge of indebtedness on principal residence													
excluded from gross income of individuals (sunset													
12/31/13)	doioa 12/31/12	-199	-1,128									-1,327	-1,327
4. Parity for exclusion for employer-provided mass													
transit and parking benefits (sunset 12/31/13) [1]	ma 12/31/11	-218	-53									-271	-271
5. Premiums for mortgage insurance deductible as													
interest that is qualified residence interest													
(sunset 12/31/13)	apoaa 12/31/11	-791	-506									-1,297	-1,297
6. Deduction for State and local general sales taxes													
(sunset 12/31/13)	tyba 12/31/11	-1,641	-2,393	-325								-4,359	-4,359
7. Contributions of capital gain real property made for	cmi												
qualified conservation purposes (sunset 12/31/13)	tyba 12/31/11	-82	-50	-11	-2	-7	-20	-26	-21	-19	-17	-152	-254
8. Deduction for qualified tuition and related	·												
expenses (sunset 12/31/13)	tyba 12/31/11	-2,323	-1,893									-4,217	-4,217
9. Tax-free distributions from IRAs to certain public	•												
charities for individuals age 70 1/2 or older, not to													
exceed \$100,000 per taxpayer per year (sunset													
12/31/13)	dmi tyba 12/31/11	-594	-283	-41	-43	-46	-49	-51	-55	-58	-61	-1,006	-1,280
10. Disclosure of prisoner return information to	•												
certain prison officials	dma DOE	1	1	1	1	1	1	1	1	1	1	5	12
11. Refunds disregarded in the administration of													
Federal programs and Federally assisted programs													
(sunset 12/31/13) [2]	ara 12/31/12	-2										-2	-2
		110.001	42.042	0.022	4.4	50	60	=.		=.		1.45.220	145.605
Total of Individual Proposals		110,221	-43,942	8,932	-44	-52	-68	-76	-75	-76	-77	-145,328	-145,697

Name Proposits	Provision	Effective	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2013-17	2013-22
apoin 12/31/13	II. Business Proposals													
2 Indian employment has credit (sumest [2/31/13)	1. Extend and modify tax credit for research and													
3. New markes tax credit (62.5 hillion allocation in 2012 and 2013 (sumset 1231/13)	experimentation expenses (sunset 12/31/13)	apoia 12/31/11	-6,232	-1,989	-1,077	-947	-834	-736	-670	-638	-617	-584	-11,079	-14,324
2012 and 2013 (sunset 12/31/13) eyba 12/31/11	2. Indian employment tax credit (sunset 12/31/13)	tyba 12/31/11	-69	-38	-11	-1							-119	-119
4.50% tax credit for certain expenditures for expenditures for maintaining railroad tracks (sunset 12/31/13). tyba 12/31/11 -2.32 -3.99 [3] -3.00 -3.00 -3.00 -3.31	3. New markets tax credit (\$3.5 billion allocation in													
S. Mine rescue team training callocod tracks (sunset 12/31/13) tyba 12/31/11 -1 -2 -1 [3] [3] -3 -3 -3 -3 -3 -3 -3	2012 and 2013) (sunset 12/31/13)	cyba 12/31/11	-5	-27	-90	-171	-221	-252	-279	-288	-267	-194	-514	-1,794
S. Mine rescue team training credit (sunset 12/31/13)	4. 50% tax credit for certain expenditures for	epoid												
12/31/13 13/14 15/14	maintaining railroad tracks (sunset 12/31/13)	tyba 12/31/11	-232	-99	[3]								-331	-331
6. Employer wage credit for activated military reservists (sunset 12/31/13)	5. Mine rescue team training credit (sunset													
reservists (sunset 12/31/13)	12/31/13)	tyba 12/31/11	-1	-2	-1	[3]	[3]	[3]					-5	-5
7. Work opportunity tax credit: a. Work opportunity tax credit (sunset 12/31/13)	6. Employer wage credit for activated military													
a. Work opportunity tax credit (sunset 12/31/13) wpoifibwa 12/31/11	reservists (sunset 12/31/13)	pma 12/31/11	-3	-3	-1	[3]							-7	-7
b. Work opportunity tax credit for qualified veterans (sunset 12/31/13)	7. Work opportunity tax credit:													
veterans (sunset 12/31/13)	a. Work opportunity tax credit (sunset 12/31/13)	wpoifibwa 12/31/11	-894	-533	-199	-84	-45	-17	-2				-1,755	-1,773
8. Qualified zone academy bonds (\$400 million allocation in 2012 and 2013) (sunset 12/31/13)	b. Work opportunity tax credit for qualified													
allocation in 2012 and 2013) (sunset 12/31/13)	veterans (sunset 12/31/13)	wpoifibwa 12/31/12	-53	-40	-20	-6	-4	-2	[3]				-123	-125
9. 15-year straight-line cost recovery for qualified leasehold, restaurant, and retail improvements and new restaurants (sunset 12/31/13)	8. Qualified zone academy bonds (\$400 million													
leasehold, restaurant, and retail improvements and new restaurants (sunset 12/31/13)	allocation in 2012 and 2013) (sunset 12/31/13)	oia 12/31/11	-3	-8	-16	-24	-29	-31	-31	-31	-31	-31	-80	-235
new restaurants (sunset 12/31/13)	9. 15-year straight-line cost recovery for qualified													
10. Accelerated depreciation for business property on Indian reservations (sunset 12/31/13)	leasehold, restaurant, and retail improvements and													
on Indian reservations (sunset 12/31/13)	new restaurants (sunset 12/31/13)	ppisa 12/31/11	-277	-371	-416	-411	-401	-388	-383	-378	-361	-331	-1,876	-3,717
11. Enhanced charitable deduction for contributions of food inventory (sunset 12/31/13)	10. Accelerated depreciation for business property													
of food inventory (sunset 12/31/13)	on Indian reservations (sunset 12/31/13)	ppisa 12/31/11	-12	-18	-20	-20	-20	-20	-20	-20	-20	-20	-91	-193
12. Increase in section 179 expensing amounts and threshold limits \$500,000/\$2,000,000 (sunset 12/31/13) [4]	11. Enhanced charitable deduction for contributions													
threshold limits \$500,000/\$2,000,000 (sunset 12/31/13) [4]	of food inventory (sunset 12/31/13)	cma 12/31/11	-218	-96									-314	-314
12/31/13) [4]	12. Increase in section 179 expensing amounts and													
13. Election to expense mine safety equipment (sunset 12/31/13)	threshold limits \$500,000/\$2,000,000 (sunset													
12/31/13)	12/31/13) [4]	tyba 12/31/12	-8,088	-4,042	3,129	2,022	1,526	1,191	777	500	350	283	-5,453	-2,352
14. Special expensing rules for certain film and television productions (sunset 12/31/13)	13. Election to expense mine safety equipment (sunset													
television productions (sunset 12/31/13)	12/31/13)	ppisa 12/31/11	-27	1	7	5	4	4	3	2	1		-9	
15. Deduction allowable with respect to income attributable to domestic production activities in Puerto Rico (sunset 12/31/13)	14. Special expensing rules for certain film and													
attributable to domestic production activities in Puerto Rico (sunset 12/31/13)	television productions (sunset 12/31/13)	qfatpca 12/31/11	-266	-164	45	38	32	24	16	11	9	7	-315	-248
Puerto Rico (sunset 12/31/13)	15. Deduction allowable with respect to income													
16. Treatment of certain dividends of RICs (sunset 12/31/13)	attributable to domestic production activities in													
(sunset 12/31/13)	Puerto Rico (sunset 12/31/13)	tyba 12/31/11	-236	-122									-358	-358
17. Extend the treatment of RICs as "qualified investment entities" under section 897 (FIRPTA)	16. Treatment of certain dividends of RICs													
investment entities" under section 897 (FIRPTA)	(sunset 12/31/13)	[5]	-124	-27									-151	-151
	17. Extend the treatment of RICs as "qualified													
(sunset 12/31/13)	investment entities" under section 897 (FIRPTA)													
	(sunset 12/31/13)	1/1/12	-48	-12									-60	-60

Provision	Effective	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2013-17	2013-22
18. Exception under subpart F for active financing													<u>'</u>
income (sunset 12/31/13)	tyba 12/31/11	-9,399	-1,826									-11,225	-11,225
19. Special rules applicable to qualified small	,												
business stock (sunset 12/31/13)	saa 12/31/11	6	7			-15	-212	-694	-27	-10	-9	-3	-954
20. Look-through treatment of payments between													
related CFCs under foreign personal holding													
company income rules (sunset 12/31/13)	tyba 2011	-1,199	-304									-1,503	-1,503
21. Empowerment zone tax incentives (sunset	. 1 . 10/01/11	2.00	4.4	22		-				2	2	4.40	450
12/31/13)	tyba 12/31/11	-360	-44	-23	-11	-5	-1	-1	-2	-2	-2	-442	-450
 Basis adjustment to stock of S corporations making charitable contributions of property 													
(sunset 12/31/13)	cmi tyba 12/31/11	-93	-50	-10	-11	-10	-10	-10	-10	-10	-10	-174	-224
23. Reduction in recognition period for S corporation	Ciiii tyba 12/31/11	-93	-30	-10	-11	-10	-10	-10	-10	-10	-10	-1/4	-224
built-in gains tax (sunset 12/31/13)	tyba 12/31/11	-184	-73	1	1	1	1	1	1	1		-255	-251
24. New York Liberty Zone tax-exempt bond	.,			_			_	_		_			
financing (sunset 12/31/13)	bia 12/31/11	-6	-6	-6	-6	-6	-6	-6	-6	-6	-6	-30	-60
25. Temporary 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 12/31/13) [2]	abiUSa 12/31/11	-199	-23									-222	-222
26. 7-year recovery period for certain motorsports													
racing track facilities (sunset 12/31/13)	ppisa 12/31/11	-46	-24	-14	-7	-4	-5	-3	5	10	10	-95	-78
27. Modify tax treatment of certain payments													
under existing arrangements to controlling	12/21/11	25	_									-40	-40
exempt organizations (sunset 12/31/13)	proaa 12/31/11	-35	-5									-40	-40
credit for American Samoa (sunset 12/31/13)	tyba 12/31/11	-76	-49									-124	-124
	•												
Total of Business Proposals		-28,379	-9,987	1,277	366	-32	-461	-1,303	-882	-954	-887	-36,753	-41,237
III. Energy Proposals													
1. Extension and modification of section 25C													
nonbusiness energy property (sunset 12/31/13)	ppisa 12/31/11	-1,456	-991									-2,446	-2,446
2. Alternative fuel vehicle refueling property													
(non-hydrogen refueling property) (sunset													
12/31/13)	tyba 12/31/11	-34	-9	-1	[3]	[6]	[6]	[6]	[6]	[6]	[6]	-44	-44
3. Credit for production of cellulosic biofuel with a													
maximum credit of \$1.01 per gallon and inclusion of	f DOE [7]	42	16									50	50
fuel from algae (sunset 12/31/13)	fpa DOE [7]	-43	-16									-59	-59
4. Extension of credits for biodiesel and renewable diesel:													
a. Income tax credits for biodiesel fuel, biodiesel													
used to produce a qualified mixture, and small	6 10/01/11	1.046	201									2.1.12	2.1.12
agri-biodiesel producers (sunset 12/31/13)	fsoua 12/31/11	-1,849	-294									-2,143	-2,143

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Provision	Effective	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2013-17	2013-22
b. Income tax credits for renewable diesel fuel and													
renewable diesel used to produce a qualified	fsoua 12/31/11					East	imata Inali	ded In Item	1 a				
mixture (sunset 12/31/13)	Isoua 12/31/11 · ·					ESII	тате Іпси	iaea in iter	n 4.a				
biodiesel fuel and mixtures (sunset 12/31/13)	fsoua 12/31/11					Fsti	imate Inclu	ided In Iter	n 1 a				
d. Excise tax credits and outlay payments for	130ua 12/31/11					Lsu	maie mei	ucu In Her	n 4.u				
renewable diesel fuel mixtures (sunset 12/31/13)	fsoua 12/31/11					Esti	imate Inclu	ıded In Iter	n 4 a				
5. Credit for production of Indian coal (sunset													
12/31/13)	cpa 12/31/12	-1	[3]	[3]	[3]	[3]	[3]	[3]				-1	-1
6. Credit for construction of energy efficient new	1		. ,	. ,	. ,	. ,							
homes (sunset 12/31/13)	haa 12/31/11	-74	-27	-14	-12	-11	-9	-6	-1			-138	-154
7. Credit for energy efficient appliances (sunset													
12/31/13)	apa 12/31/11	-155	-82	-65	-65	-65	-65	-65	-54	-28	-6	-432	-650
8. Special depreciation allowance for cellulosic biofuel													
plant property and inclusion of algae-based fuel													
plant property (sunset 12/31/13)	fpisa DOE	-1	-2	[6]	[6]	[6]	[6]	[6]	[6]	[6]	[6]	-2	[3]
9. Special rule for sales or dispositions to implement													
Federal Energy Regulatory Commission													
("FERC") or State electric restructuring policy													
(sunset 12/31/13)	tyba 12/31/11	-596	-48	110	110	110	110	110	95			-315	
10. Incentives for alternative fuel and alternative fuel													
mixtures (other than liquefied hydrogen) (sunset													
12/31/13)	fsoua 12/31/11	-353	-56									-409	-409
11. Modify expiration date for renewable electricity													
production credit to construction beginning before													
December 31, 2013 (sunset 12/31/13)	ppisa 12/31/12	-116	-445	-882	-1230	-1386	-1499	-1568	-1642	-1686	-1729	-4,060	-12,184
12. Election to claim the energy credit in lieu of the	: 10/01/10		100	120	- 1	10	-	20	40	40	40	204	105
electricity production credit (sunset 12/31/13)	ppisa 12/31/12		-100	-130	-54	-10	7	28	40	42	43	-294	-135
13. Clarify that paper which is commonly recycled													
does not constitute a qualified energy resource													
under section 45 credit for renewable electricity production	DOE	6	7	8	0	8	9	9	10	10		37	75
•		O	,	0	0	0	9	9	10	10		37	13
Total of Energy Proposals	•••••	-4,672	-2,063	-974	-1,243	-1,354	-1,447	-1,492	-1,552	-1,662	-1,692	-10,306	-18,150
ET TOTAL		-143,272	-55,992	9,235	-921	-1,438	-1,976	-2,871	-2,509	-2,692	-2,656	-192,387	-205,084

Joint Committee on Taxation

NOTE: Details may not add to totals due to rounding. The date of enactment is assumed to be October 1, 2012.

Legend and Footnotes for JCX-70-12

Legend for "Effective" column:

abiUSa = articles brought into the United States after
apa = appliances purchased after
apoia = amounts paid or incurred after
apoaa = amounts paid or accrued after
ara = amounts received after
bia = bonds issued after
cma = contributions made after

cmi = contributions made in cpa = coal produced after

cyba = calendar years beginning after

da = distributions after

dma = disclosures made after dmi = distributions made in DOE = date of enactment

doioa = discharge of indebtedness occurring after

epoid = expenses paid or incurred during

fpa = fuel produced after

fpisa = facilities placed in service after

fsoua = fuel sold or used after haa = homes acquired after

ma = months after

oia = obligations issued after
pma = payments made after
ppisa = property placed in service after
proaa = payments received or accrued after
qfatpca = qualified film and television
productions commencing after
saa = stock acquired after
tyba = taxable years beginning after
wpoifibwa = wages paid or incurred for individuals
beginning work after

[1] Estimate includes the following effects:	2013	<u>2014</u>	2015	2016	2017	2018	2019	<u>2020</u>	2021	2022	2013-17	2013-22
General Fund	-153	-40									-193	-193
OASDI	-65	-13									-78	-78

- [2] Estimate provided by the Congressional Budget Office.
- [3] Loss of less than \$500,000.
- [4] Estimate includes expensing for qualified real property.
- [5] Effective for dividends with respect to taxable years of regulated investment companies beginning after December 31, 2011.
- [6] Gain of less than \$500,000.
- [7] The technical correction is effective as if included in section 15321(b) of the Heartland, Habitat, Harvest and Horticulture Act of 2008.