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5

EXCISE TAXES

SUMMARY OF TECHNICAL ISSUES UNDER PRESENT
LAW RAISED IN TESTIMONY GIVEN BEFORE THE
COMMITTEE ON WAYS AND MEANS, HOUSE OF
REPRESENTATIVES, ON JULY 21, 22, 23, 24, 27, 28,
29, 30, 31, AND AUGUST 3, 1964



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JEWELRY AND RELATED ITEMS

| Section No. | Brief description of present law | Technical problems raised by witnesses | Name of witness |
|-------------|---|--|--|
| 4001 | This section imposes a 10-percent tax on the sale at retail of real and imitation jewelry, watches, clocks, silver plated hollow ware, gold, gold plated, silver, and sterling flatware or hollow ware, and opera, marine, and field glasses. | Question arises as to whether or not sales of jewelry to employers, etc., for use as service awards for their employees, as prizes in connection with sales promotion programs, etc., are sales at retail. Internal Revenue Service takes the position that sales of jewelry for these purposes if made by a wholesaler are not taxable (following the <i>Gelman</i> case), but that similar sales made by a retailer are taxable. Lower courts are split on the issue of whether sales by retailers for use as awards, etc., are taxable. A Michigan district court holds them to be exempt on the theory that a retail outlet may also act as a wholesaler, while other courts have held them to be retail sales and, in effect, question the validity of the holding of the <i>Gelman</i> case. | Committee for Repeal of the Federal Retail Excise Tax, p. 274. |
| 4002 | This section treats articles sold by an auctioneer as being sold at retail. | No comments----- | |
| 4003 | This section provides exceptions for (1) religious articles, (2) surgical instruments, (3) watches for the blind, (4) eyeglasses, (5) pens, pencils, and pipes if the only jewelry used are essential parts of the article rather than ornamentation, (6) buttons, etc., used on military uniforms, (7) \$100 total exemption for auction sales at the home of the owner whose property is sold, (8) clocks subject to the manufacturers' excise tax, and (9) clocks used as a part of a non-taxable regulatory device. | No comments----- | |

FURS

| | | | |
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| 4011 | This section imposes a 10-percent tax on the sale at retail of articles made of fur and articles of which fur is the component material of chief value if such value is more than 3 times the value of the next most valuable component material. | When fur is used as trim on dresses, cloth coats, etc., interpretative problems arise as to whether the fur is part of the dress (and nontaxable under the 3 times value rule) or whether it is a separate article (and taxable). In an informal ruling the Internal Revenue Service has reportedly held that if a fur collar is attached to a cloth garment by 4 or fewer basting stitches per inch, it is taxable as a separate item, but is tax exempt if attached by 6 or 8 stitches per inch. Witness maintains that the uncertainty of whether or not fur trim is taxable results in a loss of business to the fur industry. | National Board of Fur Farm Organizations, Inc., p. 297. |
| 4012 | This section treats sales by an auctioneer, and the dressing, dyeing, or manufacture of fur articles by a furrier for a customer who supplies unused hides or pelts, as sales at retail. | No comments----- | |
| 4013 | This section exempts from tax the first \$100 of otherwise taxable furs sold by an auctioneer at the home of the person whose articles are being sold. | No comments----- | |

Chapter 31—Retailers' Excise Taxes—Continued

TOILET PREPARATIONS

| Section No. | Brief description of present law | Technical problems raised by witnesses | Name of witness |
|-------------|---|---|---|
| 4021 | This section imposes a 10-percent tax on the sale at retail of perfumes, cosmetics, hair dressings and dyes, toilet powders, and similar items used or intended to be used for toilet purposes. | The witness maintains that the problems of determining the tax status of individual items causes substantial compliance problems and that Internal Revenue agents on audit often employ arbitrary methods for determining the amount of a retailer's tax liability. | National Association of Retail Druggists, p. 311; National Association of Chain Drugstores, p. 330; Toilet Goods Association, p. 338. |
| 4022 | This section provides an exemption for (1) items intended to be used only in the care of babies; (2) items used in the operation of barber shops and beauty parlors; and (3) sales of miniature samples to house-to-house salesman for demonstration use. | No comments----- | |

LUGGAGE, HANDBAGS, ETC.

| | | | |
|------|--|---|--------------------------------|
| 4031 | This section imposes a 10-percent tax on the sale at retail of specified items of luggage. | The Internal Revenue Service apparently looks to the use for which an article can be made to determine taxability. The witness claims that an article should not be taxed unless listed in the statute even though a secondary use could be to carry wearing apparel. Specific question raised relates to whether or not a carrying case designed to carry an electric hair dryer should be taxed as a "hatbox." The Internal Revenue Service has apparently taken the position that since the article is advertised as being of the "hatbox" style, and may be used to carry garments, it is taxable. The witness maintains that since the statute does not list "hairdryer carrying cases," it is not taxable since Congress removed the catchall category of "other cases, bags, and kits * * * for use in carrying toilet articles or articles of wearing apparel" from the statute effective Jan. 1, 1959. | Landers, Fray & Clark, p. 259. |
|------|--|---|--------------------------------|

SPECIAL FUELS

| | | | |
|------|--|--|---|
| 4041 | Subsec. (a) imposes a 4 cents per gallon tax upon any liquid (other than gasoline) sold for use or used as fuel for a registered diesel-powered highway vehicle. A 2 cents per gallon tax applies to liquids sold for or used as a fuel for unregistered highway vehicles. | The witness maintains that the diesel fuel tax should not apply to the use of a fuel in a highway-type vehicle while the vehicle's engine is being used for an off-highway purpose. For example, in the case of oil well servicing operations, the engine of a highway vehicle is used to transmit power to servicing equipment installed on the vehicle after the vehicle has been placed in position as a servicing unit (generally by jacking it up, attaching guy lines, etc.). The witness states that no tax would be payable on fuel used to power the equipment if a second motor was used for that purpose, even though the fuel might be drawn from a common tank. | Association of Oilwell Servicing Contractors, p. 613. |
|------|--|--|---|

The retail distributors of liquefied petroleum gas maintain that the taxation of special motor fuels used for the "propulsion of motor vehicles" places them at a competitive disadvantage vis-a-vis forklift trucks powered by electric motors or engines using diesel fuel. The witness states that administrative problems arise in determining how much special fuel is subject to tax in factory use since the tax applies to use by forklift trucks (which are defined as motor vehicles by the Internal Revenue Service) but not to fuel used by tractors which push or pull, but do not lift, a load.

The witness maintains that the Internal Revenue Service requires payment of a tax on liquids as special motor fuels if they are used by truck chassis and built-up type well servicing units, even though the fuels are not used for the propulsion of a motor vehicle.

No comments-----

No comments-----

Subsec. (b) imposes a 4 cents per gallon tax upon any liquid (other than gasoline, kerosene, gas, or fuel oil, or a liquid taxed under subsec. (a)) sold for use or used as a fuel for the propulsion of a registered motor vehicle. A 2 cents per gallon tax applies to a liquid sold for or used as a fuel for airplanes, boats, and unregistered motor vehicles.

Subsec. (c) provides that the tax rate on all fuels is to be reduced to 1½ cents per gallon on Oct. 1, 1972.

Subsecs. (d) and (e) provide exemption from the diesel fuel and special motor fuel taxes for liquids used on farms for farming purposes and as supplies for aircraft and vessels operating outside the United States.

SPECIAL PROVISIONS APPLICABLE TO RETAILER'S TAX

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| 4051 | This section defines the term "price" to include the cost of packaging, etc., but to exclude transportation, delivery, insurance, and installation charges and separately stated State sales taxes. | No comments----- | |
| 4052 | This section provides that the lease of an article is to be treated the same as the sale of an article. | No comments----- | |
| 4053 | This section provides special rules for the payment of tax on installment sales. | No comments----- | |
| 4054 | This section provides that retail sales taxes apply to retail sales made by the United States. | No comments----- | |
| 4055-4057 | These sections exempt from tax (1) articles sold to State or local governments for their exclusive use, (2) articles sold to tax-exempt educational institutions for their use, and (3) articles sold for export. | No comments----- | |

Chapter 32—Manufacturers' Excise Taxes

MOTOR VEHICLES

| Section No. | Brief description of present law | Technical problems raised by witnesses | Name of witness |
|-------------|---|---|--|
| 4061 | <p>Subsec. (a) imposes a 10-percent tax on the sale by a manufacturer, producer, or importer of automobiles, trucks, buses, trailers, and tractors. The tax rate on automobiles is scheduled to be reduced to 7 percent on July 1, 1965, and to 5 percent on other vehicles effective Oct. 1, 1972.</p> <p>Subsec. (b) imposes an 8-percent tax on the sale by a manufacturer, producer, or importer of automobile and truck parts and accessories (other than tires, tubes, and radios). The tax is scheduled to be reduced to 5 percent effective July 1, 1965.</p> | <p>Due to the problems that arise in determining who the manufacturer of an article is, a statutory definition should be added to the code.</p> <p>The witness takes issue with Rev. Rul. 64-34 which treats trucking companies as "manufacturers" when they install kits which result in the lengthening of their trailers from 35 to 40 feet. Under the ruling, the tax base includes the cost of labor, overhead, and a 10-percent profit item.</p> <p>The witness takes issue with an Internal Revenue Service ruling which holds that the automobile portion of a "flying automobile" is subject to tax. He maintains that sales of vehicles which can fly as well as be operated on the highways compete against sales of light aircraft, rather than automobiles, and should be treated accordingly.</p> <p>Although the statute does not provide an exemption for off-highway vehicles, the Internal Revenue Service has long limited tax to highway vehicles. Following this position, Treasury Regulation § 48.4061(c)(3) provides that farm wagons primarily designed for use on farms are not taxable as "trailers" even though they may be incidentally used on the highway. The witness maintains that Rev. Rul. 64-107, which held that ammonia "nurse tank wagons" are subject to tax, is contrary to this regulation and is precedent for the taxation of ordinary farm wagons. The witness also maintains that the ruling should not be retroactive since the statute of limitations does not apply to many small manufacturers of wagons who never filed returns.</p> <p>If a truck trailer manufacturer installs heating or cooling equipment in a trailer, the equipment is taxable at a 10-percent rate as part of the sales price of the trailer. The witness claims this practice places the manufacturer at a competitive disadvantage with distributors who pay tax at 8 percent on air-conditioning systems and no tax on installation costs.</p> <p>Determining if an article is an automobile part or accessory creates numerous classification problems and often results in inconsistent rulings.</p> <p>Testimony indicates that the Internal Revenue Service treats welding steel to a chassis frame for reinforcing purposes as the manufacture of an automobile part.</p> <p>Treasury regulations now hold that cutting ordinary glass for installation as a replacement part in an automobile constitutes the "manufacture" of a part. District court cases take an opposite position.</p> <p>The argument is made that baby seats and beds which are used in homes, automobiles, boats, trains, etc., should not be taxed as automobile accessories.</p> | <p>Automobile Manufacturers Association, p. 417.</p> <p>American Trucking Association, Inc., p. 535.</p> <p>Aerocar, Inc., p. 538.</p> <p>Agricultural Ammonia Institute, p. 536.</p> <p>Truck Trailers Manufacturers Association, p. 531.</p> <p>Industrywide Automotive Excise Tax Committee, p. 464.</p> <p>Truck Trailer Manufacturers Association, p. 531.</p> <p>National Glass Dealers Association, p. 524.</p> <p>Juvenile Products Manufacturers Association, Inc., p. 519.</p> |

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|------|---|---|--|---|
| 4062 | Subsec. (c) provides an exemption from tax for rebuilt parts and accessories. | This section provides that spark plugs, storage batteries, leaf springs, coils, timers, and tire chains are to be treated as automotive parts if they are suitable for use in connection with automobiles, trucks, etc. | Substantial confusion exists as to when repairing an article constitutes "manufacturing." Problems involving cleaning of spark plugs, rebuilding motors, cleaning generators raised. | Legislative Steering Committee for Rebuilders of Automotive Parts p. 493; International Motor Rebuilding Co., p. 515. |
| 4063 | This section provides an exemption for house trailers and tractors and permits a manufacturer of a car or truck chassis to buy bodies tax free if they are to be used in the manufacture of a car or truck. | Due to the difficulties of determining if a storage battery constitutes an automobile part or accessory, the witness recommends a definition which would treat all batteries as taxable if they are 6- to 10-volt batteries with 50 pounds or less metal or 12- to 24-volt batteries with 100 pounds or less metal. The tax would be based on metallic content rather than selling price. | No comments. | Industrywide Automotive Excise Tax Committee, p. 464. |

TIRES AND TUBES

| 4071 | This section provides for a tax on the sale by a manufacturer, producer, or importer of the following articles at the specified rates: | <table><thead><tr><th>Article</th><th>Present rate</th><th>Rate effective October 1, 1972</th></tr></thead><tbody><tr><td>Tires for highway vehicles</td><td>10</td><td>5</td></tr><tr><td>Other tires</td><td>5</td><td>5</td></tr><tr><td>Inner tubes</td><td>10</td><td>9</td></tr><tr><td>Tread rubber</td><td>5</td><td>Exempt</td></tr><tr><td>Laminated tires</td><td>1</td><td>1</td></tr></tbody></table> | Article | Present rate | Rate effective October 1, 1972 | Tires for highway vehicles | 10 | 5 | Other tires | 5 | 5 | Inner tubes | 10 | 9 | Tread rubber | 5 | Exempt | Laminated tires | 1 | 1 | No comments | |
|----------------------------|--|--|-------------|--------------|--------------------------------|----------------------------|----|---|-------------|---|---|-------------|----|---|--------------|---|--------|-----------------|---|---|-------------|--|
| Article | Present rate | Rate effective October 1, 1972 | | | | | | | | | | | | | | | | | | | | |
| Tires for highway vehicles | 10 | 5 | | | | | | | | | | | | | | | | | | | | |
| Other tires | 5 | 5 | | | | | | | | | | | | | | | | | | | | |
| Inner tubes | 10 | 9 | | | | | | | | | | | | | | | | | | | | |
| Tread rubber | 5 | Exempt | | | | | | | | | | | | | | | | | | | | |
| Laminated tires | 1 | 1 | | | | | | | | | | | | | | | | | | | | |
| 4072 | This section defines the terms "rubber," "tread rubber," and "tires of the type used on highway vehicles." | No comments | No comments | | | | | | | | | | | | | | | | | | | |
| 4073 | This section provides an exemption from tax for small tires and tread rubber which is not used for recapping highway tires. | No comments | No comments | | | | | | | | | | | | | | | | | | | |

Chapter 32—Manufacturers' Excise Taxes—Continued

PETROLEUM PRODUCTS

| Section No. | Brief description of present law | Technical problems raised by witnesses | Name of witness |
|-------------|--|--|--|
| 4081 | This section imposes a tax of 4 cents a gallon on the sale of gasoline by a producer or importer. The tax is scheduled to be reduced to 1½ cents a gallon effective Oct. 1, 1972. | No comments----- | |
| 4082 | Subsec. (a) defines the term "producer" to include, among others, wholesale distributors. Subsec. (b) defines the term "gasoline" to mean all products commonly or commercially known or sold as gasoline, including casinghead and natural gasoline. | No comments----- Under the present definition of gasoline adopted by the Internal Revenue Service, which refers to certain Government contract specifications, the witness maintains that certain petrochemicals may be taxed. They suggest adopting a new statutory definition of gasoline. The witness points out that since casinghead and natural gasoline are generally not finished products, and cannot generally be used in high compression engines, they should be treated as special fuels and be taxed only when used for the propulsion of a motor vehicle. Various natural gas processors have been assessed tax on casinghead and natural gasoline which they extract from natural gas and then sell to refineries for blending with crude oil into refined gasoline. Since these natural gas producers did not get exemption certificates from their purchasers, imposition of the tax will result in a double tax, once as natural gasoline and a second time as gasoline. The witness requests an expression from Congress that casinghead and natural gasoline should be taxed only when it is commercially known as gasoline. | American Petroleum Institute, p. 620. Mid-Continent Oil & Gas Association, p. 637. Natural Gas Processors Association, p. 644. |
| 4083 | Subsec. (c) provides for tax on the use of gasoline by a producer and subsec. (d) defines the term "wholesale distributor." This section provides that the tax does not apply to the sale of gasoline to a "producer." | No comments----- | |
| 4091 | This section imposes a tax on the sale of oil by a manufacturer or producer at the rate of 3 cents a gallon on cutting oils, and a rate of 6 cents a gallon on lubricating oils. | No comments----- When oil is used as a lubricant it is taxed; but when the same oil is used for some other purpose it is exempt from tax. This differentiation based on use causes administrative problems where oils are used for nonlubricating purposes since sales of such oils require the handling of exemption certificates. | American Petroleum Institute, p. 620. |
| 4092 | This section defines the term "cutting oils" and provides that a person shall be treated as a manufacturer or producer of oil if they purchase it tax free for resale. | No comments----- | |
| 4093 | This section permits a manufacturer or producer of oil to purchase oil tax free for resale by him. | No comments----- | |

The witness maintains that the bonding requirement imposes an unnecessary administrative burden upon the petroleum industry, that it is discriminatory, and that the Government is amply protected against nonpayment of tax should the bonding requirement be repealed.

This section requires every producer of gasoline and oil to register with the Treasury Department and give a bond.

4101

This section permits the inspection by State authorities of gasoline and lubricating tax returns, reports, and statements.

4102

No comments

HOUSEHOLD-TYPE EQUIPMENT, ETC.

This section imposes a 5-percent tax on the sale by a manufacturer, producer, or importer of household-type refrigerators and freezers and at a 10-percent rate on self-contained air-conditioning units.

4111

No comments

This section imposes a 5-percent tax on the sale by a manufacturer, producer, or importer of household-type water heaters, air heaters, electric blankets, mixers, fans, clothes driers, door chimes, dehumidifiers, dishwashers, hedge trimmers, lawn mowers, etc.

4121

The separation of water heaters into those which are of the household type, and therefore taxable, and those which are not taxable, has imposed continuing problems of definition and identification on both the Internal Revenue Service and the industry.

Congressman Henry S. Reuss, p. 961; Gas Appliance Manufacturers Association, p. 716.

This section imposes a 10-percent tax on the sale by a manufacturer, producer, or importer of electric light bulbs and tubes.

4131

The witness takes issue with Rev. Rul. 62-34 which treats plastic sheets made luminous through electroluminescence and fixtures incorporating such articles as "electric light bulbs or tubes."

General Electric Co. p. 560.

ENTERTAINMENT EQUIPMENT

This section imposes a 10-percent tax on the sale by the manufacturer, producer, or importer of radios, television sets, phonographs (and components thereof), and records.

4141

Difficulties arise in determining who the manufacturer of a record is in cases where a producer uses the pressing and marketing facilities of an integrated company. In practice, both are often treated as the manufacturer.

Columbia Records, p. 890.

This section defines the term "radio and television components."

4142

No comments

This section provides an exemption for communication detection or navigation equipment of the type used in commercial, military, or marine installations.

4143

No comments

This section imposes a 10-percent tax on the sale by the manufacturer, producer, or importer of musical instruments.

4151

No comments

Chapter 32—Manufacturers' Excise Taxes—Continued

RECREATIONAL EQUIPMENT

| Section No. | Brief description of present law | Technical problems raised by witnesses | Name of witness |
|-------------|--|--|---|
| 4161 | This section imposes a 10-percent tax on the sale by the manufacturer, producer, or importer of— 1. Badminton, table tennis, and tennis nets, rackets, frames, strings, and balls; 2. Bowling balls and pins; 3. Fishing rods and reels; 4. Golf bags, balls, and clubs; 5. Skis, poles, snowshoes, and sleds; 6. Lacrosse balls and sticks; and 7. Miscellaneous other sporting goods. | In some Internal Revenue districts dealers who string new tennis rackets are treated as manufacturers, in other districts they are not. There has been "considerable difficulty" in defining fishing rods and artificial lures. A problem exists as to whether or not a bamboo pole which is cut into sections and fitted with ferrules which permits the parts to be joined together constitutes a "fishing rod." Revenue Ruling 58-425 holds they are; court cases conflict. The excise tax on imported table tennis balls is based on a bulk cost, while U.S. manufactured balls are based on a packaged cost. | National Sporting Goods Association, p. 798. National Sporting Goods Association, p. 798. Norton Manufacturing Co., p. 831. Tennex Corp. of America, p. 827. |
| 4171 | This section imposes a 10-percent tax on the sale by the manufacturer, producer, or importer of cameras, camera lenses, and unexposed film, and a 5-percent tax on the sale of household-type projectors. | Problems arise in determining if projectors are of the "household type." | National Association of Photographic Manufacturers, p. 753. |
| 4172 | This section permits certain handlers of unexposed film to be treated as the manufacturer of the film. | No comments | |
| 4173 | This section exempts professional-type cameras, lenses, and film from tax, including X-ray cameras and film. | No comments | |
| 4181-4182 | Those sections impose a 10-percent tax on the sale by a manufacturer, producer, or importer of pistols and revolvers and an 11-percent tax on shells and cartridges and other firearms. An exemption is provided for sales to the Defense Department and for sales on which a transfer tax is paid. | No comments | |

OTHER ITEMS

| | | | |
|-----------|--|--|--|
| 4191-4192 | This section imposes a 10-percent tax on the sale by a manufacturer, producer, or importer of specified business machines. However, specific exemptions are provided for retail cash registers and stencil cutting machines used for preparing shipping documents. | The question of who is a "manufacturer" is constantly raised. A recent ruling indicates a typewriter dealer would be considered a manufacturer of a new machine if he changed the carriage or more than 6 letters of type on a used machine. Due to the fact the specific items listed in the statute has remained substantially unchanged since 1941, modern advances in the business machine field make tax classification of new machines difficult. Since tax is required to be paid on sales to the Federal Government, but not on leases, companies which lease have an advantage over those that sell. | National Office Machine Dealers Association, p. 389. Business Equipment Manufacturers Association, p. 371. Business Equipment Manufacturers Association, p. 371. |
|-----------|--|--|--|

Writing Instrument Manufacturers Association, p. 739.

Match Institute, Inc., p. 545.

The question of who is the manufacturer of fountain pens and pencils has caused "considerable confusion."

A controversy exists between the Internal Revenue Service and the match industry with respect to the tax base on matches where part of the charge represents special packaging for advertising purposes. Beginning in 1947, the industry computed tax by excluding advertising packaging costs from the tax base on the basis of company records. In 1960, the Service ruled that such costs could be excluded only if they were billed separately to the customer. Thus, the companies are faced with deficiency assessments for the years 1957, 1958, and 1959. The witness maintains the position of the Service should not have retroactive application since the Service was negligent in failing to develop a rule under the 1954 act until 1960.

Hunt Foods & Industries, Inc., p. 556.

Federal Excise Tax Council, p. 195.

Institute of Appliance Manufacturers, p. 700.

Industrywide Automotive Excise Tax Committee, p. 484.

Columbia Records, p. 890.

Writing Instruments Manufacturing Association, p. 739.

SPECIAL PROVISIONS APPLICABLE TO MANUFACTURERS' TAX

Subsec. (a) provides that the tax base includes charges for coverings and containers but excludes charges for transportation, delivery, insurance, installation, and similar charges.

Subsec. (b) provides that if an article is sold by a manufacturer, producer, or importer at retail, the tax base is not to exceed the highest wholesale price at which such articles are sold by manufacturers. A similar rule also generally applies to sales to retailers or special dealers (except in the case of automobiles, business machines, and matches) if the manufacturer normally sells to wholesalers in arm's length transactions. If articles are sold on consignment or at less than fair market value in a sale which is not at arm's length, the tax base is to be the price at which such articles are sold in the ordinary course of business.

Subsecs. (c) and (e) (subsec. (d) has been repealed) provide special rules for payment of tax on leases and installment sales.

The witness maintains that transportation charges from a factory to a warehouse should be excluded from the tax base. In his case, matches manufactured in Ohio are shipped in carload lots to a warehouse in Washington from which individual orders are filled. By including this transportation charge in the tax base, the tax base is higher on the sale of matches shipped from Washington than on sales delivered directly from the factory.

The constructive sales price on retail sales and sales to retailers should be based on the lowest (rather than highest) price for which such articles are sold to wholesale distributors. This would be consistent with the tax base used on articles consumed by the manufacturer.

Companies which sell only to "dealers" base the manufacturers excise tax on their price to the "dealers." Companies which sell both to "dealers" and wholesalers base the tax on sales to "dealers" on their highest price to wholesalers. This discriminates between companies.

The witness claims companies selling "private brand" automotive parts and accessories have an advantage over more integrated distributors since the tax base of "private brand" parts is substantially lower than the tax base on sales to other distributors. To remedy the situation the witness recommends excluding the cost of advertising, selling, warehousing, and other distributing costs from the tax base.

Uncertainty and discrimination result when a constructive price is used on sales of records to dealers and customers since the Internal Revenue Service uses, at its election, either general industry pricing practices or selected prices charged by the taxpayer.

Sales prices of pens and pencils have been "frequently questioned" in connection with sales to subsidiaries and constructive price formulas.

No comments-----

Chapter 32—Manufacturers' Excise Taxes—Continued
SPECIAL PROVISIONS APPLICABLE TO MANUFACTURERS TAX—Continued

| Section No. | Brief description of present law | Technical problems raised by witnesses | Name of witness |
|-------------|--|---|---|
| 4216 | Subsec. (f) permits an exclusion from the tax base for certain charges for local advertising. | No comments. | |
| 4217 | This section provides that a lease of a taxable article is considered a sale and each payment under the lease is taxable until an amount of tax is paid equal to the tax that would have been paid had the article initially been sold. | It is administratively difficult to keep track of excise tax payments on leased machines so as to cut off collection of tax on leases when the amount paid equals that which would have been paid on sale. It also raises competitive problems between lessees of identical items one of which is taxable and the other one on which full tax has been paid. | Business Equipment Manufacturers Association, p. 371. |
| 4218 | This section in general imposes a tax on the same basis as if an article were sold if a manufacturer, producer, or importer of a taxable article uses it other than as a component part of another taxable article. However, in the case of automobile parts, radio and television components, and cameras, the article which incorporates these parts need not be a taxable article for the exemption to apply. | By imposing a tax on the use of a taxable article when it is used in the manufacture of a nontaxable article, (1) subsequent tax exempt purchasers lose the benefit of their tax exempt status; (2) intermediate manufacturers who produce exempt subassemblies pay the tax, while integrated companies obtain a refund where the ultimate product is a taxable article; and (3) the Internal Revenue Service imposes a tax on a functional basis even though the article itself is nontaxable. Witness recommends extending the exemption of sec. 4218(c) to all articles, not just automotive parts and accessories, radio components, and cameras. | Federal Excise Tax Council, p. 195. |
| 4219 | This section provides that if a person acquires the right to sell a taxable article from a manufacturer, producer, or importer by operation of law, such person becomes liable for tax on the sale of the article. | Discrimination against domestic manufacturers exists where light bulbs are taxed when incorporated in nontaxable articles, for example flashlights and miniature light bulb sets, while no tax applies to light bulbs if imported as components of nontaxable articles. | General Electric Co., p. 560. |
| 4221 | This section provides exemptions from tax for: <ol style="list-style-type: none"> 1. Sales for export; 2. Sales to State and local governments for their exclusive use; 3. Sales to tax exempt educational institutions; 4. Sales for use as ship and aircraft supplies; 5. Sales of automobile parts, radio and television components, and cameras for use in the manufacture of other articles; and | <p>No comments.</p> <p>If a school district buys a school bus, no excise tax is paid by the manufacturer. Witness claims the absence of a similar exemption in the case of sales to contract operators discriminates against them.</p> <p>No comments.</p> <p>No comments.</p> <p>No comments.</p> | National School Bus Contract-Operators Association, p. 527. |

EXEMPTIONS, REGISTRATION, ETC.

| | | |
|---|--|---|
| <p>6. Sales of gasoline for nonfuel purposes in the manufacture of other articles;</p> <p>7. Sales of other taxable articles for use in the manufacture of taxable articles; and</p> <p>8. Sales of musical instruments to religious institutions for religious purposes.</p> <p>In general, these exemptions apply if the seller in good faith accepts a certificate from the purchaser that the article will be used for an exempt purpose; however, in the case of sales for export, and sales for resale by a purchaser to a 2d purchaser for use in further manufacture, proof of export or resale must be furnished the seller.</p> | <p>The witness maintains that this exception should apply to the sale of gasoline for its use as an ingredient in a new article whether or not the new article is in fact subsequently burned, for example, the use of gasoline in the manufacture of illuminating gas to enrich the gas. Recommends that the exemption apply to use for a non-motor-fuel purpose.</p> <p>Electronics manufacturers may buy radio and television components tax free whether or not the product they manufacture is taxable; however they can buy electric light bulbs tax free only if used in a taxable article. This has led to confusion and administrative difficulties. Witness recommends permitting tax-free purchase whether or not used in the manufacture of a taxable article.</p> <p>No comments-----</p> | <p>American Petroleum Institute, p. 620.</p> <p>General Electric Co., p. 560.</p> <p>Athletic Goods Manufacturers Association, p. 781. Brunswick Corp., p. 821; American Textbook Publishers Institute, p. 896.</p> |
| <p>4222</p> <p>In general, this section provides that the exemptions provided in sec. 4221 apply only if the tax-free purchaser is registered with the Treasury Department. However, the use of exemption certificates, rather than registration, is permitted in the case of sales to State and local governments and sales for export.</p> | <p>Handling/exemption certificates on sales of golf and tennis equipment to schools causes clerical problems. The securing of exemption certificates in the case of sales to schools is burdensome. Witness suggests a blanket exemption certificate procedure be adopted.</p> <p>The witness maintains that the registration system does not operate properly in the case of the sale of gasoline and oil to State and local governments and to registered aircraft and shipping companies for use as supplies for ships and aircraft engaged in foreign commerce. In this case, the witness states that the Internal Revenue Service requires the oil companies to obtain proof of use of the gasoline or oil in a tax exempt manner from the registered purchaser. They recommend that exemption should rest on mere sale to a State or local government or to a purchaser for use as supplies for vessels or aircraft.</p> <p>No comments-----</p> | <p>American Petroleum Institute, p. 620.</p> |
| <p>4223</p> <p>This section provides that a manufacturer who purchases an article tax free for further manufacture will be treated as the manufacturer of the article if he resells it. The tax base may, however, be determined by reference to his cost of the article.</p> | <p>No comments-----</p> | |
| <p>4224-4225</p> <p>These sections provide exemptions from the manufacturer's tax for jewelry and for Indian handicraft manufactured by Indians on Indian reservations.</p> | <p>No comments-----</p> | |
| <p>4226</p> <p>This section provides for assessments of floor stock taxes with respect to articles held by dealers when various rates were changed in 1956 and 1961.</p> | <p>No comments-----</p> | |

Chapter 33—Facilities and Services

ADMISSIONS

| Section No. | Brief description of present law | Technical problems raised by witnesses | Name of witness |
|-------------|---|---|---|
| 4231 | <p>This section imposes:</p> <ol style="list-style-type: none"> 1. A tax of 1 cent for each 10 cents (or major fraction thereof) over \$1 of the amount paid for admission to any place other than a racetrack; 2. A tax of 1 cent for each 5 cents (or major fraction thereof) of the amount paid for admission to a racetrack; 3. A tax of 10 percent on any amount charged by ticket agencies over the established price for tickets; 4. A tax of 50 percent of the excess over the established price for tickets charged by a proprietor, manager, or employee of a place of amusement; and 5. A tax of 10 percent of the amount paid for admission, refreshments, service or merchandise at any roof garden, cabaret, or similar establishment furnishing a public performance for profit by any patron who is entitled to be present during the performance. | <p>No comments</p> <p>No comments</p> <p>No comments</p> <p>No comments</p> <p>Revenue Ruling 63-154 provides that the Internal Revenue Service will no longer litigate cases involving the applicability of the cabaret tax in case where items are ordered and served before or after an establishment attains cabaret status. The witness claims the Internal Revenue Service should establish guidelines for other troublesome cases, e.g., items ordered and partially served before the establishment attains cabaret status. Also, a practical problem arises when the Internal Revenue Service requires a tax to be levied on service in a "related room" from which a patron can obtain entrance to the cabaret.</p> | American Hotel & Motel Association, p. 1211. |
| 4232 | <p>This section defines, among others, the term "roof garden, cabaret, or other similar place." In general, the term means any place where music and dancing or other entertainment is provided in connection with the serving or selling of food, refreshments, or merchandise. However, the term does not include a "ballroom" or similar place where the selling of food, etc., is merely "incidental."</p> | <p>In determining whether an establishment qualifies as a "ballroom, dance hall, or other similar place where the serving or selling of food, refreshment, or merchandise is merely incidental" the Internal Revenue Service is apparently basing its findings solely on a comparison of receipts from food, etc., to total receipts of the establishment. The witness claims this approach is contrary to the legislative history of the 1951 amendment which exempted ballrooms from the cabaret tax and that the industry has been unable to get the Internal Revenue Service to rule as to precisely what criteria it is using.</p> | National Ballroom Operators Association, p. 1231. |
| 4233 | <p>This section provides exemptions from the tax on admissions:</p> <ol style="list-style-type: none"> 1. If the proceeds inure exclusively to the benefit of a church, an educational institution, a community fund, a symphony orchestra or opera, a chautauqua program, a veterans organization, a scholarship program, or a policemen's or firemen's disability fund. These exemptions do not apply to postseason college athletic games which do not benefit crippled children, pugilistic | No comments | |

| | | | |
|------------------|--|--|---|
| 4234 | <p>matches, carnivals, or motion picture exhibitions;</p> <p>2. To swimming pools and skating rinks;</p> <p>3. To home and garden tours;</p> <p>4. To historical sites, etc.; and</p> <p>5. To certain rodeos, pageants, agricultural fairs, musical or dramatic performances, and athletic events.</p> | No comments----- | |
| CLUB DUES | | | |
| 4241 | <p>This section imposes a 20-percent tax on dues or membership fees paid to any social, athletic, or sporting club or organization if the annual fees exceed \$10. A similar tax applies to initiation fees if they exceed \$10 or if the dues to the club exceed \$10 a year.</p> | <p>A question exists as to whether the tax applies to the acquisition of stock in a corporation which owns land used for grazing and hunting purposes where ownership of the stock and the payment of annual dues is required as a condition precedent for membership in a hunting club. The corporation involved is part of a conservation district in California.</p> <p>The witness disagrees with the decision of the court in <i>J. R. Johnston v. Commissioner</i>, where it was held that the amount paid for membership in a bowling club for participation in bowling league competition at commercial bowling alleys is subject to the dues tax.</p> | <p>J. Martin Winton, p. 960.</p> <p>Bowling Proprietors Association of America, Inc., p. 802.</p> |
| 4242 | <p>This section defines the term "dues" to include any charge for social privileges or facilities or for athletic privileges or facilities for more than a 6-day period. It also defines the term "initiation fees."</p> | <p>The witness contends that the Treasury has followed a pattern of extending the tax base to voluntary payments. For example, the Internal Revenue Service now holds that payments for the use of lockers, for cleaning and storing golf clubs, for the use of docking and mooring facilities, and for boarding of horses (including feed and grooming charges), come within the definition of "dues."</p> <p>The witness maintains that the Internal Revenue Service takes the position that if a club imposes a monthly minimum charge against which purchases of food may be credited, the entire charge is subject to tax, not just the unused portion.</p> | <p>Walter A. Slowinski, p. 943.</p> <p>Arthur E. Iredell, p. 944.</p> |
| 4243 | <p>This section provides exemptions for dues paid:</p> <ol style="list-style-type: none"> 1. To fraternal associations operating under the lodge system or for college students; 2. For capital improvements of a facility (including furnishings); and 3. For neighborhood swimming and skating clubs. | <p>The witness considers it improper that nonprofit hunting, fishing, rifle, pistol and conservation clubs are considered to be sporting clubs and subject to tax, while nonprofit swimming and skating clubs are exempt.</p> | <p>Wildlife Management Institute, p. 837.</p> |

Chapter 33—Facilities and Services—Continued

COMMUNICATIONS

| Section No. | Brief description of present law | Technical problems raised by witnesses | Name of witness |
|-------------|--|--|---|
| 4251 | This section imposes a 10-percent tax on amounts paid for general telephone service, telegraph service, teletypewriter exchange service, and wire mileage service and an 8-percent tax on amounts paid for wire and equipment service. These taxes are scheduled to expire July 1, 1965. | No comments. | |
| 4252 | This section defines the taxable services. | The witness maintains that due to alternative uses which may be made of a single service, it is often difficult to fit a particular service into one of the statutory classifications in order to apply administrative rules and exemptions. For example, a single service may cover both voice and teletype transmissions. | American Telephone & Telegraph Co., p. 1085. |
| 4253 | The section provides exemptions for coin operated service where the charge is less than 25 cents; for news services; for servicemen's calls originating in a combat zone; for installation charges; for private communication services; etc. | The exemption of private communication systems from tax has caused a substitution of privately owned facilities for common carrier service. An agricultural news service furnished by PAM has been held subject to tax while A.T. & T. has not been paying tax on a competitive service. The taxpayer therefore wishes a determination as to whether a wire and equipment service furnishing agricultural news is or is not subject to tax under the definition of a wire and equipment service contained in sec. 4252(f) or is an exempt "news service." | American Telephone & Telegraph Co., p. 1085. Twin Coast Newspapers, Inc., p. 1130. |
| 4254 | This section establishes the method for computation of the tax. | No comments. | |

TRANSPORTATION OF PERSONS BY AIR

| | | | |
|-----------|--|--------------|--|
| 4261-4264 | In general, these sections impose a 5-percent tax on the amount paid for the domestic transportation of any person by air. This tax is scheduled to expire July 1, 1965. | No comments. | |
| 4286-4287 | These sections impose a 10-percent tax on the amount collected for the use of any safe deposit box. | No comments. | |

SAFE DEPOSIT BOXES

| | | | | | | | | | | | | | | | | | | | |
|--|--|--|--|--------------------|--------|--------------------|------|-------------------|------|-------------------|------|--------------------|-------|---------------------|-------|--------------------|-------|--|--|
| 4291 | This section provides that every person receiving any payment for facilities or services on which tax is imposed shall collect the tax. | The witness stated that the statute does not provide adequate guidance or protection for the collecting agency whose liabilities to the United States and to its customers are undefined. For example, does a statute of limitations apply? | American Telephone & Telegraph Co., p. 1085. | | | | | | | | | | | | | | | | |
| 4292-4294 | These sections provide exemptions for payments for the use of otherwise taxable facilities or services for State and local governments and exempt educational institutions. The Secretary of the Treasury is also authorized to exempt otherwise taxable articles, facilities, or services furnished the United States if he finds such exemption will avoid expense and inure to the benefit of the United States. | No comments----- | | | | | | | | | | | | | | | | | |
| Chapter 52.—Tobacco, Cigars, Cigarettes, and Cigarette Paper and Tubes | | | | | | | | | | | | | | | | | | | |
| 5701 | <p>This section, among other things, imposes a tax on cigars manufactured in, or imported into, the United States at the following rates based upon the ordinary retail price of a single cigar:</p> <table><tr><td></td><td>Tax per 1,000 cigars</td></tr><tr><td>0 to 2½ cents-----</td><td>\$2.50</td></tr><tr><td>2½ to 4 cents-----</td><td>3.00</td></tr><tr><td>4 to 6 cents-----</td><td>4.00</td></tr><tr><td>6 to 8 cents-----</td><td>7.00</td></tr><tr><td>8 to 15 cents-----</td><td>10.00</td></tr><tr><td>15 to 20 cents-----</td><td>15.00</td></tr><tr><td>Over 20 cents-----</td><td>20.00</td></tr></table> | | Tax per 1,000 cigars | 0 to 2½ cents----- | \$2.50 | 2½ to 4 cents----- | 3.00 | 4 to 6 cents----- | 4.00 | 6 to 8 cents----- | 7.00 | 8 to 15 cents----- | 10.00 | 15 to 20 cents----- | 15.00 | Over 20 cents----- | 20.00 | The witness maintains that the present bracket system is unnecessarily cumbersome and complicated and results in arbitrary tax rates having no logical relationship to the selling price per cigar. He recommends taxing cigars at 8 percent of the manufacturers net selling price. | Cigar Manufacturers Association of America, p. 1065. |
| | Tax per 1,000 cigars | | | | | | | | | | | | | | | | | | |
| 0 to 2½ cents----- | \$2.50 | | | | | | | | | | | | | | | | | | |
| 2½ to 4 cents----- | 3.00 | | | | | | | | | | | | | | | | | | |
| 4 to 6 cents----- | 4.00 | | | | | | | | | | | | | | | | | | |
| 6 to 8 cents----- | 7.00 | | | | | | | | | | | | | | | | | | |
| 8 to 15 cents----- | 10.00 | | | | | | | | | | | | | | | | | | |
| 15 to 20 cents----- | 15.00 | | | | | | | | | | | | | | | | | | |
| Over 20 cents----- | 20.00 | | | | | | | | | | | | | | | | | | |
| CREDITS AND REFUNDS | | | | | | | | | | | | | | | | | | | |
| 6414 | Subsecs. (a) and (b), in general, provide that overpayment of retailer's, manufacturer's, and cabaret taxes may be refunded only if the person who paid the tax establishes (1) that the tax was not collected from the purchaser; (2) that it was repaid to the ultimate purchaser; or (3) that the ultimate vendor has filed a waiver. These requirements do not apply, however, (1) in the case of bona fide discounts, rebates, or allowances, (2) where purchasers of articles subject to the manufacturer's excise tax use taxable articles in the manufacture of taxable articles (or any article in the case of automobile parts and accessories, radio and television components, or cameras) or (3) in the case of certain installment accounts. | <p>Persons subject to a manufacturer's excise tax should be allowed to recover illegal or erroneous overpayments in cases where the tax is not separately stated without showing (1) the tax was not collected from the vendor, (2) it was repaid to the ultimate purchaser, or (3) the ultimate purchaser consented to the repayment.</p> <p>Once a taxable article is sold, the Internal Revenue Service takes the position that the entire tax is payable even though the sales price may not be collected from the purchaser. Witness recommends allowing refund of tax paid on losses incurred on uncollectible accounts.</p> <p>To prevent a doubling up of tax in cases where two persons are treated as the manufacturer of the same article, the witness recommends giving the second person treated as a manufacturer a credit for the tax paid by the first person.</p> | <p>Federal Excise Tax Council, p. 195.</p> <p>Federal Excise Tax Council, p. 195.</p> <p>Federal Excise Tax Council, p. 195.</p> | | | | | | | | | | | | | | | | |

Chapter 52.—Tobacco, Cigars, Cigarettes, and Cigarette Paper and Tubes—Continued

CREDITS AND REFUNDS—Continued

| Section No. | Brief description of present law | Technical problems raised by witnesses | Name of witness |
|-------------|--|---|---|
| | Subsec. (c) provides that if tax paid on tires, inner tubes, or radio or television sets are used in connection with the sale of another taxable article, the manufacturer of the second taxable article may obtain a credit for tax equal to an amount determined by multiplying the tax rate on the product he manufactured by the amount paid for the tire, tube, or set. | Under sec. 4221, tires, tubes, and automobile radio and television sets cannot be purchased tax free for use in the manufacture of a taxable article. However, a credit can be obtained equal to the amount determined by multiplying the tax rate of the manufactured article times the purchase price of the tires, tubes, radio, or television set. In lieu of allowing a credit for this arbitrary amount, the witness recommends giving a credit for the actual tax paid by the tire, tube, or set manufacturer. | Automobile Manufacturers Association, p. 417. |
| | Subsecs. (d), (e), (f), (g), and (h) provide rules relating to refunds in the case of fountain pens, etc., taxable as jewelry; the election to claim a credit for overpayments rather than filing for a refund; and the denial of a claim for refund based on export of an article in the case of the export of motor vehicles, refrigeration equipment, appliances and radio and television sets, etc., unless the article was sold by the manufacturer after receipt by him of a notice of intent to export. | No comments----- | |

STATUTE OF LIMITATIONS AND JURISDICTION OF THE TAX COURT

| | | | |
|------|--|---|--|
| 6501 | This section, in general, provides that a tax assessment must be made within 3 years after the filing of a return. This rule does not apply, of course, if no return was filed or if the return was false or fraudulent. | Recent court decisions have held that a return is not filed for the purpose of causing the 3-year statute of limitations to run unless each transaction subject to tax is reported. The witness recommends that a good-faith filing of an excise tax form indicating the presence or absence of liability for any category of tax should start the running of the statute of limitations. | Federal Excise Tax Council p. 195; Automobile Manufacturers Association, p. 417. |
| 6512 | This section authorizes the Tax Court to determine a deficiency or overpayment of income, estate, and gift taxes. | The witness recommends that the Tax Court be given jurisdiction over excise tax matters. | Gibson Discount Co., p. 354. |

NOTE.—The testimony does not mention any technical problems arising and palm oil), chapter 38 (import taxes), chapter 39 (regulatory taxes), or under chapter 34 (the documentary stamp taxes), chapter 35 (the taxes on chapter 40 (occupational taxes).

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16
SUMMARY OF SENATE
AMENDMENTS TO H.R. 8000
INTEREST EQUALIZATION TAX ACT

17

PREPARED FOR THE USE OF
THE HOUSE AND SENATE CONFEREES ON
THE INTEREST EQUALIZATION TAX ACT
BY THE STAFF OF THE
JOINT COMMITTEE ON
INTERNAL REVENUE TAXATION



AUGUST 11, 1964

U.S. GOVERNMENT PRINTING OFFICE
WASHINGTON : 1964

JCS-12-64

SUMMARY OF SENATE AMENDMENTS TO H.R. 8000

INTEREST EQUALIZATION TAX ACT

SHORT TITLE

Number of
Senate
amendments

Description of amendment

- 1 This amendment changes the short title of the act to the "Interest Equalization Tax Act."

INTEREST EQUALIZATION TAX

- 2 This is a technical amendment providing for the subdivision of chapter 41 into two subchapters. Subchapter A contains substantially all provisions relating to the interest equalization tax other than the one relating to standby authority of the President to extend application of the tax to commercial bank loans. Subchapter B relates to this standby authority.
- 3 Clerical change.

ACQUISITIONS (SEC. 4912)

- 4 Clerical change.
- 5 This amendment permits a U.S. employer to make contributions to a foreign pension or profit-sharing trust established by him for the benefit of his foreign employees without incurring a tax should the foreign trust acquire foreign securities. The House bill, as does the bill as passed by the Senate, contains a similar provision relating to employee contributions. This is a committee amendment.
- 6 Amendment No. 104 permits a domestic corporation or partnership which is a dealer in securities to treat a foreign branch office as a separate corporation or partnership for purposes of the tax. This amendment provides that if a corporation or partnership making such an election transfers money or other property to the foreign branch, or otherwise makes funds available to the foreign branch, the transfer or application of funds to or for the benefit of the foreign branch, as well as U.S. bank loans taken out by the foreign branch, will be treated as an acquisition of foreign stock by the domestic corporation or partnership. This amendment also rearranges the provisions of the House bill relating to the treatment of contributions to capital, and the acquisition of debt obligations in tax avoidance cases, as acquisitions of stock. This is a committee amendment.

Number of
Senate
amendments

Description of amendment

7 and 8

These amendments permit U.S. persons to acquire foreign stock tax free in a reorganization involving an exchange of stock for stock even though the transaction is not tax free for income tax purposes due to the fact the U.S. person receives cash in addition to voting stock. Under the House bill, the acquisition of stock was taxable unless the transaction was solely a stock for stock exchange. The amendment also applies to acquisitions after July 18, 1963, of stock of a corporation in control of the acquiring corporation. These are committee amendments.

LIMITATION ON TAX ON CERTAIN ACQUISITIONS (SEC. 4913)

9 and

Clerical changes.

10

11

This amendment permits an American who acquires a debt obligation in a tax-free transaction, for example, a purchase from a prior American owner, to obtain a credit at the time the debt obligation is converted into stock equal to the amount of tax he would have paid had his acquisition of the convertible debt obligation been taxable. Under the House bill, a U.S. person could obtain a credit only for the tax he paid upon acquisition of a convertible debt obligation. This is a committee amendment.

12, 13,
and 14

These amendments permit any U.S. person who acquires foreign securities pursuant to the exercise of an option or right received by a shareholder, for example, the exercise of a subscription right, to base his tax upon the option or subscription price. Under the House bill, this rule applied only to the person who received the option or right from the corporation. These are committee amendments.

15

This amendment provides that the tax is to be based upon the subscription price when the right is, in fact, exercised within 90 days from the date of its distribution. Under the House bill, the right, by its terms, had to be exercised within 90 days of distribution. This is a committee amendment.

16

Clerical change.

17

Conforming amendment to No. 6.

18

This amendment, in effect, provides that if a domestic corporation is formed or availed of by a foreign corporation to obtain funds for it from a U.S. person, the tax is to be based on the security acquired by the U.S. person from the domestic corporation, or the security received by the domestic corporation from the foreign corporation, whichever results in the greater tax. Under the House bill both acquisitions were taxable. This is a committee amendment.

EXCLUSIONS FOR CERTAIN ACQUISITIONS (SEC. 4914)

| Number of Senate amendments | Description of amendment |
|-----------------------------------|---|
| 19 | This amendment permits a U.S. person to acquire foreign securities tax free in connection with the complete or partial liquidation of a corporation if the securities received were held by the distributing corporation on July 18, 1963. This is a committee amendment. |
| 20, 21, and 22 | Clerical changes. |
| 23 | This amendment permits a U.S. person to acquire foreign securities tax free if they are acquired, in conformity with the laws of a foreign country, as a substitute for the payment of tax to that foreign country. This is a committee amendment. |
| 24 | This amendment permits U.S. persons to acquire stock in cooperative housing corporations tax free. This is a committee amendment. |
| 25, 26, 27, and 28 | Clerical changes. |
| 29 | This amendment permits a U.S. person to acquire debt obligations tax free if they are received in connection with the sale or liquidation of a wholly owned foreign subsidiary. This is a committee amendment. |
| 30 | This amendment permits a U.S. person to acquire debt obligations tax free if they are received in connection with the sale by a U.S. person of real property located in the U.S. if the foreign purchaser pays at least 25 percent of the purchase price in U.S. dollars. This is a committee amendment. |
| 31 | This amendment permits U.S. persons who are bona fide residents of a foreign country, or who are employed on a full-time basis in a foreign country, to invest up to \$5,000 per year tax free in stock of foreign corporations substantially all of whose assets consist of stock and debt obligations of domestic corporations. This is a committee amendment. |
| 32 | This amendment provides that a debt obligation received in connection with a loan guaranteed or insured by the Export-Import Bank is to be treated in the same manner as the guaranteed portion of the loan. This is a committee amendment. |
| 33 and 35 | Clerical changes. |
| 34 and 36 | These amendments permit U.S. persons to obtain foreign securities tax free in an amount equal to 100 percent of the value of U.S. goods and services furnished in connection with a sale of property or services to a foreign person if the person receiving the securities contributes U.S. content equal to 60 percent of the value of the securities received. These are committee amendments. |
| 37 | This amendment permits a U.S. person to receive foreign securities tax free if they are received in payment for the sale or licensing of patents, copyrights, etc., produced by him in the United States. This is a committee amendment. |

17

Number of
Senate
amendments

Description of amendment

38, 39,
and 40
41

Clerical changes.

This amendment provides that a U.S. person may receive a foreign debt obligation tax free in connection with the sale of foreign ores or minerals if the ore or mineral is extracted (1) by the U.S. person making the loan, (2) by a related corporation, or (3) by a corporation in which (a) the U.S. person making the loan, (b) its 50-percent shareholders, or (c) its 50-percent owned subsidiary, owns 10 percent or more of the voting stock. Under the House bill, the 10-percent rule described in item (3) only applied to stock held by the person making the loan or a related person and required that the extracting corporation be 50 percent owned by U.S. persons. This amendment also provides that the foreign ore or mineral may be obtained under a contract entered into before July 19, 1963, or in a swap transaction. This is a committee amendment.

42 This is a clarifying amendment.

43 Conforming amendment to No. 41.

44 and 45 Clerical changes.

46, 47, These amendments are, in general, technical amendments
48, 49, to the provision of the House bill which permits insurance
50, and companies doing business in foreign countries to obtain
51 foreign securities tax free to the extent of 110 percent of their
reserve requirements against contracts the proceeds of which
are payable in foreign currencies. These are committee
amendments.

52, 53, These amendments provide detailed provisions for appli-
and 54 cation of the exemptions provided by amendments Nos.
29, 30, and 31, respectively.

55 Clerical change.

56 Conforming amendment to amendments Nos. 37, 38,
and 39.

57 Clerical change.

58 This amendment provides that a debt obligation acquired
by a U.S. person in connection with the sale of personal
property produced in the United States, or the performance
of services by U.S. persons, may be transferred to anyone
without incurring a tax at the time of transfer. For free
transferability to apply, however, the U.S. person must show
that the extension of credit at the time of sale, or at the
time the services were performed, was reasonably necessary
to accomplish the sale and that the terms of the debt obliga-
tion were not unreasonable in light of then prevailing credit
practices. This is a committee amendment.

59 Clerical change.

60 Conforming amendment to No. 37.

61 Conforming amendment to No. 38.

EXCLUSION FOR DIRECT INVESTMENTS (SEC. 4915)

| Number of Senate amendments | Description of amendment |
|-----------------------------------|---|
| 62 | This amendment permits a U.S. person owning 10 percent or more of the voting stock of a foreign corporation to acquire debt obligations from the foreign corporation tax free if the debt obligations acquired were received by the transferor as the result of the sale or rental of products manufactured or assembled by it or for the performance of services by it. Under the House bill, the exclusion for direct investments applied only to the acquisition of stock or debt obligations of the foreign corporation in which the person making the acquisition owned 10 percent or more of the voting stock. This is a committee amendment. |
| 63 | Conforming amendment to No. 62. |
| 64 and | These amendments permit a refund of tax with respect to an acquisition if the U.S. person acquires 10 percent or more of the voting stock of the issuer or obligor within 12 calendar months following the acquisition. Under the House bill, the 10-percent ownership requirement had to be met by the end of the calendar year in which the acquisition was made. These are committee amendments. |
| 66 | This amendment provides that the direct investment exclusion applies to acquisitions of stock in foreign corporations which regularly accept deposits from customers and receive borrowed funds in foreign currencies, in the same manner as investments in foreign banks, even though the corporation or partnership uses the deposits or borrowed funds to acquire debt obligations which would be taxable if acquired directly by the person acquiring stock in the foreign corporation. This is a committee amendment. |

EXCLUSION FOR INVESTMENTS IN LESS DEVELOPED COUNTRIES
(SEC. 4916)

- 67 Clerical change.
- 68 Clarifying amendment.
- 69 Clerical change.
- 70 This amendment treats stock or debt obligations as the stock or debt obligation of a less developed country corporation, without the necessity of proving that the corporation qualifies as a less developed country corporation, if acquired by a U.S. person pursuant to the terms of a contract with the government of a less developed country (a political subdivision thereof or a corporation more than 50 percent owned by a less developed country or its political subdivision) which has nationalized, or has taken action which has the effect of nationalizing, the property of the U.S. person within that country. This is a committee amendment.
- 71 This amendment permits the President to designate a possession of the United States as a less developed country. This is a committee amendment.

17

Number of
Senate
amendments

Description of amendment

72 and
73

Clerical changes.

74, 75,
and 76

These amendments differ from the provisions of the House bill establishing the criteria for qualification of a corporation as a less developed country corporation in that they provide that income from within, and property located within, the United States, and bank deposits and income on bank deposits located outside the United States of holding companies, are to be excluded from the income and assets of a corporation for purposes of the 80-percent income and assets tests. These are committee amendments.

77
thru
86

Clerical changes.

87, 88,
and 89

Clarifying amendments.

EXCLUSION FOR ORIGINAL OR NEW ISSUES WHERE REQUIRED FOR INTERNATIONAL MONETARY STABILITY (SEC. 4917)

90

This amendment permits the President to extend beyond 90 days the time within which a U.S. person must acquire a foreign security after filing notice of acquisition. Under the House bill, the security had to be acquired within 90 days of filing notice of acquisition. This is a committee amendment.

91

This amendment treats debt obligations acquired within 90 days after interest begins to accrue (60 days under the House bill), and debt obligations received in connection with construction of real property as part of an original or new issue. This is a committee amendment.

EXEMPTION FOR PRIOR AMERICAN OWNERSHIP (SEC. 4918)

92 and
93

These amendments provide that tax does not apply to an acquisition of foreign securities by a U.S. person if they are acquired from a U.S. person eligible to execute a certificate of American ownership with respect to the security. Under the House bill, the exclusion applied whether or not the prior American owner was eligible to execute a certificate of American ownership. These are committee amendments.

94

This amendment provides that a confirmation received from a member of a registered national securities exchange is conclusive proof of prior American ownership if the confirmation does not indicate that the acquisition was made subject to a special contract. Under the House bill, the confirmation had to affirmatively indicate that the acquisition was not made subject to a special contract. This is a committee amendment.

16

Number of
Senate
amendments

Description of amendment

- 95 This amendment provides that a U.S. person who does not supply proof of prior American ownership with (1) a certificate of American ownership, (2) confirmation of a transaction on a registered exchange, or (3) confirmation of a transaction in the over-the-counter market, must show reasonable cause for his failure to have a certificate or confirmation and must prove that he acquired the security from a U.S. person eligible to execute a certificate of American ownership. Under the House bill, a U.S. person was exempt from tax if he showed by "clear and convincing evidence" that he purchased a security from a U.S. person. This is a committee amendment.

SALES BY UNDERWRITERS AND DEALERS TO FOREIGN PERSONS
(SEC. 4919)

- 96 This amendment permits an underwriter to obtain a refund of tax with respect to securities sold to foreigners in connection with a private placement or a public offering. Under the amendment, the provisions of the House bill which applied to public offerings also apply to private placements. This amendment also permits a dealer to obtain a refund of tax if he sells a debt obligation to a foreigner within 90 days of purchase, or sells it to another dealer who resells it to a foreigner on the day of purchase or the following business day. The provision relating to sales to foreigners through dealer intermediaries was not contained in the House bill. Finally, this amendment permits a dealer to purchase stock from a foreigner tax free if he resells it to a foreigner within 3 days. This provision was not contained in the House bill. This is a committee amendment.
- 97 This amendment contains the same proof of sale to foreigner requirements contained in the House bill with respect to refunds of tax in cases involving sales in connection with an underwriting of foreign securities. In addition, it provides rules by which dealers may prove sales of stock or debt obligations to foreign persons in the special market of a registered national securities exchange and, in the case of dealers in debt obligations, sales in over-the-counter transactions. This is a committee amendment.
- 98 This amendment provides that a "dealer" may be a member of any national securities association registered with the SEC. The House bill required that he be a member of the National Association of Securities Dealers. This is a committee amendment.

DEFINITIONS AND SPECIAL RULES (SEC. 4920)

- 99 Clerical changes.
and
100
101 Clarifying amendment.
102 Conforming amendment to No. 106.

17

Number of
Senate
amendments

Description of amendment

- 103 These amendments permit a domestic corporation or part-
and nership which is a dealer in securities to elect to treat a foreign
104 branch office as a foreign corporation or partnership for pur-
poses of the tax. For the exemption to apply, the branch
office must have operated as a dealer for not less than 12
months immediately preceding July 19, 1963. These are
committee amendments.
- 105 Clarifying amendment to make it clear that a demand
bank deposit is treated as having a maturity of less than
3 years.
- 106 This amendment provides, as did the House bill, that a
class of stock of a foreign corporation will be treated as stock
of a domestic corporation for purposes of the tax if more
than 50 percent of such class of stock was held by Americans
on the last record date before July 19, 1963, and U.S. regis-
tered securities exchanges constituted the principal market
for the stock in 1962. In addition, the amendment provides
that a class of stock of a foreign corporation will be treated
as the stock of a domestic corporation for purposes of the
tax if Americans held more than 65 percent of such class of
stock on the last record date before July 19, 1963, without
regard to a principal market test. This is a committee
amendment.
- 107 This amendment permits a foreign underwriter to elect
to be treated as a U.S. person with respect to his participa-
tion in a public offering. This is a committee amendment.
- 108 Clerical changes.
and
109

COMMERCIAL BANK LOANS (SEC. 4931)

- 110 This amendment adds a new subchapter B to chapter 41
and grants the President authority to make the interest
equalization tax applicable to debt obligations acquired by a
commercial bank if he finds that the exclusion of such debt
obligations from tax has materially impaired the effectiveness
of the tax. The tax would apply to obligations with a period
remaining to maturity of 1 year or more, but would not
apply to export related loans or foreign currency loans by
foreign branches. This is a floor amendment.

EFFECTIVE DATE

- 111 These amendments extend the exclusion for acquisitions
and made pursuant to commitments which existed on July 18,
112 1963, to cases where approval of the acquisition had been
sent to the person from whom the acquisition was made
(rather than the issuer or obligor as required by the House
bill), and to cases where the commitment was evidenced by a
draft purchase contract or other unsigned document. These
are committee amendments.
- 113 Clerical change.

Number of
Senate
amendments

Description of amendment

114 This amendment provides that the tax shall not apply to the acquisition of foreign securities acquired pursuant to a contract entered into before July 19, 1963, with the government of a less developed country in connection with the nationalization of property owned within that country by the acquiring U.S. person. This is a committee amendment.

115
and Clerical changes.

116
117 This amendment provides that the tax shall not apply to the acquisition of stock in a foreign corporation as part of its initial capitalization if at least 75 percent of the U.S. persons who acquired stock in the corporation had signified to the coordinator of the project before July 19, 1963, that they would make the investment. This is a committee amendment.

118
and Clerical changes.

119

RETURNS

120 This amendment provides that a U.S. person claiming an exemption on the basis of acquisition from a prior American owner must attach a statement to his quarterly interest equalization tax return setting forth a summary of the evidence establishing prior American ownership if he does not have a certificate of American ownership or a confirmation from a dealer for a transaction on a registered securities exchange or in an over-the-counter transaction. This is a committee amendment.

121 This amendment requires a broker for a seller to maintain records with respect to transactions for which a certificate (or blanket certificate) of American ownership is executed and filed with him. It also requires a broker for a purchaser to maintain records in the case of transactions in the special market on a national securities exchange or in an over-the-counter transaction where the seller's broker did not represent to him that the seller had filed a certificate (or blanket certificate) of American ownership. The House bill did not require a broker for a purchaser to maintain any records. This is a committee amendment.

ORIGINAL ISSUE DISCOUNT

122 This amendment provides that the interest equalization tax may be added to the cost of a security for purposes of determining original issue discount. This is a committee amendment.

PENALTIES

123
and Clerical changes.

124
125 Conforming amendment to No. 97.

17

Number of
Senate
amendments

Description of amendment

126 Clarifying amendment.

127 This amendment provides civil penalties in cases where members of a registered securities exchange or a national securities association willfully furnish false confirmations. This is a committee amendment.

128 Clerical change.

129 This amendment provides that criminal penalties provided by the Interest Equalization Tax Act will apply only to violations occurring on or after date of enactment of the act.

130 Conforming amendment to No. 97.

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REFUNDS AND CREDITS OF INTERNAL REVENUE TAXES

LETTER

FROM

CHAIRMAN, JOINT COMMITTEE ON INTERNAL REVENUE TAXATION

TRANSMITTING

A REPORT BY THE JOINT COMMITTEE ON INTERNAL
REVENUE TAXATION, COVERING REFUNDS AND CREDITS
OF INTERNAL REVENUE TAXES FOR THE FISCAL YEAR
ENDED JUNE 30, 1962, PURSUANT TO SECTION 6405 OF THE
INTERNAL REVENUE CODE OF 1954



OCTOBER 3, 1964.—Referred to the Committee on Ways and Means and
ordered to be printed

U.S. GOVERNMENT PRINTING OFFICE

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WASHINGTON : 1964

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LETTER OF TRANSMITTAL

JOINT COMMITTEE ON INTERNAL REVENUE TAXATION,
Washington, D.C., October 3, 1964.

THE SPEAKER OF THE HOUSE OF REPRESENTATIVES.

SIR: Pursuant to section 6405 of the Internal Revenue Code of 1954 I have the honor to submit a report by the Joint Committee on Internal Revenue Taxation, dated October 3, 1964, covering refunds and credits of internal revenue taxes for the fiscal year ended June 30, 1962.

Very respectfully,

HARRY F. BYRD, *Chairman.*

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REPORT OF THE JOINT COMMITTEE ON INTERNAL REVENUE TAXATION

(Pursuant to the Internal Revenue Code)

WASHINGTON, D.C., *October 3, 1964.*

Section 6405 of the Internal Revenue Code of 1954 provides as follows in connection with refunds and credits in excess of \$100,000,

SEC. 6405. REPORTS OF REFUNDS AND CREDITS

(a) **By TREASURY TO JOINT COMMITTEE.**—No refund or credit of any income, war profits, excess profits, estate, or gift tax in excess of \$100,000 shall be made until after the expiration of 30 days from the date upon which a report giving the name of the person to whom the refund or credit is to be made, the amount of such refund or credit, and a summary of the facts and the decision of the Secretary or his delegate, is submitted to the Joint Committee on Internal Revenue Taxation.

(b) **By JOINT COMMITTEE TO CONGRESS.**—A report to Congress shall be made annually by such committee of such refunds and credits, including the names of all persons and corporations to whom amounts are credited or payments are made, together with the amounts credited or paid to each.

(c) **TENTATIVE ADJUSTMENTS.**—Any credit or refund allowed or made under section 6411 shall be made without regard to the provisions of subsection (a) of this section. In any such case, if the credit or refund, reduced by any deficiency in such tax thereafter assessed and by deficiencies in any other tax resulting from adjustments reflected in the determination of the credit or refund, is in excess of \$100,000, there shall be submitted to such committee a report containing the matter specified in subsection (a) at such time after the making of the credit or refund as the Secretary or his delegate shall determine the correct amount of the tax.

The joint committee has caused its staff to examine all refunds and credits reported by the Secretary or his delegate pursuant to section 6405, and to prepare a report thereon for the fiscal year ended June 30, 1962. In reviewing these cases the staff, by appropriate memorandum, requests the General Counsel of the Treasury to reconsider any such refunds or credits which, in the opinion of the staff, are erroneous or doubtful or inadequately substantiated. Such cases are generally resolved by conferences between the staff and Treasury officials. However, in those instances in which agreement is not reached, or the questions raised are deemed to be of unusual significance from the standpoint of the interpretation or administration of the revenue laws, or their impact on the revenues, the case is heard by the joint committee in executive session. Of the cases reported herein, only the proposed refund in favor of the Chicago & North Western Railway Co., Chicago, Ill., was heard by the committee. After consideration of the matter, the committee resolved not to specifically approve or disapprove the proposed disposition of the issue relating to the deductibility of "preissue bond interest" (i.e., the interest paid pursuant to court order in bankruptcy reorganization proceedings). However, since the disposition of this issue by the Internal Revenue Service had been reached in the context

of an overall settlement involving a number of complex issues, the committee concluded that it should withhold criticism of the proposed settlement and that a settlement should now be accomplished as expeditiously as practicable. In this connection, there was an understanding that this action will not constitute a precedent as to the position of the joint committee on the bond interest issue in any other case.

The report of the staff is attached hereto. Section I of the report lists the names of all persons (individual and legal) to whom refunds or credits in excess of \$100,000 were made, and shows the amounts refunded or credited to each. The committee submits this staff report in compliance with subsection (b) of section 6405 of the Internal Revenue Code of 1954. Section II of the report contains a general survey of such refunds and credits, and the amounts allowed since the first report was issued in 1928.

Respectfully,

HARRY F. BYRD, *Chairman.*

LETTER OF SUBMITTAL

CONGRESS OF THE UNITED STATES,
JOINT COMMITTEE ON INTERNAL REVENUE TAXATION,
Washington, D.C., October 3, 1964.

HON. HARRY F. BYRD,
Chairman, Joint Committee on Internal Revenue Taxation,
Washington, D.C.

MY DEAR MR. CHAIRMAN: There is submitted herewith a report on refunds and credits of internal revenue taxes in excess of \$100,000 as required by section 6405 of the Internal Revenue Code of 1954. This report covers the fiscal year ended June 30, 1962.

The most important facts and conclusions with respect to the report will be found in the summary.

Respectfully submitted.

LAURENCE M. WOODWORTH,
Chief of Staff.

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A REPORT ON REFUNDS AND CREDITS OF INTERNAL REVENUE TAXES FOR THE FISCAL YEAR ENDED JUNE 30, 1962

FOREWORD

The annual report on refunds and credits of internal revenue taxes of the Joint Committee on Internal Revenue Taxation required by section 6405(b) of the Internal Revenue Code of 1954 is made on a fiscal year basis.

This report covers refunds and credits of internal revenue taxes for the fiscal year ended June 30, 1962. It is divided into two sections, as follows:

Section I: Contains a list of the persons to whom refunds and credits in excess of \$100,000 were reported to the committee during the period and the amounts allowed to each.

Section II: Contains a general survey of the refunds and credits.

The procedure followed in connection with refunds and credits reported to the joint committee was analyzed in the first report submitted to the Congress by the committee ("Refunds and Credits of Internal Revenue Taxes," H. Doc. 43, 71st Cong., 1st sess., June 19, 1929). There has been no change in the policy of the committee since the publication of the first report. However, during the year 1940 it was necessary to clarify certain jurisdictional questions with respect to cases over which the Internal Revenue Service and the Department of Justice have jurisdiction. It was agreed between these departments and the Joint Committee on Internal Revenue Taxation, effective as of December 1, 1940, that the following classes of cases should be considered as coming within the purview of what is now section 6405 of the Internal Revenue Code of 1954.

INTERNAL REVENUE SERVICE CASES

(1) A refund or credit of over \$100,000 proposed in a case prior to the filing of a petition for review with the Tax Court or the filing of a suit in any court.

(2) A refund or credit of over \$100,000 provided for in a settlement entered into after the filing of a petition for review with the Tax Court but prior to a decision by the court.

(3) A refund or credit provided for in a settlement entered into after a decision on the merits has been rendered by the Tax Court if such refund or credit exceeds the amount which the court may have determined to have been overpaid. In no case will such refund or credit be referred to the committee unless the amount of the refund or credit determined by the court, plus the amount determined in any subsequent settlement, exceeds \$100,000.

As far as practicable, every effort should be made to combine all credits or refunds which have been proposed for the same taxpayer, so

that the aggregate of such refunds or credits will determine the jurisdictional amount.

In the case of a settlement providing for refunds or credits in favor of more than one taxpayer, only such refunds or credits as exceed \$100,000 to a single taxpayer will be considered as subject to the jurisdictional requirement.

Social security and unjust enrichment taxes will be considered not within the intendment of section 6405 of the Internal Revenue Code.

Any cases not covered by this agreement may be referred to the committee by mutual consent between the Internal Revenue Service and the staff.

DEPARTMENT OF JUSTICE CASES

(1) A refund or credit of over \$100,000 provided for in a settlement entered into prior to a decision by the court or the Tax Court.

(2) A refund or credit provided for in a settlement entered into after a decision on the merits has been rendered by a court or the Tax Court, if such refund or credit exceeds the amount which the court may have determined to have been overpaid. In no case will such refund or credit be referred to the committee unless the amount of the refund or credit determined by the court, plus the amount determined in any subsequent settlement, exceeds \$100,000.

(3) Where it appears that the court, in approving the settlement involving a refund or credit exceeding \$100,000 in the following classes of cases, has not passed upon the merits:

(a) Compromise cases where the taxpayers, for reasons other than the mere termination of the controversies with the Government, insist that the agreement take the form of stipulated judgments.

(b) Stipulated judgments entered into as the result of the pretrial procedure in effect in the Federal courts.

(c) Compromise agreements or settlements entered into in bankruptcy and receivership proceedings subject to the approval of the court.

In the case of a single settlement involving one or more suits by the same taxpayer for one or more taxable periods, the aggregate of such refunds or credits will determine the jurisdictional amount.

In the case of a single settlement providing for refunds or credits in favor of more than one taxpayer, only such refunds or credits as exceed \$100,000 to a single taxpayer will be considered as subject to the jurisdictional requirement.

In the case of a single settlement resulting in a refund or credit to one taxpayer and a concomitant additional tax to a related taxpayer, as defined in section 1313(c) of the Internal Revenue Code of 1954, the settlement will be construed as involving a single taxpayer for the purpose of determining the jurisdictional amount.

Social security and unjust enrichment taxes will be considered not within the intendment of section 6405 of the Internal Revenue Code.

SUMMARY

The most important facts in connection with the refunds and credits for the fiscal year ended June 30, 1962, may be summarized as follows:

| | |
|---|---------------------|
| <i>Fiscal year ended June 30, 1962</i> | |
| 1. Total refunds paid..... | \$203, 340, 230. 42 |
| 2. Total credits allowed..... | \$20, 913, 432. 12 |
| 3. Total refunds and credits..... | \$224, 253, 662. 54 |
| 4. Percentage of refunds to total refunds and credits..... | 90. 6 |
| 5. Total interest allowed..... | \$24, 043, 606. 92 |
| 6. Total number of cases reported: | |
| Internal Revenue Service cases..... | 420 |
| Department of Justice settlements..... | 14 |
| | <hr/> |
| | 434 |
| 7. Disposition of cases reported: | |
| Cases in which determinations concurred in by the staff: | |
| Internal Revenue Service..... | 407 |
| Department of Justice..... | 14 |
| Cases in which determinations were criticized in the first instance by joint committee staff: | |
| Internal Revenue Service..... | 10 |
| Department of Justice..... | 0 |
| Cases returned for lack of jurisdiction..... | 3 |

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SECTION I

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7. 10. 1970.

| Name and address of taxpayer | Years involved | Abatements | Credits | Refunds | Net over-assessments allowed | Interest payable |
|---|---------------------------------------|------------|--------------|--------------|------------------------------|------------------|
| 1961 | | | | | | |
| JULY | | | | | | |
| Actna Portland Cement Co., Bay City, Mich. | Fiscal 1954 to 1957, inclusive | | \$117,956.51 | \$39,338.17 | \$157,288.68 | \$25,065.25 |
| Alma Mills, Gaffney, S.C. | 1957, 1958 | | | 165,858.99 | 165,790.66 | 790.66 |
| American Compressed Steel Corp., The, Cincinnati, Ohio | Fiscal 1955, 1956 | | | 226,714.44 | 226,714.44 | 5,495.11 |
| American Cytoscope Makers, Inc., Pelham Manor, N.Y. | 1954, 1955, 1956 | | | 148,246.74 | 148,246.74 | |
| American Home Assurance Co., New York, N.Y. | 1955 | | | | 136,624.06 | 6,200.01 |
| Anchor Steel & Conveyor Co., Dearborn, Mich. | 1955, 1956 | | | 205,193.61 | 205,193.61 | 3,570.48 |
| Arrow Mill Co., Beverly Hills, Calif. | 1955, 1956 | | 242.90 | 231,514.15 | 231,514.15 | 4,331.82 |
| Baker Perkins, Inc., Saginaw, Mich. | 1955, 1956 | | | 382,798.17 | 382,798.17 | 4,976.92 |
| Be-Ge Manufacturing Co., Gilroy, Calif. | 1953 | | | 341,097.09 | 341,097.09 | 21,588.47 |
| Bell Aircraft Corp., Buffalo, N.Y. | Fiscal 1955, 1956 | | | 1,447,647.00 | 1,447,647.00 | 746,450.67 |
| Berkman Co. and Subsidiary Companies Consolidated, Louis, The, Steubenville, Ohio | 1945 | | | 193,921.72 | 193,921.72 | 3,636.34 |
| Bessemer Limestone & Cement Co., The, Youngstown, Ohio | 1951, 1952 | | 21,263.36 | 156,677.62 | 177,940.98 | 78,554.59 |
| Bishop & Babcock Manufacturing Co., The, Cleveland, Ohio | 1952, 1955 | | 19,185.01 | 254,690.05 | 273,875.06 | 15,155.16 |
| Brier Manufacturing Co., Providence, R.I. | 1957, 1958 | | | 102,173.34 | 102,173.34 | 1,055.82 |
| Bros. Inc. (formerly Wm. Bros. Boiler & Manufacturing Co.), Minneapolis, Minn. | 1956, 1957, 1958 | | | 242,341.04 | 242,341.04 | 2,327.13 |
| Cleveland Baseball Co., The, Cleveland, Ohio | 1951 to 1954, inclusive | | 20,780.75 | 383,740.95 | 404,521.70 | 149,022.93 |
| Cleveland Cap Sew Co., The, Cleveland, Ohio | 1955 | | | 183,101.95 | 183,101.95 | 3,722.24 |
| Congoleum-Narnp, Inc., Kearny, N.J. | 1941 | | 208,916.46 | 112,529.80 | 321,446.26 | 239,704.49 |
| Corn Products Co. (formerly Corn Products Refining Co.), New York, N.Y. | 1950 | | | 862,085.04 | 862,085.04 | |
| Electric Products Co., The, Cleveland, Ohio | 1955, 1956 | | | | 159,352.43 | 2,846.49 |
| Electric Storage Battery Co., The, Philadelphia, Pa. | 1957 | | | 142,778.47 | 142,778.47 | 26,742.60 |
| Electrol Inc., Kingston, N.Y. | Fiscal 1956, 1957, 1958 | | | 358,444.67 | 358,444.67 | 2,358.86 |
| Flag & Co. Inc., C.N., Meriden, Conn. | Fiscal 1956, 1957 | | | 186,236.35 | 186,236.35 | 2,418.56 |
| Freight Insurance Co., Freeport, Ill. | 1955, 1956 | | | 286,838.08 | 286,838.08 | 9,869.07 |
| Glasgow, Inc., Glenside, Pa. | Fiscal 1956, 1957, 1958 | | | 255,767.23 | 255,767.23 | 4,721.98 |
| Hedethorn Manufacturing & Supply Co., Dyersburg, Tenn. | 1954, 1955 | 20,915.87 | 360.75 | 215,078.52 | 245,994.37 | 2,411.75 |
| Hydro-Alfa, Inc., Burbank, Calif. | 1952, 1953, 1955, 1956 | 10,426.34 | 149,220.48 | 211,918.59 | 493,565.41 | 7,000.15 |
| Kakaba Sugar Co., Ltd., care of American Factors, Ltd., Honolulu, Hawaii | 1956 | | | 189,359.91 | 189,359.91 | 2,671.79 |
| Kempur (a trust association), H., Galveston, Tex. | 1957, 1958 | | 220,059.51 | 252.47 | 220,311.98 | 32,513.04 |
| Kraig-Trenton Co., Trenton, N.J. | Fiscal 1956, 1957 | | 66,714.54 | 130,083.65 | 205,798.19 | 3,916.73 |
| Leas & McVittie, Inc., Philadelphia, Pa. | 1955, 1956 | | | 282,247.21 | 282,247.21 | 6,377.10 |
| Leland-Gifford Co., Worcester, Mass. | 1955 | | | 158,081.70 | 158,081.70 | 5,493.07 |
| Limestone Manufacturing Co., Gaffney, S.C. | Period Apr. 1 to Dec. 31, 1948, 1949. | | | 301,368.96 | 301,368.96 | 137,791.92 |

Refunds and credits reported to the Joint Committee on Internal Revenue Taxation during the fiscal year ended June 30, 1962, by the Commissioner of Internal Revenue, under the provisions of sec. 6405 of the Internal Revenue Code—Continued

| Name and address of taxpayer | Years involved | Abatements | Credits | Refunds | Net over-assessments allowed | Interest payable |
|--|---|------------|-------------|--------------|------------------------------|------------------|
| 1961—Continued | | | | | | |
| JULY—continued | | | | | | |
| Lion Manufacturing Corp., ¹ Chicago, Ill. | 1955. | | | \$379,187.22 | \$379,187.22 | \$11,023.58 |
| Mechanical Handling Systems, Inc., Detroit, Mich. | 1955. | | | 779,507.75 | 779,507.75 | |
| Michigan Gas Storage Co., Jackson, Mich. | 1952, 1953. | | | 216,414.36 | 216,414.36 | 6,228.58 |
| Midwestern Instruments, Inc., Tulsa, Okla. | Fiscal 1956; period, Mar. 1 to Dec. 31, 1956. | | | | | |
| Narragansett Wire Co., Pawtucket, R.I. | 1955, 1956. | | | 611,107.33 | 611,107.33 | 9,615.35 |
| National Research Corp., National Research Corp. and wholly owned subsidiaries, Cambridge, Mass. | 1954, 1956, 1957, 1959. | | | 359,900.79 | 359,900.79 | 11,699.00 |
| Nevada-Massachusetts Co., Tunstun, Nev. | 1955, 1956. | | | | | |
| New Jersey Industries, Inc. and subsidiaries, New York, N.Y. | Fiscal 1956. | | \$47,636.38 | 544,440.29 | 544,440.29 | 8,173.01 |
| Nicholson Transit Co., River Rouge, Mich. | 1955, 1956. | | | 230,431.84 | 287,068.22 | 11,748.41 |
| Northwestern National Casualty Co., Milwaukee, Wis. | 1955. | | | 249,100.17 | 249,100.17 | 12,559.74 |
| Northwestern National Insurance Co., Milwaukee, Wis. | 1955, 1956. | | 1,172.11 | 289,108.43 | 289,108.43 | 29,138.58 |
| Nu-Car Carriers, Inc., Chester, Pa. | 1954. | | | 304,525.08 | 305,697.19 | 22,833.40 |
| Ohio Casualty Insurance Co., The, Hamilton, Ohio. | 1955. | | | 182,204.43 | 182,204.43 | 5,466.13 |
| Pennoyer Merchants Transfer Co., Chicago, Ill. | 1955, 1956. | | 27,887.07 | 192,422.31 | 192,422.31 | 9,425.58 |
| Radio Corp. of America, New York, N.Y. ² | 1961. | | 149,484.80 | 85,870.82 | 113,757.89 | 1,250.05 |
| Reimer, Emma, estate of, New York, N.Y. ² | 1955. | | | | 149,484.80 | |
| Russell Fork Coal Co., Inc., Elkhorn City, Ky. | Fiscal 1955, 1956, 1957. | | | 156,145.18 | 156,145.18 | 3,482.24 |
| S. A. Camp Farms Co., Shafter, Calif. | Fiscal 1952, 1953, 1954, 1958. | 58,581.81 | 23,930.94 | 369,928.27 | 452,441.02 | 6,528.45 |
| Seaport Metals, Inc., Long Island City, N.Y. | Fiscal 1956, 1957. | | | 147,765.17 | 147,765.17 | 1,297.50 |
| Selected Risks Indemnity Co. (now Selected Risks Insurance Co.), Branchville, N.J. | 1954, 1955. | | 55.54 | 239,912.78 | 239,968.32 | 22,570.35 |
| Singer Manufacturing Co. and affiliated domestic corporations, The, Elizabeth (F.), N.J. | 1951. | | 687,868.33 | | 687,868.33 | |
| South West Town Construction Co., Inc., Chicago, Ill. | Fiscal 1956, 1957, 1958. | | | | | |
| Thomas Electronics, Inc., Passaic, N.J. | 1955. | 5,718.80 | | 186,030.18 | 186,030.18 | 795.08 |
| Union Carbide & Carbon Corp. (now Union Carbide Corp.), New York, N.Y. | 1952, 1953. | | 66,249.73 | 334,681.58 | 340,400.38 | 2,453.26 |
| Wianco Engineering Co. (now Daystrom-Wianco Engineering Co.), Pasadena, Calif. | Fiscal 1956. | | | 871,376.05 | 937,625.78 | 149,959.45 |
| Wilson Marine Transit Co. (formerly The Wilson Transit Co.), Cleveland, Ohio. | 1955, 1956, 1957. | | | 189,272.71 | 189,272.71 | 2,763.90 |
| Yard-Man, Inc., Jackson, Mich. | Fiscal 1956. | | | | | |
| Zale Jewelry Co., Inc., Dallas, Tex. | Fiscal 1957. | | 1,586.83 | 1,005,648.00 | 1,005,648.00 | 21,602.95 |
| | | | | 334,892.03 | 334,892.03 | 4,600.03 |
| | | | | 203,134.08 | 204,720.91 | 1,465.89 |

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AUGUST

| | | | | | | |
|--|---|------------|------------|--------------|--------------|------------|
| Applied Science Corp. of Princeton (name changed to Mercer Control Corp. in September 1959; liquidated in August 1960), Hopewell, N.J. | 1955, 1956, 1957 | 6,948.77 | | 355,864.34 | 362,813.11 | 8,387.25 |
| Bay City Shovels, Inc., Bay City, Mich. | 1955, 1956, 1957 | | 11.34 | 436,040.30 | 436,040.64 | 11,765.59 |
| Benjamin Electric Manufacturing Co. (now Des Plaines Manufacturing Co.), Hinsdale, Ill. | Fiscal 1955, 1956, 1957 | | 1,593.90 | 310,024.46 | 311,624.36 | 7,312.97 |
| Cal-Parm Insurance Co., Berkeley, Calif. | 1955, 1956, 1957 | 7,389.08 | | 243,538.55 | 394,587.48 | 3,706.83 |
| California Compensation & Fire Co., San Francisco, Calif. | 1954, 1955 | | 143,679.85 | 412,270.30 | 412,270.30 | 6,049.51 |
| Caterpillar Tractor Co., Peoria, Ill. | 1942 to 1945, inclusive; 1950 | | | 475,691.74 | 475,691.74 | 15,315.67 |
| Central National Insurance Co. of Omaha, The, Omaha, Neb. | 1955, 1956 | 240,917.47 | | 473,871.90 | 714,789.46 | 210,513.52 |
| Chicago District Electric Generating Corp. (now Commonwealth Edison Co. of Indiana, Inc.), Chicago, Ill. | 1952, 1953 | | | 271,114.95 | 271,114.95 | 60,492.06 |
| Clearing Machine Corp. (now Rudolph W. Glasner, transferee of the assets of the R. W. G. Corp.), Chicago, Ill. | 1952 | | | 498,324.36 | 498,324.36 | |
| Colonial Brooch & Machine Co., Detroit, Mich. | 1956 | | | 171,183.82 | 171,183.82 | |
| Dowlingtown Paper Co., Downingtown, Pa. | 1955 | | | 212,462.04 | 212,462.04 | 6,184.68 |
| Duffy Silk Co., The, Buffalo, N.Y. | 1953, 1954 | | | 177,431.80 | 177,431.80 | 7,085.12 |
| E. & L. Transport Co., Dearborn, Mich. | 1954, 1955 | 83.09 | | 351,273.50 | 351,273.50 | 104,251.80 |
| Emery, Russell & Goodrich, Inc., Boston, Mass. | Fiscal 1955 to 1957, inclusive; fiscal 1959 | 619.57 | | 230,029.55 | 230,112.64 | 4,132.57 |
| Firth Carpet Co., The, New York, N.Y. | 1955 | | 110,509.89 | 226,468.40 | 227,087.97 | 13,200.93 |
| Foot-Burr Co., Cleveland, Ohio | 1956 | | | 150,488.97 | 260,998.86 | 3,702.43 |
| Fullerton Lumber Co., Minneapolis, Minn. | 1955 | | | 330,227.35 | 330,227.35 | 9,232.79 |
| Gentson Inc., Fred V., Detroit, Mich. | 1955 | | | 180,135.87 | 180,135.87 | 6,122.06 |
| Gouger Machine Co., The, Kent, Ohio | Fiscal 1955, 1956 | 33,598.07 | | 159,351.13 | 193,250.98 | 3,738.35 |
| Grace & Co. and affiliated group, W. R., New York, N.Y. | 1947 to 1950, inclusive | | 271.78 | 201,577.18 | 201,577.18 | 497.78 |
| Great American Insurance Co., New York, N.Y. | 1954, 1955 | | | 1,213,156.46 | 1,213,156.46 | 730,450.15 |
| Grunow-Hogg & Co., Dallas, Tex. | 1955, 1956 | | | 1,625,860.41 | 1,625,860.41 | 41,229.98 |
| Hanson-Van Winkle Molding Co., Matawan, N.J. | 1955, 1956, 1957 | | | 20,954.13 | 20,954.13 | 2,331.34 |
| Hoffman Beverage Co., Newark, N.J. | 1955, 1956, 1957 | 1,051.46 | | 555,098.85 | 556,150.31 | 9,704.80 |
| Keystone Insurance Co. (formerly Keystone Automobile Club Casualty Co.), Philadelphia, Pa. | 1949, 1950, 1952 to 1955, inclusive | 40,683.22 | | 641,193.83 | 691,877.03 | 77,942.23 |
| Keystone Insurance Co. (formerly Keystone Automobile Club Casualty Co.), Philadelphia, Pa. | 1956 | | | 244,014.79 | 244,014.79 | 3,870.27 |
| Laupahoehoe Sugar Co., care of Theo. H. Davies & Co., Ltd., Honolulu, Hawaii | 1955, 1956, 1957 | | | 200,491.22 | 200,491.22 | 4,678.29 |
| Long Island Lighting Co., Mineola, Long Island, N.Y. | 1950 to 1955, inclusive | 114,278.57 | | 287,420.15 | 401,698.72 | 70,104.93 |
| Nickay Co., The, Pittsburgh, Pa. | Fiscal 1952, 1953 | | | 124,132.61 | 136,578.09 | 19,902.91 |
| Metropolitan Insurance Co. (formerly Highway Casualty Co., Highway Insurance Co.), Chicago, Ill. | 1955, 1956, 1957 | 32,445.48 | | 183,968.32 | 183,968.32 | 29,299.52 |
| Miami Copper Co., New York, N.Y. | 1956 | | | 1,783,190.52 | 1,783,190.52 | |
| Milvale Co., The (now General Industrial Enterprises, Inc.), New York, N.Y. | 1953, 1954 | | | 224,294.91 | 224,294.91 | 4,434.85 |
| Miller, Blanche Marie, estate of, The First National Bank of Chicago, executor, Chicago, Ill. | Date of death, May 2, 1957 | | | 2,292,559.21 | 2,292,559.21 | 499,508.11 |
| Missouri-Kansas-Texas R.R. Co. and affiliated companies, Denison, Tex. | 1951 to 1959, inclusive | | | 182,694.17 | 182,694.17 | 1,845.03 |
| Neco Ordnance Corp. (now by statutory merger), National Decorated Co., Inc., Prairie du Chien, Wis. | 1954, 1957 | 256.90 | | | | |

See footnotes at end of table, p. 19.

Refunds and credits reported to the Joint Committee on Internal Revenue Taxation during the fiscal year ended June 30, 1962, by the Commissioner of Internal Revenue, under the provisions of sec. 6405 of the Internal Revenue Code—Continued

| Name and address of taxpayer | Years involved | Abatements | Credits | Refunds | Net over-assessments allowed | Interest payable |
|---|---|------------|------------|--------------|------------------------------|------------------|
| 1961—Continued | | | | | | |
| AUGUST—continued | | | | | | |
| Orr & Sembower, Inc., Millmont, Reading, Pa. | Fiscal 1956; 52 to 53 work years, 1957, 1958. | | | \$170,032.65 | \$170,032.65 | \$3,107.59 |
| Peters-Dalton, Inc., Detroit, Mich. | Period Jan. 1 to Sept. 30, 1955, Fiscal 1956. | | \$159.57 | 449,363.76 | 449,523.33 | 12,130.22 |
| Sciaky Bros., Inc., Chicago, Ill. | Fiscal 1956, 1956, 1957 | 2,604.07 | 1,450.87 | 494,629.43 | 498,684.37 | 17,457.33 |
| Seeburg Corp., J. P. (now N. Marshall Seeburg & Sons, Inc.), Chicago, Ill. | Fiscal 1955. | | | 567,000.00 | 567,000.00 | 14,361.41 |
| Shawnee Manufacturing Co., Inc., care of Koehring Co., transferet, Milwaukee, Wis. | Fiscal 1956, 1957 | | | 231,776.24 | 231,776.24 | 4,162.45 |
| Springfield Street Ry. Co., Springfield, Mass. | 1953, 1956 | | 517.32 | 149,441.13 | 149,958.45 | 26,763.68 |
| Standard Garments, Inc., Baltimore, Md. | 1955, 1956 | | | 291,777.09 | 291,777.09 | 7,237.32 |
| Woodall Industries, Inc., Detroit, Mich. | Fiscal 1951, 1953, 1954 | | | 126,244.87 | 126,244.87 | 890.21 |
| SEPTEMBER | | | | | | |
| Admiral Corp., Chicago, Ill. | 1955 | | | | | |
| American Steamship Co., Buffalo, N.Y. | 1955 | | | 690,572.12 | 690,572.12 | 10,197.76 |
| Anvill Brand, Inc., High Point, N.C. | 1954, 1955, 1957 | | | 184,865.26 | 181,865.26 | 3,661.78 |
| Bellingham estate, Mary Elmore, Montgomery, Ala. | Fiscal 1956, 1957, 1958 | | 428,381.47 | | 428,381.47 | 2,237.03 |
| Bowen-McLaughlin, Inc., Phoenix, Ariz. | Fiscal 1953 | | | 163,151.36 | 103,151.36 | 1,359.12 |
| Commercial Standard Insurance Co., Fort Worth, Tex. | 1955, 1956, 1958, 1959 | | 698.88 | 378,694.70 | 379,383.58 | 6,518.08 |
| Corbett Co., J. M., Chicago, Ill. | Fiscal 1956, 1957 | | | 112,903.99 | 112,903.99 | 2,521.36 |
| Dietzen Co., Eugene, Chicago, Ill. | 1956 | | | 304,897.19 | 304,897.19 | 10,199.44 |
| Eastern States Petroleum & Chemical Corp. and wholly owned subsidiaries, Signal Oil & Gas Co. (transferee), Houston, Tex. | 1953, 1955, 1956, 1957 | 791,429.37 | 518,805.18 | 1,215,011.76 | 2,525,246.31 | 18,628.54 |
| Electric Auto-Lite Co., Tye, Toledo, Ohio | 1952, 1953 | | | 1,640,114.17 | 1,640,114.17 | 55,529.87 |
| Federal Tool Corp. (now Fedco Corp.), Chicago, Ill. | 1956 | | | 154,664.08 | 154,664.08 | 2,283.94 |
| 1407 Broadway Realty Corp. (now 39052 Corp.), New York, N.Y. | Fiscal 1953 | | | 141,450.92 | 141,450.92 | 39,486.33 |
| General Oil Field Supply, Olney, Ill. | Fiscal 1959 | | 158,704.80 | | 158,704.80 | 4,364.38 |
| Glass Fibers, Inc., Johns-Manville Fiber Glass, Inc. (transferee), Toledo, Ohio. | 1953 | | | 147,705.36 | 147,705.36 | |
| Grimes & Hauser Poultry Processing Corp., Fredericksburg, Pa. | Fiscal 1956, 1957, 1958 | | | 100,141.63 | 100,141.63 | 1,642.48 |
| Grolier Society, Inc., and subsidiary companies (now Grolier, Inc., and subsidiary companies), New York, N.Y. | 1955 | | | 383,985.44 | 383,985.44 | 1,265.57 |
| Hallett Construction Co., Crosby, Minn. | 1955, 1956 | | | 143,005.02 | 143,005.02 | 3,306.74 |
| Heintzen Manufacturing Co., Philadelphia, Pa. | 1955, 1956 | | | 834,034.00 | 834,034.00 | 8,340.34 |
| Henderson Cotton Mills, Henderson, N.C. | 1956 | | | 198,739.80 | 198,739.80 | 2,085.41 |
| Holland Furnace Co., Holland, Mich. | 1955, 1956 | | 589.14 | 1,538,650.86 | 1,539,240.00 | 70,904.10 |
| Kilde & Co., Inc., Walter, New York, N.Y. | 1955, 1956 | | | 511,304.81 | 511,304.81 | 5,725.63 |

| | | | | |
|--|--|------------|--------------|------------|
| Laurens Mills, Laurens, S.C. | Fiscal 1955, 1956, 1957 | 507,314.04 | 507,314.04 | 19,147.32 |
| Lockheed Aircraft Service, Inc., Ontario, Calif. | 1956 | 354,824.67 | 975,934.17 | 15,341.35 |
| Maloming Coal R.R. Co., The, New York, N.Y. | 1941, 1942, 1944, 1945, 1946, 1947, 1948, 1949, 1950 | 552,346.61 | 369,261.70 | 129,396.81 |
| McCall Corp., New York, N.Y. | 1955 | | 757,793.44 | 92,444.38 |
| Merchants Fire Assurance Corp. of New York, New York, N.Y. | 1955 | | 750,039.96 | 20,712.13 |
| Metal Moldings Corp., Detroit, Mich. | 1955, 1956 | | 137,162.05 | 5,555.88 |
| Midland Screw Corp., Chicago, Ill. | Fiscal 1956, 1957 | | 425,882.79 | 2,052.64 |
| Motor City Electric Co., Detroit, Mich. | Fiscal 1955, 1956, 1957 | 19,872.69 | 119,958.09 | 2,971.08 |
| Niagara, Lockport & Ontario Power Co., Niagara Mohawk Power Corp., successor, Syracuse, N.Y. | 1944, period Jan. 1 to Oct. 31, 1945 | | 335,000.00 | 157,316.91 |
| Oregon-Washington Plywood Co., Garibaldi, Oreg. | Fiscal 1955, 1956 | | 533,586.86 | 10,364.50 |
| Patterson Co., C. J., Kansas City, Mo. | Fiscal 1957 | | 119,929.44 | 2,088.59 |
| Peoples Trust City Bank (formerly City Bank & Trust Co. of Reading), Reading, Pa. | 1957, 1958, 1959 | | 130,008.82 | 23,236.22 |
| Planet Insurance Co., Detroit, Mich. | 1954, 1955 | | 191,311.05 | 4,062.02 |
| Pullman Coach Co., Chicago, Ill. | Fiscal 1955, 1956, 1957 | | 251,592.40 | 15,347.41 |
| Rudisill Foundry Co., Anniston, Ala. | 1955 | | 387,664.19 | 3,206.48 |
| Saginaw Bay Industries, Inc., Bay City, Mich. | 1955, 1956, 1957 | | 232,052.00 | 4,342.35 |
| Saginaw Pattern & Manufacturing Co., Saginaw, Mich. | 1955, 1956, 1957 | | 132,151.52 | 2,771.59 |
| Schiavone-Bonomo Corp., Jersey City, N.J. | Fiscal 1955, 1956, 1957 | 6,486.08 | 374,663.81 | 11,903.36 |
| Schriek Corp., The, Defiance, Ohio | Fiscal 1956, 1957 | | 296,649.02 | 3,463.23 |
| Sloane Realty Corp. and subsidiary, W. & J. (formerly W. & J. Sloane), New York, N.Y. | Fiscal 1955, 1956, 1957 | 311,974.66 | 649,511.61 | 8,511.76 |
| Standard Accident Insurance Co., Detroit, Mich. | 1954, 1955 | | 1,677,880.02 | 41,570.02 |
| Symphonic Electronic Corp. (New York), New York, N.Y. | Fiscal 1956, 1957, period May 1, 1957 to Jan. 31, 1958 | | 288,666.62 | 9,324.32 |
| (successor to Symphonic Electronic Corp., (Massachusetts)). | | | | |
| Waldes Koli-Noor Inc., Long Island City, N.Y. | Fiscal 1955 | | 123,565.15 | 2,251.85 |
| Ward, Joseph and Agnes, Kirkwood, Mo. | 1954 | | 102,300.67 | 18,121.22 |
| White Sewing Machine Corp., Cleveland, Ohio | 1955, 1956 | | 732,849.64 | 18,321.24 |
| Wood Co., John, New York, N.Y. | 1955 | | 808,110.74 | 35,666.77 |
| Wrigley, William, Jr., deceased, trust under will of, Suspense Trust, Fund, Phillip K. Wrigley and The First National Bank of Chicago, Chicago, Ill. | 1958 | 139,181.81 | 139,181.81 | |
| OCTOBER | | | | |
| A. C. F. Wrigley Stores, Inc., Detroit, Mich. (formerly ACF-Brill Motors Co., Philadelphia, Pa.) | 1954 | | 186,795.17 | 404.76 |
| Avery, Waldo A., deceased, estate of, Detroit, Mich. | 1957 | | 675,407.25 | 148,321.28 |
| Bush Machine Tool Co., Springfield, Mass. | 1956, 1957 | 2,798.35 | 148,595.24 | 1,244.51 |
| Booth-Kelly Lumber Co., The, Springfield, Oreg. | 1942 to 1944, inclusive; 1950, 1954, 1955 | 213,938.23 | 213,938.23 | 8,867.15 |
| Chamberlin Products Corp., South Whitley, Ind. | 1957, fiscal 1959 | | 148,909.13 | 1,009.58 |
| Commerce Tankers Corp., New York, N.Y. | 1957, 1958 | 71,403.08 | 335,454.39 | 1,256.97 |
| Consolidated Oppenheims Corp., New York, N.Y. | 1956 | | 201,094.91 | 3,545.33 |
| Consolidated Iron-Steel Manufacturing Co., The, Cleveland, Ohio | Fiscal 1957 | 45.18 | 204,416.69 | 3,167.06 |
| Constitution Insurance Corp. of New York, The, New York, N.Y. | 1955, 1956, 1957 | | 113,034.21 | 2,973.40 |

See footnotes at end of table, p. 19.

Refunds and credits reported to the Joint Committee on Internal Revenue Taxation during the fiscal year ended June 30, 1962, by the Commissioner of Internal Revenue, under the provisions of sec. 6405 of the Internal Revenue Code—Continued

| Name and address of taxpayer | Years involved | Abatements | Credits | Refunds | Net over-assessments allowed | Interest payable |
|--|--|------------|---------------|----------------|------------------------------|------------------|
| 1961—Continued | | | | | | |
| OCTOBER—continued | | | | | | |
| Cooper Corp., The, Findlay, Ohio..... | 1953, 1954, 1955; period, Jan. 1 to Apr. 30, 1956..... | ----- | \$324, 292.52 | ----- | \$324, 292.52 | \$19, 758.76 |
| de Kotzebue, Aliene, estate of, New York, N.Y..... | Fiscal 1955, 1956, 1957..... | ----- | ----- | ----- | 284, 747.47 | ----- |
| Ensign Carburetor Co. (now by statutory merger, American Bosch Arma Corp.), Garden City, N.Y..... | ----- | ----- | ----- | ----- | 223, 265.86 | 4, 659.03 |
| First Trust & Savings Bank of Kankakee, Kankakee, Ill..... | 1956, 1957..... | ----- | ----- | 151, 244.23 | 151, 244.23 | 1, 228.68 |
| Forest City Material Co., The, Cleveland, Ohio..... | 1952 to 1957, inclusive..... | ----- | 166, 964.03 | ----- | 166, 964.03 | 1, 046.69 |
| Giant Tire & Rubber Co., The, Findlay, Ohio..... | Fiscal 1957..... | ----- | 155, 441.99 | ----- | 155, 441.99 | 8, 817.80 |
| Groesjean Rice Milling Co., C. E., San Francisco, Calif..... | 1955, 1956, 1957..... | ----- | ----- | 135, 051.06 | 135, 051.06 | 222.00 |
| Inslay Manufacturing Corp., Indianapolis, Ind..... | 1955, 1956, 1957..... | ----- | 9, 603.69 | ----- | 427, 801.80 | 10, 728.83 |
| Klemp Metal Grating Corp., New York, N.Y..... | 1955, 1956..... | ----- | ----- | 172, 603.17 | 182, 206.76 | 12, 707.66 |
| Lutcher & Moore Lumber Co., The, Orange, Tex..... | 1955, 1956..... | ----- | ----- | 570, 744.15 | 570, 744.15 | 79, 271.56 |
| Mack, Harry R. and Minnie L., New York, N.Y..... | 1955, 1956..... | ----- | ----- | 112, 283.65 | 112, 283.65 | 24, 347.79 |
| McGraw Industries, Inc., Hartford, Conn..... | Fiscal 1957..... | ----- | ----- | 185, 518.64 | 185, 518.64 | 1, 446.03 |
| Merchants Indemnity Corp. of New York, New York, N.Y..... | 1955..... | ----- | ----- | 181, 988.61 | 181, 988.61 | 5, 168.10 |
| Mississippi Shipping Co., Inc., New Orleans, La..... | 1948, 1949..... | ----- | 475, 632.89 | 49, 011.18 | 525, 644.07 | 360, 914.68 |
| New York Central R.R. Co., New York, N.Y..... | 1942, 1943, 1944..... | ----- | ----- | 306, 499.67 | 306, 499.67 | 250, 747.60 |
| Pittsburgh & Lake Erie R.R. Co., The, New York, N.Y..... | 1943 to 1946, inclusive..... | ----- | 418, 351.04 | 602, 986.41 | 921, 337.45 | 187, 482.13 |
| Quigley Co., J. R., Newark, N.J..... | Fiscal 1955, 1956..... | ----- | 3, 128.00 | 630, 716.00 | 533, 844.00 | 7, 488.18 |
| Rhyme-Houser Manufacturing Co. (now R-H Manufacturing Co.), Cherryville, N.C..... | Fiscal 1957, 1958..... | ----- | ----- | 106, 537.92 | 106, 537.92 | 9, 283.38 |
| St. Joe Paper Co., Jacksonville, Fla..... | 1951, 1952, 1954..... | ----- | ----- | 327, 689.70 | 327, 689.70 | 4, 766.98 |
| Southwest Steel Products, Houston, Tex..... | 1952, 1956, 1957..... | ----- | ----- | 441, 746.09 | 441, 746.09 | 11, 889.19 |
| Spangler-van Beuren Estates, Inc., New York, N.Y..... | 1955, 1956, 1957..... | ----- | 9, 130.22 | 647, 914.21 | 657, 044.43 | 111, 423.49 |
| Sunray Oil Co., Tulsa, Okla..... | 1957..... | ----- | ----- | 409, 265.00 | 409, 265.00 | 13, 690.75 |
| Technical Tapes Corp., New Rochelle, N.Y..... | Fiscal 1953, 1954, 1955..... | ----- | 71, 308.41 | 193, 814.39 | 278, 711.55 | 1, 026.57 |
| Terminal Railroad Association of St. Louis, St. Louis, Mo..... | 1955, 1956..... | ----- | ----- | 1, 503, 819.42 | 1, 503, 819.42 | 11, 490.24 |
| Triangle Publications, Inc. and affiliated companies (for the year 1943), Triangle Publications, Inc. (for the years 1944 through 1953), Philadelphia, Pa..... | 1943 through 1952, inclusive..... | ----- | ----- | 462, 386.54 | 462, 386.54 | 300, 426.22 |
| United Distillers of America, Inc. (now Hammer Galleries, Inc.), New York, N.Y..... | Fiscal 1947, 1951..... | ----- | 266, 858.66 | 679, 057.83 | 1, 244, 394.28 | ----- |
| United Iron & Metal Co., Inc., Baltimore, Md..... | 1955..... | ----- | 54, 810.29 | 144, 039.19 | 198, 849.48 | 4, 439.56 |
| United States Steel Corp., and affiliated companies, New York, N.Y..... | 1942..... | ----- | ----- | 3, 389, 244.52 | 3, 389, 244.52 | 2, 283, 629.55 |
| Universal Pictures, Inc., New York, N.Y..... | Fiscal 1955, 1956..... | ----- | 65, 635.33 | 2, 878, 144.19 | 2, 878, 144.19 | 62, 294.07 |
| West Pittston Iron Works, Inc., care of Goodwin, Rosenbath, Malvern & White, Washington, D.C..... | Fiscal 1943, 1944..... | 48, 953.81 | ----- | 62, 121.06 | 179, 710.20 | 60, 354.15 |
| W. W. Interests, Radnorfield, N.J. (formerly Warren Webster & Co., Camden, N.J.)..... | 1956, 1957..... | ----- | ----- | 317, 454.15 | 317, 454.15 | 851.38 |

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| | | | | | | |
|--|---|-----------------|--------------|-----------------|-----------------|--------------|
| Alr-Way Electric Appliance Corp. (now Lamb Industries, Inc., formerly Air-Way Industries, Inc.), Toledo, Ohio. | 1963, 1964. | | 119, 530. 65 | 520, 480. 17 | 640, 010. 82 | 7, 150. 80 |
| Boettcher estate, Claude K., Denver, Colo. | Period June 9 to Nov. 30, 1967. | | | 135, 364. 00 | 135, 364. 00 | 31, 067. 70 |
| Braun & Co., C. F., Alhambra, Calif. | 1966. | | | 2, 216, 063. 00 | 2, 216, 063. 00 | 85, 925. 23 |
| Brown & Root, Inc., Houston, Tex. | 1932, 1953. | 629. 15 | | 902, 770. 63 | 903, 398. 78 | 187, 464. 65 |
| Caine Steel Co., Chicago, Ill. | 1956. | | | 479, 212. 15 | 479, 212. 15 | 6, 894. 96 |
| Central National Bank of Cleveland, Cleveland, Ohio. | 1934. | 120, 944. 75 | | | 120, 944. 75 | |
| Central Pennsylvania Quarry Stripping & Construction Co., Hazleton, Pa. | 1955, 1956, 1957. | | | 155, 657. 53 | 155, 657. 53 | 6, 121. 80 |
| Chaney, Alger, executor, estate of Henry F. Chaney, Portland, Oreg. | 1963. | | | 335, 422. 05 | 335, 422. 05 | 79, 816. 66 |
| Chemurg Corp., Station F, Kansas City, Mo. | Fiscal 1956. | | | 153, 178. 88 | 153, 178. 88 | 1, 859. 00 |
| Enders, John O., estate of, West Hartford, Conn. | Period Apr. 2 to May 31, 1958, | 42, 631. 90 | | 193, 433. 22 | 236, 065. 12 | 27, 336. 10 |
| | fiscal 1959. | | | | | |
| | Fiscal 1956, 1957. | | | 176, 699. 74 | 176, 699. 74 | 9, 578. 82 |
| Flightex Fabrics, Inc., Flightex Fabrics, Inc. and subsidiaries, Pawtucket, R.I. | Fiscal 1958, 1959 | | | 131, 630. 74 | 131, 630. 74 | 502. 58 |
| Florida Food Products, Inc., Eustis, Fla. | Fiscal 1955, 1956 | | | 142, 850. 27 | 142, 850. 27 | 4, 267. 51 |
| Flynn-Learner, Oakland, Cal. | 1955, 1956. | 2, 678. 57 | | 228, 110. 96 | 228, 110. 96 | 3, 586. 48 |
| General Industries Co., The, Elvira, Ohio. | Fiscal 1957, 1958 | 1, 081, 063. 84 | | | 1, 081, 063. 84 | |
| General Tire International Co., Akron, Ohio | 1956, 1957, 1958. | | | 106, 667. 57 | 106, 667. 57 | 1, 338. 39 |
| Inductive Equipment Corp., Care of Essex Wire Corp., Fort Wayne, Ind. | 1955, 1956. | | | | | |
| Industrial Indemnity Co., San Francisco, Calif. | 1967, 1957. | | | 1, 098, 803. 93 | 1, 098, 803. 93 | 15, 222. 52 |
| Lone Star Steel Co., Dallas, Tex. | Fiscal 1955, 1956 | | | 4, 924, 212. 08 | 4, 924, 212. 08 | 14, 570. 27 |
| Martin Theatres of Georgia, Inc., Columbus, Ga. | 1956, 1957, 1958. | | | 201, 712. 66 | 201, 712. 66 | 12, 610. 76 |
| McCluskey & Co., Philadelphia, Pa. | Fiscal 1955, 1956 | | | 171, 464. 22 | 171, 464. 22 | 3, 304. 78 |
| Mergenthaler Linotype (a corporation), Brooklyn, N.Y. | 1955 to 1958, inclusive | 21, 987. 58 | | 1, 668, 001. 21 | 1, 668, 001. 21 | 66, 783. 22 |
| Norton, Inc., Darten, Conn. | Fiscal 1957, 1958 | 210, 312. 92 | | 121, 698. 44 | 143, 686. 02 | 26, 594. 72 |
| Pan-American General Tire Co., Akron, Ohio. | Fiscal 1955, 1956, 1957. | 1, 608. 26 | | 691, 156. 26 | 210, 312. 92 | |
| Peaslee-Gauthier Corp., Louisville, Ky. | 1949, 1952. | | | 636, 120. 51 | 592, 764. 52 | 16, 001. 53 |
| Pullman Co., The, Chicago, Ill. | Fiscal 1956, 1957, 1958. | 25, 665. 36 | | 119, 924. 07 | 119, 924. 07 | 2, 209. 26 |
| Rust Furnace Co., Pittsburg, Pa. | Fiscal 1963, 1956 | | | 157, 287. 91 | 184, 420. 87 | 4, 009. 77 |
| Somerville Construction Co., Ada, Mich. | Fiscal 1957, 1958, 1959. | | | 220, 826. 48 | 220, 826. 48 | 272. 96 |
| Southwell Combng Co., North Chelmsford, Mass. | 1956, 1957, period Jan. 1 to Feb. 28, 1958. | | | 106, 112. 72 | 106, 112. 72 | 2, 767. 06 |
| Standard Steel Corp., Los Angeles, Calif. | 1956, 1957. | | | 293, 555. 70 | 293, 555. 70 | 7, 094. 05 |
| Stationers Corp., Los Angeles, Calif. | Fiscal 1966, 1957. | | | 120, 340. 65 | 120, 340. 65 | 3, 259. 09 |
| Superior Pattern & Manufacturing Co., Detroit, Mich. | 1957, 1959. | | | 186, 265. 21 | 186, 265. 21 | 2, 597. 60 |
| Texas Wire & Cable Co., Plano, Tex. | 1956, 1957. | | | 190, 058. 48 | 190, 058. 48 | 2, 119. 28 |
| Tidewater Grain Co., Philadelphia, Pa. | 1949, 1951. | | | 1, 154, 879. 20 | 1, 154, 879. 20 | 29, 631. 35 |
| Titanium Metals Corp. of America, New York, N.Y. | | | | 1, 011, 860. 84 | 1, 011, 860. 84 | 653, 025. 16 |
| Twentieth Century-Fox Film Corp. (New York) and affiliated companies, now Twentieth Century-Fox Film Corp. (Delaware) and affiliated companies, New York, N.Y. | 1947, 1950, 1961 | 302, 571. 42 | | 1, 100, 699. 47 | 1, 463, 170. 89 | 680, 695. 35 |
| United Fruit Co. and consolidated subsidiaries, Boston, Mass. | 1956, 1957. | | | 159, 772. 08 | 159, 772. 08 | 1, 297. 86 |
| Wiesner-Rapp Co., Inc., The, Buffalo, N.Y. | 1942, 1943, 1944, 1946. | 91, 606. 66 | | 221, 004. 18 | 312, 510. 84 | 176, 835. 38 |
| Worcester Transportation Associates (now Worcester Investment Associates), and subsidiaries, years 1942, 1943, and 1944, Worcester Transportation Associates (now Worcester Investment Associates), and subsidiaries, years 1946, Worcester, Mass. | 1957, 1958. | 4, 520. 85 | | 278, 469. 19 | 282, 999. 04 | 2, 565. 61 |
| Yoder Co., The, Cleveland, Ohio. | | | | | | |

Refunds and credits reported to the Joint Committee on Internal Revenue Taxation during the fiscal year ended June 30, 1962, by the Commissioner of Internal Revenue, under the provisions of sec. 6405 of the Internal Revenue Code—Continued

| Name and address of taxpayer | Years involved | Abatements | Credits | Refunds | Net over-assessments allowed | Interest payable |
|--|---|------------|------------|--------------|------------------------------|------------------|
| 1961—Continued | | | | | | |
| DECEMBER | | | | | | |
| Alaska Barge & Transport, Inc., Vancouver, Wash. | 1957, 1958, 1959 | | | \$315,841.96 | \$315,841.96 | \$2,690.08 |
| Associated Transport, Inc., New York, N.Y. | 1957, 1958, 1959 | | | 108,448.80 | 108,448.80 | |
| Barnes Drill Co., Rockford, Ill. | Fiscal 1956 | | | 146,368.70 | 146,368.70 | 2,145.78 |
| Berlach Corp., The (formerly The Stearns Co.), Chicago, Ill. | 1957, 1958, 1959 | | | 155,988.89 | 155,988.89 | 7,010.72 |
| Binkley Manufacturing Co., Warren, Mo. | 1956, 1956 | | \$77.90 | 345,685.98 | 345,685.98 | 7,770.68 |
| Bunker Hill Co., The (formerly Bunker Hill & Sullivan Mining & Concentrating Co.), San Francisco, Calif. | 1955, 1956, 1957 | | | 2,353,001.59 | 2,353,001.59 | 26,624.36 |
| Central RR. Co. of New Jersey and affiliated companies, The, Jersey City, N.J. | | | | | | |
| Chicago & North Western Ry. Co., Chicago, Ill. | 1952, 1953 | 23,828.69 | | 238,241.96 | 262,070.65 | 74,260.34 |
| Crimmins Contracting Co., Thomas, New York, N.Y. | 1944, 1943, 1946 | | | 5,106,288.26 | 5,106,288.26 | 4,523,384.78 |
| Delaware & Hudson Co. and affiliated corporations, The, New York, N.Y. | 1956, 1957 | | | 124,643.35 | 124,643.35 | 2,346.56 |
| Doelger Builder, Inc., Henry, Daly City, Calif. | 1952, 1953 | | 13,827.37 | 2,084,411.07 | 2,098,238.44 | |
| Dormeyer Corp., transferee: Dormeyer Corp. (formerly Vall Manufacturing Co.), Chicago, Ill. | 1954, 1955 | | 258,773.49 | 344,946.91 | 603,770.40 | 13,186.13 |
| Edel-Maculloch, Inc., San Carlos, Calif. | Fiscal 1955, 1956 | | | 128,533.14 | 420,583.44 | 1,876.94 |
| El Lilly International Corp., Indianapolis, Ind. | 1957, 1958 | | 292,050.30 | 1,105,988.96 | 1,105,988.96 | 7,711.61 |
| El Lilly Pan-American Corp., Indianapolis, Ind. | 1959 | | | 287,649.32 | 287,649.32 | 28,367.35 |
| Elizabeth Arden Sales Corp., New York, N.Y. | 1956 | | | 191,810.27 | 191,810.27 | 13,116.67 |
| Eric Motor Systems, Inc., transferor: A. O. Smith Corp., transferee, Milwaukee, Wis. | 1940 to 1945, inclusive | | | 275,000.00 | 275,000.00 | |
| Gordon Baking Co., Detroit, Mich. | 1956, 1956, 1957 | | 68,968.24 | 196,886.77 | 265,855.01 | 4,447.29 |
| Guild Construction Co., Inc., C. L., East Providence, R.I. | Fiscal 1955, 1956 | | 58.69 | 424,271.01 | 424,271.01 | 16,095.87 |
| Kieckhefer, William H., estate of, Milwaukee, Wis. | 1956, 1957, 1958 | | | 349,984.22 | 349,984.22 | 3,213.73 |
| Koenig Coal & Supply Co., Detroit, Mich. | 1957, 1958 | | | 639,290.74 | 639,290.74 | 130,378.80 |
| Kropp Steel Co. (liquidated May 31, 1960, Kropp Forge Co., transferee), Rockford, Ill. | Fiscal 1956, 1957 | | | 170,732.61 | 170,732.61 | 6,568.68 |
| Lilhue Plantation Co., Ltd., The, care of American Factors, Ltd., Honolulu, Hawaii | do. | | | 111,540.84 | 111,540.84 | 2,064.30 |
| Llewellyn Machinery Corp., Miami, Fla. | 1953 to 1958, inclusive | | 87.46 | 442,222.25 | 442,222.25 | 16,179.67 |
| Michigan Tool Co., Detroit, Mich. | 1956, 1957, 1958 | | | 133,922.39 | 133,922.39 | 4,165.72 |
| New York, Chicago & St. Louis RR. Co., Cleveland, Ohio | Period Jan. 1 to Nov. 30, 1955; fiscal 1956 | | | 424,323.04 | 424,323.04 | 11,594.60 |
| Nidever, Corp., estate of, deceased, Fresno, Calif. | 1950, 1952 | | | 111,704.90 | 111,704.90 | 39,943.53 |
| Philadelphia National League Club, Philadelphia, Pa. | Fiscal 1956, 1957, 1958, 1959 | | | 125,400.25 | 125,400.25 | 818,080.76 |
| Pittsburgh Steel Co., Pittsburgh, Pa. | Fiscal 1956, 1957, 1958 | | | 347,254.05 | 347,254.05 | 28,138.97 |
| Polk, Ralph L., estate of, Detroit, Mich. | 1951 | | | 518,138.24 | 518,138.24 | |
| Rembrandt Lamp Corp., Chicago, Ill. | 1958, 1959 | | | 107,140.97 | 107,140.97 | 12,535.40 |
| | Fiscal 1956, 1957 | | | 139,616.12 | 139,616.12 | 3,972.37 |

| | | | | | | | |
|--|-------------|---|-----------|----------|--|--|--|
| Reserve Oil & Gas Co., San Francisco, Calif. | 1955, 1956 | 52 to 53 weeks year ended Dec. 28, 1957; Jan. 3, 1959, Dec. 31, 1959. | 30,862.00 | 2,798.14 | 326,528.62 1,000,000.00 169,949.12 408,363.19 151,343.54 135,292.61 | 326,528.62 1,000,000.00 169,949.12 408,363.19 151,343.54 135,292.61 | 4,630.51 487,794.52 1,380.54 6,011.73 109.71 141.44 |
| United States Smelting, Refining & Mining Co. and affiliated companies, Boston, Mass. | 1945 | 1955, 1956 | | | 516,563.79 | 516,563.79 | 126,902.35 |
| Westinghouse Electric Corp. (successor to B. F. Sturtevant Co.), Pittsburgh, Pa. | 1955 | 1955, 1956 | | | 1,053,951.31 | 1,053,951.31 | 298,743.78 |
| Whitney Blake Co., The, Hamden, Conn. | 1955 | 1955, 1956 | | | 184,432.04 | 184,432.04 | 3,342.51 |
| York-Hoover Corp., York, Pa. | Fiscal 1957 | 1955, 1956 | | | 183,792.80 | 183,792.80 | 5,785.70 |
| JANUARY | | | | | | | |
| American Ceramic Products, Inc., Santa Monica, Calif. | 1952 | 52 to 53 weeks year ended Dec. 28, 1957; Jan. 3, 1959, Dec. 31, 1959. | 30,862.00 | 2,798.14 | 157,881.59 | 157,881.59 | 459.50 |
| American Motor Sales Corp. (formerly Nash-Kelvinator Sales Corp.) Detroit, Mich. | 1954, 1955 | Period Oct. 13, 1956 to June 30, 1957. | | | 4,817,615.91 | 4,817,615.91 | 10,731.59 |
| Central Surety & Insurance Corp., New York, N.Y. | 1955, 1956 | 1955, 1956 | | | 602,766.05 | 602,766.05 | 11,617.69 |
| Charmain Paper Products Co., The, Cincinnati, Ohio | 1955, 1956 | 1955, 1956 | | | 235,223.65 | 235,223.65 | 39,884.08 |
| Davis Tool & Engineering Co., Detroit, Mich. | 1955, 1956 | 1955, 1956 | | | 328,537.60 | 328,537.60 | 6,670.82 |
| Dodge Steel Co., Philadelphia, Pa. | 1955, 1956 | 1955, 1956 | | | 182,092.70 | 182,092.70 | 2,239.98 |
| Drilling & Service, Inc., Dallas, Tex. | 1955, 1956 | 1955, 1956 | | | 352,578.36 | 352,578.36 | 4,975.58 |
| Fosphate Citrus Concentrate Cooperative (name changed to Mid-Florida Citrus Cooperative in 1959), Orlando, Fla. | 1955, 1956 | 1955, 1956 | | | 294,640.67 | 294,640.67 | 4,399.43 |
| General Crude Oil Co., Houston, Tex. | 1955, 1956 | 1955, 1956 | | | 298,906.00 | 298,906.00 | 6,739.75 |
| Industrial Motor Sales Corp., Leonia, N.J. | 1955, 1956 | 1955, 1956 | | | 160,586.88 | 160,586.88 | 3,871.08 |
| Lehigh Valley R.R. Co., New York, N.Y. | 1955, 1956 | 1955, 1956 | | | 547,626.14 | 547,626.14 | 3,106.59 |
| Loosle Construction Co., The, Wyandotte, Mich. | 1955, 1956 | 1955, 1956 | | | 107,939.63 | 107,939.63 | 17,447.72 |
| Lyon, Inc., Detroit, Mich. | 1955, 1956 | 1955, 1956 | | | 280,794.51 | 280,794.51 | 11,015.71 |
| Marlham, John H. and Grace Y., Centralia, Wash. | 1955, 1956 | 1955, 1956 | | | 109,796.18 | 109,796.18 | 12,277.81 |
| Okole Sugar Co., Ltd., Honolulu, Hawaii | 1955, 1956 | 1955, 1956 | | | 338,516.51 | 338,516.51 | 27,068.05 |
| Paco, Inc. (formerly Hunter Packing Co.), East St. Louis, Ill. | 1955, 1956 | 1955, 1956 | | | 206,644.03 | 206,644.03 | 75,318.72 |
| Parke, Davis & Co., Ltd. (Colorado), Parke, Davis Inter-American Corp. (Delaware), and Parke, Davis & Co., Ltd. (New York), Detroit, Mich. | 1955, 1956 | 1955, 1956 | | | 1,580,707.55 | 1,580,707.55 | 4,863.67 |
| Red Corn Pioneer Mills, Inc. (Delaware), Chicago, Ill. | 1955, 1956 | 1955, 1956 | | | 212,724.59 | 212,724.59 | 714.99 |
| Riverside Metal Co., The, H. K. Porter Co., Inc. (transfer), Husbards, Chicago, Ill. | 1955, 1956 | 1955, 1956 | | | 167,290.55 | 167,290.55 | 348,897.25 |
| Sandley Corp., A. L. (now Smithcraft Corp.), Chelsea, Mass. | 1955, 1956 | 1955, 1956 | | | 344,517.94 | 344,517.94 | 6,118.00 |
| Standard Cotton Prods. Co., Flint, Mich. | 1955, 1956 | 1955, 1956 | | | 183,825.33 | 183,825.33 | 6,008.37 |
| Stelson Co., John B. Philadelphia, Pa. | 1955, 1956 | 1955, 1956 | | | 279,480.13 | 279,480.13 | 10,423.32 |
| Union Packing Co., Los Angeles, Calif. | 1955, 1956 | 1955, 1956 | | | 369,280.06 | 369,280.06 | 483,834.55 |
| Wigan Baking Corp., Newark, N.J. | 1955, 1956 | 1955, 1956 | | | 173,405.92 | 173,405.92 | 5,019.27 |
| Weber Showcase & Fixture Co., Inc., Los Angeles, Calif. | 1955, 1956 | 1955, 1956 | | | 178,499.66 | 178,499.66 | 2,677.49 |

Refunds and credits reported to the Joint Committee on Internal Revenue Taxation during the fiscal year ended June 30, 1962, by the Commissioner of Internal Revenue, under the provisions of sec. 6405 of the Internal Revenue Code—Continued

| Name and address of taxpayer | Years involved | Abitations | Credits | Refunds | Net over-assessments allowed | Interest payable |
|--|---|------------|------------|--------------|------------------------------|------------------|
| 1962—Continued | | | | | | |
| FEBRUARY | | | | | | |
| Alco, Inc., Akron, Ohio..... | Fiscal 1955, 1956, 1957..... | | \$542.53 | \$258,623.00 | \$259,165.53 | \$10,940.11 |
| Atlas Tack Corp., Fairhaven, Mass..... | 1956, 1957, 1958..... | | | 123,762.85 | 123,762.85 | 32,428.81 |
| Becton, Dickinson & Co., East Rutherford, N.J..... | Fiscal 1958, 1959..... | | | 340,552.15 | 340,552.15 | 54,251.10 |
| Blackstone Mills, Inc., Clinton, Mass..... | 1957, 1958..... | 8,950.98 | 963.38 | 150,194.46 | 160,108.82 | 1,368.21 |
| Bobbs-Merrill Co., Inc., The, Indianapolis, Ind..... | Fiscal 1956, 1957, 1958..... | | | 211,310.35 | 211,310.35 | 1,230.23 |
| Chicago, Rock Island & Pacific R.R. Co., Chicago, Ill..... | 1953..... | | | 141,725.76 | 141,725.76 | 54,345.97 |
| Cruetite Steel Casting Co., Lansdowne, Pa..... | 1956..... | | | 165,731.86 | 165,731.86 | 3,843.35 |
| Electra-Chemical Engraving Co., Inc., Bronx, N.Y..... | 1955, 1956..... | 12,307.56 | 401.60 | 158,795.07 | 171,504.23 | 2,651.52 |
| Ford, Clara J., estate of, deceased, Detroit, Mich..... | 1959..... | | 882,185.01 | | 882,185.01 | |
| Frigidaire Sales Corp., Detroit, Mich..... | 1955, 1956..... | | | 269,808.36 | 269,808.36 | 26,511.97 |
| Grand Central Aircraft Co., Glendale, Calif..... | Fiscal 1955, 1956, 1957..... | | | 116,361.88 | 116,361.88 | 3,873.41 |
| Hendy Corp., Joshua, Los Angeles, Calif..... | Fiscal 1955, 1956..... | | 41,276.79 | 200,092.17 | 241,368.96 | 2,760.93 |
| L. H. L. Lumber Corp., Portland, Ore..... | 1955, 1956..... | | | 126,485.08 | 126,485.08 | 38,067.87 |
| Lilli Ann Corp., San Francisco, Calif..... | 1950, 1951, 1952..... | | 82,964.19 | 157,700.54 | 157,700.54 | 4,175.82 |
| Macco Corp., Paramount, Calif..... | Fiscal 1957; period Feb. 1 to July 31, 1957; fiscal 1958..... | | | 345,126.25 | 428,090.44 | 67,897.15 |
| McFadden California Arizona Corp. (now Geo. H. McFadden & Bros., Inc.), Memphis, Tenn..... | 1952..... | | | 1,074,750.85 | 1,074,750.85 | 17,340.04 |
| National Fire Insurance Co. of Hartford and affiliated companies, Hartford, Conn..... | 1951..... | 21,151.25 | 249.76 | 190,111.54 | 211,512.55 | |
| Newsweek, Inc. (formerly Weekly Publications, Inc.), New York, N.Y..... | 1955, 1956, 1957..... | | | 168,419.33 | 168,419.33 | 58,824.49 |
| Niagara Fire Insurance Co., New York, N.Y..... | 1954..... | | | 1,362,587.00 | 1,362,587.00 | 31,507.47 |
| Nicholson & Co., W. H., Wilkes Barre, Pa..... | 1955, 1956..... | | 84.96 | 431,655.80 | 431,650.76 | 12,883.21 |
| Rosendahl Corp., Los Angeles, Calif..... | Fiscal 1957..... | | | 415,621.48 | 415,621.48 | 6,234.32 |
| Schwartz & Co., B. (now Beness Enterprises, Inc.), Chicago, Ill..... | Fiscal 1957, 1958, 1959..... | | | 150,723.98 | 150,723.98 | 1,273.93 |
| Suntide Refining Co., Corpus Christi, Tex..... | 1956..... | | | 433,004.89 | 433,004.89 | 3,588.59 |
| Trenton Pottery Co., The, Crane Co., transferee, Chicago, Ill..... | 1955..... | | 6,228.10 | 544,993.00 | 544,993.00 | 4,247.95 |
| Youngs Bay Lumber Co., Inc., transferee: United States Plywood Corp., New York, N.Y..... | Fiscal 1951, 1952, 1954, 1955..... | | 141.69 | 152,270.76 | 158,498.86 | 5,230.32 |
| | | | | 235,688.79 | 235,688.79 | 98,018.13 |
| MARCH | | | | | | |
| Aberfoyle Manufacturing Co., Gastonia, N.C..... | Fiscal 1955, 1956, 1957..... | | | 270,493.56 | 270,493.56 | 4,308.54 |
| Associated Food Stores, Inc., Jamaica, N.Y..... | Fiscal 1957, 1958, 1959..... | 687.70 | | 198,290.03 | 198,290.03 | 3,724.05 |
| Associated Press and domestic subsidiaries, The, New York, N.Y..... | 1955, 1956..... | | | 327,575.02 | 327,575.02 | 6,025.51 |
| Basalt Rock Co., Inc., Napa, Calif..... | 1950, 1952..... | | 1.41 | 143,483.65 | 143,483.65 | 50,765.27 |
| Beard Co., Inc., J. B., The, Shreveport, La..... | Fiscal 1956, 1957..... | | | 275,817.64 | 275,817.64 | 6,109.39 |
| Breeze Corps, Inc., Newark, N.J., now Union, N.J..... | 1953..... | | 2,325.72 | 445,098.97 | 447,424.69 | 6,662.89 |

| | | | | | | |
|--|--|-----------|------------|--------------|--------------|------------|
| Brown-Dunkin Co., Tulsa, Okla. | Fiscal 1956, 1957, 1958 | 2,554.70 | 222.02 | 180,800.40 | 153,676.12 | 5,005.40 |
| California Transcontinental Wine Co., Fresno, Calif. | Fiscal 1957, 1958 | | | 238,440.25 | 238,440.25 | 2,185.21 |
| Chicago Malleable Castings Co., Chicago, Ill. | 1955, 1957 | | | 111,541.37 | 111,541.37 | 3,403.20 |
| Copied Shoe Co., Inc., Waukegan, Ill. | Fiscal 1956, 1957 | | | 126,805.13 | 126,805.13 | 1,643.50 |
| Dereca Distributing Corp., New York, N.Y. | 1952 | | | 109,178.00 | 109,178.00 | 3,247.03 |
| Eastern Air Lines, Inc., New York, N.Y. | 1955 | | | 3,056,975.27 | 3,056,975.27 | 107,990.17 |
| Gannett Construction Co., M. A. Providence, R.I. | 1956, 1957, 1958 | | 539.66 | 550,546.16 | 551,645.82 | 1,587.70 |
| Gates International, Inc., Denver, Colo. | Fiscal 1955, 1956, 1957, 1958 | | | 232,935.52 | 232,935.52 | 43,947.46 |
| Hawaiian Commercial & Sugar Co., Ltd., Honolulu, Hawaii | 1956, 1956 | | | 1,398,075.57 | 1,388,016.57 | 60,200.70 |
| Isbrandtsen Co., Inc., and subsidiaries, New York, N.Y. | 1956, 1957 | | | 1,083,108.17 | 1,083,108.17 | 58,432.31 |
| King Ranch, Kingsville, Tex. | 1959 | | | 170,681.77 | 170,681.77 | 12,449.10 |
| Knighs Co., Frank J., Center Line, Mich. | 1955, 1956 | | | 387,133.65 | 387,133.65 | 9,409.18 |
| Lewis Bolt & Nut Co., Minneapolis, Minn. | Fiscal 1957, 1958, 1959 | | | 121,697.04 | 121,697.04 | 2,513.34 |
| Luer Packing Co., Los Angeles, Calif. | Fiscal 1957, 1958 | | | 133,079.39 | 133,079.39 | 1,369.32 |
| Marietta Concrete Corp., The, transferee: Martin-Marietta Corp., Baltimore, Md. | 1958; period Jan. 1 to Oct. 31, 1954, fiscal 1956 | 17,109.52 | 9,946.74 | 244,897.17 | 271,953.43 | 1,926.70 |
| Matson Navigation Co., San Francisco, Calif. | 1956, 1957 | | | 213,922.11 | 400,133.62 | 8,662.38 |
| Mercury Engineering Corp., Milwaukee, Wis. | 1956, 1957; period Jan. 1 to Oct. 31, 1958 | | 186,211.51 | 248,097.71 | 248,097.71 | 2,693.10 |
| Muncie Construction Corp., presently by merger: N. G. Gilbert Corp., Muncie, Ind. | Fiscal 1956, 1957, 1958 | | | 240,382.00 | 240,382.00 | 751.38 |
| New York, Chicago & St. Louis RR. Co., The, Cleveland, Ohio | 1953, 1954, 1955 | | | 194,515.32 | 194,515.32 | 37,309.64 |
| New York City Omnibus Corp. (now Fifth Avenue Coach Lines, Inc.), New York, N.Y. | 1944, 1945, 1946, 1949 | | 533,753.31 | 263,004.43 | 796,757.74 | 95,836.22 |
| Pan American-Grace Airways, Inc., New York, N.Y. | 1951, 1953 | | 2,031.97 | 548,076.22 | 551,008.10 | 8,800.72 |
| Phillips & Butford Manufacturing Co. (now Phillips & Butford Corp.), Nashville, Tenn. | Fiscal 1955, 1956 | | 82.12 | 263,648.39 | 263,630.51 | 7,501.61 |
| Premier Industrial Corp. (California), formerly the Premier Autoware Co. (California), Cleveland, Ohio | Fiscal 1956 to 1959, inclusive | | 159,406.42 | | 159,406.42 | |
| St. Paul & Tacoma Lumber Co., St. Regis Paper Co., transferee, New York, N.Y. | 1942 | | 23,087.35 | 87,590.14 | 110,677.49 | |
| Sawyer's, Inc., Portland, Oreg. | 1956, 1958 | | 16,815.79 | 278,066.72 | 294,882.51 | 5,359.45 |
| Sayford Co., Frank M., care of Sayford Corp., Litchfield, Conn. | Fiscal 1955, 1956 | | | 224,352.40 | 224,352.40 | 3,917.42 |
| Structo Manufacturing Co., Freeport, Ill. | Fiscal 1957, 1958 | | | 388,749.43 | 388,749.43 | 3,846.05 |
| Tranan, Drilling Contractor, Inc., J. C., Shreveport, La. | Fiscal 1958 | | | 464,884.35 | 464,884.35 | 35,288.89 |
| Zeller Corp., The, Defiance, Ohio | 1957 | | | 114,619.45 | 114,619.45 | 1,738.13 |
| Zion Industries, Inc., Zion, Ill. | Period Aug. 18 to Dec. 31, 1948; 1949 to 1953, inclusive | | | 658,476.90 | 658,476.90 | 299,869.68 |
| APRIL | | | | | | |
| Actna Steel Products Corp., New York, N.Y. | 1956, 1956, 1957 | 18,810.06 | 2,427.93 | 840,044.40 | 861,282.39 | 17,768.95 |
| Badel, Inc. (formerly The South Bend Toy Manufacturing Co.), South Bend, Ind. | 1956, 1956, 1959 | 47,500.98 | 1,269.43 | 160,541.53 | 193,251.94 | 2,336.79 |
| Blockson Chemical Co. (now Olin Mathieson Chemical Corp., transferee), New York, N.Y. | Period July 1 to Dec. 31, 1950; 1951, 1952, 1953 | | | 300,000.00 | 300,000.00 | 110,144.09 |
| State Bank & Trust Co. of New York, New York, N.Y. | 1956, 1957 | | | 425,253.50 | 425,253.50 | 6,588.52 |
| Denver Chicago Trucking Co., Inc., Denver, Colo. | 1951, 1952 | | 251,115.10 | 43,011.68 | 294,126.78 | 13,125.77 |
| Drovers Trust & Savings Bank, Chicago, Ill. | 1956, 1957, 1958 | | | 135,129.80 | 135,129.80 | 2,337.92 |
| Estevé Bros. & Co., Dallas, Tex. | 1957 | | | 227,477.74 | 227,477.74 | 3,748.71 |
| Fidelity & Casualty Co., of New York, The, New York, N.Y. | 1955, 1956 | | | 562,902.96 | 562,902.96 | 32,162.57 |

Refunds and credits reported to the Joint Committee on Internal Revenue Taxation during the fiscal year ended June 30, 1962, by the Commissioner of Internal Revenue, under the provisions of sec. 6405 of the Internal Revenue Code—Continued

| Name and address of taxpayer | Years involved | Absentments | Credits | Refunds | Net over-assessments allowed | Interest payable |
|---|-------------------------|-------------|--------------|---------------|------------------------------|------------------|
| 1962—Continued | | | | | | |
| APRIL—continued | | | | | | |
| First National Bank at Lubbock, Lubbock, Tex. | 1959 | | \$105,134.78 | | \$105,134.78 | \$5,174.25 |
| General Motors Acceptance Corp., Detroit, Mich. | 1953, 1955 | | 412,018.65 | \$11,094.47 | 423,113.12 | 23,948.98 |
| Gladia Biscuit Co., (Faint Milling Co., transferee of assets), Dallas, Tex. | Fiscal 1957 | | | 121,205.72 | 121,205.72 | 805.27 |
| Gulf Ins. and Co. and subsidiaries, Dallas, Tex. | 1958, 1959, 1960 | | | | | |
| Motor Wheel Corp., Lansing, Mich. | 1955 | | | 157,591.71 | 157,591.71 | 12,704.28 |
| Nicola Door Manufacturing Co., Portland, Ore. | 1946, 1957, 1958 | | | 1,376,222.70 | 1,376,222.70 | 38,113.36 |
| Pacific Int. & Steel Corp., Los Angeles, Calif. | 1956, 1957 | | | 145,695.00 | 145,695.00 | 16,641.43 |
| Phillips, Frank N., estate of, Providence R.I. | 1958 | | | 435,242.32 | 435,242.32 | 16,770.83 |
| Portland Cement Co., Portland, Ore. | 1955, 1956, 1957 | | | 163,893.99 | 163,893.99 | 13,044.33 |
| Portland General Electric Co., Portland, Ore. | 1954, 1955, 1958 | | | 594,508.97 | 594,508.97 | 138,962.68 |
| Wilson Automation Co., Detroit, Mich. | 1954 | | | 344,094.25 | 344,094.25 | 4,496.05 |
| | Fiscal 1956, 1960 | | 8,806.14 | 253,844.55 | 253,844.55 | 4,496.99 |
| | | | | 152,805.41 | 161,671.55 | 3,373.52 |
| MAY | | | | | | |
| Baltimore Contractors, Inc., Baltimore, Md. | 1956, 1957, 1958 | | | 303,234.62 | 303,234.62 | 1,550.70 |
| Belo Petroleum Corp. (inc. June 19, 1958.) transferor, Beleo Petroleum Corp. (inc. July 28, 1959), transferee, New York, N.Y. | Fiscal 1956, 1957 | | 3,560.94 | 326,743.89 | 330,304.83 | 14,770.24 |
| Bethlehem Steel Co. (consolidated), Bethlehem, Pa. | 1951, 1952 | | | 19,458,175.36 | 19,458,175.36 | |
| Chambers, Inc., Robert R., Pittsburgh, Pa. | Fiscal 1955, 1956 | | | 627,081.03 | 704,807.39 | 10,537.56 |
| Chase National Bank of the City of New York, The (now The Chase Manhattan Bank), New York, N.Y. | Fiscal 1956, 1957, 1958 | | 172,190.10 | 210,084.55 | 210,087.37 | 15,092.17 |
| Chicago District Pipeline Co., Joliet, Ill. | 1953, 1954 | | 202.82 | 707,080.67 | 707,080.67 | 311,965.40 |
| Columbia Pictures International Corp., New York, N.Y. | 1952, 1953 | | | 184,452.29 | 184,452.29 | |
| Copper Alloy Corp., Hillside, N. Y. | Fiscal 1947, 1948 | | | 226,045.80 | 226,045.80 | 174,435.42 |
| Cribben & Sexton Co., Chicago, Ill. | Fiscal 1956, 1957, 1958 | | | 477,893.61 | 477,893.61 | 3,741.72 |
| Daily Machine Specialties, Inc., Chicago, Ill. | Fiscal 1955, 1956 | | | 313,827.96 | 313,827.96 | 3,706.29 |
| Decca Distributing Corp., New York, N.Y. | 1956 | | 7,722.77 | 323,891.05 | 331,613.82 | 7,088.91 |
| Drovers National Bank, Chicago, Ill. | 1956, 1957, 1958 | | | 456,642.44 | 456,642.44 | 7,074.88 |
| Forbes Lithograph Manufacturing Co., Chelsea, Mass. (now New York, N.Y.) | 1956, 1957 | | | 157,230.98 | 157,230.98 | 3,921.20 |
| Gratenstein, Emanuel H. and Anna, Woodmont, Conn. | 1951 to 1959, inclusive | | | 171,140.00 | 171,140.00 | 5,242.05 |
| Gratenstein, Jerome, Woodmont, Conn. | 1955 to 1959, inclusive | | | 108,499.73 | 108,499.73 | 19,293.57 |
| Hammond Warehouse Co. (dissolved), care of Swift & Co., (Illinois), transferee, Chicago, Ill. | 1955, 1956 | | 14,110.74 | 125,259.37 | 125,259.37 | 18,376.01 |
| Johnson Publishing Co., Inc., Chicago, Ill. | Fiscal 1957 | | 12,175.01 | 118,777.84 | 132,855.38 | 20,914.17 |
| Lewis, Frank J. and Julia Deal, Chicago, Ill. | 1958 | | | 227,026.83 | 230,201.84 | 3,352.53 |
| | | | | 186,064.26 | 180,064.26 | 37,475.50 |

| | 1956, 1957, 1958 1954, 1955 | 7,559.81 | 45,988.69 | | 1956, 1957, 1958 1954, 1955 | 699,663.06 1,087,920.42 | 39,516.58 40,837.19 |
|--|---|---------------|--------------|--|---|----------------------------|------------------------|
| | | | | | | | |
| McDonald Printing Co., Inc., Cincinnati, Ohio | 1956 | | | | 1956 | 699,663.06 | 39,516.58 |
| Mojord Co., Inc. (now Martindale Industries, Inc.), New York, N.Y. | 1954 | | | | 1954 | 1,087,920.42 | 40,837.19 |
| Murray Ohio Manufacturing Co., The, Nashville, Tenn. | 1955 | | | | 1955 | 357,096.00 | 10,571.02 |
| Nobles Engineering & Manufacturing Co., St. Paul, Minn. | Fiscal 1955, 1956 | | | | Fiscal 1955, 1956 | 185,432.79 | 2,348.84 |
| Northern Insurance Co. of New York, New York, N.Y. | 1956, 1957 | | | | 1956, 1957 | 354,511.41 | 12,600.80 |
| Oahu Sugar Co., Ltd., care of American Factors, Ltd., Honolulu, Hawaii | 1953 | | | | 1953 | 323,609.48 | 4,566.00 |
| Pan American World Airways, Inc., New York, N.Y. | 1957, 1958, 1959 | | | | 1957, 1958, 1959 | 299,398.26 | 92,883.53 |
| People's Savings Association, Toledo, Ohio | 1956, 1957 | | | | 1956, 1957 | 595,606.28 | 6,317.69 |
| Sperry Products, Inc., Danbury, Conn. | 1953, 1954, 1955 | 45,438.09 | | | 1953, 1954, 1955 | 342,087.41 | 5,798.67 |
| Squier, Schilling & Skiff, Inc., Bear, Stearns & Co., transferee, New York, N.Y. | 1955 | | | | 1955 | 259,735.39 | 46,890.46 |
| American Employers' Insurance Co., Boston, Mass. | 1954, 1955 | | | | 1954, 1955 | 124,749.28 | 26,984.64 |
| APL Associates, Inc., Naomias Co., successor in 1956, San Francisco, Calif. | 1942 to 1945, inclusive | 6,014,755.73 | | | 1942 to 1945, inclusive | 174,304.14 | 70,925.02 |
| Atchison, Topeka & Santa Fe Ry. Co., and affiliated companies, The, Chicago, Ill. | Fiscal 1958, 1959, 1960 | | | | Fiscal 1958, 1959, 1960 | 6,242,885.70 | 3,091,341.08 |
| Atlantic Wire Co., The, Branford, Conn. | 1957, 1958, 1959 | 858.83 | | | 1957, 1958, 1959 | 218,325.92 | 2,714.54 |
| Braun & Co., (now B. B. B., Inc.), South Bend, Ind. | Fiscal 1956, 1957, 1958 | | | | Fiscal 1956, 1957, 1958 | 626,132.56 | 61,143.18 |
| Brown & Co., C. F., Alhambra, Calif. | 1954, 1955 | | | | 1954, 1955 | 1,065,660.00 | 22,880.79 |
| Buell Die & Machine Co., Detroit, Mich. (now Waterbury, Conn.) | 1957 | | | | 1957 | 129,666.30 | 3,102.55 |
| Central Pennsylvania Quarry Stripping & Construction Co., Hazleton, Pa. | 1959 | | | | 1959 | 192,786.12 | 1,629.44 |
| Clark, Halford R., estate of, Rochester, N.Y. | Fiscal 1958 | | | | Fiscal 1958 | 141,212.66 | 14,121.27 |
| Connet Rice Mills and consolidated subsidiaries, Houston, Tex. | Fiscal 1955, 1956, 1959 | | | | Fiscal 1955, 1956, 1959 | 126,517.18 | 5,611.99 |
| Dayton Malleable Iron Co., The, Dayton, Ohio | Fiscal 1956, 1957, 1958 | 441.52 | | | Fiscal 1956, 1957, 1958 | 281,684.77 | 6,965.42 |
| Haddock, Ltd., J. E., Pasadena, Calif. | 1958 | 152,182.54 | | | 1958 | 374,970.79 | 7,386.46 |
| Interprovincial Pipe Line Co., Edmonton, Alberta, Canada | 1954, 1955 | | | | 1954, 1955 | 114,270.36 | 18,534.49 |
| Maryland Casualty Co., Baltimore, Md. | 52 to 53 week year ended Jan. 1, 1956 | | | | 52 to 53 week year ended Jan. 1, 1956 | 3,760,070.70 | 84,702.26 |
| Mayer & Co., Inc., Osear, Chicago, Ill. | 1956 | | | | 1956 | 141,008.14 | 48,127.67 |
| Miami Window Corp., Miami, Fla. | Fiscal 1956; period, July 1, 1956 to Feb. 28, 1957; fiscal 1958 | 1,095.60 | | | Fiscal 1956; period, July 1, 1956 to Feb. 28, 1957; fiscal 1958 | 527,952.79 | 16,250.63 |
| Michigan Forging Co., Dearborn, Mich. | Fiscal 1955, 1956 | | | | Fiscal 1955, 1956 | 121,941.62 | 3,141.70 |
| Poloron Products, Inc., New Rochelle, N.Y. | Fiscal 1953, 1955, 1956 | 14,063.51 | | | Fiscal 1953, 1955, 1956 | 221,284.40 | 4,690.55 |
| Rockford Machine Tool Co., Rockford, Ill. | Fiscal 1956, 1957 | | | | Fiscal 1956, 1957 | 218,851.72 | 2,759.76 |
| Servomechanisms, Inc., El Segundo, Calif. | 1955, 1956, 1957 | 77,609.54 | | | 1955, 1956, 1957 | 562,501.73 | 42,544.83 |
| Shaw Co., Benjamin F., Wilmington, Del. | 1957, 1958, 1959 | | | | 1957, 1958, 1959 | 188,785.82 | 1,347.34 |
| Standard Oil Co. (Indiana) and affiliated companies, Chicago, Ill. | 1951 | 16.34 | | | 1951 | 3,416,537.84 | 1,347.34 |
| Sterling Grinding Wheel Co., Tiffin, Ohio | Fiscal 1955, 1956 | | | | Fiscal 1955, 1956 | 118,321.63 | 2,378.06 |
| Treatwell Construction Co., Midland, Pa. | 1956, 1957 | 277,632.37 | | | 1956, 1957 | 457,850.99 | 4,040.22 |
| Westinghouse Electric International Co. (now Westinghouse Electric Corp.), Pittsburgh, Pa. | 1944 | | | | 1944 | 230,000.00 | 231,692.72 |
| (Grand total) | | 20,913,432.12 | 2,518,451.14 | | | 226,772,113.58 | 21,043,606.92 |

* Certificate of overassessment not received pending administrative action.

1 Returned to Treasury Department for lack of jurisdiction.

16

17

SECTION II

16

17

GENERAL SURVEY OF REFUNDS AND CREDITS, FISCAL YEAR ENDED JUNE 30, 1962

The statistics in regard to refunds and credits submitted to the joint committee by the Secretary or his delegate during the fiscal year ended June 30, 1962, appear as follows:

Recapitulation of abatements, credits, and refund allowances from July 1, 1961, to June 30, 1962

| | | | | |
|--|------------------|------------------|---------------|--|
| Composed of: | | | | |
| Refunds..... | \$203,340,230.42 | | | |
| Credits..... | 20,913,432.12 | | | |
| Abatements..... | 2,518,451.14 | | | |
| | | \$226,772,113.68 | | |
| Interest on refunds and credits reported and allowed during the fiscal year ended June 30, 1962..... | | | 24,043,606.92 | |

Total abatements, credits, refunds, and interest allowed..... 250,815,720.60

A comparison of the refunds and credits allowed in the fiscal year 1962 with those allowed in previous years, and the percentage of increase or decrease from year to year is shown in the following table:

| Year | Refunds | Credits | Total | Percent increase or decrease |
|--|--------------|--------------|--------------|------------------------------|
| 1928—7-month period (June 1 to Dec. 31)..... | \$53,735,064 | \$17,944,683 | \$71,679,747 | ----- |
| 1929—Calendar year..... | 38,203,522 | 15,969,125 | 54,172,647 | |
| 1930—Calendar year..... | 27,174,872 | 27,677,259 | 54,852,131 | +1.24 |
| 1931—Calendar year..... | 15,773,240 | 9,962,580 | 25,735,820 | -53.08 |
| 1932—Calendar year..... | 12,412,885 | 10,500,287 | 22,913,172 | -10.97 |
| 1933—Calendar year..... | 7,315,708 | 8,695,973 | 16,011,681 | -30.12 |
| 1934—Calendar year..... | 4,759,407 | 4,194,599 | 8,954,006 | -44.08 |
| 1935—Calendar year..... | 2,314,495 | 11,083,172 | 13,397,667 | +33.17 |
| 1936—Calendar year..... | 601,517 | 3,897,616 | 4,499,133 | -66.42 |
| 1937—Calendar year..... | 1,683,026 | 2,026,789 | 3,709,815 | -17.54 |
| 1938—Calendar year..... | 3,059,205 | 4,156,014 | 7,215,219 | +48.58 |
| 1939—6-month period (Jan. 1 to June 30)..... | 4,437,825 | 1,388,973 | 5,826,798 | ----- |
| 1940—Fiscal year..... | 8,281,501 | 3,113,379 | 11,394,880 | |
| 1941—Fiscal year..... | 9,498,039 | 5,091,983 | 14,590,022 | +21.90 |
| 1942—Fiscal year..... | 9,917,250 | 2,501,462 | 12,418,712 | -14.83 |
| 1943—Fiscal year..... | 5,846,266 | 2,481,108 | 8,327,374 | -32.94 |
| 1944—Fiscal year..... | 10,384,707 | 3,893,412 | 14,278,119 | +71.46 |
| 1945—Fiscal year..... | 11,465,524 | 13,618,638 | 25,084,162 | +75.68 |
| 1946—Fiscal year..... | 23,388,127 | 12,094,521 | 35,482,648 | +41.45 |
| 1947—Fiscal year..... | 39,371,821 | 25,201,607 | 64,573,428 | +81.98 |
| 1948—Fiscal year..... | 94,533,359 | 41,870,083 | 136,403,442 | +111.00 |
| 1949—Fiscal year..... | 148,932,036 | 99,587,625 | 248,519,661 | +82.19 |
| 1950—Fiscal year..... | 155,697,097 | 60,225,254 | 215,922,351 | -13.10 |
| 1951—Fiscal year..... | 459,281,389 | 239,282,297 | 698,563,686 | +223.62 |
| 1952—Fiscal year..... | 205,133,336 | 125,698,227 | 330,831,563 | -52.64 |
| 1953—Fiscal year..... | 166,094,169 | 165,429,783 | 331,523,952 | +. |
| 1954—Fiscal year..... | 228,232,084 | 119,128,821 | 347,360,905 | +4.77 |
| 1955—Fiscal year..... | 281,900,090 | 231,936,608 | 513,836,698 | +47.83 |
| 1956—Fiscal year..... | 96,697,521 | 39,057,741 | 135,755,262 | -282.18 |
| 1957—Fiscal year..... | 154,532,403 | 69,508,075 | 224,040,478 | +65.00 |
| 1958—Fiscal year..... | 144,922,555 | 74,983,638 | 219,906,193 | -1.08 |
| 1959—Fiscal year..... | 271,907,684 | 73,821,006 | 345,728,691 | +36.4 |
| 1960—Fiscal year..... | 269,466,186 | 39,419,971 | 308,886,158 | -10.6 |
| 1961—Fiscal year..... | 304,008,750 | 50,244,190 | 354,252,940 | +6.8 |
| 1962—Fiscal year..... | 203,340,230 | 20,913,432 | 224,253,662 | -36.97 |