

ESTIMATED REVENUE EFFECTS OF H.R. 8,
 THE "DEATH TAX ELIMINATION ACT OF 2001,"
 AS REPORTED BY THE COMMITTEE ON WAYS AND MEANS

Fiscal Years 2002 - 2011

[Millions of Dollars]

Provision	Effective	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2002-06	2002-11
1. Phase In Repeal of Estate, Gift, and Generation-Skipping Transfer Taxes - beginning in 2002, convert the unified credit into a true exemption, repeal the 5% "bubble" (which phases out the lower rates); repeal rates in excess of 53%; in 2003, repeal rates in excess of 50%; in 2004 through 2006, reduce all rates by 1 percentage point a year; in 2007 through 2010 reduce all rates by 2 percentage points a year; proportionately reduce State tax credit rates; beginning in 2011, repeal all of these taxes; carryover basis applies to transfers at death after 12/31/10 of assets fully owned by decedents, except: (1) \$1.3 million of additional basis and certain loss carryforwards of the decedent are allowed to be added to carryover basis, and (2) an additional \$3 million of basis is allowed to be added to carryover basis of assets going to surviving spouse; certain reporting requirements on large gifts and bequests	dda & gma 12/31/01	---	-6,724	-8,774	-10,964	-12,720	-14,444	-19,408	-26,968	-33,283	-48,832	-39,183	-182,118
2. Expand Availability of Estate Tax Exclusion for Conservation Easements - increase the 25-mile limit to 50 miles; increase 10-mile limit to 25 miles, and clarify the date for determining easement compliance	dda 12/31/00	-2	-13	-19	-20	-20	-21	-22	-24	-26	-28	-74	-195
3. Modifications to Generation-Skipping Transfer Tax Rules -													
a. Deemed allocation of the generation-skipping transfer tax exemption to lifetime transfers to trusts that are not direct skips	ta 12/31/00	-1	-3	-4	-4	-4	-4	-4	-4	-4	-4	-16	-36
b. Retroactive allocation of the generation-skipping tax exemption	generally 12/31/00	-1	-4	-6	-6	-6	-6	-6	-6	-6	-6	-23	-53
c. Severing of trusts holding property having an inclusion ratio of greater than zero	---	----- Included in Item 3.b. -----											
d. Modification of certain valuation rules	---	----- Included in Item 3.b. -----											
e. Relief from late elections	---	----- Included in Item 3.b. -----											
f. Substantial compliance	---	----- Included in Item 3.b. -----											

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4. Modifications to Section 6166 - increase from 15 to 45 the number of partners of a partnership or shareholders in a corporation eligible for installment payments of estate tax under section 6166	dda 12/31/01	---	-285	-297	-330	-364	-394	-383	-381	-371	-358	-1,276	-3,163
NET TOTAL		-4	-7,029	-9,100	-11,324	-13,114	-14,869	-19,823	-27,383	-33,690	-49,228	-40,572	-185,565

Joint Committee on Taxation

NOTE: Details may not add to totals due to rounding.

Legend for "Effective" column:

dda = decedents dying after

gma = gifts made after

ta = transfers after