JOINT COMMITTEE ON TAXATION
May 28, 2010
JCX-30-10

ESTIMATED BUDGET EFFECTS OF THE REVENUE PROVISIONS CONTAINED IN H.R. 4213, THE "AMERICAN JOBS AND CLOSING TAX LOOPHOLES ACT OF 2010," SCHEDULED FOR CONSIDERATION BY THE HOUSE OF REPRESENTATIVES

Fiscal Years 2010 - 2020

[Millions of Dollars]

Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
I. Infrastructure Incentives														
A. Extend Build America Bonds with Direct-Pay Subsidy Rate Decreasing to 32% for Governmental Capital Project Financing Bonds Issued During 2011, and 30% for Such Bonds During 2012 [1].....	DOE	---	-89	-343	-451	-451	-451	-451	-451	-451	-451	-451	-1,786	-4,042
B. Exempt-Facility Bonds for Sewage and Water Supply Facilities														
1. Provide that the volume cap for private activity bonds shall not apply to bonds for facilities for the furnishing of water and for sewage facilities.....	oia DOE	-1	-3	-7	-14	-23	-31	-39	-47	-55	-63	-71	-79	-354
2. Permit Indian tribes to issue tax-exempt private activity bonds for facilities for the furnishing of water and for sewage facilities.....	oia DOE	[2]	[2]	-1	-1	-1	-2	-2	-2	-3	-3	-3	-5	-18
C. Extension of Exemption from AMT Tax Treatment for Certain Tax-Exempt Bonds (sunset 12/31/11).....	oia 12/31/10	---	-13	-25	-25	-25	-25	-24	-24	-22	-21	-20	-113	-224
D. Extension and Additional Allocations of Recovery Zone Bond Authority [1].....	DOE	-10	-104	-242	-266	-259	-256	-249	-249	-249	-249	-249	-1,137	-2,385
E. Allow New Markets Tax Credit Against the AMT [3].....	[4]	-1	-6	-21	-43	-61	-73	-77	-74	-61	-28	---	-205	-445
F. Extension of Tax-Exempt Eligibility for Loans Guaranteed by Federal Home Loan Banks (sunset 12/31/11).....	DOE	---	-13	-15	-15	-15	-15	-15	-15	-15	-15	-15	-73	-148
G. Extension of Temporary Small Issuer Rules to Tax-Exempt Interest Allocation Rules for Financial Institutions (sunset 12/31/11).....	bia 12/31/10	---	-7	-21	-29	-29	-29	-29	-28	-28	-27	-27	-115	-254
Total of Infrastructure Incentives……		**-12**	**-235**	**-675**	**-844**	**-864**	**-882**	**-886**	**-890**	**-884**	**-857**	**-836**	**-3,513**	**-7,870**

Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
II. Extension of Expiring Provisions														
A. Energy														
1. Alternative motor vehicle credit for new qualified hybrid motor vehicles other than passenger automobiles and light trucks (sunset 12/31/10).....	ppa 12/31/09	-3	-3	-1	-1	[2]	[5]	[5]	---	---	---	---	-8	-8
2. Excise tax credits and outlay payments for biodiesel and renewable diesel:														
a. Biodiesel (sunset 12/31/10).....	fsoua 12/31/09	-624	-231	---	---	---	---	---	---	---	---	---	-854	-854
b. Renewable diesel (sunset 12/31/10).....	fsoua 12/31/09	-10	-4	---	---	---	---	---	---	---	---	---	-14	-14
3. Extend and modify credit for electricity produced at open-loop biomass facilities placed-in-service before 10/22/04 (sunset 12/31/10).....	epasa 12/31/09	-43	-29	-6	-3	-2	-1	---	---	---	---	---	-84	-84
4. Extend and modify credit for steel industry fuel (sunset 12/31/10).....	DOE & fpa 10/1/08	-13	-15	-16	---	---	---	---	---	---	---	---	-44	-44
5. Placed-in-service date for eligibility for tax credit for the production of coke or coke gas (sunset 12/31/10).....	fpisa 12/31/09	-3	-5	-5	-5	-3	---	---	---	---	---	---	-21	-21
6. Credit for construction of energy efficient new homes (sunset 12/31/10).....	haa 12/31/09	-23	-17	-6	-6	-5	-4	-4	-1	---	---	---	-61	-66
7. Incentives for alternative fuel and alternative fuel mixtures (excluding liquefied hydrogen, coal to liquids, and P-series fuels) (sunset 12/31/10).....	fsoua 12/31/09	-73	-23	---	---	---	---	---	---	---	---	---	-96	-96
8. Special rule for sales or dispositions to implement FERC or State electric restructuring policy for qualified electric utilities (sunset 12/31/10).....	ta 12/31/09	-221	-88	49	49	49	49	49	49	17	---	---	-113	---
9. Suspension of 100 percent-of-net- income limitation on percentage depletion for oil and natural gas from marginal properties (sunset 12/31/10).....	tyba 12/31/09	-67	-36	---	---	---	---	---	---	---	---	---	-103	-103
10. Direct payment of energy-efficient appliance tax credit [1].....	api 2009 & 2010	-68	-2	---	---	---	---	---	---	---	---	---	-69	-69
11. Modify the requirements for exterior windows, doors, and skylights to be eligible for the credit for nonbusiness energy property (sunset 12/31/10).....	ppisa DOE	---	-145	---	---	---	---	---	---	---	---	---	-145	-145
B. Individual Tax Relief														
1. Deduction for certain expenses of elementary and secondary school teachers (sunset 12/31/10).....	tyba 12/31/09	-43	-172	---	---	---	---	---	---	---	---	---	-215	-215
2. Additional standard deduction for State and local real property taxes (sunset 12/31/10).....	tyba 12/31/09	-233	-1,318	---	---	---	---	---	---	---	---	---	-1,551	-1,551
3. Deduction of State and local general sales taxes (sunset 12/31/10).....	tyba 12/31/09	-218	-1,288	-294	---	---	---	---	---	---	---	---	-1,800	-1,800

Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
4. Contributions of capital gain real property made for qualified conservation purposes (sunset 12/31/10)	cmi tyba 12/31/09	-23	-60	-22	-17	-14	-12	-10	-8	-8	-8	-8	-148	-190
5. Deduction for qualified tuition and related expenses (sunset 12/31/10)	tyba 12/31/09	-35	-658	---	---	---	---	---	---	---	---	---	-693	-693
6. Tax-free distributions from IRAs to certain public charities from age 70 1/2 or older, not to exceed $100,000 per taxpayer per year (sunset 12/31/10)	Dmi tyba 12/31/09	-175	-187	-24	-25	-26	-28	-29	-31	-33	-34	-35	-465	-627
7. Look-thru of certain regulated investment company ("RIC") stock in determining gross estate of nonresidents (sunset 12/31/10)	dda 12/31/09	*No Revenue Effect*												
8. Election for direct payment of low-income housing credit for 2010 [1]	DOE	-3,072	-1,232	281	435	504	521	523	523	523	523	482	-2,563	11
C. Business Tax Relief														
1. Tax credit for research and experimentation expenses (sunset 12/31/10)	apoia 12/31/09	-2,195	-1,522	-483	-425	-374	-329	-291	-274	-265	-256	-236	-5,328	-6,650
2. Indian employment tax credit (sunset 12/31/10)	tyba 12/31/09	-6	-34	-7	-1	---	---	---	---	---	---	---	-49	-49
3. New markets tax credit (sunset 12/31/10)	cyba 12/31/09	---	-7	-33	-101	-156	-169	-191	-208	-205	-176	-100	-467	-1,347
4. 50% tax credit for certain expenditures for maintaining railroad tracks (sunset 12/31/10)	epoid tyba 12/31/09	-66	-99	[2]	[2]	---	---	---	---	---	---	---	-165	-165
5. Mine rescue training credit:														
a. Mine rescue team training credit (sunset 12/31/10)	tyba 12/31/09	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	-1	-1
b. Allow mine rescue team training credit against the AMT (sunset 12/31/10)	tyba 12/31/09	-1	-1	-1	-1	[2]	[2]	[2]	---	---	---	---	-6	-6
6. Employer wage credit for activated military reservists (sunset 12/31/10)	pma 12/31/09	-1	-2	-1	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	-4	-4
7. 5-year depreciation for certain farming business machinery and equipment (sunset 12/31/10)	ppisa 12/31/09	-113	-228	-164	-156	-178	41	377	334	87	---	---	-798	---
8. 15-year straight-line cost recovery for qualified leasehold, restaurant and retail improvements (sunset 12/31/10)	ppisa 12/31/09	-145	-410	-528	-522	-513	-489	-475	-479	-466	-443	-380	-2,608	-4,851
9. 7-year recovery period for certain motorsports entertainment complexes (sunset 12/31/10)	ppisa 12/31/09	-11	-18	-11	-6	-3	-4	-4	1	6	6	6	-52	-38
10. Accelerated depreciation for business property on Indian reservations (sunset 12/31/10)	ppisa 12/31/09	-107	-186	-69	15	51	80	65	35	4	-7	-4	-216	-123
11. Enhanced charitable deduction for contributions of food inventory (sunset 12/31/10)	cma 12/31/09	-43	-35	---	---	---	---	---	---	---	---	---	-78	-78
12. Enhanced charitable deduction for contributions of book inventory (sunset 12/31/10)	cma 12/31/09	-17	-14	---	---	---	---	---	---	---	---	---	-31	-31

Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
13. Enhanced charitable deduction for qualified computer contributions (sunset 12/31/10).....	cmi tyba 12/31/09	-107	-88	---	---	---	---	---	---	---	---	---	-195	-195
14. Election to expense mine safety equipment (sunset 12/31/10).....	ppisa 12/31/09	-8	-2	3	2	2	1	1	1	[5]	---	---	-3	---
15. Special expensing rules for qualified film and television productions (sunset 12/31/10).....	qfatpca 12/31/09	-54	-108	12	26	18	15	13	11	9	7	5	-91	-46
16. Expensing of Brownfields environmental remediation costs (sunset 12/31/10).....	epoia 12/31/09	-201	-124	19	22	25	23	20	18	15	13	12	-236	-158
17. Deduction allowable with respect to income attributable to domestic production activities in Puerto Rico (sunset 12/31/10).....	tyba 12/31/09	-84	-101	---	---	---	---	---	---	---	---	---	-185	-185
18. Modify tax treatment of certain payments under existing arrangements to controlling exempt organizations (sunset 12/31/10).....	proaa 12/31/09	-17	-3	---	---	---	---	---	---	---	---	---	-20	-20
19. Exclusion of gain or loss on sale or exchange of certain Brownfield sites from unrelated business taxable income (sunset 12/31/10).....	paa 12/31/09	1	1	-1	-17	-18	-3	-3	-3	-3	-3	-3	-37	-54
20. REIT timber provisions including mineral royalties treated as qualified REIT income of timber REITs; treatment of REIT timber gain; and prohibited transactions safe harbor rules (sunset 12/31/10).....	tyea 5/22/09	-1	-1	-1	-1	-1	-1	-1	-1	---	---	---	-5	-7
21. Treatment of certain dividends of regulated investment companies ("RICs") (sunset 12/31/10).....	[6]	-12	-72	---	---	---	---	---	---	---	---	---	-84	-84
22. Extend the treatment of RICs as "qualified investment entities" under section 897 ("FIRPTA") (sunset 12/31/10).....	1/1/10	-5	-5	---	---	---	---	---	---	---	---	---	-10	-10
23. Exception under Subpart F for active financing income (sunset 12/31/10).....	tyba 12/31/09	-945	-2,978	---	---	---	---	---	---	---	---	---	-3,923	-3,923
24. Look-thru treatment of payments between related controlled foreign corporations under foreign personal holding company income rules (sunset 12/31/10).....	tyba 2009	-135	-439	---	---	---	---	---	---	---	---	---	-574	-574
25. Basis adjustment to stock of S corporations making charitable contributions of property (sunset 12/31/10).....	cmi tyba 12/31/09	-11	-11	-1	-2	-2	-2	-2	-2	-2	-2	-2	-29	-39
26. Empowerment zone tax incentives (sunset 12/31/10).....	tyba 12/31/09	-203	-103	8	2	1	---	-2	-1	-2	-2	-2	-295	-304
27. Tax incentives for investment in the District of Columbia (sunset 12/31/10).....	tyba 12/31/09	-55	-11	-3	-1	-1	-2	-4	-2	-2	-2	-2	-73	-85

Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
28. Renewal community tax incentives (sunset 12/31/10)	tyba 12/31/09	-239	-252	-80	-42	-3	-3	-2	-1	1	---	---	-615	-621
29. Increase in limit on cover over of rum excise tax revenues (from $10.50 to $13.25 per proof gallon) to Puerto Rico and the Virgin Islands; (sunset 12/31/10) [1] [7]	abiUSa 12/31/09	-104	-27	---	---	---	---	---	---	---	---	---	-131	-131
30. Payment to American Samoa in lieu of extension of economic development credit [1] [7]	---	-18	---	---	---	---	---	---	---	---	---	---	-18	-18
31. Election to temporarily utilize unused AMT credits determined by domestic investment [8]	tyba 12/31/09	-160	-3,032	167	142	120	102	87	74	63	53	45	-2,660	-2,337
32. Study of expiring tax provisions	DOE	*No Revenue Effect*												
D. Temporary Disaster Relief Provisions														
1. National disaster relief														
a. Waive certain mortgage revenue bond requirements following Federally declared disasters (sunset 12/31/10) [9]	bia 12/31/09	-1	-2	-2	-2	-2	-2	-2	-2	-2	-2	-2	-11	-21
b. Individual casualty losses attributable to Federally declared disasters deductible without regard to AGI; $500 floor applicable to all casualty losses (sunset 12/31/10)	tyba 12/31/09	-273	-455	---	---	---	---	---	---	---	---	---	-728	-728
c. Special depreciation allowance for qualified disaster property (sunset 12/31/10)	eoao doa 12/31/09	-335	-625	-469	-183	-76	-69	-18	97	83	72	65	-1,757	-1,457
d. 5-year carryback of net operating losses attributable to Federally declared disasters (sunset 12/31/10)	doa 12/31/09	-21	-380	53	57	49	37	28	21	15	12	9	-205	-120
e. Expensing of qualified disaster expenses (sunset 12/31/10)	eoao doa 12/31/09	-20	-17	1	1	1	1	1	1	---	---	---	-33	-31
2. New York Liberty Zone:														
a. Special depreciation allowance for nonresidential and residential real property (sunset 12/31/10)	ppisa 12/31/09	-33	-10	1	1	1	1	1	1	1	1	1	-39	-34
b. Tax-exempt bond financing (sunset 12/31/10)	bia 12/31/09	-2	-8	-12	-12	-12	-12	-12	-12	-12	-12	-12	-58	-118
3. GO Zone:														
a. Extend the higher credit rate for GO Zone rehabilitation (sunset 12/31/10)	apoia 12/31/09	-23	-29	-6	2	2	2	2	2	2	2	2	-52	-43
b. Work opportunity tax credit with respect to certain individuals affected by Hurricane Katrina for employees inside disaster areas (sunset 8/27/10)	iha 8/27/09	-6	-1	[2]	[2]	[2]	[2]	---	---	---	---	---	-7	-7

Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
c. Extend the placed-in-service deadline for GO Zone low-income housing credits (sunset 12/31/12).....	ppisa 12/31/10	---	-8	-29	-40	-40	-40	-40	-40	-40	-40	-40	-157	-357
Extension of Expiring Provisions……		**-10,724**	**-16,960**	**-1,681**	**-815**	**-606**	**-297**	**77**	**103**	**-214**	**-298**	**-199**	**-31,081**	**-31,619**
III. Pension Provisions														
A. Pension Funding Relief														
1. Single-employer plans [10].....	various	110	777	1,595	1,524	859	468	239	-134	-1,006	-1,743	-1,380	5,333	1,309
2. Rollover of amounts received in airline carrier bankruptcy.....	DOE	-25	-91	25	-4	-4	-4	-4	-4	-3	-3	-3	-102	-119
3. Multiemployer plans [10].....	various	9	34	56	79	99	117	134	132	99	40	-2	394	797
B. Defined Contribution Plan Fee Disclosure.....	pyba 12/31/11	*Negligible Revenue Effect*												
Total of Pension Provisions……		**94**	**720**	**1,676**	**1,599**	**954**	**581**	**369**	**-6**	**-910**	**-1,706**	**-1,385**	**5,625**	**1,987**
IV. Revenue Offsets														
A. Foreign Provisions														
1. Rules to prevent splitting foreign tax credits from the income to which they relate.....	generally fitpoaa doi	75	850	800	750	700	650	600	550	500	450	400	3,825	6,325
2. Denial of foreign tax credit with respect to foreign income not subject to United States taxation by reason of covered asset acquisitions.....	generally caaa DOE	25	400	400	400	400	400	400	400	400	400	400	2,025	4,025
3. Separate application of foreign tax credit limitation, etc., to items resourced under treaties	tyba DOE	3	25	25	25	25	25	25	25	25	25	25	128	253
4. Limitation on the amount of foreign taxes deemed paid with respect to section 956 inclusions.....	[11]	10	100	100	100	100	100	100	100	100	100	100	510	1,010
5. Special rule with respect to certain redemptions by foreign subsidiaries.....	aa doi	5	25	25	25	25	25	25	25	25	25	25	130	255
6. Modification of affiliation rules for purposes of rules allocating interest expense.....	tyba DOE	15	225	150	10	5	[5]	[5]	[5]	[5]	[5]	[5]	405	405
7. Termination of special rules for interest and dividends received from persons meeting the 80-percent foreign business requirements.....	generally tyba 12/31/10	---	1	2	6	9	12	15	21	25	29	33	30	153
8. Source rules for income on guarantees.....	gia DOE	25	200	200	200	200	200	200	200	200	200	200	1,025	2,025
9. Modification of statute of limitations for failure to disclose certain foreign transactions.....	[12]	*No Revenue Effect*												
B. Personal Service Income Earned in Pass-Thru Entities														
1. Partnership interests transferred in connection with performance of services.....	iipta DOE	*Estimate Included in Item IV.B.2.*												

Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
2. Income of partners for performing investment management services treated as ordinary income received for performance of services [13].....	tyea 12/31/10	298	958	1,362	1,707	1,661	1,463	1,551	1,977	2,267	2,268	2,185	7,449	17,697
3. Employment and self-employment tax treatment of professional service businesses [10].....	tyba 12/31/10	---	502	863	942	1,051	1,138	1,205	1,274	1,348	1,425	1,501	4,496	11,249
C. Corporate Provisions														
1. Treatment of securities of a controlled corporation exchanged for assets in certain reorganizations.....	gea DOE	5	25	25	25	25	25	25	25	25	25	25	130	255
2. Taxation of boot received in reorganizations.....	gea DOE	10	50	50	50	50	50	50	50	50	50	50	260	510
D. Other Provisions														
1. Increase Oil Spill Liability Trust Fund tax to 34 cents per barrel (sunset 12/31/20) and increase single-incident expenditure caps for the Oil Spill Liability Trust Fund [14].....	fqb 60da DOE & ema DOE	---	1,185	1,197	1,200	1,199	1,195	1,195	1,161	1,149	1,151	1,153	5,975	11,785
2. Increase by 36 percentage points the required corporate estimated tax payments factor for corporations with assets of at least $1 billion for payments due in July, August, and September 2015.....	DOE	---	---	---	---	---	21,234	-21,234	---	---	---	---	21,234	---
Total of Revenue Offsets……		**471**	**4,546**	**5,199**	**5,440**	**5,450**	**26,517**	**-15,843**	**5,808**	**6,114**	**6,148**	**6,097**	**47,622**	**55,947**
Total of Titles I - IV……		**-10,171**	**-11,929**	**4,519**	**5,380**	**4,934**	**25,919**	**-16,283**	**5,015**	**4,106**	**3,287**	**3,677**	**18,653**	**18,445**
V. Unemployment Health, and Other Assistance														
1. Establish a CMS-IRS data match to identify tax-delinquent providers [1] [7].....	DOE	---	---	38	38	50	50	50	50	50	50	50	175	425
Total of Unemployment Health, and Other Assistance……		**---**	**---**	**38**	**38**	**50**	**50**	**50**	**50**	**50**	**50**	**50**	**175**	**425**
VI. Other Provisions														
1. Exclude from gross income amounts received by Indians pursuant to Cobell settlement.....	DOE	*No Revenue Effect*												
2. Provide that tax refunds or credits are not income in the year received for purposes of the administration of Federal programs and federally assisted programs (sunset 12/31/10) [1] [7].....	ara 12/31/09	-2	---	---	---	---	---	---	---	---	---	---	-2	-2

Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
3. Extensions of duty suspensions on certain cotton shirting fabrics (sunset 12/31/13) [7].....	DOE	---	[15]	[15]	[15]	[15]	---	---	---	---	---	---	[15]	[15]
Total of Other Provisions……		**-2**	**[15]**	**[15]**	**[15]**	**[15]**	**---**	**---**	**---**	**---**	**---**	**---**	**-2**	**-2**
NET TOTAL ……		**-10,173**	**-11,929**	**4,557**	**5,418**	**4,984**	**25,969**	**-16,233**	**5,065**	**4,156**	**3,337**	**3,727**	**18,826**	**18,868**

Joint Committee on Taxation

NOTE: Details may not add to totals due to rounding. The date of enactment is assumed to be July 1, 2010.

Legend for "Effective" column:

aa = acquisitions after
abiUSa = articles brought into the United States after
api = appliances produced in
apoia = amounts paid or incurred after
ara = amounts received after
bia = bonds issued after
caaa = covered asset acquisitions after
cma = contributions made after
cmi = contributions made in
cyba = calendar years beginning after
dda = decedents dying after
Dmi - distributions made in
doa = disasters occurring after
DOE = date of enactment
ema = expenditures made after
eoao = expenditures on account of
epasa = electricity produced and sold after
epoia = expenses paid or incurred after
epoid = expenses paid or incurred during
fitpoaa = foreign income taxes paid or accrued after
fpa = fuel produced after
fpisa = facilities placed in service after
fqb = first quarter beginning
fsoua = fuel sold or used after
gea = generally exchanges after
gia = guarantees issued after
haa = homes acquired after
iha = individuals hired after
iipta = interests in partnerships transferred after
oia = obligations issued after
paa = property acquired after
Paa = penalties assessed after
pma = payments made after
ppa = property purchased after
ppisa = property placed in service after
proaa = payments received or accrued after
pyba = plan years beginning after
qfatpca = qualified film and television productions commencing after
tyba = taxable years beginning after
tyea = taxable years ending after
60da = 60 days after

[1] Estimate includes the following outlay effects:	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
Build America Bonds……	---	484	1,949	2,730	2,730	2,730	2,730	2,730	2,730	2,730	2,730	10,622	24,270
Recovery Zone Bonds……	14	70	141	141	141	141	141	141	141	141	141	648	1,353
Direct payment of energy-efficient appliance tax credit……	68	2	---	---	---	---	---	---	---	---	---	69	69
Election for refundable low-income housing credit for 2010……	3,112	1,334	---	---	---	---	---	---	---	---	---	4,446	4,446
Rum cover over [7]……	104	27	---	---	---	---	---	---	---	---	---	131	131
Payment to American Samoa [7]……	18	---	---	---	---	---	---	---	---	---	---	18	18
CMS-IRS data match to identify tax-delinquent providers [7]……	---	---	-38	-38	-50	-50	-50	-50	-50	-50	-50	-175	-425
Tax refunds or credits not income in the year received [7]……	2	---	---	---	---	---	---	---	---	---	---	2	2

[2] Loss of less than $500,000.
[3] Estimate includes interaction with item II.C.3.
[4] Effective for qualified equity investments initially made after March 15, 2010, and before January 1, 2012.
[5] Gain of less than $500,000.
[6] Effective for dividends with respect to taxable years of regulated investment companies beginning after December 31, 2009.

[Footnotes for JCX-30-10 are continued on the following page]

Footnotes for JCX-30-10 continued:

[7] Estimate provided by the Congressional Budget Office.

[8] Provision does not apply for taxable years beginning after December 31, 2010.

[9] Extends provisions in Internal Revenue Code sections 143(k)(11) and 143(k)(13).

[10] Estimate includes the following off-budget effects:

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
Pension Funding Relief for Single-Employer Plans……	---	144	342	349	202	104	45	-60	-331	-561	-450	1,141	-215
Pension Funding Relief for Multiemployer Plans……	---	5	12	20	25	30	36	37	29	11	-1	92	203
Employment and self-employment tax treatment of professional service businesses……	---	316	553	547	568	615	652	692	733	777	823	2,598	6,276

[11] Effective for acquisitions of U.S. property determined under section 956 after the date of introduction.

[12] Effective for returns filed after March 18, 2010, as well as other returns for which the limitations period under section 6501 had not yet expired as of that date.

[13] For taxable years beginning before January 1, 2013, 50 percent of income and other items to which the provision applies is treated as ordinary; 75 percent thereafter. These percentages also apply to self-employment and Medicare unearned income tax.

[14] Estimate does not include the following outlay effects,

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
which are provided by the Congressional Budget Office……	---	500	400	100	---	---	---	---	---	---	---	1,000	1,000

[15] Negligible revenue effect.