

| Provision | Effective | 1998 | 1999 | 2000 | 2001 | 2002 | 2003 | 2004 | 2005 | 2006 | 2007 | 2008 | 1998-03 | 1998-08 |
|---|--------------------|--|------|------|------|--------|--------|--------|--------|--------|--------|--------|---------|---------|
| <i>D. Education Tax Provisions</i> | | | | | | | | | | | | | | |
| 1. Tax credits for holders of qualified school modernization bonds and qualified zone academy bonds..... | 1/1/99 | --- | -44 | -362 | -719 | -1,005 | -1,133 | -1,150 | -1,150 | -1,150 | -1,150 | -1,150 | -3,264 | -9,014 |
| 2. Exclusion for employer-provided educational assistance, including graduate level courses (sunset 5/31/01)..... | [8] | -10 | -240 | -378 | -462 | -234 | --- | --- | --- | --- | --- | --- | -1,324 | -1,324 |
| 3. Eliminate tax on forgiveness of direct student loans subject to income contingent repayment..... | 1/1/99 | ----- No Revenue Effect in the Budget Window ----- | | | | | | | | | | | | |
| <i>E. Extend Certain Expiring Tax Provisions</i> | | | | | | | | | | | | | | |
| 1. Work opportunity tax credit (through 4/30/00)..... | wpoifbwa 6/30/98 | -10 | -234 | -263 | -184 | -85 | -32 | -9 | -1 | --- | --- | --- | -808 | -818 |
| 2. Welfare-to-work tax credit (through 4/30/00)..... | wpoifbwa 4/30/99 | --- | -14 | -51 | -46 | -25 | -11 | -4 | -1 | --- | --- | --- | -147 | -151 |
| 3. Research tax credit (through 6/30/99)..... | 7/1/98 | -205 | -920 | -505 | -258 | -184 | -94 | -20 | --- | --- | --- | --- | -2,167 | -2,187 |
| 4. Contributions of appreciated stock to private foundations (through 6/30/99)..... | 7/1/98 | --- | -63 | -13 | -4 | --- | --- | --- | --- | --- | --- | --- | -80 | -80 |
| <i>F. Miscellaneous Tax Provisions</i> | | | | | | | | | | | | | | |
| 1. Increase low-income housing tax credit per capita cap to \$1.75 (non-indexed)..... | 1/1/99 | --- | -20 | -83 | -190 | -336 | -479 | -601 | -697 | -790 | -902 | -1,035 | -1,107 | -5,132 |
| 2. Extend and modify Puerto Rico tax credit..... | tyba 12/31/98 | --- | -23 | -110 | -131 | -216 | -545 | -803 | -1,095 | -1,792 | -2,251 | -2,605 | -1,025 | -9,571 |
| 3. Specialized small business investment company tax incentives..... | various | [3] | [3] | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -4 | -10 |
| 4. Accelerate and expand incentives available to two new empowerment zones..... | 1/1/99 | --- | -37 | -45 | -6 | -6 | -7 | -10 | -33 | -42 | -39 | -12 | -101 | -237 |
| 5. Exempt first \$2,000 of severance pay from income tax (through 12/31/03) [9]..... | spri tyba 12/31/98 | --- | -72 | -147 | -151 | -156 | -160 | -81 | --- | --- | --- | --- | -687 | -768 |
| <i>G. Simplification Provisions</i> | | | | | | | | | | | | | | |
| 1. Optional Self-Employment Contributions Act ("SECA") computations..... | tyba 12/31/98 | --- | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 3 | 7 |
| 2. Statutory hedging and other rules to ensure business property is treated as ordinary property..... | DOE | -2 | -10 | -12 | -14 | -16 | -18 | -20 | -22 | -24 | -26 | -28 | -72 | -192 |
| 3. Clarify rules relating to certain disclaimers..... | Dma DOE | --- | --- | -4 | -4 | -4 | -4 | -4 | -5 | -5 | -5 | -5 | -16 | -40 |
| 4. Simplify the foreign tax credit limitation for dividends from "10/50" companies..... | tyba 12/31/97 | -55 | -235 | -247 | -259 | -272 | -229 | -65 | -39 | -23 | -14 | -8 | -1,297 | -1,446 |
| 5. Interest treatment for dividends paid by certain regulated investment companies to foreign persons..... | [10] | [3] | -31 | -66 | -69 | -73 | -77 | -80 | -84 | -89 | -93 | -98 | -316 | -760 |
| <i>H. Taxpayers' Rights Provisions</i> | | | | | | | | | | | | | | |
| 1. Suspend collection by levy during refund suit..... | tyba 12/31/98 | ----- Negligible Revenue Effect ----- | | | | | | | | | | | | |
| 2. Suspend collection by levy while offer-in-compromise is pending..... | ta 60da DOE | ----- Negligible Revenue Effect ----- | | | | | | | | | | | | |
| 3. Suspend collection to permit resolution of disputes as to liability..... | tyba 12/31/98 | --- | --- | --- | -22 | -1 | -1 | -1 | -1 | -1 | -1 | -1 | -24 | -29 |
| 4. Require District Counsel approval of certain third-party collection activities..... | taa DOE | ----- Negligible Revenue Effect ----- | | | | | | | | | | | | |
| 5. Require management approval of levies on certain assets..... | taa DOE | ----- Negligible Revenue Effect ----- | | | | | | | | | | | | |
| 6. Require District Counsel review of jeopardy and termination assessments and jeopardy levies..... | taa DOE | ----- Negligible Revenue Effect ----- | | | | | | | | | | | | |
| 7. Require management approval of sales of perishable goods..... | taa DOE | ----- Negligible Revenue Effect ----- | | | | | | | | | | | | |
| 8. Codify certain fair debt collection procedures..... | DOE | ----- No Revenue Effect ----- | | | | | | | | | | | | |

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|---|----------------|-------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|----------------|----------------|
| 9. Modify payment of taxes [11]..... | DOE | | | | | | | | | | | | | |
| 10. Require disclosures relating to extension of statutes of limitation by agreement..... | DOE | | | | | | | | | | | | | |
| 11. Publish living allowance schedules relating to offers-in-compromise..... | 180da DOE | | | | | | | | | | | | | |
| 12. Ensure availability of installment agreements..... | DOE | | | | | | | | | | | | | |
| 13. Increase superpriority dollar limits..... | DOE | | | | | | | | | | | | | |
| 14. Permit personal delivery of section 6672(b) notices.... | DOE | | | | | | | | | | | | | |
| 15. Allow taxpayers to quash all third-party summonses.. | ssa DOE | | | | | | | | | | | | | |
| 16. Require disclosure of criteria for examination selection..... | 180da DOE | | | | | | | | | | | | | |
| 17. Prohibit threat of audit to coerce tip reporting alternative commitment agreements..... | DOE | | | | | | | | | | | | | |
| 18. Permit service of summonses by mail..... | ssa DOE | | | | | | | | | | | | | |
| 19. Allow suits for damages if the IRS violates certain bankruptcy procedures..... | voa DOE | | | | | | | | | | | | | |
| 20. Increase Tax Court's "small case" limit..... | pca DOE | | | | | | | | | | | | | |
| 21. Provide equitable tolling on filing refund claims during periods of disability..... | tyea DOE | | | | | | | | | | | | | |
| 22. Require notice of deficiency to specify Tax Court filing deadlines..... | nma 12/31/1998 | | | | | | | | | | | | | |
| 23. Allow actions for refund with respect to certain estates which have elected the installment method of payment..... | DOE | | | | | | | | | | | | | |
| 24. Expand authority to award costs and certain fees..... | DOE | [3] | -1 | -1 | -1 | -2 | -2 | -2 | -2 | -3 | -3 | -3 | -7 | -20 |
| 25. Expand authority to issue taxpayer assistance orders..... | DOE | [12] | [12] | [12] | [12] | [12] | [12] | [12] | [12] | [12] | [12] | [12] | [13] | [14] |
| 26. Provide new remedy for third parties who claim that the IRS has filed an erroneous lien..... | DOE | | | | | | | | | | | | | |
| 27. Allow damage suits by persons other than the taxpayer..... | caa DOE | | | | | | | | | | | | | |
| 28. Suspend collection in certain joint liability cases..... | tyba 12/31/98 | | | | | | | | | | | | | |
| 29. Require explanation of joint and several liability..... | 180da DOE | | | | | | | | | | | | | |
| 30. Relieve innocent spouse of liability in certain cases... | tyba DOE | | | | | | | | | | | | | |
| 31. Allow "global" interest netting of under and overpayments..... | pmioa DOE | | | | | | | | | | | | | |
| 32. Facilitate archiving of IRS records..... | DOE | | | | | | | | | | | | | |
| 33. Clarify authority to prescribe manner of making elections..... | DOE | | | | | | | | | | | | | |
| 34. Grant IRS broad authority to enter into cooperative agreements with State tax authorities..... | DOE | | | | | | | | | | | | | |
| 35. Provide clinics for low-income taxpayers..... | DOE | | | | | | | | | | | | | |
| 36. Provide procedures for release of field service data... | DOE | | | | | | | | | | | | | |
| SUBTOTAL: PROVISIONS REDUCING REVENUES..... | | -265 | -2,751 | -4,117 | -4,625 | -5,269 | -5,920 | -6,048 | -6,348 | -7,213 | -7,849 | -8,377 | -22,942 | -58,777 |
| II. PROVISIONS INCREASING REVENUE | | | | | | | | | | | | | | |
| A. Accounting Provisions | | | | | | | | | | | | | | |
| 1. Repeal lower of cost or market inventory accounting method..... | tyba DOE | [15] | 154 | 348 | 337 | 333 | 270 | 106 | 61 | 65 | 69 | 74 | 1,442 | 1,817 |
| 2. Repeal non-accrual experience method of accounting and make certain trade receivables ineligible for mark-to-market treatment..... | tyea DOE | 149 | 532 | 463 | 300 | 107 | 80 | 84 | 88 | 93 | 97 | 102 | 1,631 | 2,095 |

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|---|-----------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|---------|---------|
| <i>B. Financial Products and Institutions</i> | | | | | | | | | | | | | | |
| 1. Defer interest deduction on certain convertible debt... | dio/a dofca | 1 | 13 | 25 | 38 | 51 | 64 | 72 | 80 | 89 | 99 | 107 | 192 | 639 |
| 2. Extend pro rata disallowance of tax-exempt interest expense that applies to banks to all financial intermediaries..... | [16] | --- | 5 | 12 | 16 | 20 | 24 | 28 | 32 | 36 | 39 | 42 | 77 | 255 |
| <i>C. Corporate Tax Provisions</i> | | | | | | | | | | | | | | |
| 1. Eliminate dividends-received deduction for certain preferred stock..... | sia DOE | 2 | 6 | 11 | 17 | 23 | 29 | 36 | 42 | 50 | 57 | 65 | 86 | 336 |
| 2. Repeal tax-free conversion of large C corporations into S corporations..... | tyba 1/1/99 | --- | 3 | 16 | 38 | 55 | 62 | 64 | 66 | 68 | 70 | 72 | 174 | 514 |
| 3. Restrict special net operating loss carryback rules for specified liability losses..... | NOLgi tyba DOE | --- | --- | 15 | 32 | 42 | 43 | 41 | 40 | 41 | 42 | 42 | 131 | 337 |
| 4. Clarify the meaning of "subject to" liabilities under section 357(c)..... | Ta dofca | 1 | 10 | 12 | 14 | 16 | 18 | 20 | 22 | 24 | 26 | 28 | 71 | 191 |
| <i>D. Insurance Provisions</i> | | | | | | | | | | | | | | |
| 1. Increase the proration percentage for property and casualty ("P&C") insurance companies..... | [17] | --- | 25 | 41 | 63 | 86 | 110 | 135 | 161 | 189 | 217 | 247 | 325 | 1,274 |
| 2. Capitalization of net premiums for credit life insurance contracts..... | tyba DOE | --- | 35 | 32 | 29 | 25 | 22 | 18 | 15 | 11 | 7 | 4 | 142 | 198 |
| 3. Modify corporate-owned life insurance rules..... | tyba DOE | --- | 196 | 404 | 427 | 454 | 483 | 512 | 541 | 571 | 602 | 634 | 1,963 | 4,821 |
| 4. Modify reserve rules for annuity contracts (Administration's estimate) [18]..... | tyeo/a DOE | --- | 1,815 | 674 | 821 | 639 | 692 | 849 | 653 | 720 | 883 | 786 | 4,641 | 8,532 |
| 5. Tax certain exchanges of insurance contracts and reallocations of assets within variable insurance contracts..... | cia DOE | --- | 19 | 41 | 102 | 204 | 361 | 502 | 594 | 667 | 719 | 774 | 726 | 3,982 |
| 6. Computation of "investment in the contract" for mortality and expense charges on certain insurance contracts..... | cia dofca | --- | 1 | 4 | 12 | 23 | 35 | 47 | 60 | 73 | 86 | 100 | 75 | 442 |
| <i>E. Estate and Gift Tax Provisions</i> | | | | | | | | | | | | | | |
| 1. Eliminate non-business valuation discounts..... | tma 12/31/98 | --- | --- | 485 | 495 | 525 | 554 | 590 | 628 | 656 | 700 | 750 | 2,059 | 5,383 |
| 2. Gifts of "present interests" in a trust (repeal "Crummey" case rule)..... | gma 12/31/98 | --- | --- | 50 | 53 | 55 | 58 | 61 | 64 | 67 | 71 | 74 | 216 | 555 |
| 3. Eliminate gift tax exemption for personal residence trusts..... | tita DOE | --- | -1 | -1 | -1 | 1 | 5 | 10 | 15 | 20 | 25 | 30 | 3 | 103 |
| 4. Include qualified terminable interest property ("QTIP") trust assets in surviving spouse's estate..... | dda DOE | ----- | ----- | ----- | ----- | ----- | ----- | ----- | ----- | ----- | ----- | ----- | ----- | ----- |
| <i>F. Foreign Tax Provisions</i> | | | | | | | | | | | | | | |
| 1. Replace sales source rules with activity-based rule.... | tyba DOE | 1 | 758 | 1,760 | 1,892 | 2,034 | 2,187 | 2,351 | 2,527 | 2,716 | 2,920 | 3,140 | 8,632 | 22,286 |
| 2. Modify rules relating to foreign oil and gas extraction income..... | ftpa tyba DOE | 5 | 187 | 193 | 199 | 205 | 212 | 219 | 226 | 233 | 240 | 248 | 1,001 | 2,167 |
| 3. Apply "80/20" company rules on a group-wide basis.. | iodpoa 30da DOE | --- | 40 | 42 | 44 | 46 | 49 | 51 | 54 | 56 | 59 | 62 | 221 | 503 |
| 4. Prescribe regulations regarding foreign built-in losses | DOE | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| 5. Prescribe regulations regarding use of hybrids..... | DOE | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| 6. Modify foreign office material participation exception applicable to certain inventory sales | too/a DOE | --- | 3 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 37 | 102 |
| 7. Modify controlled foreign corporation exception from U.S. tax on transportation income..... | tyba DOE | --- | 3 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 23 | 48 |
| <i>G. Administrative Provisions</i> | | | | | | | | | | | | | | |
| 1. Increase penalties for failure to file correct information returns..... | rd 90da DOE | --- | --- | 7 | 15 | 23 | 24 | 25 | 27 | 28 | 29 | 31 | 69 | 209 |
| 2. Modify definition of substantial understatement penalty for large corporations..... | tyba DOE | --- | --- | --- | --- | --- | 10 | 20 | 20 | 20 | 20 | 20 | 10 | 110 |

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|---|------------------|---------------------------------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|---------------|---------------|
| 3. Repeal exemption for withholding on gambling winnings from bingo and keno in excess of \$5,000..... | pma fmb 10da DOE | --- | 22 | 4 | 2 | 2 | 3 | 3 | 3 | 3 | 3 | 3 | 34 | 48 |
| 4. Modify deposit requirement for FUTA [11]..... | mba 12/31/03 | --- | --- | --- | --- | --- | --- | 997 | 50 | 53 | 57 | 2 | --- | 1,159 |
| 5. Clarify and expand math error procedures..... | tyea DOE | --- | 12 | 25 | 26 | 27 | 28 | 29 | 30 | 31 | 32 | 33 | 118 | 273 |
| <i>H. Real Estate Investment Company Provisions</i> | | | | | | | | | | | | | | |
| 1. Freeze grandfathered status of stapled or paired-share REITs..... | dofca | [5] | 1 | 3 | 6 | 10 | 14 | 19 | 26 | 35 | 45 | 58 | 34 | 217 |
| 2. Restrict impermissible businesses indirectly conducted by REITs..... | dofca | [5] | 1 | 2 | 4 | 5 | 7 | 9 | 10 | 12 | 14 | 16 | 19 | 80 |
| 3. Modify treatment of closely held REITs..... | tyba dofca | --- | 4 | 12 | 13 | 13 | 14 | 15 | 16 | 16 | 17 | 18 | 56 | 138 |
| <i>I. Earned Income Tax Compliance Provisions</i> | | | | | | | | | | | | | | |
| 1. Simplify foster child definition under the earned income credit..... | tyba 12/31/98 | --- | --- | 4 | 5 | 5 | 5 | 5 | 5 | 6 | 6 | 6 | 19 | 47 |
| 2. Definition of qualifying child for purposes of the earned income credit where more than one taxpayer satisfies the requirements with respect to the same child..... | tyba DOE | ----- Negligible Revenue Effect ----- | | | | | | | | | | | | |
| <i>J. Other Revenue-Increase Provisions</i> | | | | | | | | | | | | | | |
| 1. Repeal percentage depletion for certain non-fuel minerals mined on Federal and formerly Federal lands [19]..... | tyba DOE | --- | 39 | 66 | 67 | 69 | 71 | 72 | 74 | 76 | 78 | 80 | 311 | 692 |
| 2. Modify depreciation method for tax-exempt use property..... | ppisa 12/31/98 | --- | 2 | 5 | 9 | 13 | 17 | 22 | 27 | 32 | 37 | 43 | 47 | 207 |
| 3. Impose excise tax on purchase of structured settlements..... | aoa DOE | --- | 10 | 14 | 15 | 17 | 18 | 19 | 20 | 21 | 23 | 24 | 74 | 181 |
| 4. Reinstate Oil Spill Liability Trust Fund excise tax and increase trust fund ceiling to \$5 billion (through 9/30/08)..... | DOE | 64 | 186 | 231 | 235 | 239 | 243 | 248 | 253 | 258 | 264 | 269 | 1,197 | 2,489 |
| <i>K. Reinstate Hazardous Substance Superfund Excise Tax and Environmental Income Tax</i> | | | | | | | | | | | | | | |
| 1. Superfund corporate environmental income tax..... | [20] | 100 | 953 | 625 | 608 | 601 | 600 | 609 | 630 | 656 | 681 | 710 | 3,487 | 6,773 |
| 2. Superfund excise taxes (through 9/30/08)..... | DOE | 84 | 667 | 693 | 706 | 718 | 731 | 745 | 760 | 775 | 792 | 809 | 3,598 | 7,479 |
| <i>L. Extend Highway Trust Fund Excise Taxes on Motor Fuels [21].....</i> | | | | | | | | | | | | | | |
| | 10/1/99 | ----- No Revenue Effect ----- | | | | | | | | | | | | |
| SUBTOTAL: PROVISIONS INCREASING REVENUE..... | | 407 | 5,701 | 6,330 | 6,652 | 6,700 | 7,158 | 8,649 | 7,937 | 8,485 | 9,145 | 9,523 | 32,941 | 76,682 |
| III. OTHER MEASURES AFFECTING RECEIPTS | | | | | | | | | | | | | | |
| <i>A. Convert Airport and Airway Trust Fund Excise Taxes to Cost-Based User Fees for Federal Aviation Administration services (Administration's estimate) [18].....</i> | | | | | | | | | | | | | | |
| | 10/1/99 | --- | --- | 1,700 | 1,700 | 1,700 | 850 | 488 | 354 | 208 | 45 | -127 | 5,950 | 6,918 |
| <i>B. Tobacco Legislation (Administration's estimate) [18].</i> | | | | | | | | | | | | | | |
| | --- | --- | 9,795 | 11,787 | 13,283 | 14,544 | 16,085 | 16,556 | 17,039 | 17,529 | 18,034 | 18,567 | 65,494 | 153,219 |
| <i>C. Revenue Effects of Other Provisions in the President's Fiscal Year 1999 Budget Proposal</i> | | | | | | | | | | | | | | |
| 1. Infrastructure grant programs to leverage private financing for new transportation infrastructure projects: | | | | | | | | | | | | | | |
| a. \$150 million per year capitalization of State Infrastructure Banks ("SIB") and authority to dedicate a portion of the Highway Trust Fund to SIBs..... | | | | | | | | | | | | | | |
| | 1/1/99 | --- | -1 | -4 | -8 | -12 | -16 | -20 | -24 | -29 | -34 | -39 | -40 | -185 |

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|--|-----------|-------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|----------------|----------------|
| b. \$100 million per year infrastructure credit enhancement grants to leverage the financing of public-private projects..... | 1/1/99 | --- | -2 | -9 | -26 | -41 | -43 | -30 | -18 | -16 | -16 | -16 | -120 | -215 |
| 2. Amendment to Housing Act of 1937 to permit drawdown of funds for credit enhancement of tax-exempt bonds; may be used in conjunction with low-income housing credit..... | [22] | --- | -4 | -7 | -10 | -11 | -12 | -12 | -11 | -11 | -11 | -11 | -44 | -101 |
| 3. Employer buy-in (COBRA continuation coverage) for certain retirees [23]..... | 1/1/99 | --- | -10 | -16 | -17 | -19 | -21 | -23 | -26 | -28 | -31 | -34 | -82 | -224 |
| 4. Consumer bill of rights and responsibilities from the Advisory Commission on Consumer Protection and Quality in the Health Care Industry [23]..... | 1/1/99 | --- | -199 | -295 | -310 | -327 | -347 | -367 | -390 | -413 | -437 | -463 | -1,478 | -3,548 |
| SUBTOTAL: OTHER MEASURES AFFECTING RECEIPTS..... | | --- | 9,579 | 13,156 | 14,612 | 15,834 | 16,496 | 16,592 | 16,924 | 17,240 | 17,550 | 17,877 | 69,680 | 155,864 |
| NET TOTAL | | 142 | 12,529 | 15,369 | 16,639 | 17,265 | 17,734 | 19,193 | 18,513 | 18,512 | 18,846 | 19,023 | 79,679 | 173,769 |
| Subtotal of Provisions That Lose Revenue..... | | -265 | -2,968 | -4,449 | -4,997 | -5,680 | -6,360 | -6,501 | -6,818 | -7,711 | -8,379 | -8,941 | -24,712 | -63,063 |
| Subtotal of Provisions That Raise Revenue..... | | 407 | 15,497 | 19,818 | 21,636 | 22,945 | 24,094 | 25,694 | 25,331 | 26,223 | 27,225 | 27,964 | 104,391 | 236,832 |

Joint Committee on Taxation

NOTE: Details may not add to totals due to rounding. Enactment date assumed to be August 1, 1998.

Legend for "Effective" column:

- | | |
|---|--|
| aoa = acquisitions occurring after | rd = returns due |
| caa = collections actions after | sa = sales after |
| cia = contracts issued after | sia = stock issued after |
| cyba = calendar years beginning after | ssa = summonses served after |
| dda = decedents dying after | spri = severance pay received in |
| dio/a = debt issued on or after | ta = taxes assessed |
| Dma = disclaimers made after | Ta = transfers after |
| dozca = date of first committee action | taa = taxes assessed after |
| DOE = date of enactment | tita = transfers in trust after |
| fmb = first months beginning at least | tma = transfers made after |
| ftpa = foreign taxes paid or accrued in | too/a = transactions occurring on or after |
| gma = gifts made after | tyba = taxable years beginning after |
| iopoa = interest or dividends paid or accrued more than | tyea = taxable years ending after |
| mba = months beginning after | tyeo/a = taxable years ending on or after |
| nma = notices mailed after | voo = violations occurring after |
| NOLgi = net operating losses generated in | wpoifbwa = wages paid or incurred for individuals beginning work after |
| pca = proceedings commencing after | yba = years beginning after |
| pma = payments made after | 10da = 10 days after |
| pmioa = periods of mutual indebtedness occurring after | 30da = 30 days after |
| ppisa = property placed in service after | 60da = 60 days after |
| ptba = partial terminations beginning after | 90da = 90 days after |
| pyba = plan years beginning after | 180da = 180 days after |

[Footnotes for JCX-14-98 appear on the following page]

Footnotes for JCX-14-98:

- [1] Generally effective for final purchases from unrelated third parties between 12/31/99, and before 1/1/04, for use within the United States. The credit for fuel cells would be available for purchases after 12/31/99, and before 1/1/05.
- [2] Up to \$2,000 for homes purchased after 12/31/98 and before 1/1/04; up to \$1,000 for homes purchased after 12/31/03 and before 1/1/06.
- [3] Loss of less than \$500,000.
- [4] Effective for investments placed in service after 12/31/98 and before 1/1/04.
- [5] Gain of less than \$500,000.
- [6] Effective for solar water heating equipment placed in service after 12/31/98 and before 1/1/04; effective for photovoltaic equipment placed in service after 12/31/98 and before 1/1/06.
- [7] Gain of less than \$1 million.
- [8] Extension of the exclusion for employer-provided educational assistance to graduate-level courses is effective for expenses with respect to courses beginning after 12/31/97. The exclusion expires with respect to courses (both graduate and undergraduate) beginning after 12/31/02.
- [9] The estimate assumes clarifications of the proposal, e.g., a definition of severance pay.
- [10] Effective for dividends paid by RICs in taxable years beginning after 12/31/98.
- [11] Estimate provided by the Congressional Budget Office.
- [12] Loss of less than \$1 million.
- [13] Loss of less than \$5 million.
- [14] Loss of less than \$10 million.
- [15] Gain of less than \$5 million.
- [16] Effective taxable years beginning after the date of enactment with respect to obligations issued on or after the date of first committee action.
- [17] Effective for taxable years beginning after the date of enactment with respect to investments acquired on or after the date of first committee action.
- [18] The Joint Committee on Taxation's analysis of this provision has not been completed at this time due to insufficient specification of the proposal.
- [19] Estimate assumes proposal applies to all land originally purchased under 1872 laws; no grandfather for lands purchased from third party.
- [20] Effective for taxable years beginning after 12/31/97 through taxable years beginning before 1/1/09.
- [21] The Congressional Budget Office revenue baseline assumes that these taxes will remain in effect throughout the budget window. Thus, the extension of these taxes is scored as having no revenue effect.
- [22] Effective for projects associated with bonds issued in 1997 through 2002.
- [23] This provision has no outlay effect. The table shows the indirect effects of the provision on Federal revenues (income and payroll taxes). Estimate was prepared by the Congressional Budget Office in cooperation with the Joint Committee on Taxation.