JOINT COMMITTEE ON TAXATION
March 10, 2010
JCX-9-10

ESTIMATED REVENUE EFFECTS OF THE REVENUE PROVISIONS CONTAINED IN THE "AMERICAN WORKERS, STATE AND BUSINESS RELIEF ACT OF 2010," AS PASSED BY THE SENATE ON MARCH 10, 2010

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. Extension of Expiring Provisions														
A. Energy														
1. Alternative motor vehicle credit for heavy hybrids (sunset 12/31/10).....	ppa 12/31/09	-3	-3	-1	-1	[1]	[2]	[2]	---	---	---	---	-8	-8
2. Incentives for biodiesel and renewable diesel:														
a. Biodiesel (sunset 12/31/10).....	fsoua 12/31/09	-726	-268	---	---	---	---	---	---	---	---	---	-994	-994
b. Renewable diesel (sunset 12/31/10).....	fsoua 12/31/09	-10	-4	---	---	---	---	---	---	---	---	---	-14	-14
3. Credit for electricity produced at open-loop biomass facilities placed-in-service before 10/22/04 (sunset 12/31/10).....	epasa 12/31/09	-54	-36	-7	-4	-3	-1	---	---	---	---	---	-105	-105
4. Extend placed-in-service date for refined coal and steel industry fuel (sunset 12/31/10 for facilities placed-in-service after 12/31/09).....	fpisa 12/31/09	-3	-6	-6	-6	-6	-6	-6	-6	-6	-7	-5	-33	-63
5. Period of incurring qualified expenditures for purposes of credit for production of low sulfur diesel fuel for small refiners in compliance with Environmental Protection Agency sulfur regulations for small refiners (sunset 12/31/10).....	[3]	-11	-7	-1	-1	[1]	[2]	[2]	[2]	[2]	[2]	[2]	-20	-20
6. 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
7. Credit for construction of energy efficient new homes (sunset 12/31/10).....	ppisa 12/31/09	-23	-17	-6	-6	-5	-4	-4	-1	---	---	---	-61	-66
8. Incentives for alternative fuel and alternative fuel mixtures (excluding liquified hydrogen) (sunset 12/31/10).....	fsoua 12/31/09	-148	-48	---	---	---	---	---	---	---	---	---	-196	-196
9. 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	---

Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
10. Extension of 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
11. Grants for energy efficient appliances in lieu of credit [4]	api 2009 & 2010	-68	-2	---	---	---	---	---	---	---	---	---	-69	-69
12. 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
13. Extend and modify section 45 credit for steel industry fuel (sunset 12/31/10)	DOE & fpa 10/1/08	-13	-15	-16	---	---	---	---	---	---	---	---	-44	-44
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
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	-300	-1,201	---	---	---	---	---	---	---	---	---	-1,501	-1,501
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 refundable low-income housing credit for 2010 [4]	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	-17	-23	-7	-1	---	---	---	---	---	---	---	-48	-48
3. New markets tax credit (sunset 12/31/10)	cyba 12/31/09	-15	-55	-161	-181	-204	-219	-219	-196	-145	-9	3	-834	-1,401
4. 50% tax credit for certain expenditures for maintaining railroad tracks (sunset 12/31/10)	epoid tyba 12/31/09	-66	-99	[1]	[1]	---	---	---	---	---	---	---	-165	-165
5. Extension of mine rescue team training credit (sunset 12/31/10)	tyba 12/31/09	[1]	[1]	[1]	[1]	[1]	[1]	[1]	[1]	[1]	[1]	[1]	-1	-1

Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
6. Employer wage credit for activated military reservists (sunset 12/31/10)	pma 12/31/09	-1	-2	-1	[1]	[1]	[1]	[1]	[1]	[1]	[1]	[1]	-4	-4
7. 5-year recovery period for certain farming business machinery or 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 and new restaurant buildings (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
13. Enhanced charitable deduction for qualified computer contributions (sunset 12/31/10)	cmi tyba 12/31/09	-107	-88	---	---	---	---	---	---	---	---	---	-195	-195
14. Extension of election to expense advanced mine safety equipment (sunset 12/31/10)	ppisa 12/31/09	-8	-2	3	2	2	1	1	1	[2]	[2]	[2]	-4	-2
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	*Estimate Included in Item I.C.25.*												
21. Treatment of certain dividends of regulated investment companies (sunset 12/31/10)	[5]	-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

Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
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 CFCs under foreign personal holding company income rules (sunset 12/31/10)	tyba 2009	-135	-439	---	---	---	---	---	---	---	---	---	-574	-574
25. Reduction in corporate rate for qualified timber gain (sunset 12/31/10)	5/23/09	-110	-36	-20	-28	-27	-27	-11	-2	-1	-1	-1	-246	-261
26. 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
27. Empowerment zone tax incentives (sunset 12/31/10)	tyba 12/31/09	-203	-103	8	2	1	---	-2	-1	-2	-2	-2	-295	-304
28. Tax incentives for investment in the District of Columbia (sunset 12/31/10)	tyba 12/31/09	-59	-17	-3	-2	-1	-2	-4	-2	-2	-4	-4	-84	-101
29. Renewal community tax incentives (sunset 12/31/10)	tyba 12/31/09	-259	-274	-87	-46	-3	-3	-2	-1	1	---	---	-672	-675
30. 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) [6]	abiUSa 12/31/09	-102	-26	---	---	---	---	---	---	---	---	---	-128	-128
31. Economic development credit for American Samoa (sunset 12/31/10)	tyba 12/31/09	-6	-12	---	---	---	---	---	---	---	---	---	-18	-18
32. Election to temporarily utilize unused minimum tax credits [7]	tyba 12/31/09	-160	-3,032	167	142	120	102	87	74	63	53	45	-2,660	-2,337
33. Allow mine safety training credit and election to expense equipment against the AMT (sunset 12/31/10)	tyba 12/31/09	-1	-1	-1	-1	[1]	[1]	[1]	---	---	---	---	-6	-6
D. Temporary Disaster Relief Provisions														
1. National disaster relief														
a. Waiver of certain mortgage revenue bond requirements following Federally declared disasters (sunset 12/31/10)	doa 12/31/09	-1	-2	-2	-2	-2	-2	-2	-2	-2	-2	-2	-11	-21
b. Losses attributable to Federally declared disasters (sunset 12/31/10)	tyba 12/31/09	-437	-291	---	---	---	---	---	---	---	---	---	-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. Net operating losses attributable to Federally declared disasters (sunset 12/31/10)	lat 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

Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
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. Remove limitation on basis qualifying for GO Zone additional depreciation allowance.....	ppisa 12/31/09	-41	-68	-26	-1	1	2	3	4	4	4	4	-133	-114
b. Increase in rehabilitation credit.....	ppisa 12/31/09	-11	-11	[1]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	-21	-15
c. 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	[1]	[1]	[1]	[1]	---	---	---	---	---	-7	-7
e. Extend placed in service deadline for low income housing tax credit building in the GO Zone (sunset 12/31/12).....	ppisa 12/31/10	---	-8	-29	-40	-40	-40	-40	-40	-40	-40	-40	-157	-357
f. Expand the election for the refundable low-income housing credit for 2010 and the election for the low-income housing grant election for 2009 to the GO Zone and the Midwestern disaster area and Hurricane Ike disaster areas [4] [8].....	[9]	-1,131	-353	108	161	161	161	161	161	161	161	161	-893	-91
g. Extend tax-exempt bond financing in the GO Zone (sunset 12/31/11).....	bia DOE	---	-7	-26	-39	-39	-39	-39	-39	-39	-39	-39	-151	-348
4. Midwestern disaster areas:														
a. Extension of special rules for use of retirement funds.....	[10]	-14	-9	[1]	-1	[1]	[1]	[1]	[1]	[1]	-1	-1	-25	-27
b. Extension of exclusion of certain cancellation of indebtedness income.....	apoia 12/31/09	-1	-1	---	---	---	---	---	---	---	---	---	-2	-2
c. Extend the special allowance for certain Kansas disaster property (sunset 12/31/10).....	ppisa 12/31/09	-25	-14	-1	[2]	[2]	1	1	1	1	1	1	-39	-34
Extension of Expiring Provisions……		**-12,700**	**-17,966**	**-1,782**	**-817**	**-566**	**-256**	**157**	**233**	**-36**	**-17**	**20**	**-34,088**	**-33,735**
II. Revenue Provision Contained in Unemployment Insurance, Health, and Other Provisions - Extend COBRA Subsidy Eligibility Period to to December 31, 2010 [4] [11]……	**[12]**	**-4,685**	**-4,144**	**-1,140**	**-60**	**42**	**26**	**16**	**6**	**1**	**---**	**---**	**-9,962**	**-9,939**

Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
III. Pension Funding Relief [4] [13]														
A. Provide Temporary Defined Benefit Plan Funding Relief for Single-Employer Plans														
1. Extended period for defined benefit plans to amortize certain shortfall amortization bases.....	pyba 12/31/07	110	778	1,595	1,523	858	467	238	-135	-1,006	-1,743	-1,380	5,331	1,305
2. Application of extended amortization period to plans subject to prior law funding rules.....	[14]	*Estimate Included in Item III.A.1.*												
3. Lookback for benefit accrual restriction.....	[15]	*Estimate Included in Item III.A.1.*												
4. Lookback for Credit Balance Rule for Plans Maintained by Charities.....	[16]	*Estimate Included in Item III.A.1.*												
B. Provide Temporary Defined Benefit Plan Funding Relief for Multiemployer Plans														
1. Adjustments to funding standard account rules; reporting clarification.....	[17]	9	34	56	79	99	117	134	132	99	40	-2	394	797
Total of Pension Funding Relief ……		**119**	**812**	**1,651**	**1,602**	**957**	**584**	**372**	**-3**	**-907**	**-1,703**	**-1,382**	**5,725**	**2,102**
IV. Offset Provisions														
A. Black Liquor														
1. Exclusion of unprocessed fuels from the cellulosic biofuel producer credit.....	fsoua DOE	---	5,452	6,137	5,247	2,930	1,465	419	---	---	---	---	21,231	21,650
2. Prohibition on alternative fuel credit and alternative fuel mixture credit for black liquor.....	fsoua 12/31/09	*Estimate Included in Item IV.A.1.*												
B. Increased Reporting Requirements for the Homebuyer Credit.....	generally DOE	*Negligible Revenue Effect*												
C. Codify Economic Substance Doctrine and Impose Penalties for Underpayments.....	teia DOE	74	347	450	512	543	556	568	582	597	613	630	2,483	5,474
D. Increase Information Return Penalties.....	irrtbfo/a 1/1/11	---	30	41	42	42	43	43	43	44	45	47	197	419
E. Clarify That Bad Check Penalty Applies to Electronic Checks and Other Payment Forms.....	ita DOE	2	4	4	4	5	5	5	5	5	5	5	24	49
F. Application of Levy to Payments to Federal Vendors Relating to Property.....	laa DOE	6	13	13	13	14	14	14	15	15	15	15	73	147
G. Authorize Post-Levy Due Process.....	lia 12/31/10	---	39	37	37	38	39	40	40	41	42	43	189	395
H. Allow Participants in Governmental 457 Plans to Treat Elective Deferrals as Roth Contributions.....	tyba 12/31/10	---	12	17	25	36	48	56	60	69	83	100	138	506
I. Allow Rollovers from Elective Deferral Plans to Roth Designated Accounts.....	DOE	1	2	2	2	3	6	10	15	21	28	37	16	127
J. Require Information Reporting for Rental Property Expense Payments.....	pma 12/31/10	---	[2]	227	239	251	261	275	285	299	314	325	978	2,476
K. Additional Provision - Revision To The Medicare Improvement Fund.....	---	*Estimate to be Provided by the Congressional Budget Office*												
Total of Offset Provisions……		**83**	**5,899**	**6,928**	**6,121**	**3,862**	**2,437**	**1,430**	**1,045**	**1,091**	**1,145**	**1,202**	**25,329**	**31,243**

Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
V. Satellite Television Extension……	---	*Estimate to be Provided by the Congressional Budget Office*												
VI. Other Provisions - Increase in the Medicare Physician Payment Update……	---	*Estimate to be Provided by the Congressional Budget Office*												
NET TOTAL ……		**-17,183**	**-15,399**	**5,657**	**6,846**	**4,295**	**2,791**	**1,975**	**1,281**	**149**	**-575**	**-160**	**-12,996**	**-10,329**

Joint Committee on Taxation

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

Legend for "Effective" column:

abiUSa = articles brought into the United States after
api = appliances produced in
apoia = amounts paid or incurred after
bia = bonds issued 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
eoao = expenditures on account of
epasa = electricity produced and sold after
epoia = expenses paid or incurred after
epoid = expenses paid or incurred during
fpa = fuel produced after
fpisa = facilities placed in service after
fsoua = fuel sold or used after
iha = individuals hired after
irrtbfo/a = information returns required to be filed on or after
ita = instruments tendered after
laa = levies approved after
lia = levies issued after
lat = losses attributable to
paa = penalties assessed after
pma = payments made after
ppa = property purchased after
ppisa = property placed in service after
pyba = plan years beginning after
qfatpca = qualified film and television productions commencing after
teia = transactions entered into after
tyba = taxable years beginning after
tyea = taxable years ending after

[1] Loss of less than $500,000.
[2] Gain of less than $500,000.
[3] Effective as if included in section 339 of the American Jobs Creation Act of 2004.
[4] Estimate includes the following outlay effects:

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
Grants for energy efficient appliances ……	68	2	---	---	---	---	---	---	---	---	---	69	69
Election for refundable low-income housing credit for 2010……	3,112	1,334	---	---	---	---	---	---	---	---	---	4,446	4,446
COBRA……	358	291	591	89	---	---	---	---	---	---	---	1,328	1,328
Expansion of LIHC credit for 2010 and LIHC grant for 2009……	1,131	374	---	---	---	---	---	---	---	---	---	1,505	1,505
Single and multi-employer pension funding provisions ……	---	---	-75	-125	-200	-275	-125	-100	-25	100	150	-675	-675

[5] Effective for dividends with respect to taxable years of regulated investment companies beginning after December 31, 2009.
[6] Estimate provided by the Congressional Budget Office.
[7] Provision does not apply for taxable years beginning after December 31, 2010.
[8] Estimate includes interaction with item to extend placed in service deadline for low income housing tax credit building in the GO Zone.
[9] The provision related to the refundable low-income housing credit is effective on the date of enactment. The provision related to the low-income housing grant election is effective as if enacted in the American Recovery and Reinvestment Tax Act of 2009.

[Footnotes for JCX-9-10 appear on the following page]

Footnotes for JCX-9-10:

[10] Effective as if included in the Heartland Disaster Tax Relief Act of 2008.
[11] Estimate has been updated to reflect enactment of H.R. 4691. Estimate includes interactions with unemployment insurance. Estimates for the rest of this title will be provided by the Congressional Budget Office.
[12] Generally effective as if included in the American Recovery and Reinvestment Act of 2009.
[13] Estimates do not include outlay effects that are provided by the Congressional Budget Office as part of Footnote 4.
[14] Effective as if included in the Pension Protection Act of 2006 (with special rules for eligible charity plans).
[15] Effective for plan years beginning on or after October 1, 2008 (with special rules for plans with a valuation date other than the first day of the plan year).
[16] Generally effective for plan years beginning after August 31, 2009; for plans with a valuation date other than the first day of the plan year, effective for plan years beginning after December 31, 2008.
[17] Generally effective as of the first day of the first plan year beginning after August 31, 2008, with restrictions on certain plan amendments increasing benefits effective as of date of enactment.