JOINT COMMITTEE ON TAXATION
February 9, 2006
JCX-10-06

COMPARISON OF THE ESTIMATED REVENUE EFFECTS OF THE TAX PROVISIONS CONTAINED IN H.R. 4297, THE "TAX RELIEF EXTENSION RECONCILIATION ACT OF 2005," AS PASSED BY THE HOUSE, AND H.R. 4297, THE "TAX RELIEF ACT OF 2005," AS AMENDED BY THE SENATE

Fiscal Years 2006 - 2015

[Millions of Dollars]

Provision	Effective	H.R. 4297, as Passed by the House							H.R. 4297, as Amended by the Senate						
		2006	2007	2008	2009	2010	2006-10	2006-15	2006	2007	2008	2009	2010	2006-10	2006-15
I. Extension and Modification of Certain Provisions															
A. Treatment of nonrefundable personal credits under the individual alternative minimum tax [1] {H} (sunset 12/31/06); {S} (sunset 12/31/07) [2]	tyba 12/31/05	-565	-2,260	---	---	---	-2,825	-2,825	-573	-2,936	-2,580	---	---	-6,089	-6,089
B. Tax incentives for business activities on Indian reservations:															
1. Indian employment tax credit {H} (sunset 12/31/06); {S} (sunset 12/31/07)	tyba 12/31/05	-18	-31	-11	-1	---	-62	-62	-18	-53	-40	-11	-1	-123	-123
2. Accelerated depreciation for business property on Indian reservations {H} (sunset 12/31/06); {S} (sunset 12/31/07)	ppisa 12/31/05	-160	-278	-103	23	76	-442	-179	-160	-441	-386	-82	99	-970	-350
C. {H} Extend and modify the work opportunity tax credit (sunset 12/31/06)	wpoifibwa 12/31/05	-125	-193	-87	-38	-23	-466	-480	*No Provision*						
D. {H} Welfare-to-work tax credit (sunset 12/31/06)	wpoifibwa 12/31/05	-12	-27	-24	-12	-6	-80	-85	*No Provision*						
E. {S} Combine and expand work opportunity tax credit and welfare-to-work tax credit (sunset 12/31/07)	wpoifibwa 12/31/05	*No Provision*							-154	-412	-387	-186	-91	-1,230	-1,309
F. Enhanced deduction for qualified computer contributions {H} (sunset tyba 12/31/06); {S} (sunset tyba 12/31/07)	cmd tyba 12/31/05	-66	-55	---	---	---	-121	-121	-66	-132	-62	---	---	-260	-260
G. Availability of Archer medical savings accounts (sunset 12/31/06)	DOE	*Negligible Revenue Effect*							*No Provision*						
H. 15-year straight-line cost recovery for qualified leasehold improvements {H} (sunset 12/31/06); {S} (sunset 12/31/07)	ppisa 12/31/05	-46	-138	-181	-177	-171	-714	-1,472	-46	-189	-333	-375	-365	-1,309	-2,923
I. 15-year straight-line cost recovery for qualified restaurant improvements {H} (sunset 12/31/06); {S} (sunset 12/31/07)	ppisa 12/31/05	-22	-56	-68	-68	-68	-283	-601	-22	-81	-130	-143	-142	-519	-1,199
J. Suspension of 100 percent-of-net-income limitation on percentage depletion for oil and gas from marginal wells (sunset 12/31/06)	tyba 12/31/05	-46	-25	---	---	---	-70	-70	*No Provision*						
K. Tax incentives for investment in the District of Columbia (sunset 12/31/06)	1/1/06 {H} [3]	-43	-26	-3	-2	-5	-79	-207	-43	-26	-3	-2	-5	-79	-207
L. Possession tax credit with respect to American Samoa (sunset taxable years beginning after 12/31/06)	tyba 12/31/05	-2	-8	---	---	---	-10	-10	*No Provision*						
M. Parity in the application of certain limits to mental health benefits (sunset 12/31/06)	DOE	*Present Law (P.L. 109-151)*							*No Provision*						
N. Extend and modify the research credit {H} (sunset 12/31/06); {S} (sunset 12/31/07)	H = apoia 12/31/05 & tyea DOE S = tyba 12/31/05 & tyea 12/31/05	-2,666	-3,219	-1,480	-1,097	-740	-9,201	-9,393	-2,847	-6,744	-4,880	-2,664	-1,901	-19,036	-20,212

Provision	Effective	H.R. 4297, as Passed by the House							H.R. 4297, as Amended by the Senate						
		2006	2007	2008	2009	2010	2006-10	2006-15	2006	2007	2008	2009	2010	2006-10	2006-15
O. {H} Extend; {S} extend and modify qualified zone academy bonds {H} (sunset 12/31/06); {S} (sunset 12/31/07)	bia 12/31/05	-3	-7	-14	-19	-20	-62	-162	-2	-8	-19	-31	-36	-96	-281
P. Above-the-line deduction for teacher classroom expenses capped at $250 annually {H} (sunset 12/31/06); {S} (sunset 12/31/07)	epoii tyba 12/31/05	-40	-159	---	---	---	-199	-199	-40	-200	-164	---	---	-404	-404
Q. Deduction for qualified tuition and related expenses {H} (sunset 12/31/06); {S} (sunset 12/31/09)	pmi tyba 12/31/05	-336	-1,344	---	---	---	-1,680	-1,680	-336	-1,707	-1,831	-1,916	-1,604	-7,394	-7,394
R. Deduction of State and local general sales taxes {H} (sunset 12/31/06); {S} (sunset 12/31/07) [4]	tyba 12/31/05	-506	-1,614	-293	---	---	-2,412	-2,412	-665	-2,608	-1,947	-310	---	-5,530	-5,530
S. Extension of full credit for qualified electric vehicles (sunset 12/31/06)	tyba 12/31/05	*No Provision*							-3	-5	-1	[5]	[5]	-9	-8
T. Increase individual AMT exemption amount for 2006 to $42,500 ($62,550 joint) (sunset 12/31/06)	tyba 12/31/05	*No Provision*							-6,209	-24,838	---	---	---	-31,047	-31,047
Total of Extension and Modification of Certain Provisions		**-4,656**	**-9,440**	**-2,264**	**-1,391**	**-957**	**-18,706**	**-19,958**	**-11,184**	**-40,380**	**-12,763**	**-5,720**	**-4,046**	**-74,095**	**-77,336**
II. Extensions of Certain Provisions for Additional Years, and Other Modifications															
A. Extend and expand to petroleum products the expensing of "Brownfields" environmental remediation costs (sunset 12/31/07)	epoia 12/31/05	-197	-377	-124	45	52	-600	-390	-197	-377	-124	45	52	-600	-390
B. Controlled foreign corporations:															
1. Exception under subpart F for active financing income (sunset 12/31/08)	[6]	---	-775	-2,339	-1,682	---	-4,796	-4,796	*No Provision*						
2. Look-through treatment of payments between related CFCs under foreign personal holding company income rules (sunset 12/31/08)	[7]	-82	-237	-260	-167	---	-746	-746	*No Provision*						
C. Tax capital gains and dividends with a 15%/0% rate structure:															
1. Capital gains (sunset 12/31/10)	tyba 12/31/08	---	---	-1,549	-8,375	2,672	-7,252	-20,004	*No Provision*						
2. Dividends (sunset 12/31/10)	tyba 12/31/08	---	---	-860	-4,431	-8,008	-13,299	-30,779	*No Provision*						
D. Credit for elective deferrals and IRA contributions {H} (sunset 12/31/08); {S} (sunset 12/31/09)	tyba 12/31/06	---	-481	-1,428	-903	-10	-2,823	-2,875	---	-481	-1,428	-1,318	-842	-4,068	-4,144
E. Increase section 179 expensing from $25,000 to $100,000 and increase the phaseout threshold amount from $200,000 to $400,000; include software in section 179 property; and extend indexing of both the deduction limit and the phaseout threshold (sunset 12/31/09)	tyba 12/31/07	---	---	-2,605	-4,459	-209	-7,274	-271	---	---	-2,605	-4,459	-209	-7,274	-271
F. Extend and modify the new markets tax credit (sunset 12/31/08)	tyba 12/31/07 & DOE	*No Provision*							---	---	-108	-168	-170	-445	-1,322
Total of Extensions of Certain Provisions for Additional Years, and Other Modifications		**-279**	**-1,870**	**-9,165**	**-19,972**	**-5,503**	**-36,790**	**-59,861**	**-197**	**-858**	**-4,265**	**-5,900**	**-1,169**	**-12,387**	**-6,127**
III. Other Provisions															
A. Taxation of certain settlement funds (sunset 12/31/10)	aafca DOE	-2	-9	-10	-11	-12	-44	-116	*No Provision*						
B. Modify rules for distributions of controlled corporations {H} (sunset 12/31/10); {S} (includes disqualified investment corporation rules) [8]	generally da DOE	-1	-7	-8	-8	-9	-33	-51	1	2	3	4	-6	4	48
C. Expand the qualified veterans' mortgage bond program (sunset 12/31/10)	bia 12/31/05	[5]	-1	-2	-4	-7	-14	-58	*No Provision*						

Provision	Effective	H.R. 4297, as Passed by the House							H.R. 4297, as Amended by the Senate						
		2006	2007	2008	2009	2010	2006-10	2006-15	2006	2007	2008	2009	2010	2006-10	2006-15
D. Provide capital gains treatment for certain self-created musical works (sunset 12/31/10)	soei tyba DOE	-1	-4	-5	-5	-4	-19	-25	No Provision						
E. Expand the eligibility for the tonnage tax election (minimum of 6,000 deadweight tons) (sunset taxable years ending before 1/1/11)	tyba 12/31/05	-2	-3	-4	-4	-4	-17	-20	No Provision						
F. Modification of certain arbitrage rules for certain funds {H} (include 20% State limitation); {S} (include 30% State limitation); both {H} and {S} (sunset 8/31/09)	bia DOE	---	---	-1	-2	-1	-4	-5	[5]	[5]	-1	-3	-2	-7	-9
G. Provisions Relating to Exempt Organizations															
1. Charitable Giving Incentives [9]															
a. Provide charitable contribution deduction for nonitemizers with cash contributions in excess of $210 ($420 joint); disallow charitable contributions by itemizers which are less than or equal to $210 ($420 joint)	cmi tyba 12/31/05 & tybb 1/1/08	No Provision							-14	-44	56	---	---	-2	-2
b. Tax-free distributions from IRAs for charitable purposes - taxpayer must have attained age 70-1/2 for contributions made directly to a charitable organization and age 59-1/2 for contributions to a split-interest entity; modify return requirements for certain trusts	tyba 12/31/05 & tybb 1/1/08	No Provision							-107	-212	-121	-39	-47	-526	-914
c. Extend present-law section 170(e)(3) deduction for food inventory to all businesses and provide special basis rule for certain taxpayers; modify the enhanced deduction for charitable contributions of donations of food inventory to equal the lesser of the item's fair market value or twice basis	cmi tyba 12/31/05 & tybb 1/1/08	No Provision							-71	-180	-93	-25	---	-369	-369
d. Adjustment to basis of S corporation stock for certain charitable contributions	cmi tyba 12/31/05 & tybb 1/1/08	No Provision							-15	-35	-22	-4	-5	-81	-106
e. Enhanced charitable deduction for contributions of book inventory with special fair market value rule	cmi tyba 12/31/05 & tybb 1/1/08	No Provision							-7	-20	-10	-2	---	-39	-39
f. Modify tax treatment of certain payments to controlling exempt organizations and require disclosure and certification relating to UBIT	[10]	No Provision							-59	-20	-21	-23	-25	-148	-163
g. Encourage contributions of capital gain real property made for conservation purposes	cmi tyba 12/31/05 & tybb 1/1/08	No Provision							-11	-36	-18	-4	---	-69	-69
h. Enhanced deduction for certain charitable contributions of self-created literary, musical, artistic, and scholarly compositions (sunset 12/31/07)	cma 12/31/05	No Provision							-5	-21	-18	---	---	-44	-44
i. Certain mileage reimbursements to charitable volunteers excluded from gross income	tyba 12/31/05 & before 1/1/08	No Provision							[5]	[5]	[5]	---	---	-1	-1
j. Alternative percentage limitation for corporate charitable contributions to the mathematics and science partnership program (sunset 12/31/06)	cmi tyba 12/31/05	No Provision							-1	[5]	---	---	---	-1	-1
2. Reforming Exempt Organizations															
a. Tax involvement by exempt organizations in tax shelter transactions	[11]	No Provision							13	20	28	32	36	130	400
b. Apply an excise tax on certain acquisitions of interest in insurance contracts in which certain exempt organizations hold an interest	cia 5/3/05	No Provision							3	7	12	17	22	61	264
c. Increase the amount of excise taxes imposed on public charities, social welfare organizations, and private foundations	tyba DOE	No Provision							2	4	4	4	4	18	40

Provision	Effective	H.R. 4297, as Passed by the House							H.R. 4297, as Amended by the Senate						
		2006	2007	2008	2009	2010	2006-10	2006-15	2006	2007	2008	2009	2010	2006-10	2006-15
d. Limitations of charitable donations of easements on buildings located in registered historic districts	generally cma 11/15/05	No Provision							1	4	5	7	8	25	67
e. Modifications of rules regarding donation of taxidermy and exempt use property	cma 11/15/05 & cma 6/1/06	No Provision							[12]	2	5	5	5	18	43
f. Limit charitable contributions of clothing and household items and increased substantiation required for charitable contributions (receipts for all cash gifts)	cma 12/31/06 & cmi tyba DOE	No Provision							3	62	85	78	52	280	543
g. Modification of rules regarding donations of fractional interests in tangible personal property	cbagma DOE	No Provision							1	8	8	8	8	33	76
h. Provisions relating to substantial and gross overstatements of valuations of charitable deduction property:															
1. Substantial and gross overstatements of valuations of charitable deduction property [13]	rfa DOE	No Provision							[12]	1	1	1	1	4	11
2. Penalty on appraisers whose appraisals result in substantial or gross valuation misstatements; definition of qualified appraisers and appraisals [13]	rfa DOE	No Provision							[12]	[12]	[12]	[12]	[12]	1	3
i. Establish additional exemption standards for credit counseling organizations	[14]	No Provision							1	3	4	6	7	21	70
j. Expand the base of the tax on private foundation net investment income	tyba DOE	No Provision							12	17	18	19	19	85	192
k. Definition of convention or association of churches	DOE	No Provision							Negligible Revenue Effect						
l. Notification requirement for exempt entities not currently required to file	fapba 12/31/05	No Provision							Negligible Revenue Effect						
m. Disclosure to State officials of certain tax information related to certain section 501(c) organizations	DOE	No Provision							Negligible Revenue Effect						
n. Define donor advised fund and, in general, provide rules relating to payouts and certain prohibited transactions [15]	generally tyba DOE	No Provision							1	2	2	2	2	9	20
o. Provide for prohibited transactions and additional reporting by all supporting organizations and modify payout, limit business holdings, and improve accountability of Type III supporting organizations [16]	generally DOE	No Provision							3	5	5	6	6	26	65
H. Miscellaneous Provisions [9]															
1. Restructure New York Liberty Zone tax incentives	DOE	No Provision							177	-85	-127	-69	-193	-297	-440
2. Modification to S corporation passive investment income rules	tyba 12/31/06 & tybb 10/1/09	No Provision							-9	-74	-138	-130	-59	-411	-411
3. Modification to small issue bonds - accelerate effective date for increase in capital expenditure limit	bia 12/31/06	No Provision							---	-2	-9	-15	-18	-44	-136
4. Establish deduction for private mortgage insurance (sunset 12/31/07)	cia 12/31/06	No Provision							---	-14	-77	---	---	-91	-91
5. Provide exclusion from nonqualified deferred compensation rules for certain foreign stock option plans	[17]	No Provision							-2	-4	-7	-10	-13	-33	-90
6. Modification of treatment of loans to qualified continuing care facilities	lma 12/31/05	No Provision							[5]	[5]	[5]	-1	-1	-2	-2
7. Exclusion of gain from sale of a principal residence by certain employees of the intelligence community	soea DOE	No Provision							[5]	[5]	[5]	[5]	[5]	-1	-1
8. Partial expensing for advanced mine safety equipment (sunset 3 years after date of enactment)	cpoia DOE	No Provision							-6	-8	-6	2	4	-14	-1
9. Mine rescue team training credit (sunset 12/31/08)	tyba 12/31/05	No Provision							[5]	[5]	-1	-1	-1	-3	-8
I. Revenue Offset Provisions															
1. Provisions Designed to Curtail Tax Shelters															
a. Understatement of taxpayer's liability by income tax return preparer	dpa DOE	No Provision							Negligible Revenue Effect						

Provision	Effective	H.R. 4297, as Passed by the House							H.R. 4297, as Amended by the Senate						
		2006	2007	2008	2009	2010	2006-10	2006-15	2006	2007	2008	2009	2010	2006-10	2006-15
b. Frivolous tax submissions	[18]	No Provision							3	3	3	3	3	15	30
c. Penalty for promoting abusive tax shelters	aoa DOE	No Provision							Negligible Revenue Effect						
d. Penalty for aiding and abetting the understatement of tax liability	aoa DOE	No Provision							Negligible Revenue Effect						
2. Economic Substance Doctrine															
a. Clarification of the economic substance doctrine and related penalty provisions	teia DOE	No Provision							391	805	1,127	1,270	1,427	5,019	15,768
b. Deny deduction for interest paid to the IRS on underpayments involving certain tax motivated transactions	teia DOE	No Provision							---	1	1	3	4	9	29
3. Improvements in Efficiency and Safeguards in Internal Revenue Service Collection															
a. Waiver of user fee for installment agreements using automated withdrawals	aeio/a 180da DOE	No Provision							-2	-3	-3	-3	-3	-14	-35
b. Termination of installment agreements	foo/a DOE	No Provision							Negligible Revenue Effect						
c. Require partial payments with submissions of offers-in-compromise (permanent 24-month rule)	osoaa 60da DOE	No Provision							64	156	168	181	194	763	1,975
4. Penalties and Fines															
a. Increase in certain criminal penalties	aaftaoa DOE	No Provision							[19]	[19]	[19]	[19]	[19]	1	5
b. Double certain penalties, fines, and interest on underpayments related to certain offshore financial arrangements	oyo/a DOE	No Provision							1	1	[19]	[19]	[19]	5	6
c. Denial of deduction for certain fines, penalties, and other amounts	generally apoio/a DOE	No Provision							31	59	28	12	12	141	200
d. Deny deduction for punitive damages	dpoio/a DOE	No Provision							20	31	32	33	34	149	333
e. Increase in penalty for bad checks and money orders	comora DOE	No Provision							3	3	3	3	3	15	30
5. Provisions to Discourage Expatriation															
a. Tax treatment of inverted entities	[20]	No Provision							182	226	140	176	213	937	2,748
b. Impose mark-to-market on individuals who expatriate	[21]	No Provision							31	59	57	54	50	251	458
6. Miscellaneous Provisions															
a. Change the tax treatment of contingent convertible debt instruments	diio/a DOE	No Provision							3	34	51	61	62	211	440
b. Grant Treasury regulatory authority to address foreign tax credit transactions involving inappropriate separation of foreign taxes from related foreign income	teia DOE	No Provision							[19]	1	1	2	2	6	16
c. Modifications of effective dates of leasing provisions of the American Jobs Creation Act of 2004	[22]	No Provision							1,210	2,204	1,403	372	-173	5,018	4,465
d. Application of earnings stripping rules to partners which are C corporations	tybo/a DOE	No Provision							8	23	25	27	29	112	290
e. Limitation of employer deduction for certain entertainment expenses	eia DOE	No Provision							1	4	4	5	5	19	50
f. Increase in age of minor children whose unearned income is taxed as if parent's income	tyba 12/31/05	No Provision							56	145	203	219	153	776	2,128
g. Loan and redemption requirements on pooled financings	bia DOE	No Provision							18	40	42	44	46	190	456
h. Reporting of interest on tax-exempt bonds	iea 12/31/05	No Provision							[12]	2	2	2	2	9	24
i. Modification of credit for producing fuel from a nonconventional source - modify section 29/45K credit inflation adjustment and phase out rules and clarify coke production credit	qfsa 12/31/04	No Provision							38	67	32	9	5	151	152
j. Modification of individual estimated tax safe-harbor to: 120% for tax year 2006; 110% for tax years 2007 and thereafter	tyba 12/31/05	No Provision							5,014	-5,014	---	---	---	---	---

Provision	Effective	H.R. 4297, as Passed by the House							H.R. 4297, as Amended by the Senate						
		2006	2007	2008	2009	2010	2006-10	2006-15	2006	2007	2008	2009	2010	2006-10	2006-15
k. Revaluation of LIFO inventories of large integrated oil companies	tyei 2005	*No Provision*							3,488	844	---	---	---	4,332	4,332
l. Eliminate tax incentives for the amortization of geological and geophysical ("G&G") costs for integrated oil companies	apoii tyba 8/8/05	*No Provision*							-88	18	60	65	45	101	292
m. Modify the treatment of employee personal use of noncommercial aircraft	use after DOE	*No Provision*							1	2	2	3	3	11	44
n. Treatment of distributions attributable to FIRPTA gains (including application of FIRPTA to RICs, and prevention of avoidance through wash sales) [23]	various	*No Provision*							1	3	3	3	3	13	28
o. Amortization of expenses incurred in creating or acquired in obtaining music or music copyrights	epoia 2005 in tyea 2005	*No Provision*							2	9	7	5	3	26	32
p. Credit to holders of rural renaissance bonds ($200 million cap)	bia DOE & before 1/1/10	*No Provision*							-2	-6	-11	-12	-12	-43	-103
q. Modify foreign tax credit rules for large integrated oil companies that are dual capacity taxpayers	tpoai tyba DOE	*No Provision*							13	69	73	77	80	312	776
r. Disability preference program for tax collection contracts	DOE	*No Provision*							*Negligible Revenue Effect*						
Total of Other Provisions		**-6**	**-24**	**-30**	**-34**	**-37**	**-131**	**-275**	**10,398**	**-832**	**3,020**	**2,479**	**1,994**	**17,067**	**33,914**
NET TOTAL		**-4,941**	**-11,334**	**-11,459**	**-21,397**	**-6,497**	**-55,627**	**-80,094**	**-983**	**-42,070**	**-14,008**	**-9,141**	**-3,221**	**-69,415**	**-49,549**

Joint Committee on Taxation

NOTE: Details may not add to totals due to rounding. Date of enactment is assumed to be April 1, 2006. Provisions are estimated relative to the Congressional Budget Office baseline of January, 2005.

Legend: {H} = H.R. 4297,as Passed by the House of Representatives
{S} = H.R. 4297, as Amended by the Senate

Legend for "Effective" column:

aafca = accounts and fund created after
aaftaoa = actions and failures to act occurring after
aeio/a agreements entered into on or after
aoa = actions occurring after
apoia = amounts paid or incurred after
apoii = amounts paid or incurred in
apoio/a = amounts paid or incurred on or after
bia = bonds issued after
cbagma = contributions, bequests, and gifts made after
cia = contracts issued after
cma = contributions made after
cmd = contributions made during
cmi = contributions made in
comora = checks or money orders received after
cpoia = costs paid or incurred after
da = distributions after
diio/a = debt instrument issued on or after
DOE = date of enactment
dpa = documents prepared after
dpoio/a = damages paid or incurred on or after
eia = expenses incurred after
epoia = expenditures paid or incurred after
epoii = expenses paid or incurred in
fapba = for annual periods beginning after
foo/a = failures occurring on or after
iea = interest earned after
lma = loans made after
osoaa = offers submitted on and after
oyo/a = open years on or after
pmi = payments made in
ppisa = property placed in service after
qfsa = qualified fuel sold after
rfa = returns filed after
soea = sales or exchanges after
soei = sales or exchanges in
teia = transactions entered into after
tpoai = taxes paid or accrued in
tyba = taxable years beginning after
tybb = taxable years beginning before
tybo/a = taxable years beginning on or after
tyei = taxable years ending in
wpoifibwa = wages paid or incurred for individuals beginning work after
60da = 60 days after
180da = 180 days after

[1] The "Economic Growth and Tax Relief Reconciliation Act of 2001" provides that the child tax credit and adoption tax credit are allowed for purposes of the alternative minimum tax for 2002 through 2010.
[2] The Senate amendment treats the alternative motor vehicle credit and the alternative fuel vehicle refueling property credit as nonrefundable personal credits.
[3] The extension of tax-exempt financing is effective for bonds issued after the date of enactment.
[4] Includes interaction with item I.T.
[5] Loss of less than $500,000.

[Footnotes for JCX-10-06 are continued on the following page]

Footnotes for JCX-10-06 continued:

[6] Effective for taxable years of foreign corporations beginning after December 31, 2006, and before January 1, 2009, and to taxable years of U.S. shareholders with or within which such taxable years of such foreign corporations end.
[7] Effective for taxable years of foreign corporations beginning after December 31, 2005, and before January 1, 2009, and to taxable years of U.S. shareholders with or within which such taxable years of such foreign corporations end.
[8] A portion of the provision sunsets December 31, 2009.
[9] Generally, the provisions do not apply to taxable years beginning after September 30, 2010, (or an earlier effective date if specifically indicated in the description or effective date).
[10] Generally effective for payments received or accrued after December 31, 2000, and returns filed after the date of enactment.
[11] Generally effective for transactions that are prohibited after the date of enactment, except that no tax applies with respect to income that is properly allocable to the period ending 90 days after the date of enactment.
[12] Gain of less than $500,000.
[13] With respect to qualified real property interests, effective for contributions or appraisals made after December 16, 2004.
[14] Generally effective for taxable years beginning one year after the date of enactment.
[15] Estimate includes interaction with the supporting organizations proposal.
[16] Estimate includes interaction with the donor advised funds proposal.
[17] Effective as if included in the provision of the American Jobs Creation Act of 2004 to which it relates.
[18] Effective for submissions made and issues raised after the first list is prescribed under section 6702(c).
[19] Gain of less than $1 million.
[20] Effective for certain transactions substantially completed after March 20, 2002.
[21] Generally effective for U.S. citizens who expatriate or long-term residents who terminate their residency on or after the date of enactment.
[22] Modification to qualified transportation property effective as if included in the provision of the American Jobs Creation Act of 2004; modification to certain leases with foreign entities effective for taxable years beginning after December 31, 2005.
[23] Some of the provisions sunset December 31, 2007.