

Joint Committee on Taxation
May 13, 1993
JCX-3-93
PRELIMINARY

- Ways and Means Committee -
AMENDMENT TO PRESIDENT'S BUDGET PROPOSALS

Fiscal Years 1994-1998

[Millions of Dollars]

Provision	Effective	1994	1995	1996	1997	1998	1994-98
1 a Increase corporate tax rate to 36% for taxable income above \$10 million (phaseout benefit of 34% rate beginning at \$15 million) (1) [DELETE].....	1/1/93	-8,510	-5,417	-5,677	-5,942	-6,147	-31,694
b. Increase corporate tax rate to 35% for taxable income above \$10 million (phaseout benefit of 34% rate beginning at \$15 million) (1).....	1/1/93	4,404	2,808	2,943	3,080	3,186	16,421
2 Substitute 50% R&E solution for President's royalty / 100% R&E proposal.....	(2)	-438	-1,271	-1,200	-1,240	-1,278	-5,427
3. Temporary incremental tax credit for large businesses and permanent investment tax credit for businesses with gross receipts under \$5 million [DELETE].....	ppisa 12/3/92	12,875	6,586	3,631	3,274	4,003	30,370
4. Section 179 expensing to \$25,000.....	tyba 12/31/92	-3,949	-1,693	-1,223	-815	-462	-8,141
5. Increase inland waterways fuel tax (1/2 of Administration's tax rate increases).....	1/1/94	-10	-44	-94	-136	-148	-431
6. Amortization of acquired intangible assets (14 years).....	DoE	38	300	454	586	720	2,097
7 Increase corporate estimated tax to 100% and modify annualization rules.....	tyba 12/31/93	2,116	428	59	61	62	2,724
8 Interaction changes (36% to 35% corporate rate):							
a. Alternative minimum tax (AMT).....	--	-74	-157	-209	-239	-245	-924
b. Other	--	-8	-44	-65	-149	-73	-337
9 Expand passive loss relief for real estate persons to permit offset of rental real estate losses against nonreal estate income.....	1/1/94	-43	-86	-89	-96	-107	-422
10 Modify UBIT rules pertaining to pension funds investing in REITs....	1/1/94	-11	-15	-15	-15	-15	-71

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11. Increase recovery period for non-residential real property from 37 years to 39 years.....	ppiso/a 2/25/93	110	245	336	471	489	1,652
12. Information reporting for discharge of indebtedness for FDIC, RTC, and financial institutions.....	DoE	115	115	102	82	75	490
13. Individual estimated tax at 110% (100% if previous-year AGI less than \$150,000).....	tyba 12/31/93	-1,900	--	--	2,600	--	700
14. Add anti-relocation language to section 936.....	tyba 12/31/93	--	--	--	--	--	
15. Exclude discharge of indebtedness income for certain real property business debt of individuals.....	1/1/93	-138	-110	-60	-30	-28	366
16. BTU import proposal.....	6/1/94	--	27	193	359	401	981
17. Net effect of BTU amendments.....	6/1/94	80	-9	-44	-45	21	4
18. Empowerment zone modifications.....	--	-60	-96	-149	-190	-226	721
19. Repeal luxury taxes on boats, furs, airplanes, and jewelry.....	1/1/93	-69	-46	-49	-52	-55	270
20. Index luxury tax on automobiles.....	1/1/93	-98	-124	-179	-237	-300	938
21. Repeal diesel fuel exemption for boats.....	1/1/94	21	30	28	28	29	137
22. Childhood immunization entitlement.....	--	--	-500	-520	-535	-550	-2,105
23. Appreciated property study.....	--	--	--	--	--	--	
24. CFC study.....	--	--	--	--	--	--	
NET TOTAL.....		4,451	927	-1,827	820	-648	3,729

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

Legend for "Effective" column: DoE = date of enactment

ppisa = property placed in service after

ppiso/a = property placed in service on or after

tyba = taxable years beginning after

(1) Effective 1/1/93, but no penalties for underwithholding or estimated tax in 1993.

(2) Effective at expiration of Rev. Proc. 92-56, which is generally the third taxable year beginning after 8/1/91.