

ESTIMATED REVENUE EFFECTS OF THE MANAGER'S AMENDMENT TO TITLE V. OF H.R. 3,
 THE "HIGHWAY REAUTHORIZATION AND EXCISE TAX SIMPLIFICATION ACT OF 2005,"
 SCHEDULED FOR CONSIDERATION ON THE SENATE FLOOR

Fiscal Years 2005 - 2015

[Millions of Dollars]

Provision	Effective	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2005-09	2005-10	2005-15
I. Trust Fund Reauthorization															
A. Extend Highway Trust Fund and Aquatic Resources Trust Fund Expenditure Authority Through September 30, 2009, and Related Taxes Through September 30, 2011 [1]	DOE	----- No Revenue Effect -----													
B. Extend General Fund Retention of 4.8 Cents/Gallon of Taxes on Motorboat and Small Engine Gasoline (sunset 9/30/11)	10/1/05	----- No Revenue Effect -----													
Total of Trust Fund Reauthorization		----- No Revenue Effect -----													
II. Excise Tax Reform and Simplification															
A. Highway Excise Taxes															
1. Modify Gas Guzzler Tax	10/1/05	---	-3	-4	-4	-4	-5	-5	-5	-5	-5	-6	-15	-20	-46
2. Exclusion for tractors with a Gross Vehicle Weight Rating of 19,500 pounds or less from Federal excise tax on heavy trucks and trailers	sa 9/30/05	-1	-2	-2	-3	-3	-3	-3	-3	-3	-3	-3	-11	-14	-31
3. Exemption of bulk beds for farm crops from excise tax on heavy trucks and trailers	sa 9/30/05	[2]	[2]	-1	-1	-1	-1	-1	-1	-1	-1	-1	-2	-2	-4
B. Aquatic Excise Taxes															
1. Eliminate Aquatic Resources Trust Fund and transform Sport Fish Restoration Account	10/1/05	----- No Revenue Effect -----													
2. Repeal Harbor Maintenance tax on exports [3]	boaa DOE	----- No Revenue Effect -----													
3. Cap excise tax on certain fishing equipment [4]	[5]	---	-3	-3	-4	-4	-4	-4	-4	-5	-5	-5	-14	-17	-41
C. Aerial Excise Taxes															
1. Clarify excise tax exemptions for agricultural aerial applicators and exempt certain fixed-wing aircraft engaged in forestry operations	fuoa 9/30/05	---	-4	-4	-4	-4	-4	-4	-4	-4	-4	-4	-16	-20	-40
2. Modify the definition of rural airport	10/1/05	---	-3	-3	-4	-4	-4	-4	-4	-4	-5	-5	-14	-18	-40
3. Exempt from ticket taxes transportation provided by seaplanes	ta 9/30/05	---	-1	-1	-1	-1	-1	-1	-1	-1	-1	-1	-4	-5	-11
4. Exempt certain sightseeing flights from taxes on air transportation	[6]	---	-7	-7	-7	-7	-8	-8	-8	-9	-9	-9	-28	-36	-79
D. Taxes Relating to Alcohol															
1. Repeal special occupational taxes on producers and marketers of alcoholic beverages	7/1/08	---	---	---	-50	-59	-59	-59	-59	-59	-59	-59	-109	-167	-459
2. Modify limitation on rate of rum excise tax cover over to Puerto Rico and Virgin Islands (sunset 12/31/06) [7]	abiUSa 12/31/05	-11	-58	-18	---	---	---	---	---	---	---	---	-87	-87	-87
3. Provide income tax credit for cost of carrying tax-paid distilled spirits in wholesale inventories and in control State bailment warehouses	tyba 9/30/05	---	-9	-17	-19	-20	-20	-20	-20	-21	-21	-21	-65	-84	-188
4. Quarterly filing by small alcohol producers	qpboaa 1/1/06	---	-5	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	-5	-5	-6

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E. Sports Excise Taxes - Provide Exemption for Certain Custom Gunsmiths [8].....	[5]	---	-1	-1	-1	-1	-1	-1	-1	-1	-1	-1	-4	-4	-8
Total of Excise Tax Reform and Simplification		-12	-96	-61	-98	-108	-110	-110	-110	-113	-114	-115	-374	-479	-1,040
III. Miscellaneous Provisions															
A. Establish a Motor Fuel Tax Enforcement Advisory Commission.....	DOE	----- No Revenue Effect -----													
B. Establish a National Surface Transportation Infrastructure Financing Commission.....	DOE	----- No Revenue Effect -----													
C. Expand Highway Trust Fund Expenditure Purposes to Include Funding for Studies of Supplemental or Alternative Financing for the Highway Trust Fund.....	DOE	----- No Revenue Effect -----													
D. Delta Regional Transportation Plan	DOE	----- No Revenue Effect -----													
E. Establish the Build America Corporation.....	DOE	----- No Revenue Effect -----													
F. Treasury Study of Highway Fuels Used by Trucks for Non-Transportation Purposes.....	DOE	----- No Revenue Effect -----													
Total of Miscellaneous Provisions.....		----- No Revenue Effect -----													
IV. Fuels-Related Technical Corrections	---	----- No Revenue Effect -----													
V. Revenue Offset Provisions															
A. Modify the Tax Treatment of Contingent Convertible Debt Instruments	dii/a DOE	6	19	34	51	61	62	57	50	46	40	36	171	233	462
B. Frivolous Tax Submissions	[9]	---	3	3	3	3	3	3	3	3	3	3	12	15	30
C. Increase in Certain Criminal Penalties.....	aaftaoa DOE	---	[10]	[10]	[10]	[10]	[10]	[10]	[10]	[10]	[10]	[10]	1	1	5
D. Double Certain Penalties, Fines, and Interest on Underpayments Related to Certain Offshore Financial Arrangements	oyo/a DOE	[11]	2	1	1	1	1	1	1	1	1	1	5	6	10
E. Modification of CFC-PFIC Coordination Rules	[12]	2	4	5	6	8	10	12	15	17	19	21	25	35	119
F. Declaration by Chief Executive Officer Relating to Federal Annual Income Tax Return of a Corporation.....	rf tyea DOE	----- Negligible Revenue Effect -----													
G. Grant Treasury Regulatory Authority to Address Foreign Tax Credit Transactions Involving Inappropriate Separation of Foreign Taxes from Related Foreign Income.....	DOE	[10]	[10]	1	1	2	2	2	2	2	2	2	4	6	16
H. Whistleblower Reforms.....	ipo/a DOE	---	3	8	10	20	31	42	54	66	79	94	41	71	407
I. Denial of Deduction for Certain Fines, Penalties, and Other Amounts.....	generally apoio/a DOE	11	36	51	26	11	11	11	11	11	11	11	135	146	200
J. Freeze of Interest Suspension Rules With Respect to Listed Transactions (section 6404(g) modification).....	[13]	25	208	92	52	19	---	---	---	---	---	---	396	396	396
K. Repeal Section 470 Exception for Qualified Transportation Property.....	[13]	---	14	36	43	43	43	41	39	37	37	37	136	180	372
L. Impose Mark-to-Market on Individuals Who Expatriate	[14]	6	62	58	56	54	50	46	43	41	39	38	236	286	493
M. Deny Deduction for Punitive Damages.....	dpoio/a DOE	7	30	31	32	33	34	35	36	37	38	39	133	166	350
N. Application of Earnings Stripping Rules to Partners Which are C Corporations.....	tybo/a DOE	1	15	23	25	27	29	31	33	35	38	41	91	120	298
O. Deferral of Certain Stock Option and Restricted Stock Option Gains Prohibited.....	aeo/a DOE	4	7	6	6	5	4	7	8	7	6	5	28	31	64
P. Clarification of the Economic Substance Doctrine and Related Penalty Provisions	teia DOE & Ta DOE in tyea DOE	---	586	805	1,127	1,270	1,427	1,631	1,877	2,154	2,445	2,643	3,788	5,214	15,964
Q. Termination of Installment Agreements.....	foo/a DOE	----- Negligible Revenue Effect -----													
R. Office of Chief Counsel Review of Offers-in-Compromise...	osopo/a DOE	----- No Revenue Effect -----													

Provision	Effective	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2005-09	2005-10	2005-15
S. Require Partial Payments With Submissions of Offers-in-Compromise (24-month rule through 7/1/10; 12-month rule thereafter).....	osooa 60da DOE	---	100	162	174	188	159	10	-28	-30	-32	-35	624	783	668
T. Joint Task Force Study on Offers-in-Compromise.....	[15]	----- No Revenue Effect -----													
Total of Revenue Offset Provisions		62	1,089	1,316	1,613	1,745	1,866	1,929	2,144	2,427	2,726	2,936	5,826	7,689	19,854
Total of Sections I. Through V.		50	993	1,255	1,515	1,637	1,756	1,819	2,034	2,314	2,612	2,821	5,452	7,210	18,814
VI. Additional Miscellaneous Provisions															
A. Tax-Exempt Financing of Highway Projects and Rail-Truck Transfer Facilities	bia DOE	[2]	-5	-14	-25	-36	-50	-72	-97	-122	-146	-170	-79	-131	-738
B. Increase Transit and Vanpooling Exclusion to \$155; Index Transportation Benefits After 2008.....	tyba 12/31/05	---	-6	-6	-8	-5	-7	-11	-13	-14	-19	-23	-26	-33	-113
C. Waiver of User Fee for Installment Agreements Using Automated Withdrawals.....	aeio/a 180da DOE	---	-2	-3	-3	-3	-3	-4	-4	-4	-4	-5	-11	-14	-35
Total of Additional Miscellaneous Provisions		[2]	-13	-23	-36	-44	-60	-87	-114	-140	-169	-198	-116	-178	-886
VII. Additional Revenue Provisions															
A. Suspend Section 9503(c)(2) Transfers from Trust Funds to the General Fund (sunset 9/30/09) [3].....	apfwntmb 4/1/05	----- No Revenue Effect -----													
B. Temporary Dedication of Gas Guzzler Tax to Highway Trust Fund (sunset 9/30/09).....	tioaa 7/1/05	----- No Revenue Effect -----													
C. Provisions to Combat Fuel Fraud															
1. Treatment of kerosene used in aviation.....	[16]	---	48	49	50	50	50	50	50	50	49	49	197	247	495
2. Repeal of ultimate vendor refund claims with respect to farming.....	sa 9/30/05	---	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]
3. Refunds of excise taxes on exempt sales of fuel by credit card.....	sa 12/31/05	----- Negligible Revenue Effect -----													
4. Additional requirement for exempt purchases.....	sa 12/31/05	---	3	4	4	4	4	4	5	5	5	5	15	19	43
5. Reregistration in event of change in ownership.....	aofaa DOE	[11]	4	4	4	4	4	4	5	5	5	5	16	21	45
6. Reconciliation of on-loaded cargo to entered cargo.....	DOE	---	[11]	4	4	4	4	4	5	5	5	5	12	17	41
7. Registration of deep-draft vessels.....	DOE	[11]	3	3	3	3	3	3	3	3	3	3	12	14	31
8. Taxation of gasoline blendstocks and kerosene.....	feora 9/30/05	---	101	106	110	114	117	120	123	126	130	133	431	548	1,180
9. Nonapplication of export exemption to delivery of fuel to motor vehicles removed from the United States.....	sodma DOE	----- No Revenue Effect -----													
10. Penalty with respect to certain adulterated fuels.....	tsohofsoa DOE	----- Negligible Revenue Effect -----													
Total of Additional Revenue Provisions		[11]	159	170	175	179	182	185	191	194	197	200	683	866	1,835
Total of Sections VI. Through VII.		[11]	146	147	139	135	122	98	77	54	28	2	567	688	949
NET TOTAL		50	1,139	1,402	1,654	1,772	1,878	1,917	2,111	2,368	2,640	2,823	6,019	7,898	19,763

Joint Committee on Taxation

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

Legend and Footnotes for JCX-33-05:

Legend for "Effective" column:

aaftaoa = actions, and failures to act, occurring after
abiUSa = articles brought into the United States after
aео/a = any exchange on or after
aoftaa = actions, or failures to act, after
aeio/a agreements entered into on or after
apfwtmb = amounts paid for which no transfer made before
apoi/a = amounts paid or incurred on or after
bia = bonds issued after
boaa = before, on, and after
diiо/a = debt instrument issued on or after
DOE = date of enactment

dpoi/a = damages paid or incurred on or after
foo/a = failures occurring on or after
feora = fuel entered or removed after
fuоata = fuel use or air transportation after
ipo/a = information provided on or after
oyo/a = open years on or after
osоaa = offers submitted on and after
osopo/a = offers submitted or pending on or after
qpboaa = quarterly periods beginning on and after
rf = returns for
sa = sales after

sodma = sales or deliveries made after
ta = transportation after
Ta = transactions after
teia = transactions entered into after
tioaa = taxes imposed on and after
tsohofsoa = transfer, sale, or holding out for sale occurring after
tyba = taxable years beginning after
tybo/a = taxable years beginning on or after
tyea = taxable years ending after
60da = 60 days after

- [1] Any possible outlay effects will be estimated by the Congressional Budget Office ("CBO").
- [2] Loss of less than \$500,000.
- [3] Estimate provided by the Congressional Budget Office.
- [4] Estimate does not include a decrease in outlays of \$38 million for the fiscal years 2005 through 2015.
- [5] Effective for articles sold by the manufacturer, producer, or importer after September 30, 2005.
- [6] Effective with respect to transportation beginning after September 30, 2005, but shall not apply to any amount paid before that date for such transportation.
- [7] Preliminary outlay estimate provided by the Congressional Budget Office and is subject to change.
- [8] Estimate does not include a decrease in outlays of \$7 million for the fiscal years 2005 through 2015.
- [9] Effective for submissions made and issues raised after the first list is prescribed under section 6702(c).
- [10] Gain of less than \$1 million.
- [11] Gain of less than \$500,000.
- [12] Effective for taxable years of foreign corporations beginning after March 2, 2005, and for taxable years of U.S. shareholders with or within which such taxable years of such foreign corporations end.
- [13] The provisions would be effective as if included in the enactment of the American Jobs Creation Act of 2004.
- [14] Generally effective for U.S. citizens who expatriate or long-term residents who terminate their residency on or after date of enactment.
- [15] Effective for reports in calendar year 2006 and after.
- [16] Effective for fuels or liquids removed, entered into the United States, or sold after September 30, 2005.