JOINT COMMITTEE ON TAXATION March 8, 2010 JCX-7-10

ESTIMATED BUDGET EFFECTS OF THE REVENUE PROVISIONS CONTAINED IN THE PRESIDENT'S FISCAL YEAR 2011 BUDGET PROPOSAL [1]

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. Index to Inflation the 2009 Parameters of the AMT as Enacted in the American Recovery and Reinvestment Act	. tyba 12/31/09	-6,306	-65,897	-31,860	-36,442	-40,907	-45,689	-52,260	-60,432	-69,787	-81,038	-93,014	-227,101	-583,633
II. Make Permanent Certain Tax Cuts Enacted in 2001 and 2003:														
A. Permanently Extend Capital Gains and Dividends														
0%/15% Rates; Add a 20% Rate for Taxpayers														
Otherwise in the 36% and 39.6% Brackets	tyba 12/31/10	-132	-5,046	-16,291	-19,673	-21,868	-24,628	-26,779	-28,731	-30,345	-31,764	-33,049	-87,637	-238,306
B. Permanently Increase the Maximum Amount														
and Phaseout Threshold Under Section 179	(-1 - 12/21/10		0 700	5 1 1 0	4 470	2 071	2 0 4 9	2 0 1 9	1 220	1 000	000	1 1 50	10 107	25 (02
that are Scheduled to Expire After 2010 C. Reductions in Individual Income Tax Rates	tyba 12/31/10		-2,789	-5,110	-4,479	-3,871	-2,948	-2,018	-1,330	-1,009	-989	-1,150	-19,197	-25,693
1. Retain 10% bracket [2]	tyba 12/31/10		-40.215	-59,531	-62,389	-65,062	-67,311	-69,480	-71,900	-74,239	-76,803	-79,348	-294,509	-666,279
2. Retain the 25% income tax bracket, and	tyba 12/31/10		-40,215	-59,551	-02,389	-05,002	-07,511	-09,480	-71,900	-74,239	-70,803	-79,540	-294,509	-000,279
retain and expand the 28% income tax														
bracket	tyba 12/31/10		-26.676	-40.952	-45.046	-49.176	-52,739	-55,617	-58,255	-60.506	-62.909	-65,600	-214,588	-517,476
D. Extend the \$1,000 Child Tax Credit,			- ,	- ,	- ,	-,	- ,		,	,	- ,	,	,	
Refundability, and AMT rules [2]	tyba 12/31/10		-5,775	-38,708	-38,927	-39,011	-38,998	-39,135	-39,406	-39,591	-39,855	-40,043	-161,420	-359,450
E. Marriage Penalty Relief [2]			-18,181	-31,817	-33,885	-35,703	-37,200	-38,309	-39,391	-40,573	-41,594	-42,928	-156,786	-359,583
F. Education Incentives [3]	generally 1/1/11		-783	-1,576	-1,631	-1,721	-1,819	-1,966	-2,061	-2,165	-2,279	-2,397	-7,532	-18,400
G. Make Permanent the Estate, Gift, and														
Generation-Skipping Transfer Taxes; Extend														
2009 Law; Gift Tax Lifetime Exclusion to	11 0 10/01/00	24		10.054	21.202	04 477	20.045	20.020		22.1.65	24.044	26005	0 < 0 2 2	252.204
Remain at \$1 Million	dda &gma 12/31/09	34	5,114	-18,056	-21,293	-24,677	-28,045	-29,929	-31,511	-33,165	-34,964	-36,805	-86,922	-253,296
H. Other Incentives for Families and Children [2]	tyba 12/31/10		-195	-786	-906	-946	-970	-989	-1,001	-1,015	-1.025	-1,037	-3,802	-8,869
[4] I. Repeal Overall Limitation on Itemized	tyba 12/51/10		-195	-780	-900	-940	-970	-969	-1,001	-1,015	-1,023	-1,037	-5,802	-0,009
Deduction and the Personal Exemption														
Phaseout for Certain Taxpayers	tyba 12/31/10		-638	-1,358	-1,525	-1.694	-1,850	-1,974	-2.086	-2,183	-2,276	-2,381	-7,064	-17,965
				,	,	,	,		,	,	,	,	.,	.,
Total of Make Permanent Certain Tax Cuts Enacted in 2001 and 2003		-98	05 194	214 195	220 754	242 720	256 500	266 104	275 672	284 701	204 459	304 739	-1,039,457	-2.465.317
Enacicu III 2001 anu 2003	••••••	-70	-93,104	-214,105	-229,134	-243,129	-230,308	-200,190	-2/3,0/2	-204,/91	-294,430	-304,/38	-1,039,457	-2,403,317
III. Temporary Recovery Measures														
A. Extend the Making Work Pay Tax Credit [2]	tyba 12/31/10		-28,788	-32.987						_			-61.775	-61,775
1. Extend the Making Work Lay Tax Clutt [2]	cyba 12/31/10		20,700	.52,707									-01,775	-01,775

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Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
B. Temporary Recovery Measures														
1. Economic Recovery Payments for 2010 [2]	tyba 12/31/09	-14,216	-167	-29									-14,412	-14,412
2. Interaction of Economic Recovery Payments with														
the Making Work Pay Tax Credit [2]	tyba 12/31/09	240	1,683										1,923	1,923
3. Provide \$250 Refundable Credit for Federal, State														
and Local Government Retirees Not Eligible for														
Social Security Benefits [2]	tyba 12/31/09	-33	-228										-261	-261
C. Extend COBRA Health Insurance Premium														
Assistance (extend 12-month COBRA subsidy	DOE	2 5 60	2 0 2 1	-949									9 4 4 0	Q 440
eligibility period to December 31, 2010) [2] [5] D. Provide Additional Tax Credits for Investment	DOE	-3,569	-3,921	-949									-8,440	-8,440
in Qualified Property Used in a Qualified														
Advanced Energy Manufacturing Project	DOE		-460	-818	-989	-1,011	-654	-23	166	103	58	23	-3,932	-3,604
E. Extend Temporary Increase in Expensing for	DOE		-400	-010	-989	-1,011	-054	-23	100	105	50	25	-3,952	-5,004
Small Businesses	tyba 12/31/09	-556	-368	305	192	140	108	68	39	19	9	8	-178	-35
F. Extend Temporary Bonus Depreciation for	ej ou 12/01/09	000	200	000		110	100	00	07		-	0	110	
Certain Property	ppisa 12/31/09	-26,889	-14,871	10,880	7,347	5,793	4,557	2,932	1,787	1.013	693	665	-13,183	-6,093
G. Extend Option for Cash Assistance to States in	FF	,	,	,	.,	-,.,-	.,	_,,	-,	-,			,	-,
Lieu of Housing Tax Credits [2]	DOE	-404	-3,900	281	435	504	521	523	523	523	523	482	-2,563	11
Total of Temporary Recovery Measures	••••••	-45,427	-51,020	-23,317	6,985	5,426	4,532	3,500	2,515	1,658	1,283	1,178	-102,821	-92,686
IV. Tax Cuts for Families and Individuals														
A. Expand the Earned Income Credit ("EIC") [2]	tyba 12/31/10		-35	-3,547	-3,500	-3.418	-3,347	-3,340	-3,396	-3,477	-3,562	-3.665	-13,847	-31,287
B. Expand the Child and Dependent Care Tax	<i>cyou</i> 12/51/10		55	5,517	5,500	5,110	5,517	3,510	5,570	3,177	3,302	5,005	15,017	51,201
Credit [2]	tyba 12/31/10		-338	-1,369	-1.429	-1.442	-1.446	-1.445	-1.440	-1.439	-1.434	-1.431	-6.024	-13.214
C. Provide for Automatic Enrollment in IRAs and	.,			-,,	-,,	-,	-,	-,	-,	-,	-,	-,	-,	,
Double the Tax Credit for Small Employer														
Plan Startup Costs [2]	1/1/12			-601	-2,431	-2,541	-2,651	-2,796	-2,932	-3,100	-3,332	-3,485	-8,223	-23,868
D. Expand Saver's Credit [2]	tyba 12/31/10		-422	-3,361	-3,183	-3,030	-2,897	-2,919	-2,852	-2,828	-3,025	-2,972	-12,893	-27,489
E. Extend American Opportunity Tax Credit [2]	tyba 12/31/10		-1,147	-5,707	-5,691	-6,072	-6,122	-6,213	-6,414	-6,777	-6,759	-7,218	-24,738	-58,119
Total of Tax Cuts for Families and Individuals			-1,942	-14,585	-16,234	-16,503	-16,463	-16,713	-17,034	-17,621	-18,112	-18,771	-65,725	-153,977
V. Tax Cuts for Businesses														
A. Eliminate Capital Gains Taxation on														
Investments in Small Business Stock	saa 2/17/09	2	10	18	40	-248	-589	-967	-1,294	-1,495	-1,640	-1,760	-767	-7,924
B. Make the R&E Credit Permanent	epoia 12/31/09	-2,195	-3,789	-4,475	-5,193	-5,893	-6,554	-7,189	-7,825	-8,469	-9,129	-9,805	-28,099	-70,516
C. Remove Cell Phones from Listed Property	tyea DOE	-80	-183	-243	-322	-374	-393	-412	-433	-455	-477	-501	-1,595	-3,873
Total of Tax Cuts for Businesses		-2,273	-3,962	-4,700	-5,475	-6,515	-7,536	-8,568	-9,552	-10,419	-11,246	-12,066	-30,461	-82,313

Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
VII. Continue Certain Expiring Provisions Through														
Calendar Year 2011														
A. Extend Certain Expiring Provisions Through 2011														
1. Deduction of State and local general sales taxes														
(sunset 12/31/11)	tyba 12/31/09	-124	-2,791	-2,534	-284								-5,733	-5,733
2. Additional standard deduction for State and														
local real property taxes (sunset 12/31/11)	tyba 12/31/09	-115	-2,551	-2,067									-4,733	-4,733
3. Deduction for qualified tuition and related														
expenses (sunset 12/31/11)	tyba 12/31/09	-30	-682	-450									-1,163	-1,163
4. Above-the-line deduction of up to \$250 for														
teacher classroom expenses (sunset 12/31/11)	tyba 12/31/09	-10	-225	-156									-391	-391
5. Exception under Subpart F for active financing														
income (sunset 12/31/11)	tyba 12/31/09	-925	-4,275	-2,601									-7,801	-7,801
6. Look-through treatment of payments between														
related CFCs under foreign personal holding														
company income rules (sunset 12/31/11)	tyba 12/31/09	-127	-687	-441									-1,255	-1,255
7. 15-year straight-line cost recovery for qualified														
leasehold improvements, qualified restaurant														
buildings and improvements, and qualified retail														
improvements (sunset 12/31/11)	ppisa 12/31/09	-117	-2,093	-2,295	-638	-632	-616	-606	-602	-582	-549	-491	-6,390	-9,219
8. 7-year recovery period for motorsports														
entertainment complexes (sunset 12/31/11)	ppisa 12/31/09	-11	-29	-29	-17	-9	-7	-8	-3	7	12	12	-101	-81
9. 50% tax credit for certain expenditures for	epoii													
maintaining railroad tracks (sunset 12/31/11)	tyba 12/31/09	-66	-165	-99	[6]	[6]							-331	-331
10. Special expensing rules for certain qualified film														
and television productions (sunset 12/31/11)	pca 12/31/09	-93	-281	-76	46	38	32	26	19	12	9	8	-334	-260
11. Expensing of "Brownfields" environmental														
remediation costs (sunset 12/31/11)	epoia 12/31/09	-62	-431	-105	39	45	46	41	36	31	26	24	-469	-311
12. Mine rescue team training credit (sunset														
12/31/10)	tyba 12/31/09	-1	-1	-1	[6]	[6]	[6]	[6]	[6]	[6]			-3	-3
13. Election to expense advanced mine safety														
equipment (sunset 12/31/11)	ppisa 12/31/09	-9	-2	3	2	2	1	1	1	1	[7]		-3	0
14. Employer wage credit for activated military														
reservists (sunset 12/31/11)	pma 12/31/09	-1	-4	-4	-1	[6]	[6]	[6]	[6]	[6]	[6]	[6]	-11	-11
15. 5-year recovery period for farming business														
machinery and equipment (sunset 12/31/11)	ppisa 12/31/09	-56	-232	-321	-250	-253	-167	231	563	394	91		-1,279	
16. Treatment of certain dividends and assets of														
regulated investment companies ("RICs") (sunset														
12/31/10)	tyba 12/31/09	-12	-85	-73									-170	-170
17. Estate tax look-through for certain RIC stock														
held by nonresidents (sunset 12/31/11)	dda 12/31/09	[6]	-4	-8									-12	-12

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Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-2
18. Extend the treatment of RICs as "qualified			_	_	_	_					_	_		_
investment entities" under section 897 ("FIRPTA")														
(sunset 12/31/11)	dma 12/31/09	-8	-27	-23									-58	-5
19. Contributions of capital gain real property made														
for qualified conservation purposes (sunset	cmi													
12/31/10)	tyba 12/31/09	-13	-65	-62	-22	-17	-14	-12	-10	-8	-8	-7	-193	-23
20. Enhanced charitable deduction for contributions														
of food inventory (sunset 12/31/11)	cma 12/31/09	-33	-80	-36									-149	-1-
21. Enhanced charitable deduction for contributions														
of book inventory (sunset 12/31/11)	cma 12/31/09	-12	-30	-18									-60	-
22. Enhanced charitable deduction for qualified														
computer contributions (sunset 12/31/11)	cmi tyba 12/31/09	-90	-208	-97									-395	-3
23. 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 12/31/11)	dmi tyba 12/31/09	-167	-350	-197	-29	-30	-31	-32	-34	-35	-36	-38	-804	-9
24. Modify tax treatment of certain payments under														
existing arrangements to controlling exempt														
organizations (sunset 12/31/11)	proaa 12/31/09	-17	-22	-5									-44	-
25. Exclusion of gain or loss on sale or exchange of														
certain Brownfield sites from unrelated business														
taxable income (sunset 12/31/11)	paa 12/31/09	1	3	-1	-19	-38	-24	-7	-7	-7	-7	-7	-78	-1
26. Basis adjustment to stock of S corporations														
making charitable contributions of property														
(sunset 12/31/11)	cmi tyba 12/31/09	-10	-28	-21	-5	-3	-3	-3	-3	-3	-3	-3	-70	-
27. Indian employment tax credit (sunset 12/31/11)	tyba 12/31/09	-6	-53	-33	-9	-1							-102	-1
28. Accelerated depreciation for business property														
on Indian reservations (sunset 12/31/11)	ppisa 12/31/09	-36	-375	-274	-61	68	136	153	106	42	-2	-11	-542	-2
29. Deduction allowable with respect to income														
attributable to domestic production activities														
in Puerto Rico (sunset 12/31/11)	tyba 12/31/09	-84	-192	-109									-385	-3
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 12/31/11) [2] [8]	dsbiUSa 12/31/09	-122	-113	-27									-262	-2
31. Economic development credit for American														
Samoa (sunset 12/31/11)	tyba 12/31/09	-6	-19	-13									-38	-
32. Empowerment zone tax incentives (sunset														
12/31/10)	pa 12/31/09	-204	-218	-71	-61	-1	6	2		1	3	4	-550	-5
33. Renewal community tax incentives (sunset														
12/31/10)	pa 12/31/09	-259	-366	-118	-74	-54	-70	-98	-92	-60	-47	-39	-941	-1,2
34. Tax incentives for investment in the District														
of Columbia (sunset 12/31/11)	pa 12/31/09	-41	-109	-3	-6	-2		-27	-11	-2	-17	-15	-160	-2

Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
35. Tax incentives for New York Liberty Zone:														
a. Bonus depreciation for nonresidential real														
property and residential rental property														
(sunset 12/31/11)	ppisa 12/31/09	-33	-44	-9	2	2	2	2	2	2	2	2	-79	-68
b. Liberty Zone bonds (sunset 12/31/11)	bia 12/31/09	-2	-8	-12	-12	-12	-12	-12	-12	-12	-12	-12	-58	-118
36. Tax incentives for the Gulf Opportunity ("GO") Zone:														
a. Work opportunity tax credit with respect to														
certain individuals affected by Hurricane														
Katrina for employers inside the disaster area														
(sunset 8/27/10)	iha 8/28/09	-6	-1	[6]	[6]	[6]	[6]						-7	-7
b. Extend the higher credit rate for GO Zone														
rehabilitation (sunset 12/31/11)	apoia 12/3/109	-25	-45	-20	1	2	3	3	3	3	3	3	-82	-67
37. Individual casualty losses attributable to Federally	1													
declared disasters deductible without regard to														
AGI; \$500 floor applicable to all casualty losses														
(sunset 12/31/11)	[9]	-273	-946	-328									-1,547	-1,547
38. Expensing of qualified disaster expenses														
(sunset 12/31/11)	doa 12/31/09	-15	-42	-18	1	2	2	1	1	1	1	1	-70	-65
39. Relax certain mortgage revenue bond														
requirements following Federally declared														
disasters (sunset 12/31/11) [10]	bia 12/31/09	-1	-2	-3	-4	-4	-4	-4	-4	-4	-4	-4	-18	-38
40. Additional depreciation allowance for qualified														
disaster assistance property (sunset 12/31/11)	doa 12/31/09	-54	-262	-524	-640	-616	-527	-374	-122	59	84	93	-2,623	-2,883
41. Increased expensing for qualified disaster														
assistance property under section 179 (sunset														
12/31/11)	doa 12/31/09						- Estimate	Included i	n Item VII.	40				
42. Incentives for biodiesel and renewable diesel:														
a. Biodiesel (sunset 12/31/11)	fsoua 12/31/09	-624	-1,028	-295									-1,947	-1,947
b. Renewable diesel (sunset 12/31/11)	fsoua12/31/09	-10	-15	-5									-30	-30
43. Alternative motor vehicle credit for heavy hybrids														
(sunset 12/31/11)	ppa 12/31/09	-2	-10	-9	-2	-1	-1	[7]	[7]				-25	-24
44. Alternative fuel credit for natural gas, and														
liquefied petroleum gas (except for forklift use of														
LPG) (sunset 12/31/11)	fsoua 12/31/09	-68	-89	-22									-179	-179
45. Special rule for sales or dispositions to implement														
FERC or State electric restructuring policy for														
qualified electric utilities (sunset 12/31/11)	da 12/31/09	-221	-320	-43	100	100	100	100	100	68	18		-285	
46. Alternative motor vehicle credit for advanced														
lean burn technology motor vehicles and														
qualified hybrid motor vehicles that are														
passenger automobiles or light trucks (sunset														
12/31/11)	tyba 12/31/10		-20	-25	-4	-3	-2	[7]	[7]				-54	-54

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Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
 Credit for construction of energy efficient new homes (sunset 12/31/11) 	ppisa 12/31/09	-24	-43	-25	-12	-11	-9	-8	-5	[7]	[7]		-124	-137
48. 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 12/31/11)49. Alternative fuel vehicle refueling property (non-hydrogen refueling property) (sunset	epoia 12/31/09	-11	-7	-1	-1	-1	[7]	[7]	[7]	[7]	[7]	[7]	-21	-2
12/31/11)	tyba 12/31/10		-12	-10	-3	-2	-1	[7]	1	1	1	1	-28	-24
50. Sales by REITs of timber property held at least two years to qualified organizations for conservation purposes treated as sale of property held for investment or used in a trade or business														
(sunset 12/31/11)	5/23/09 -						Estimate I	ncluded in	Item VII.A	.55				
51. Credit for certain nonbusiness energy property	$t_{\rm the} \frac{12}{21} \frac{10}{10}$		251	1.005									1 256	1.25
(sunset 12/31/11)	tyba 12/31/10		-251	-1,005									-1,256	-1,25
 52. Alternative motor vehicle credit for qualified alternative fuel vehicles (sunset 12/31/11) 53. Alternative fuel refueling property - increase in 	tyba 12/31/10		-12	-10	-1	-2	-2	-1	[6]				-28	-3
credit rate and credit cap (sunset 12/31/11)	tyba 12/31/10 -						Estimate I	ncludød in	Item VII.A	10				
54. Enhanced credit for health insurance costs of	generally						Lsumare 1	neinaea in	110m v11.21	.+/				
eligible individuals (sunset 12/31/11) [2]	tyba 12/31/10		-84	-44									-128	-12
55. Taxation of qualified timber gain	.,													
(sunset 12/31/11)	5/23/09	-136	-104	-50	-30	-29	-28	-27	-11	-2	-2	-1	-375	-4]
56. Mineral royalties treated as qualified REIT income for timber REITs (sunset 12/31/11)	5/23/09 -						Estimate I	ncluded in	Item VII.A					
57. Incentives for alcohol fuels:														
a. Alcohol fuels income tax credit (sunset														
12/31/11)	1/1/11		-3,558	-1,311									-4,869	-4,86
 b. Alcohol fuel mixture excise tax credit (including 10 epg small ethanol producer 														
credit) (sunset 12/31/11)	1/1/11 ·					· 1	Estimate In	cluded in .	Item VII.A.	57.a				
58. Work opportunity tax credit targeted group status														
for unemployed veterans and disconnected youth (sunset 12/31/11)	iwbwa 12/31/10 & [11]		-34	-57	-26	-9	-5	-2	[6]				-130	-13
59. Qualified zone academy bonds - allocations of														
bond authority (sunset 12/31/11)	oia 12/31/10		-2	-12	-40	-71	-82	-81	-79	-75	-72	-71	-207	-58
60. School construction bonds - allocation of bond														
authority (sunset 12/31/11)	oia 12/31/10		-16	-82	-201	-334	-459	-559	-603	-598	-579	-566	-1,092	-3,99
61. Modification of AMT limitations on tax exempt														
bonds (sunset 12/31/11)	oia 12/31/10		-13	-25	-25	-25	-25	-24	-24	-22	-21	-20	-113	-22

Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
62. Exclusion from income for benefits provided to														
volunteer firefighters and emergency medical														
responders (sunset 12/31/11)	tyba 12/31/10		-21	-76									-97	-97
63. Parity for exclusion for employer-provided mass	<i>cjou 12,01,</i> 10			10										21
transit and parking benefits (sunset 12/31/11)	mbo/a 12/31/10		-95	-32									-127	-127
64. Qualified mortgage bonds for refinancing of	1100, 4 12, 01, 10		20	02									12,	
subprime loans (sunset 12/31/11)	bia 12/31/10		-8	-30	-48	-48	-46	-44	-42	-40	-38	-36	-180	-380
65. Expansion of availability of industrial														
development bonds to facilities manufacturing														
intangible property (sunset 12/31/11)	oia 12/31/10		-3	-13	-20	-20	-19	-19	-19	-18	-18	-18	-75	-167
66. Volume cap increase and set-aside for private														
activity bonds for housing (sunset 12/31/11)	oia 12/31/10		-5	-20	-32	-32	-32	-32	-32	-32	-32	-32	-121	-281
67. Bonds guaranteed by Federal Home Loan banks														
eligible for treatment as tax-exempt bonds (sunset														
12/31/11)	bia 12/31/10		-13	-15	-15	-15	-15	-15	-15	-15	-15	-15	-73	-148
68. Premiums for mortgage insurance deductible as														
interest that is qualified residences interest (sunset														
12/31/11)	apoaa 12/31/10		-87	-260									-347	-347
69. Five-year amortization of music and music	ppisi													
copyrights (sunset 12/31/11)	tyba 12/31/10		-2	-3	1	1	[7]	[7]	[7]	[7]	[7]	[7]	-3	-3
70. Natural gas distribution lines treated as 15-year														
property (sunset 12/31/11)	ppisa 12/31/10		-13	-33	-36	-30	-24	-19	-18	-22	-25	-26	-137	-247
71. Modification of small issuer exception to														
tax-exempt interest allocation rules for financial														
institutions (sunset 12/31/11)	bia 12/31/10		-80	-242	-330	-345	-340	-335	-330	-325	-320	-315	-1,337	-2,962
72. De minimus safe harbor exception for tax-exempt														
interest allocation rules for financial institutions														
(included above) (sunset 12/31/11)	bia 12/31/10 -						Estimate I	ncluded in	Item VII.A	.71				
73. Alaska Native Settlement Trusts (sunset 12/31/11)	[12]		-2	-2									-4	-4
74. Reduce the S corporation built-in gains holding														
period from 10 to 7 years (sunset 12/31/11)	tyba 12/31/10		-52	-61	-9								-122	-122
75. Authority to issue Recovery Zone economic														
development bonds and facility bonds (sunset														
12/31/11) [2]	oia 12/31/10		-70	-154	-161	-155	-153	-148	-148	-148	-148	-148	-693	-1,433
B. Extend Certain Trade Provisions														
1. Andean Trade Preferences (sunset 12/31/11) [8]	1/1/11		-67	-22									-89	-89
2. Caribbean Basin Initiative (sunset 12/31/11) [8]	10/1/10		-46	-11									-57	-57
3. Generalized System of Preferences (sunset														
12/31/11) [8]	1/1/11		-454	-151									-605	-605

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Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
 Temporary Alcohol Fuels Tariff (sunset 12/31/11) [8] 	1/1/11		24	8									32	32
Total of Continue Certain Expiring Provisions Through Calendar Year 2011		-4,371	-24,752	-17,428	-2,936	-2,544	-2,390	-1,937	-1,393	-1,388	-1,706	-1,726	-54,422	-62,572
/III. Other Revenue Changes and Loophole Closers														
A. Reform Treatment of Financial Institutions and														
Products														
1. Impose a financial crisis responsibility fee [13]	7/1/10		8,000	8,000	9,000	9,000	9,000	9,000	9,000	9,000	10,000	10,000	43,000	90,000
2. Require accrual of income on forward sale of				,				,	,	,	,	,	,	
corporate stock	fceia 12/31/11			1	4	7	10	13	16	19	22	25	22	117
3. Require ordinary treatment of income from														
day-to-day dealer activities for certain dealers of														
equity options and commodities	fceio/a 12/31/11	24	143	212	221	235	247	258	269	280	291	302	1,082	2,481
4. Modify the definition of "control" for purposes of													,	
section 249	DOE	2	6	7	7	8	8	8	9	9	10	10	38	84
B. Reinstate Superfund Taxes														
1. Reinstate Superfund excise taxes (sunset 12/31/20).	pa 12/31/10		490	656	657	656	654	654	655	654	655	657	3,114	6,389
2. Reinstate Superfund environmental income tax	I												- ,	- ,
(sunset 12/31/20)	tyba 12/31/10		719	1,230	1,285	1,321	1,328	1,329	1,346	1,373	1,412	1,459	5,884	12,803
C. Make the Unemployment Insurance Surtax	.,		,	-,• •	-,	-,	-,	-,/	-,	-,	-,	-,	-,	,
Permanent [8]	7/1/11		86	1,035	1,409	1,445	1,469	1,485	1,499	1,512	1,525	1,538	5,444	13,003
D. Repeal LIFO Method of Accounting for				-,	-,	-,	-,	-,	-,	-,	-,	-,	-,	,
Inventories	tyba 12/31/11			4,171	7,440	7,846	8,099	8,566	9,208	9,576	9,988	10,418	27,556	75,312
E. Repeal Gain Limitation for Dividends Received in	cyou 12/01/11			.,	,,	7,010	0,077	0,000	,200	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	10,110	27,000	/0,012
Reorganization Exchanges	tyba 12/31/10		10	50	50	50	50	50	50	50	50	50	210	460
F. Reform U.S. International Tax System	.,													
1. Defer deduction of interest expense related to														
deferred income	tyba 12/31/10		1,864	3,572	3,588	3,947	4,341	4,775	3,877	2,889	3,178	3,496	17,312	35,527
2. Foreign tax credit reform - determine the foreign	.,		-,	-,	-,	-,	.,	.,	-,	_,,	-,	-,.,-		
tax credit on a pooling basis	tyba 12/31/10		2,470	5,187	4,310	4,575	4,804	5,044	5,296	556	5,839	6,131	21,346	44,212
3. Foreign tax credit reform - prevent splitting of			,	-,	,	y- · -	,	- , -	-,		- ,	-, -	,	,
foreign income and foreign taxes	tyba 12/31/10		503	1,107	1,096	1,063	1,031	1,000	970	941	913	885	4,799	9,507
4. Tax currently excess returns associated with				,	,	,	,	,					,	- ,
transfers of intangibles offshore	tyba 12/31/10		422	907	948	991	1,035	1,082	1,131	1,182	1,235	1,290	4,304	10,223
5. Limit shifting of income through intangible	J		_				,	,	,	,	,	,	y	-,
property transfers	tyba 12/31/10		24	50	50	50	50	50	50	50	50	50	224	474
6. Disallow the deduction for excess non-taxed														
reinsurance premiums paid to affiliates	tyba 12/31/10		37	89	111	139	174	217	272	340	424	530	550	2,333
· ·	tyba 12/31/10		69	145	152	160					204	214	694	1,667
7. Limit earnings stripping by expatriated entities	1/10		0.7	14.)	1.12	100	168	176	185	194	204	214	094	1.007

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Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-2
9. Prevent the avoidance of dividend withholding														
taxes	pma 2010	5	72	120	126	132	139	146	153	161	169	177	594	1,40
10. Modify the tax rules for dual capacity taxpayers	tyba 12/31/10		312	749	779	810	842	876	911	947	985	1,025	3,492	8,23
11. Combat under-reporting of income through use of														
accounts and entities in in offshore jurisdictions	various	87	326	474	509	749	783	818	855	893	933	975	2,928	7,4
G. Reform Treatment of Insurance Companies and														
Products														
1. Modify rules that apply to sales of life insurance														
contracts	[14]		35	60	64	67	71	74	77	80	83	87	297	6
2. Modify dividends-received deduction for life														
insurance company separate accounts	tyba 12/31/10		165	267	289	308	322	335	352	371	395	413	1,351	3,2
3. Expand pro rata interest expense disallowance for														
corporate-owed life insurance ("COLI")	ceia 12/31/10		143	336	495	627	738	833	916	990	1,058	1,123	2,339	7,2
4. Permit partial annuitization of a nonqualified														
annuity contract	paa 12/31/10		5	20	37	56	77	99	124	149	179	210	195	9
H. Eliminate Fossil Fuel Preferences														
1. Eliminate oil and gas preferences:														
a. Repeal enhanced oil recovery credit	tyba 12/31/10						N	lo Revenue	Effect					
b. Repeal credit for oil and gas produced from														
marginal wells	tyba 12/31/10							lo Revenue	00					
c. Repeal expensing of intangible drilling costs	epoia 12/31/10		1,655	2,359	2,025	1,653	1,271	888	501	236	167	170	8,963	10,9
d. Repeal deduction for tertiary injectants	epoia 12/31/10		4	7	8	8	7	5	5	5	4	4	34	
e. Repeal exemption to passive loss limitation for														
working interests in oil and natural gas														
properties	tyba 12/31/10		8	25	24	24	24	23	23	22	22	22	105	2
f. Repeal percentage depletion for oil and natural														
gas wells	tyba 12/31/10		562	886	931	964	984	1,000	1,025	1,060	1,101	1,139	4,328	9,6
g. Repeal domestic manufacturing deduction for							=-							
oil and gas production	tyba 12/31/10		708	1,277	1,341	1,408	1,478	1,552	1,630	1,711	1,797	1,887	6,212	14,7
h. Increase geological and geophysical														
amortization period for independent producers	. 10/01/10		10	1.15	221	1.62	107	00		50		10	600	
to seven years	epoia 12/31/10		42	165	221	163	107	88	69	50	50	49	698	1,0
2. Eliminate coal preferences:														
a. Repeal expensing of exploration and	. 10/01/10		•			10			20	20		21	202	
development costs	epoia 12/31/10		28	47	44	42	41	41	39	38	34	31	202	
b. Repeal percentage depletion for hard mineral	. 1 10/01/10		15	70	01	05	00	101	105	111	114	115	100	
fossil fuels	tyba 12/31/10		45	79 22	91 50	95 62	99	101	105	111	114	115	409	ç
c. Repeal capital gains treatment for royalties	tyba 12/31/10		16	33	59	63	66	69	72	76	82	89	238	6
d. Repeal domestic manufacturing deduction for	the 10/21/10		00	176	107	107	200	222	225	240	264	200	050	2
coal and other hard mineral fossil fuels	tyba 12/31/10		88	176	186	197	209	222	235	249	264	280	856	2,1
I. Tax Carried (Profit) Interests as Ordinary Income	tyba 12/31/10	574	2,070	3,020	2,798	2,395	2,150	2,306	2,969	3,435	3,480	3,399	13,007	28,5
J. Modify the Cellulosic Biofuel Producer Credit	DOE		4,255	5,605	4,919	2,757	1,378	394					18,914	19,3

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Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-2
K. Eliminate the Advanced Earned Income Tax														
Credit [2]	tyba 12/31/09	163	117	99	102	102	103	105	107	110	112	114	686	1,23
L. Deny Deduction for Punitive Damages	dpoia 12/31/11			24	33	34	35	36	37	38	39	40	125	3
M. Repeal Lower-of-Cost-or-Market Inventory														
Accounting Method	tyba 12mf DOE		27	583	1,352	1,550	1,709	1,110	596	295	355	412	5,221	7,9
N. Reduce the Tax Gap and Make Reforms														
1. Expand information reporting:														
a. Require information reporting on payments to														
corporations	pma 12/31/10		46	454	297	327	333	354	370	385	400	420	1,458	3,3
b. Require information reporting for rental														
property expense payments	tyba 12/31/10		[15]	227	239	251	261	275	285	299	314	325	978	2,4
c. Require information reporting for private														
separate accounts of life insurance companies	tyba 12/31/10	[6]	[6]	[6]	[6]	[6]	[6]	[6]	[6]	[6]	[6]	[6]	[6]	
d. Require a certified Taxpayer Identification														
Number from contractors and allow certain														
withholding	pma 12/31/10		5	44	32	35	37	39	42	44	46	49	153	3
e. Require increased information reporting for														
certain government payments for property and														
services	pma 12/31/10		77	157	89	18	18	19	20	21	22	23	359	4
f. Increase information return penalties	rrtbfa 12/31/11			31	42	42	43	43	43	44	45	47	157	3
2. Improve compliance by businesses:														
a. Require greater electronic filing of returns	tyea 12/31/10 ·						N	lo Revenue	Effect					
b. Implement standards clarifying when employee														
leasing companies can be held liable for their														
clients' Federal employment taxes	[16]						Negli	igible Reve	nue Effect					
c. Increase certainty with respect to worker							-	-						
classification [13]	DOE		11	214	543	688	766	848	933	1,020	1,112	1,208	2,222	7,3
3. Strengthen tax administration:														
a. Codify "economic substance" doctrine	teia DOE	34	434	551	639	741	761	773	791	813	836	860	3,161	7,2
b. Allow assessment of criminal restitution as tax	12/31/11			1	1	1	1	1	1	1	1	1	3	
c. Revise offer-in-compromise application rules	DOE	-5	-5	[17]	[17]	[17]	[17]	[17]	[17]	[17]	[17]	[17]	-10	-
d. Expand IRS access to information in the														
National Directory of New Hires for tax														
administration purposes	DOE ·						N	lo Revenue	Effect					
e. Make repeated willful failure to file a tax return									55					
a felony	rrtbfa 12/31/10						Negli	igible Reve	nue Effect					
f. Facilitate tax compliance with local									55 - 54					
1	Dma DOE						Negli	igible Reve	nue Effect					
1urisdictions														
jurisdictions g. Extension of statute of limitations where State														
g. Extension of statute of limitations where State adjustment affects Federal tax liability	rrtbfa 12/31/10	[7]	[7]	[7]	[7]	[7]	[7]	[7]	[7]	[7]	[7]	[7]	1	

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Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
4. Expand penalties:														
a. Clarify that bad check penalty applies to														
electronic checks and other payment forms	rrtbfa 12/31/10		4	4	4	5	5	5	5	5	5	5	22	47
b. Impose a penalty on failure to comply with														
electronic filing requirements	rrtbfea 12/31/11 · ·						1	No Revenu	e Effect					
O. Reform Estate and Gift Tax Rules														
1. Require consistent valuation for transfer and														
income tax purposes	DOE	3	36	89	96	102	107	111	115	120	124	128	433	1,031
2. Modify rules on valuation discounts	[18] -					<i>Pr</i>	oposal Red	quires Add	itional Spec	cification -				
3. Require a minimum term for grantor retained														
annuity trusts ("GRATs")	tca DOE		3	11	121	260	381	507	621	743	857	945	775	4,448
Total of Other Revenue Changes and Loophole Closer	`S	887	26,187	44,713	48,964	48,267	47,914	47,903	47,959	43,248	51,081	52,928	216,933	460,049
IX. Upper-Income Tax Provisions														
A. Limit the Tax Rate at Which Itemized Deductions														
Reduce Tax Liability to 28%	tyba 12/31/10		7,279	22,254	23,794	26,395	29,032	31,457	33,756	36,063	38,450	40,779	108,754	289,260
Total of Upper-Income Tax Provisions			7,279	22,254	23,794	26,395	29,032	31,457	33,756	36,063	38,450	40,779	108,754	289,260
X. Trade Provisions														
A. Afghan-Pakistan Reconstruction Opportunity														
Zone [8]	1/1/11			-1	-2	-4	-7	-11	-15	-20	-24	-29	-14	-113
B. Implement Free Trade Agreement with Panama [8].	1/1/11			-1	-1	-1	-1	-1	-1	-1	-1	-1	-4	-9
C. Implement Free Trade Agreement with														
Columbia [8]	1/1/11			-96	-108	-113	-117	-121	-126	-133	-143	-155	-434	-1,112
D. Implement Free Trade Agreement with Korea [8]	1/1/11			-472	-561	-615	-665	-703	-742	-800	-880	-976	-2,313	-6,414
Total of Trade Provisions				-570	-672	-733	-790	-836	-884	-954	-1,048	-1,161	-2,765	-7,648
XI. User Fees - Support Capital Investment in the														
Inland Waterways [8]	10/1/11			197	196	232	209	193	165	165	166	167	834	1,690
XII. Other Initiatives														
A. Extend and Modify the New Markets Tax Credit	DOE	-11	-186	-363	-563	-596	-590	-587	-530	-410	-185	-9	-2,309	-4,030
B. Reform and Extend Build America Bonds [2]	bia 12/31/10		-50	-239	-399	-564	-734	-909	-1,089	-1,275	-1,466	-1,664	-1,986	-8,389
C. Restructure Assistance to New York City -									,	,=	,	,	,	.,
Provide Tax incentives for Transportation														
Infrastructure [2]	1/1/11		-200	-200	-200	-200	-200	-200	-200	-200	-200	-200	-1,000	-2,000
D. Implement Unemployment Insurance Integrity													, -	, -
Legislation [2][8]	DOE				277		34				39	47	783	939

Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
E. Levy Payments to Federal Contractors with Delinquent Tax Debt														
1. Authorize post-levy due process	lia 12/31/10		39	37	37	38	39	40	40	41	42	43	189	39
2. Increase levy authority to 100% for vendor														
payments	pma DOE	3	13	13	13	14	14	14	15	15	15	15	70	144
F. Allow Offset of Federal Income Tax Refunds to														
Collect Delinquent State Income Taxes for														
Out-of-State Residents	DOE ·							No Revenu	e Effect					
Total of Other Initiatives		-8	-384	-357	-835	-1,232	-1,437	-1,624	-1,740	-1,801	-1,755	-1,768	-4,253	-12,94
ET TOTAL	•••••	-57,596	-209,675	-239,839	-212,409	-231,843	-249,125	-265,080	-282,312	-305,628	-318,383	-338,192	-1,200,484	-2,710,08

Joint Committee on Taxation

NOTE: Details may not add to totals due to rounding. The date of enactment is generally assumed to be July 1, 2010.

Legend for "Effective" column:

205	the for Effective column.		
	apoaa = amounts paid or accrued after	epoia = expenses paid or incurred after	ppisa = property placed in service after
	apoia = amounts paid or incurred after	epoii = expenses paid or incurred in	ppisi = property placed in service in
	bia = bonds issued after	fceio/a = forward contracts entered into on or after	proaa = payments received or accrued after
	ceia -= contracts entered into after	fsoua = fuel sold or used after	rrtbfa = returns required to be filed after
	cma - contributions made after	gma = gifts made after	rrtbfea = returns required to be filed electronically
	cmi = contributions made in	iwbwa = individuals who begin work after	after
	da = dispositions after	iha = individuals hired after	saa = securities acquired after
	dda = decedents dying after	lia = levies issued after	saua = sales and uses after
	dma = distributions made after	mbo/a = months beginning on or after	tca = trusts created after
	Dma = disclosures made after	oia = obligations issued after	teia = transactions entered into after
	dmi = distributions made in	pa = periods after	tyba = taxable years beginning after
	doa = disasters occurring after	paa = property acquired after	tyea = taxable years ending after
	DOE = date of enactment	pca = productions commencing after	12mf = twelve months from
	dpoia = damages paid or incurred after	pma = payments made after	
	dsbiUSa = distilled spirits brought into the United States after	ppa = property purchased after	

[Footnotes for JCX-7-10]

[1] To the extent the proposals are not fully specified, estimates will be updated as new information becomes available and policy intent is clarified.

[1] To the extent the proposals are not tany spectrul, estimates will be updated as[2] Estimate includes the following outlay effects:	<u>2010</u>	2011	<u>2012</u>	2013	<u>2014</u>	2015	2016	<u>2017</u>	<u>2018</u>	<u>2019</u>	2020	2010-15	<u>2010-20</u>
Retain 10% bracket			1,258	1,342	1,441	1,582	1,677	1,742	1,846	1,923	2,035	5,623	14,846
Child credit			26,597	26,557	26,409	26,143	26,189	26,540	26,739	27,158	27,404	105,706	239,736
Marriage penalty			2,038	2,023	1,996	1,993	2,016	2,053	2,100	2,156	2,198	8,050	18,573
EIC part of marriage penalty			3,718	3,785	3,808	3,817	3,869	3,954	4,049	4,165	4,269	15,128	35,434
Other incentives for families and children			79	294	318	324	325	326	324	323	321	1,015	2,634
Extend Making Work Pay tax credit			19,996									19,996	19,996
Economic Recovery Payments for 2010	14,216	167	29									14,412	14,412
Interaction of economic recovery payments with the													
Making Work Pay tax credit		-768										-768	-768
Provide \$250 refundable credit for Federal, State and local													
government retirees not eligible for Social Security benefits		98										98	98
Extend COBRA Health Insurance Premium Assistance	107	274	475									856	856
Extend option for cash assistance to States in lieu of housing													
tax credits	444	4,001										4,445	4,445
Expanded earned income credit			3,255	3,214	3,132	3,064	3,057	3,110	3,182	3,262	3,353	12,665	28,629
Expanded child and dependent care tax credit			105	425	448	457	467	477	487	498	510	1,435	3,873
Require certain employers to establish automatic enrollment													
in IRAs				1,135	1,170	1,197	1,253	1,307	1,357	1,481	1,546	3,502	10,446
Expanded Saver's credit			1,274	1,204	1,152	1,098	1,114	1,115	1,102	1,194	1,182	4,728	10,435
Extend American Opportunity tax credit			2,086	1,963	1,996	1,915	1,866	1,841	1,921	1,895	1,984	7,960	17,467
Increase in limit on cover over of rum excise tax revenues	122	113	27									262	262
Enhanced credit for health insurance costs of eligible individuals		66	35									101	101
Recovery zone bonds		74	148	148	148	148	148	148	148	148	148	666	1,406
Eliminate the advanced earned income credit	-90	-98	-98	-100	-101	-102	-103	-105	-107	-109	-111	-588	-1,124
Reform and Extend Build America Bonds		522	2,504	4,186	5,919	7,704	9,542	11,435	13,385	15,394	17,463	20,835	88,054
Restructure Assistance to New York City - Provide Tax													
incentives for Transportation infrastructure		200	200	200	200	200	200	200	200	200	200	1,000	2,000
Implement unemployment insurance integrity legislation			-395	-334	-197	-200	-203	-205	-208	-210	-212	-1,126	-2,164
Total Outlay Effects	14,799	4,649	63,331	46,042	47,839	49,340	51,417	53,938	56,525	59,478	62,290	226,001	509,647
3] The provision that permanently extends the exclusion for undergraduate													
courses and graduate level courses is included in the Education													
Incentives line and includes the following effects:													
Total Revenue Effects		-706	-964	-992	-1,023	-1,053	-1,085	-1,117	-1,151	-1,185	-1,221	-4,738	-10,497
On-budget effects		-460	-653	-671	-692	-713	-734	-756	-779	-802	-826	-3,189	-7,086
Off-budget effects		-246	-311	-321	-331	-340	-351	-361	-372	-383	-395	-1,549	-3,411

Footnotes for JCX-7-10 are continued on the following page:

[Footnotes for JCX-7-10]

- [4] Estimate includes extension of the adoption tax credit, employer-provided child care tax credit, and dependent care tax credit.
- [5] Estimate does not include effects of interaction with unemployment insurance.
- [6] Loss of less than \$500,000.
- [7] Gain of less than \$500,000.
- [8] Estimate provided by the Congressional Budget Office.
- [9] Effective for disasters occurring after December 31, 2009 and taxable years beginning after December 31, 2009 for the \$500 limitation provision.
- [10] Extends provisions in sections 143(k)(11) and 143(k)(13) of the Internal Revenue Code.
- [11] Effective for any unemployed veteran hired within five years (but not less than two months) of the date of discharge.
- [12] Not effective for taxable years of electing Settlement Trusts beginning after December 31, 2011, or for contributions to such trusts made after December 31, 2011.
- [13] The estimate shown here is provided by the Department of the Treasury. A final estimate will be provided after necessary data specifications and model development, specific to this proposal, have been completed.
- [14] Effective after assignments of interest in life insurance policies and payment of death benefits for taxable years beginning after.
- [15] Negligible revenue gain.
- [16] Effective for employment tax returns required to be filed with respect to wages paid after December 31, 2010.
- [17] Negligible revenue effect.
- [18] Effective for transfers after the date of enactment of property subject to restrictions created after October 8, 1990 (the effective date of section 2704).