

ESTIMATED REVENUE EFFECTS OF CERTAIN TAX PROVISIONS CONTAINED IN S. 1072,
 THE "SAFE, ACCOUNTABLE, FLEXIBLE, AND EFFICIENT TRANSPORTATION EQUITY ACT OF 2004,"
 AS PASSED BY THE SENATE

Fiscal Years 2004 - 2013

[Millions of Dollars]

Provision	Effective	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2004-08	2004-13
Trust Fund and Expenditure Authority Reauthorization													
1. Extend Highway Trust Fund excise taxes (through 9/30/09).....	DOE	----- No Revenue Effect -----											
2. Extend Highway Trust Fund and Aquatic Resources Trust Fund expenditure authority (through 9/30/09) [1] [2]	DOE	----- No Revenue Effect -----											
3. Credit the Highway Trust Fund with interest on unexpended balances.....	DOE	----- No Revenue Effect -----											
4. Apportionments based on 4 years (rather than 2 years) of excise tax receipts [1]	DOE	----- No Revenue Effect -----											
5. Repeal transfers from Highway Trust Fund to General Fund under section 9503(c)(2).....	4/1/04	----- No Revenue Effect -----											
6. Prohibit use of Highway Account funds for certain rail projects [1].....	DOE	----- No Revenue Effect -----											
7. Authorize Highway Trust Fund to pay for certain highway excise tax compliance projects [1].....	DOE	----- No Revenue Effect -----											
Total of Trust Fund and Expenditure Authority Reauthorization		----- No Revenue Effect -----											
The "Volumetric Ethanol Excise Tax Credit ('VEETC') Act"													
A. Alcohol and Biodiesel Excise Tax Credit and Extension of Alcohol Fuels Income Tax Credit													
1. Provide excise tax credits for biodiesel used to produce a qualified fuel mixture [3] (\$1.00/gallon for agribiodiesel and \$0.50/gallon for biodiesel) (sunset 12/31/06) [4]	fsoua 9/30/04	---	-41	-57	-16	---	---	---	---	---	---	-114	-114
2. Provide excise tax credit (in lieu of reduced tax rate on gasoline) to certain blenders of alcohol fuel mixtures (sunset 12/31/10)	fsoua 9/30/04	----- No Revenue Effect -----											
3. Provide that all alcohol fuels excise tax credits are paid from the General Fund [5].....	fsoua 9/30/04	---	---	---	---	---	---	---	1,131	1,559	1,586	---	4,276
4. Repeal reduced-rate sales of gasoline for blending with alcohol and reduced-rate sales of alcohol fuel blends	fsoua 9/30/04	---	22	23	23	23	23	23	22	22	22	92	204
5. Transfer full amount of alcohol fuel excise taxes to the Highway Trust Fund	fsoua 9/30/03	----- No Revenue Effect -----											

Provision	Effective	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2004-08	2004-13
6. Extension of section 40 alcohol fuels income tax credit (sunset 12/31/10)	DOE	---	---	---	---	-2	-6	-8	-10	-10	-4	-2	-41
7. Provide outlay payments (in lieu of excise tax credits and refunds) to producers of alcohol and biodiesel fuel mixtures and users of neat alcohol and neat biodiesel fuels:													
a. Outlay effects [6] [7]	fsoua 9/30/04	---	-105	-114	-116	-117	-119	-121	-38	---	---	-451	-729
b. Revenue effects.....	fsoua 9/30/04	---	105	114	116	117	119	121	38	---	---	451	729
B. Biodiesel Income Tax Credit - provide income tax credits for biodiesel fuel and biodiesel used to produce a qualified fuel mixture (\$1.00/gallon for agribiodiesel and \$.50/gallon for biodiesel) (sunset 12/31/06) [4]	fpasoua 9/30/04	----- Revenue Effects Included in Item A.1., Above -----											
C. Extension of Temporary Additional Duty on Ethyl Alcohol (sunset 1/1/11) [8]	DOE	----- Negligible Revenue Effect -----											
Total of The "Volumetric Ethanol Excise Tax Credit ("VEETC") Act"		[9]	-19	-34	7	21	17	15	1,143	1,571	1,604	-24	4,325
Fuel Fraud Prevention Provisions													
A. Aviation Jet Fuel													
1. Taxation of aviation grade kerosene at the terminal rack.....	[10]	---	397	427	431	434	437	437	435	433	432	1,689	3,863
2. Transfers from Airport and Airway Trust Fund to Highway Trust Fund to reflect highway use of jet fuel [11]...	10/1/04	----- No Revenue Effect -----											
B. Dyed Fuel Provisions													
1. Elimination of manual dyeing of fuel.....	[12]	---	31	45	45	46	46	46	46	46	46	167	398
2. Elimination of administrative review for taxable use of dyed fuel.....	paa DOE	----- Negligible Revenue Effect -----											
3. Extension of penalty on untaxed chemically altered fuel mixtures.....	DOE	----- Negligible Revenue Effect -----											
4. Termination of dyed diesel use by intercity buses.....	fsa 9/30/04	----- Negligible Revenue Effect -----											
C. Modification of Inspection of Records Provisions													
1. Authority to inspect on-site records.....	DOE	----- Negligible Revenue Effect -----											
2. Assessable penalty for refusal of entry.....	10/1/04	----- Negligible Revenue Effect -----											
D. Registration and Reporting Requirements													
1. Registration of all pipeline or vessel operators required for exemption of bulk transfers; penalty on knowing transfers to nonregistered person; Secretary must publish list of registered persons [13].....	10/1/04	---	116	124	125	126	127	128	128	128	128	492	1,130
2. Display of registration.....	10/1/04	----- Revenue Effects Included in Item D.1., Above -----											
3. Certain reports filed electronically; penalty for failure to report.....	10/1/04	----- Revenue Effects Included in Item D.1., Above -----											
4. Increased penalty for failure to register.....	pia 10/1/04	---	2	2	2	2	2	2	2	2	2	8	19
5. Registration of persons within foreign trade zones.....	10/1/04	----- Revenue Effects Included in Item D.1., Above -----											
6. Information reporting for persons claiming certain tax benefits.....	10/1/04	----- Negligible Revenue Effect -----											
E. Import Provisions													
1. Tax at point of entry where importer not registered.....	DOE	2	8	8	8	8	8	8	8	8	8	33	72
2. Reconciliation of on-loaded cargo to entered cargo.....	DOE	----- Negligible Revenue Effect -----											

Provision	Effective	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2004-08	2004-13
F. Miscellaneous Provisions													
1. Tax on sale of diesel fuel whether suitable for use or not in a diesel powered vehicle or train.....	DOE	----- Revenue Effects Included in Item G., Below -----											
2. Limit ultimate vendor refund claims on sales of fuel used for farming purposes.....	fsfnua DOE	----- Negligible Revenue Effect -----											
3. Permit ultimate vendors to administer credits and refunds of fuel tax.....	10/1/04	----- Negligible Revenue Effect -----											
4. Two-party exchanges.....	DOE	----- Negligible Revenue Effect -----											
5. Modifications of tax on use of highway vehicles.....	tpba DOE [14]	143	119	122	124	126	129	129	131	133	135	635	1,292
6. Dedication of revenue from certain penalties to the Highway Trust Fund.....	pia 10/1/2004	----- No Revenue Effect -----											
7. Nonapplication of export exemption to delivery of fuel to motor vehicles removed from the United States.....	sodma DOE	----- No Revenue Effect -----											
G. Total Accountability - taxation and reporting for blendstocks, transmix, and other products removed from terminals and refineries, including those in foreign trade zones.....													
	rl & fsoua 9/30/04	---	100	106	107	108	108	108	108	107	107	421	958
Total of Fuel Fraud Prevention Provisions		145	773	834	842	850	857	858	858	857	858	3,445	7,732
Definition of Highway Vehicle													
A. Exemption From Certain Excise Taxes for Mobile Machinery Vehicles	[15]	---	79	106	106	106	106	106	106	106	106	396	923
B. Modified Definition of Off-Highway Vehicle.....	[15]	----- Negligible Revenue Effect -----											
Total of Definition of Highway Vehicle		[9]	79	106	106	106	106	106	106	106	106	396	923
Excise Tax Reform and Simplification Provisions													
A. Highway Excise Taxes													
1. Dedication of gas guzzler tax to Highway Trust Fund [16]	DOE	----- No Revenue Effect -----											
2. Repeal gas guzzler tax for limousines.....	DOE	-2	-4	-4	-4	-5	-5	-5	-6	-6	-7	-19	-48
3. Repeal of 4.3-cent General Fund excise taxes on railroads diesel fuel and inland waterway fuel:													
a. Railroads.....	10/1/04	---	-139	-146	-149	-154	-158	-162	-166	-171	-175	-588	-1,420
b. Inland waterway.....	10/1/04	---	-11	-15	-15	-16	-16	-17	-17	-18	-18	-57	-143
B. Aquatic Excise Taxes													
1. Eliminate Aquatic Resources Trust Fund and transform Sport Fishing Restoration Account.....	10/1/04	----- No Revenue Effect -----											
2. LED devices exempted from sonar devices suitable for finding fish [17].....	[18]	---	[19]	[19]	[19]	[19]	[19]	[19]	-1	-1	-1	-2	-4
3. Repeal of Harbor Maintenance tax on exports [8].....	bo/a DOE	----- Negligible Revenue Effect -----											
4. Cap on excise tax on certain fishing equipment [20].....	[18]	---	-3	-3	-3	-3	-3	-4	-4	-4	-4	-12	-31
5. Reduction in rate of tax on portable aerated bait containers [21].....	[18]	---	[19]	[19]	[19]	[19]	[19]	[19]	[19]	[19]	[19]	[19]	-1
C. Aerial Excise Taxes													
1. Clarification of excise tax exemptions for agricultural aerial applicators and exemption for certain fixed-wing aircraft.....	fuoata DOE	-1	-4	-4	-4	-4	-4	-4	-4	-4	-4	-17	-37
2. Modification of rural airport definition.....	4/1/04	-2	-3	-3	-3	-4	-4	-4	-4	-4	-5	-15	-36

Provision	Effective	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2004-08	2004-13
3. Exemption from ticket taxes for transportation provided by seaplanes.....	ta 3/31/04	-1	-1	-1	-1	-1	-1	-1	-1	-1	-1	-4	-10
4. Certain sightseeing flights exempt from taxes on air transportation.....	[22]	-5	-6	-7	-7	-7	-7	-8	-8	-9	-9	-32	-72
D. Alcoholic Beverage Excise Taxes													
1. Repeal of occupational taxes relating to distilled spirits, wine, and beer.....	[23]	-66	-78	-78	-78	-78	-78	-78	-78	-78	-78	-378	-768
2. Suspension of limitation on cover over of rum excise tax revenues (maintain cover over at \$13.25 per proof gallon and increase to \$13.50 on 10/1/04) (sunset 12/31/05); require transfer to Puerto Rico Conservation Trust Fund.....	abiUSa 12/31/03 [24]	-67	-93	-22	---	---	---	---	---	---	---	-182	-182
E. Sport Excise Taxes													
1. Exempt custom gunsmiths from firearms excise tax [25].....	[26]	[19]	-1	-1	-1	-1	-1	-1	-1	-1	-1	-4	-7
2. Modified taxation of imported archery products [27].....	[28]	[19]	-1	-1	-1	-1	-1	-1	-1	-1	-1	-4	-8
3. Repeal of Chapter 35 Federal wagering excise and occupational taxes (sections 1308 and 5443).....	[29]	-2	-9	-9	-9	-9	-9	-9	-9	-9	-9	-37	-79
F. Other Provisions													
1. Income tax credit for distilled spirits wholesalers and for distilled spirits in control state bailment warehouses for costs of carrying Federal excise taxes on bottled distilled spirits.....	tyba DOE	-4	-29	-33	-34	-35	-35	-35	-36	-36	-37	-135	-314
2. Credit for taxpayers owning commercial power takeoff vehicles (sunset 12/31/06).....	tyba DOE	---	-25	-40	-14	---	---	---	---	---	---	-79	-79
3. Credit for auxiliary power units installed on diesel-powered trucks (sunset 12/31/06)	ppaif tyba DOE	---	-1	-2	-1	---	---	---	---	---	---	-4	-4
Total of Excise Tax Reform and Simplification Provisions		-150	-408	-369	-324	-318	-322	-329	-336	-343	-350	-1,569	-3,243
Miscellaneous Provisions													
A. Motor Fuel Tax Enforcement Advisory Commission.....	DOE	----- No Revenue Effect -----											
B. National Surface Transportation Infrastructure Financing Commission.....	DOE	----- No Revenue Effect -----											
C. Treasury Study of Fuel Tax Compliance and Interagency Cooperation.....	DOE	----- No Revenue Effect -----											
D. Funding for Studies of Supplemental or Alternative Financing for the Highway Trust Fund	DOE	----- Estimate Will Be Provided by the Congressional Budget Office -----											
E. Treasury Study of Highway Fuels Used by Trucks for Non-transportation Purposes.....	DOE	----- No Revenue Effect -----											
F. Delta Regional Transportation Plan [30].....	DOE	----- No Revenue Effect -----											
G. Increase exclusion for employer-provided transit and vanpool benefits to \$120 per month.....	tyba 12/31/04	---	-6	-11	-12	-15	-17	-21	-22	-25	-27	-44	-156
H. Study of Incentives for Production of Biodiesel.....	DOE	----- No Revenue Effect -----											
Total of Miscellaneous Provisions		---	-6	-11	-12	-15	-17	-21	-22	-25	-27	-44	-156
Revenue Offset Provisions													
A. Expansion of Limitation on Depreciation of Certain Passenger Automobiles	ppisa 2/2/04	42	112	40	-52	-45	-43	-20	---	---	---	97	34

Provision	Effective	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2004-08	2004-13
B. Provisions Designed to Curtail Tax Shelters													
1. Clarification of the economic substance doctrine and related penalty provisions	Ta 2/2/04	341	1,163	1,282	1,156	1,197	1,323	1,472	1,673	1,906	2,172	5,140	13,686
2. Provisions relating to reportable transactions and tax shelters	[31]	30	76	119	120	124	131	139	150	164	179	469	1,232
3. Modification to the substantial understatement penalty	tyba DOE	---	---	7	15	23	26	30	34	38	38	45	211
4. Impose a civil penalty (of up to \$5,000) on failure to report interest in foreign financial accounts	DOE	[32]	[32]	[32]	[32]	[32]	[32]	[32]	[32]	[32]	[32]	1	3
5. Actions to enjoin conduct with respect to tax shelters	DOE	----- <i>Negligible Revenue Effect</i> -----											
6. Understatement of taxpayer's liability by income tax return preparer	dpa DOE	----- <i>Negligible Revenue Effect</i> -----											
7. Frivolous tax submissions	[33]	3	3	3	3	3	3	3	3	3	3	15	30
8. Regulation of individuals practicing before the Department of Treasury	ata DOE	----- <i>No Revenue Effect</i> -----											
9. Extend statute of limitations for undisclosed listed transactions	[34]	---	---	1	1	1	1	1	1	1	1	3	8
10. Deny deduction for interest paid to the IRS on underpayments involving certain tax motivated transactions	tyba DOE	---	---	1	1	3	4	4	4	4	4	5	25
11. Authorize additional \$300 million per year to the IRS to combat abusive tax avoidance transactions [1]	DOE	----- <i>No Revenue Effect</i> -----											
C. Other Corporate Governance Provisions													
1. Affirmation of consolidated return regulation authority	[35]	----- <i>Negligible Revenue Effect</i> -----											
2. Chief executive officer required to sign declaration as part of corporate income tax return	rfa DOE	----- <i>Negligible Revenue Effect</i> -----											
3. Denial of deduction for certain fines, penalties, and other amounts	apoia 4/27/03	176	10	10	10	10	10	10	10	10	10	216	266
4. Denial of deduction for punitive damages	dpoia DOE	10	29	30	31	32	33	34	35	36	37	132	307
5. Increase the maximum criminal fraud penalty for individuals to the amount of the tax at issue.....	uaoataoa DOE	---	---	[32]	[32]	[32]	[32]	[32]	[32]	[32]	[32]	[32]	5
6. Double certain penalties, fines, and interest on underpayments related to certain offshore financial arrangements	oyo/a DOE	2	1	1	[32]	[32]	[32]	[32]	[32]	[32]	[32]	4	6
D. Enron-Related Tax Shelter Provisions													
1. Limitation on transfer or importation of built-in losses	Ta 2/13/03	128	123	136	149	164	180	198	218	240	264	700	1,800
2. No reduction of basis under section 734 in stock held by partnership in corporate partner	da 2/13/03	12	16	24	29	33	35	33	32	33	34	114	281
3. Repeal of special rules for FASITs	on 2/13/03	----- <i>Negligible Revenue Effect</i> -----											
4. Expanded disallowance of deduction for interest on convertible debt	diia 2/13/03	6	88	90	94	96	98	101	103	106	109	374	891
5. Expanded authority to disallow tax benefits under section 269	aa 2/13/03	3	9	10	10	11	11	12	12	13	14	43	105
6. Modification of interaction between subpart F and passive foreign investment company rules.....	[36]	23	15	8	4	5	6	8	10	12	15	55	106
E. Provisions to Discourage Expatriation													
1. Tax treatment of inversion transactions	[37]	172	137	140	168	202	242	290	348	418	493	819	2,610

Provision	Effective	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2004-08	2004-13
C. Addition of Vaccines Against Influenza to the List of Taxable Vaccines [1].....	[44]	10	52	54	56	58	59	59	60	61	62	229	530
D. Extend Present-Law Intangibles Amortization Provisions to Acquisitions of Sports Franchises	aoa DOE	10	55	94	68	36	23	22	20	23	25	263	376
Total of Tax-Exempt Financing of Highway Projects and Rail-Truck Transfer Facilities and Other Provisions		19	103	129	88	37	2	-22	-44	-60	-75	375	176
NET TOTAL		1,007	2,832	3,365	3,296	3,451	3,532	3,719	5,095	5,800	6,139	13,953	38,250

Joint Committee on Taxation

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

Legend for "Effective" column:

aa = acquisitions after
 abiUSa = articles brought into United States after
 aoa = acquisitions occurring after
 apoia = amounts paid or incurred after
 as = articles sold
 ata = actions taken after
 bia = bonds issued after
 bo/a = before, on, and after
 coio/a = cancellations of indebtedness on or after
 da = distributions after
 diia = debt instrument issued after
 DOE = date of enactment
 dpa = documents prepared after
 dpoia = damages paid or incurred after
 fpasoua = fuel produced, and sold or used, after

fsfnua = fuels sold for nontaxable use after
 fsoua = fuel sold or used after
 fuoata = fuel use or air transportation after
 iaeio/a = installment agreements entered into on or after
 oyo/a = open years on or after
 paa = penalties assessed after
 padoa = purchases and dispositions occurring after
 peo/a = positions established on or after
 pia = penalties imposed after
 ppaif = property purchased and installed for
 ppisa = property placed in service after
 rfa = returns filed after
 rl = reportable liquid
 rma = requests made after

rra = risk reinsured after
 sodma = sales or deliveries made after
 soo/a = sales occurring on or after
 ta = transportation after
 Ta = transactions after
 tada = transfers and distributions after
 toa = transactions occurring after
 to/a = transactions on or after
 tpba = taxable periods beginning after
 tyba = taxable years beginning after
 tybo/a = taxable years beginning on or after
 uaoataoa = underpayments and overpayments attributable to actions occurring after
 30da = 30 days after

- [1] Any outlay effects of this provision will be estimated by the Congressional Budget Office ("CBO")
- [2] Aquatic Resources Trust Fund is to be restructured and the name changed under the Excise Tax Reform and Simplification Provisions, Item B.1. (Eliminate Aquatic Resources Trust Fund and transform Sport Fishing Restoration Account).
- [3] Tax credits would be provided for on-road and off-road uses of biodiesel.
- [4] This provision may also have indirect effects on Federal outlays for certain farm programs. Outlay effects will be estimated by the Congressional Budget Office.
- [5] The bill provides that the excise tax credit and outlay payments to alcohol fuels blenders expire after December 31, 2010. If this bill is enacted, CBO's subsequent baseline would not assume extension of the excise tax credit and outlay payments beyond the 2010 expiration, because the requirement to assume extension of excise taxes dedicated to trust funds does not apply to excise tax credits and outlays paid from the General Fund. Thus, it is assumed that the excise tax credit and the outlay payments to alcohol fuel blenders would expire as scheduled. This treatment generates changes in revenues after 2010.
- [6] Estimate provided by the Congressional Budget Office. Negative numbers indicate an increase in outlays.
- [7] The outlay payments for ethanol expire after December 31, 2010, and the outlay payments for biodiesel expire after December 31, 2006.
- [8] Estimate provided by the Congressional Budget Office.
- [9] Negligible revenue effect.
- [10] Effective for aviation-grade kerosene removed, entered into the United States, or sold after September 30, 2004.
- [11] The Secretary of the Treasury would determine on an annual basis the appropriate amounts to be transferred from the Airport and Airway Trust Fund to the Highway Trust Fund to reflect highway use of jet fuel.
- [12] Generally effective 180 days after the date on which the Secretary issues the regulations, which are required on or before June 30, 2004.
- [13] Secretary must publish the list by June 30, 2004.

[Footnotes for JCX-19-04 are continued on the following page]

Footnotes for JCX-19-04 continued:

- [14] The display and electronic identification device provisions are effective October 1, 2005.
- [15] Generally effective after the date of enactment, except for fuel taxes, effective for taxable years beginning after the date of enactment.
- [16] The gas guzzler tax, as amended, would generate between \$71 million and \$75 million per year in Federal tax receipts.
- [17] Provision will result in a reduction in outlays of approximately \$4 million over 10 years from the Sport Fish Restoration Trust Fund, successor to the Aquatic Resources Trust Fund.
- [18] Effective for articles sold by the manufacturer, producer, or importer on and after October 1, 2004.
- [19] Loss of less than \$500,000.
- [20] Provision will result in a reduction in outlays of approximately \$34 million over 10 years from the Sport Fish Restoration Trust Fund, successor to the Aquatic Resources Trust Fund.
- [21] Provision will result in a reduction in outlays of approximately \$1 million over 10 years from the Sport Fish Restoration Trust Fund, successor to the Aquatic Resources Trust Fund.
- [22] Effective with respect to transportation beginning on or after the date of the enactment, but shall not apply to any amount paid before such date.
- [23] Effective on July 1, 2004, but shall not apply to taxes imposed for periods before such date.
- [24] The transfer to the Puerto Rico Conservation Trust Fund is effective October 1, 2004.
- [25] Provision will result in a reduction in outlays of approximately \$7 million over 10 years from the Federal Wildlife Restoration Fund.
- [26] Effective for articles sold by the manufacturer, producer, or importer on or before the first day of the month beginning at least two weeks after the date of enactment.
- [27] Provision will result in a reduction in outlays of approximately \$9 million over 10 years from the Federal Wildlife Restoration Fund.
- [28] Effective for articles sold by the manufacturer, producer, or importer after the date of the enactment.
- [29] Effective for wagers made after the date of enactment and July 1, 2004, for purposes of occupational taxes, but shall not apply to occupational taxes imposed for periods before such date.
- [30] The provision has outlay effects which will be provided by the Congressional Budget Office.
- [31] Effective dates for provisions relating to reportable transactions and tax shelters: the penalty for failure to disclose reportable transactions is effective for returns and statements the due date of which is after the date of enactment; the modification to the accuracy-related penalty for listed or reportable transactions is effective for taxable years ending after the date of enactment; the tax shelter exception to confidentiality privileges is effective for communications made on or after the date of enactment; the material advisor and investor list disclosure provisions apply to transactions with respect to which material aid, assistance or advice is provided after the date of enactment; the failure to register tax shelter penalty applies to returns the due date for which is after the date of enactment; the investor list penalty applies to requests made after the date of enactment; and the penalty on promoters of tax shelters is effective for activities after the date of enactment.
- [32] Gain of less than \$1 million.
- [33] Effective for submissions made and issues raised after the first list is prescribed under section 6702(c).
- [34] Effective for taxable years with respect to which the period for assessing deficiencies did not expire before the date of enactment.
- [35] Effective for all taxable years, whether beginning before, on, or after the date of enactment.
- [36] Effective for taxable years of controlled foreign corporations beginning after February 13, 2003, and for taxable years of U.S. shareholders with or within which such taxable years of such foreign corporations end.
- [37] Effective for certain transactions completed after March 20, 2002, and would also affect certain taxpayers who completed transactions before March 21, 2002.
- [38] Generally effective for U.S. citizens who expatriate or long-term residents who terminate their residency on or after February 2, 2004.
- [39] Estimate is subject to review by the Congressional Budget Office.
- [40] Gain of less than \$500,000.
- [41] Estimate is preliminary and subject to change pursuant to the receipt of additional information.
- [42] Generally effective for start-up and organizational expenditures incurred after the date of enactment.
- [43] Effective for vaccines sold beginning on the first day of the first month beginning more than four weeks after the date of enactment.
- [44] Effective for vaccines sold and used on or after the later of the first day of the first month beginning more than four weeks after the date of enactment, or the date on which the Secretary of Health and Human Services lists the vaccine in the Vaccine Injury Compensation Trust Fund.