

ESTIMATED BUDGET EFFECTS OF RECONCILIATION PROVISIONS (TITLES XIII AND XIV)
AS APPROVED BY THE COMMITTEE ON WAYS AND MEANS

Fiscal Years 1996 - 2002

[Millions of Dollars]

Item	Effective	1996	1997	1998	1999	2000	2001	2002	1996-00	1996-02
TITLE XIII. REVENUE RECONCILIATION ACT										
I. EXPIRING PROVISIONS										
A. Provisions Extended Through 12/31/97:										
1. Work opportunity tax credit [1].....	1/1/96	-64	-173	-176	-93	-36	-12	-2	-542	-556
2. Employer-provided educational assistance (for undergraduate education after 12/31/95).....	1/1/95	-731	-500	-307	---	---	---	---	-1,538	-1,538
3. R&D credit with modifications.....	7/1/95	-1,149	-1,389	-1,013	-518	-343	-176	-40	-4,412	-4,628
4. Contributions of appreciated stock to private foundations.....	1/1/95	-47	-108	-20	-7	---	---	---	-182	-182
5. Orphan drug tax credit.....	1/1/95	-33	-20	-7	---	---	---	---	-60	-60
B. Permanent Extension of FUTA exemption for alien agricultural workers [2].....										
	1/1/95	-5	-3	-3	-3	-3	-3	-3	-17	-23
C. Commercial Aviation Fuel: extend 4.3 cents/gallon exemption through 9/30/97.....										
	10/1/95	-417	-439	-6	---	---	---	---	-863	-863
D. Extend all Airport and Airway Trust Fund excise taxes through 9/30/96 [3].....										
	1/1/96	----- No Revenue Effect -----								
Total for Expiring Provisions.....		-2,446	-2,632	-1,532	-621	-382	-191	-45	-7,614	-7,850

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19. Failure to agree to extension not taken into account.....	DOE	----- No Revenue Effect -----								
20. Award of litigation costs permitted in declaratory judgment proceedings.....	DOE	[4]	[4]	[4]	[4]	[4]	[4]	[4]	[5]	[5]
21. Increase in limit on recovery of civil damages.....	DOE	-3	-3	-3	-3	-3	-3	-3	-15	-21
22. Court discretion to reduce award for litigation costs.....	DOE	-1	-1	-1	-1	-1	-1	-1	-5	-7
23. Preliminary notice requirement.....	6/30/96	----- No Revenue Effect -----								
24. Disclosure of certain information where more than one person liable for penalty.....	DOE	----- No Revenue Effect -----								
25. Right of contribution where more than one person liable for penalty.....	DOE	----- No Revenue Effect -----								
26. Volunteer board members of tax-exempt organizations exempt from penalty.....	DOE	----- No Revenue Effect -----								
27. Enrolled agents included as third-party recordkeepers.....	DOE	[4]	[4]	[4]	[4]	[4]	[4]	[4]	[5]	[5]
28. Safeguards relating to designated summonses.....	DOE	[4]	[4]	[4]	[4]	[4]	[4]	[4]	[5]	[5]
29. Report on designated summonses...	DOE	----- No Revenue Effect -----								
30. Relief from retroactive application of Treasury Department regulations.....	DOE	---	-1	-4	-4	-4	-5	-5	-13	-23
31. Report on pilot program for appeal of enforcement actions.....	DOE	----- No Revenue Effect -----								
32. Phone number of person providing payee statements.....	1/1/97	----- No Revenue Effect -----								
33. Required notice of certain payments.....	DOE	----- No Revenue Effect -----								
34. Unauthorized enticement of information disclosure.....	DOE	----- No Revenue Effect -----								
35. Annual reminders to taxpayers with delinquent accounts.....	1/1/96	[6]	[6]	[6]	[6]	[6]	[6]	[6]	[7]	[7]
36. 5-year extension of authority for undercover operations	DOE	[6]	[6]	[6]	[6]	[6]	[6]	[6]	[7]	[7]
37. Disclosure of Form 8300 information.....	DOE	----- No Revenue Effect -----								
38. Disclosure of returns and return information to designee of taxpayer..	DOE	----- No Revenue Effect -----								

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39. Study of netting of interest on overpayments and liabilities.....	DOE	----- <i>No Revenue Effect</i> -----								
40. Provide tax credit for Taxpayer Compliance Measurement Program for individual taxpayers.....	tyba 12/31/94	---	-74	-74	-74	---	---	---	-222	-222
41. Expenses of detection of underpayments and fraud.....	DOE	----- <i>Negligible Revenue Effect</i> -----								
Total of Taxpayer Bill of Rights 2.....		-12	-95	-99	-100	-27	-30	-30	-333	-393

IV. ADDITIONAL TECHNICAL CORRECTIONS.....

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V. INFORMATION SHARING PROVISION: EXTENSION OF DISCLOSURE OF RETURN INFORMATION TO DEPARTMENT OF VETERANS AFFAIRS (outlay reductions) (2).....

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VI. CORPORATE AND OTHER REFORMS

1. Reform the tax treatment of certain corporate stock redemptions.....	5/4/95	-576	-481	-295	-57	238	505	643	-1,171	-23
2. Require corporate tax shelter reporting.....	atsotppa DOE	[7]	[7]	[7]	[7]	[7]	[7]	[7]	[8]	[8]
3. Disallow interest deduction for corporate-owned life insurance policy loans.....	ipoaa 12/31/95	192	517	802	1,094	1,354	1,506	1,550	3,959	7,016
4. Phase-out preferential tax deferral for certain large farm corporations required to use accrual accounting...	[9]	26	37	38	39	40	41	42	179	261
5. Phased-in repeal of section 936.....	tyba 12/31/95	31	92	258	447	586	737	951	1,414	3,102

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6. Corporate accounting - reform of income forecast method	ppisa 9/13/95	34	73	31	14	15	17	20	167	204
7. Corporate pension reversions.....	1/1/95	2,814	2,585	2,329	1,356	491	[10]	[10]	9,575	9,538
8. Modify exclusion of damages received on account of personal injury or sickness:										
a. Treat all punitive damages as taxable.....	ama 12/31/95	3	4	6	7	7	7	8	27	42
b. Include in income damage recoveries for non-physical injuries.....	ama 12/31/95	31	47	49	52	54	57	60	233	350
9. Require tax reporting for payments to attorneys.....	1/1/96	[7]	[7]	[7]	[7]	[7]	[7]	[7]	[8]	[8]
10. Expatriation tax provisions.....	2/6/95	64	97	146	199	254	289	304	760	1,353
11. Phase-out of tax credits for wind energy and "closed loop" biomass.....	tyea 9/13/95	---	9	19	28	34	35	37	90	162
12. Ethanol: Reduce blenders' tax subsidy from \$0.54 to \$0.51 per gallon to remove implicit subsidy for carbon dioxide; limit blenders' tax subsidy to plants in service before 9/14/95, not to exceed average production during the three year period ending 8/31/95 (exempting small producers); include excise tax compliance measures; reverse IRS regulations on ETBE as qualified alcohol fuel, and raise small producer credit from \$0.10 to \$0.13 per gallon.....	1/1/96	128	183	174	178	186	411	522	851	1,784
13. Remove business exclusion for energy subsidies provided by public utilities.....	ara 9/13/95	54	96	100	104	107	109	111	461	679
14. Modify basis adjustment rules under section 1033.....	ica 9/13/95	2	4	7	11	16	23	31	40	94
15. Modify the exception to the related party rule of section 1033 for individuals to only provide an exception for de minimis amounts (\$100,000).....	ica 9/13/95	1	2	4	7	10	13	15	24	52

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16. Disallow rollover under section 1034 to extent of previously claimed depreciation for home office or other depreciable use of residence.....	tyea 12/31/95	1	3	4	5	6	8	9	19	35
17. Provide that rollover of gain on sale of a principal residence cannot be elected unless the replacement property purchased is located within the United States (limit to resident aliens who terminate residence within 2 years).....	sea 9/13/95	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]
18. Tax gambling income of Indian tribes; repeal of targeted exemption from UBIT from gambling in certain States.....	1/1/96	28	50	52	52	53	54	56	235	345
19. Repeal exemption for withholding on gambling winnings from bingo and keno, where proceeds exceed \$5,000.....	1/1/96	20	6	6	6	6	7	7	45	58
20. Sunset the low-income housing tax credit after 12/31/97	DOE	-24	-29	64	333	674	1,046	1,431	1,018	3,494
21. Repeal tax credit for contributions to special Community Development Corporations.....	DOE	1	1	2	2	2	2	2	8	12
22. Repeal advance refunds of diesel fuel tax for diesel cars and light trucks.....	1/1/96	8	19	19	19	19	19	19	84	122
23. Apply failure to pay penalty to substitute returns.....	DOE	1	3	29	30	32	33	35	95	163
24. Repeal section 280A(g) (clarify that there is no basis adjustment required if depreciation is not claimed).....	tyba 12/31/95	11	22	23	23	24	26	27	103	155
25. Allow conversion of scholarship funding corporation to taxable corporation.....	DOE	3	4	6	8	10	10	9	30	48
26. Apply look-through rule for purposes of characterizing certain subpart F insurance income as UBIT.....	gira 12/31/95	7	23	24	27	30	32	34	111	177

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27. Intermediate sanctions for certain tax-exempt organizations.....	9/13/95	4	4	4	5	5	5	6	22	33
Total for Corporate and Other Reforms.....		2,864	3,371	3,901	3,989	4,253	4,992	5,929	18,379	29,256

VII. EITC REFORMS

1. Modify AGI for the EITC to include nontaxable Social Security benefits and nontaxable distributions of IRAs, pension, and annuities:										
a. Revenue.....	tyba 12/31/95	10	201	215	219	199	246	268	843	1,357
b. Outlay reductions.....	tyba 12/31/95	57	1,152	1,225	1,284	1,388	1,412	1,415	5,107	7,934
2. Restrict EITC eligibility to individuals with qualifying children:										
a. Revenue.....	tyba 12/31/95	4	89	93	97	100	107	112	382	601
b. Outlay reductions.....	tyba 12/31/95	27	535	557	583	610	631	658	2,313	3,602
3. Increase the EITC phaseout rate to 18 percent for individuals with one qualifying child and 23 percent for individuals with two or more qualifying children:										
a. Revenue.....	tyba 12/31/95	30	604	637	667	698	743	783	2,636	4,162
b. Outlay reductions.....	tyba 12/31/95	33	659	692	723	765	805	846	2,874	4,523
4. Require Social Security numbers for primary and secondary taxpayers, and treat omission of a correct Social Security number and underpayment of SECA as a math error:										
a. Revenue.....	tyba 12/31/95	1	28	29	29	30	30	31	117	178
b. Outlay reductions.....	tyba 12/31/95	10	224	232	236	242	245	251	945	1,441
Total of EITC Revenue [12].....		39	781	824	857	895	950	1,071	3,397	5,423
Total of EITC Outlay [12].....		131	2,636	2,779	2,897	3,045	3,159	3,197	11,489	17,845

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VIII. EXTENSION OF DEBT CEILING.....		---	---	---	---	---	---	---	---	---

IX. COAL INDUSTRY RETIREE

HEALTH EQUITY.....	10/1/95	----- <i>Negligible Revenue Effect</i> -----								
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TITLE XIV. TAX SIMPLIFICATION ACT**I. SIMPLIFICATION PROVISIONS****RELATING TO INDIVIDUALS**

1. Rollover of gain on sale of principal residence:										
a. Multiple sales within rollover period.....	s/a DOE	-1	-2	-2	-2	-2	-2	-3	-9	-14
b. Rules in case of divorce.....	s/a DOE	-2	-2	-2	-2	-3	-3	-3	-11	-17
2. One-time exclusion on the sale of a principal residence by an individual who has attained age 55 (allow additional exclusion for married couples under certain conditions where one spouse has claimed an exclusion prior to their marriage).....	s/a 9/13/95	-10	-19	-20	-21	-22	-23	-24	-92	-139
3. Permit payment of taxes by any commercially acceptable means.....	DOE + 9 months	----- <i>Negligible Revenue Effect</i> -----								
4. Simplified foreign tax credit limitation for individuals.....	tyba 12/31/95	[13]	-1	-1	-1	-1	-1	-1	-4	-6
5. Treatment of personal transactions by individuals under foreign currency rules.....	tyba 12/31/95	[13]	[13]	[13]	[13]	[13]	[13]	[13]	-1	-1
6. Treatment of certain reimbursed expenses of rural mail carriers.....	tyba 12/31/95	[13]	-1	-1	-1	-1	-1	-1	-5	-7
7. Exclusion of combat pay from withholding limited to amount excludable from gross income.....	r/a 12/31/95	----- <i>No Revenue Effect</i> -----								

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8. Travel expenses of Federal employee participating in a Federal criminal investigation.....	tyea DOE	[13]	[13]	[13]	[13]	[13]	[13]	[13]	-1	-1
II. PENSION SIMPLIFICATION										
A. Simplified Distribution Rules										
1. Sunset of 5-year income averaging for lump-sum distributions	tyba 12/31/95	4	13	23	36	44	46	48	119	213
2. Repeal of \$5,000 exclusion of employees' death benefits.....	tyba 12/31/95	16	46	49	52	54	55	55	218	328
3. Simplified method for taxing annuity distributions under certain employer plans.....	asda 12/31/95	[11]	2	4	4	6	6	6	16	28
4. Minimum required distributions.....	yba 12/31/95	-1	-4	-4	-4	-4	-4	-4	-17	-25
B. Increased Access to Pension Plans										
1. Modifications of simplified employee pensions (SEPs).....	yba 12/31/95	-12	-35	-36	-37	-38	-39	-40	-159	-238
2. State and local governments and tax-exempt organizations that do not maintain section 457 plans eligible under section 401(k).....	pyba 12/31/96	---	-37	-89	-95	-98	-102	-105	-319	-526
C. Nondiscrimination Provisions										
1. Simplified definition of highly compensated employees.....	yba 12/31/95	----- <i>Considered in Other Provisions</i> -----								
2. Repeal of family aggregation rules...	yba 12/31/95	----- <i>Considered in Other Provisions</i> -----								
3. Modification of additional participation requirements.....	yba 12/31/95	----- <i>Negligible Revenue Effect</i> -----								
4. Safe-harbor nondiscrimination rules for qualified cash or deferred arrangements, matching contributions, and salary reduction SEPs.....	yba 12/31/95	-52	-149	-154	-160	-165	-171	-177	-680	-1,028
D. Miscellaneous Pension Simplification										
1. Treatment of leased employees.....	yba 12/31/95	----- <i>Negligible Revenue Effect</i> -----								
2. Plans covering self-employed individuals.....	yba 12/31/95	----- <i>Negligible Revenue Effect</i> -----								
3. Elimination of special vesting rule for multiemployer plans.....	pybo/a 1/1/96	[11]	-1	-1	-1	-1	-1	-1	-4	-6
4. Distributions under rural cooperative plans.....	da 12/31/95	----- <i>Negligible Revenue Effect</i> -----								

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IV. FOREIGN TAX SIMPLIFICATION

A. Modification of Passive Foreign Investment Company Provisions to Eliminate Overlap with Subpart F and to Allow Mark-to-Market Election.....

tyba 12/31/95	-7	-18	-20	-21	-22	-24	-25	-88	-137
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B. Modifications to Provisions Affecting Controlled Foreign Corporations

1. General provisions.....	---	-1	-2	-2	-3	-3	-3	-3	-11	-17
2. Repeal of excess passive assets provision (section 956A).....	tyba 9/30/95	-17	-26	-29	-35	-41	-45	-51	-148	-244

C. Other Foreign Provisions

1. Exchange rate used in translating foreign taxes.....	---	[13]	[13]	[13]	[13]	[13]	[13]	[13]	[13]	[13]
2. Election to use simplified foreign tax credit limitation for alternative minimum tax.....	tyba 12/31/95	[13]	[13]	[13]	[13]	[13]	[13]	[13]	-1	-1
3. Treatment of inbound and outbound transfers.....	---	-1	-2	-2	-2	-2	-2	-2	-9	-13
4. Application of uniform capitalization rules to foreign persons.....	tyba 12/31/95	-31	-87	-26	-15	-17	-19	-21	-176	-216
5. Modification of reporting threshold for stock ownership of a foreign corporation.....	reoa 12/31/95	[13]	[13]	[13]	-1	-1	-2	-2	-2	-6
6. Prizes and awards received by a nonresident alien relating to amateur sports competitions held in the United States.....	DOE	[13]	[13]	[13]	[13]	[13]	[13]	[13]	[13]	[13]
7. Conform estate and income tax treatments of certain short-term OID obligations held by a nonresident alien.....	DOE	----- Negligible Revenue Effect -----								

V. OTHER INCOME TAX SIMPLIFICATION PROVISIONS

A. Subchapter S Corporations

1. Increase number of eligible shareholders.....	tyba 12/31/95	-7	-12	-14	-16	-20	-22	-25	-69	-116
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Item	Effective	1996	1997	1998	1999	2000	2001	2002	1996-00	1996-02
2. Permit certain trusts to hold stock in S corporations.....	tyba 12/31/95	-1	-2	-2	-2	-2	-2	-2	-9	-13
3. Extend holding period for certain trusts.....	tyba 12/31/95	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]
4. Financial institutions permitted to hold safe-harbor debt.....	tyba 12/31/95	[13]	[13]	[13]	[13]	[13]	[13]	[13]	-1	-1
5. Authority to validate certain invalid elections.....	tyba 12/31/82	[13]	[13]	[13]	[13]	[13]	[13]	[13]	-1	-1
6. Allow interim closing of the books.....	tyba 12/31/95	----- Negligible Revenue Effect -----								
7. Expand post-termination period and amend subchapter S audit procedures.....	tyba 12/31/95	[13]	[13]	[13]	[13]	[13]	[13]	[13]	-1	-1
8. S corporations permitted to hold S or C subsidiaries.....	tyba 12/31/95	-3	-7	-9	-11	-13	-15	-17	-43	-75
9. Treatment of distributions during loss years.....	tyba 12/31/95	[13]	[13]	[13]	[13]	[13]	[13]	[13]	-1	-1
10. Treatment of S corporations as shareholders in C corporations.....	tyba 12/31/95	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]
11. Elimination of certain earnings and profits of S corporations.....	tyba 12/31/95	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]
12. Treatment of certain losses carried over under at-risk rules.....	tyba 12/31/95	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]
13. Adjustments to basis of inherited S stock.....	dda DOE	[6]	[6]	[6]	[6]	[6]	[6]	[6]	[6]	[6]
14. Treatment of certain real estate held by an S corporation.....	tyba 12/31/95	[13]	-1	-1	-2	-2	-2	-2	-6	-10
15. Transition rule for elections after termination.....	tyba 12/31/95	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]
16. Interaction of subchapter S changes.....	---	-3	-10	-26	-32	-37	-38	-39	-108	-185
B. Regulated Investment Companies (RICs) and Real Estate Investment Trusts (REITs)										
1. Repeal of 30% gross income limitation for RICs.....	tyba DOE	-9	-17	-20	-24	-28	-32	-35	-98	-164
2. Modification of rules for real estate investment trusts (REITs):										
a. Repeal 30% gross income test....	tyba DOE	-4	-6	-7	-8	-9	-10	-11	-34	-55
b. Intermediate sanctions.....	tyba DOE	[14]	[14]	[14]	[14]	[14]	[14]	[14]	[15]	[15]
c. Phantom income exclusion from 95% distribution rule.....	tyba DOE	[14]	[14]	[14]	[14]	[14]	[14]	[14]	[15]	[15]
d. Other provisions.....	tyba DOE	----- Negligible Revenue Effect -----								

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C. Accounting Provisions										
1. Modifications to look-back method for long-term contracts.....	cc/tyea/E	-2	-3	-3	-3	-4	-4	-4	-15	-23
2. Allow traders to adopt mark-to-market accounting for securities.....	DOE	----- <i>Negligible Revenue Effect</i> -----								
3. Modification of Treasury ruling requirement for nuclear decommissioning funds.....	tyba DOE	-4	-4	-5	-5	-5	-5	-5	-23	-33
4. Fiscal year election for partnerships and S corporations.....	tyba 12/31/96	---	-100	-200	-25	-10	-10	-10	-335	-355
5. Provide that a taxpayer may elect to include in income crop insurance proceeds and disaster payments in the year of the disaster or in the following year.....	pra 12/31/95	7	-1	-1	-1	-1	-1	-1	3	1
D. Tax-Exempt Bond Provisions										
1. Repeal of \$100,000 limitation on unspent proceeds under 1-year exception from rebate.....	bia DOE	-2	-3	-4	-4	-5	-8	-10	-18	-36
2. Exception from rebate for earnings on bona fide debt service fund under construction bond rules.....	bia DOE	-1	-2	-2	-3	-3	-4	-8	-11	-23
3. Repeal of debt service-based limitation on investment in certain non-purpose investments.....	bia DOE	----- <i>Negligible Revenue Effect</i> -----								
4. Repeal of expired provisions affecting student loan bonds.....	DOE	----- <i>No Revenue Effect</i> -----								
E. Insurance Provisions										
1. Treatment of certain insurance contracts on retired lives.....	tyba 12/31/95	6	-4	5	4	4	12	-7	16	21
2. Treatment of modified guaranteed contracts.....	tyba 12/31/95	-1	2	4	1	2	1	-1	8	8
3. Treatment of certain small property and casualty insurance companies under the alternative minimum tax....	tyba 12/31/95	-1	-2	-2	-2	-3	-3	-3	-11	-16
F. Other Provisions										
1. Closing of partnership taxable year with respect to deceased partner.....	tyba 12/31/95	[13]	[13]	[13]	[13]	[13]	[13]	[13]	-1	-1
2. Modifications to the FICA tip credit...	eaai OBRA	----- <i>Negligible Revenue Effect</i> -----								

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3. Conform due date for first quarter estimated tax by private foundations.....	1/1/96									
4. Treatment of dues paid to agricultural or horticultural organizations.....	1/1/96									
VI. ESTATE, GIFT, AND TRUST TAX PROVISIONS										
A. Estate and Trust Income Tax Provisions										
1. Certain revocable trusts treated as part of estate.....	DOE	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[16]	[16]
2. Distributions during first 65 days of taxable year of estate.....	DOE									
3. Separate share rules available to estates.....	DOE									
4. Executor of estate and beneficiaries treated as related persons for disallowance of losses.....	DOE									
5. Limitation on taxable year of estates.....	DOE									
6. Repeal of throwback rules applicable to domestic trusts.....	DOE	-8	-9	-10	-10	-10	-10	-10	-47	-67
7. Simplified taxation of earnings of pre-need funeral trusts.....	DOE	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[7]	[7]
B. Estate and Gift Tax Provisions										
1. Clarification of waiver of certain rights of recovery.....	DOE									
2. Adjustments for gifts within 3 years of decedent's death.....	DOE	---	-6	-6	-7	-7	-7	-7	-26	-40
3. Clarification of qualified terminable interest rules.....	DOE									
4. Transitional rule under section 2056A.....	DOE									
5. Opportunity to correct certain failures under section 2032A.....	DOE									
6. Unified credit of decedent increased by unified credit of spouse used on split gift included in decedent's gross estate.....	DOE	---	-9	-9	-10	-10	-11	-11	-38	-60
7. Reformation of defective bequests to spouse of decedent.....	DOE	---	-11	-11	-12	-13	-13	-14	-47	-74

Item	Effective	1996	1997	1998	1999	2000	2001	2002	1996-00	1996-02
8. Gifts may not be revalued for estate tax purposes after expiration of statute of limitations.....	ga DOE	---	-15	-16	-16	-18	-21	-26	-65	-112
9. Clarifications relating to disclaimers.....	DOE	---	-2	-2	-2	-2	-3	-3	-8	-14
10. Clarify relationship between community property rights and retirement benefits.....	DOE	---	-3	-4	-4	-4	-4	-4	-15	-23
11. Treatment under qualified domestic trust rules of forms of ownership which are not trusts.....	DOE	----- <i>Negligible Revenue Effect</i> -----								
12. Authority to waive requirement of U.S. trustee for qualified domestic trusts.....	DOE	----- <i>No Revenue Effect</i> -----								
C. Generation-Skipping Tax Provisions										
1. Severing of trusts holding property having an inclusion ratio of greater than zero.....	DOE	---	-5	-6	-6	-6	-6	-7	-23	-36
2. Clarification of who is transferor where subsequent gift by reason of power of appointment.....	DOE	----- <i>Negligible Revenue Effect</i> -----								
3. Taxable termination not to include direct skips.....	DOE	----- <i>Negligible Revenue Effect</i> -----								
4. Modification of generation-skipping transfer tax for transfers to individuals with deceased parents.....	DOE	-3	-4	-4	-4	-4	-4	-4	-19	-27

VII. EXCISE TAX SIMPLIFICATION

A. Distilled Spirits, Wines, and Beer

1. Credit or refund for imported bottled distilled spirits returned to bonded premises.....	fcq DOE+180 days	----- <i>Negligible Revenue Effect</i> -----								
2. Authority to cancel or credit export bonds without submission of records.....	fcq DOE+180 days	----- <i>No Revenue Effect</i> -----								
3. Repeal of required maintenance of records on premises of distilled spirits plant.....	fcq DOE+180 days	----- <i>No Revenue Effect</i> -----								
4. Fermented material from any brewery may be received at a distilled spirits plant.....	fcq DOE+180 days	----- <i>Negligible Revenue Effect</i> -----								

Item	Effective	1996	1997	1998	1999	2000	2001	2002	1996-00	1996-02
5. Repeal of requirement for wholesale dealers in liquors to post sign.....	DOE									
----- <i>No Revenue Effect</i> -----										
6. Refund of tax on wine returned to bond not limited to unmerchantable wine.....	fcq DOE+180 days									
----- <i>Negligible Revenue Effect</i> -----										
7. Use of additional ameliorating material in certain wines.....	fcq DOE+180 days									
----- <i>No Revenue Effect</i> -----										
8. Domestically produced beer may be withdrawn free of tax for use of foreign embassies, legations, etc.....	fcq DOE+180 days									
----- <i>Negligible Revenue Effect</i> -----										
9. Beer may be withdrawn free of tax for destruction.....	fcq DOE+180 days									
----- <i>Negligible Revenue Effect</i> -----										
10. Authority to allow drawback on exported beer without submission of records.....	fcq DOE+180 days									
----- <i>No Revenue Effect</i> -----										
11. Transfer to brewery of beer imported in bulk without payment of tax.....	fcq DOE+180 days									
----- <i>Negligible Revenue Effect</i> -----										
B. Consolidate Imposition of Aviation										
Gasoline Excise Tax.....	1/1/96	[11]	--	--	--	--	--	--	[11]	[11]
C. Other Excise Tax Provisions										
1. Authority for IRS to grant exemptions from registration requirements.....	fcq DOE+180 days									
----- <i>No Revenue Effect</i> -----										
2. Clarify present law for retail truck excise tax (certain activities do not constitute remanufacture).....	DOE									
----- <i>Negligible Revenue Effect</i> -----										
3. Exempt Alaska from diesel dyeing requirement during period that the State is exempt from Clean Air Act dyeing requirement.....	DOE	-1	[13]	--	--	--	--	--	-1	-1
4. Repeal of temporary reduction in tax on piggyback trailers as "deadwood".....	DOE									
----- <i>No Revenue Effect</i> -----										
5. Delete deep seabed hard minerals excise tax as "deadwood".....	DOE									
----- <i>No Revenue Effect</i> -----										

VIII. ADMINISTRATIVE SIMPLIFICATION PROVISIONS

A. General Provisions

1. Repeal of authority to disclose whether prospective juror has been audited.....	DOE									
----- <i>No Revenue Effect</i> -----										

Item	Effective	1996	1997	1998	1999	2000	2001	2002	1996-00	1996-02
2. Clarification of statute of limitations for items from pass-through entities.....	tyba DOE	----- No Revenue Effect -----								
3. Certain notices disregarded under provision increasing interest rate on large corporate underpayments.....	1/1/96	[13]	[13]	[13]	[13]	[13]	[13]	[13]	-1	-1
4. Withholding of Puerto Rico income taxes from the salaries of employees of the U.S.....	tyba 1995	----- No Revenue Effect -----								
B. Tax Court Procedures										
1. Overpayment determinations of Tax Court.....	DOE	----- No Revenue Effect -----								
2. Awarding of administrative costs and attorneys fees.....	DOE	----- No Revenue Effect -----								
3. Redetermination of interest pursuant to motion.....	DOE	----- No Revenue Effect -----								
4. Application of net worth requirement for awards of litigation costs.....	DOE	----- No Revenue Effect -----								
C. Authority for Certain Cooperative Agreements										
1. Cooperative agreements with State tax authorities.....	DOE	----- No Revenue Effect -----								
Total of Tax Simplification Act (Title XIV).....		-157	-646	-865	-717	-733	-769	-839	-3,129	-4,735

GRAND TOTAL OF REVENUE EFFECTS (Titles XIII and XIV).....	171	582	1,996	3,140	3,700	4,631	5,749	9,579	19,922
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GRAND TOTAL OF OUTLAY EFFECTS (Titles XIII and XIV).....	131	2,636	2,779	2,904	3,062	3,186	3,234	11,513	17,933
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Joint Committee on Taxation

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

For revenue estimation purposes, the date of enactment of this bill is assumed to be October 1, 1995.

[Legend and Footnotes for JCX-43-95 appear on the following page]

Legend and Footnotes for JCX-43-95:

Legend for "Effective" column: s/a = sales after

sea = sales and exchanges after

DOE = date of enactment

tyba = taxable years beginning after

r/a = remuneration after

asda = annuity starting date after

yba = years beginning after

pyba = plan years beginning after

fcq DOE+180 days = beginning of first calendar quarter that starts at least 180 days after date of enactment

ppisa DOE = property placed in service after date of enactment

cc/tyea/E = contracts completed in taxable years ending after date of enactment

gira = gross income received after

eaII GATT = effective as if included in GATT

tyea = taxable years ending after

reoa = reportable events that occur after

pybo/a = plan years beginning on or after

lyba = limitation years beginning after

da = distributions after

tybo/a = taxable years beginning on or after

bia = bonds issued after

pra = payments received after

ama = awards made after

6ma DOE = 6 months after date of enactment

tyea DOE = taxable years ending after date of enactment

ga DOE = gifts after date of enactment

dda DOE = decedents dying after date of enactment

ara = amounts received after

ipooa = interest paid or accrued after

ica = involuntary conversion after

atsotppa DOE = any tax shelter offered to potential participants after date of enactment

eaII OBRA = effective as if included in the Omnibus Budget Reconciliation Act of 1993

[1] Credit rate at 35% on first \$6,000 of income and AFDC included.

[2] Estimates provided by the Congressional Budget Office (CBO).

[3] Section 257(b)(2)(c) of the Balanced Budget and Emergency Deficit Control Act of 1985, as amended by the Budget Enforcement Act of 1990, indicates that "excise taxes dedicated to a trust fund, if expiring, are assumed to be extended at current rates". Since the revenues from these taxes are dedicated to the Airport and Airway Trust Fund, an extension of the taxes is scored as having no revenue effect.

[4] Loss of less than \$1 million.

[5] Loss of less than \$5 million.

[6] Gain of less than \$1 million.

[7] Gain of less than \$5 million.

[8] Gain of less than \$25 million.

[9] No new suspense accounts could be established in taxable years ending after 9/13/95. The income in existing suspense accounts would be recognized in equal installments over a 20-years period beginning with the first taxable year beginning after 9/13/95.

[10] Loss of less \$50 million.

[11] Gain of less than \$500,000.

[12] Due to interaction between the provisions, items do not sum to total package.

[13] Loss of less than \$500,000.

[14] Gain of less than \$50,000.

[15] Gain of less than \$250,000.

[16] Loss of less than \$25 million.