

**JOINT COMMITTEE ON TAXATION**  
**December 7, 2009**  
**JCX-59-09**

**ESTIMATED REVENUE EFFECTS OF H.R. 4213,  
THE "TAX EXTENDERS ACT OF 2009"**

**Fiscal Years 2010 - 2019**

*[Millions of Dollars]*

Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2010-14	2010-19
<b>I. General Provisions</b>													
A. Individual Tax Relief													
1. Deduction of State and local general sales taxes (sunset 12/31/10).....	tyba 12/31/09	-220	-1,306	-320	---	---	---	---	---	---	---	-1,846	-1,846
2. Additional standard deduction for State and local real property taxes (sunset 12/31/10).....	tyba 12/31/09	-219	-1,241	---	---	---	---	---	---	---	---	-1,460	-1,460
3. Deduction for qualified tuition and related expenses (sunset 12/31/10).....	tyba 12/31/09	-306	-1,223	---	---	---	---	---	---	---	---	-1,529	-1,529
4. Above-the-line deduction of up to \$250 for teacher classroom expenses (sunset 12/31/10).....	tyba 12/31/09	-46	-182	---	---	---	---	---	---	---	---	-228	-228
B. Business Tax Relief													
1. Tax credit for research and experimentation expenses (sunset 12/31/10).....	apoi 12/31/09	-2,556	-1,591	-505	-444	-391	-344	-305	-286	-277	-268	-5,487	-6,966
2. Exception under Subpart F for active financing income (sunset 12/31/10).....	tyba 12/31/09	-945	-2,978	---	---	---	---	---	---	---	---	-3,923	-3,923
3. Look-through treatment of payments between related CFCs under foreign personal holding company income rules (sunset 12/31/10).....	tyba 12/31/09	-135	-439	---	---	---	---	---	---	---	---	-574	-574
4. 15-year straight-line cost recovery for qualified leasehold improvements, qualified restaurant buildings and improvements, and qualified retail improvements (sunset 12/31/10).....	ppisa 12/31/09	-174	-497	-641	-632	-620	-586	-566	-576	-561	-536	-2,564	-5,390
5. 7-year recovery period for motorsports entertainment complexes (sunset 12/31/10).....	ppisa 12/31/09	-11	-18	-11	-6	-3	-4	-4	1	6	6	-50	-45
6. 50% tax credit for certain expenditures for maintaining railroad tracks (sunset 12/31/10).....	tyba 12/31/09	-66	-99	[1]	[1]	---	---	---	---	---	---	-165	-165
7. Special expensing rules for certain qualified film and television productions (sunset 12/31/10).....	pca 12/31/09	-54	-108	12	26	18	15	13	11	9	7	-106	-51



Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2010-14	2010-19
8. Basis adjustment to stock of S corporations making charitable contributions of property (sunset 12/31/10).....	cmi tyba 12/31/09	-11	-11	-1	-2	-2	-2	-2	-2	-2	-2	-27	-37
<b>D. Miscellaneous Provisions</b>													
1. Indian employment tax credit (sunset 12/31/10).....	tyba 12/31/09	-17	-23	-7	-1	---	---	---	---	---	---	-49	-49
2. Accelerated depreciation for business property on Indian reservations (sunset 12/31/10).....	ppisa 12/31/09	-113	-196	-73	16	54	84	68	37	4	-7	-312	-125
3. Deduction allowable with respect to income attributable to domestic production activities in Puerto Rico (sunset 12/31/10).....	tyba 12/31/09	-84	-101	---	---	---	---	---	---	---	---	-185	-185
4. 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 12/31/10) [3].....	dsbiUSa 12/31/09	-102	-26	---	---	---	---	---	---	---	---	-128	-128
5. Economic development credit for American Samoa (sunset 12/31/10).....	tyba 12/31/09	-6	-12	---	---	---	---	---	---	---	---	-18	-18
<b>Total of General Provisions.....</b>		<b>-5,838</b>	<b>-10,899</b>	<b>-1,741</b>	<b>-1,235</b>	<b>-1,154</b>	<b>-817</b>	<b>-441</b>	<b>-505</b>	<b>-764</b>	<b>-833</b>	<b>-20,870</b>	<b>-24,230</b>
<b>II. Community Assistance Provisions</b>													
1. Empowerment zone tax incentives (sunset 12/31/10).....	pa 12/31/09	-209	-91	-24	-18	-14	-11	-9	-1	-2	-2	-356	-381
2. Renewal community tax incentives (sunset 12/31/10).....	pa 12/31/09	-474	-183	-44	-34	-26	-20	-3	-1	---	---	-762	-786
3. New markets tax credit (sunset 12/31/10).....	cyba 2009	-16	-57	-166	-182	-205	-220	-219	-194	-143	[1]	-626	-1,402
4. Tax incentives for investment in the District of Columbia (sunset 12/31/10).....	pa 12/31/09	-7	-5	-2	-1	-1	[1]	---	---	---	---	-16	-17
5. Tax incentives for New York Liberty Zone:													
a. Bonus depreciation for nonresidential real property and residential rental property (sunset 12/31/10).....	ppisa 12/31/09	-33	-10	1	1	1	1	1	1	1	1	-40	-34
b. Liberty Zone bonds (sunset 12/31/10).....	bia 12/31/09	-6	-22	-32	-32	-32	-32	-32	-32	-32	-32	-123	-284
6. 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	[1]	[1]	[1]	[1]	---	---	---	---	-7	-7
b. Extend the higher credit rate for GO Zone rehabilitation (sunset 12/31/10).....	apoiia 12/3/109	-10	-11	-1	-1	-1	[1]	[1]	[1]	[2]	[2]	-24	-25

Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2010-14	2010-19
7. Election for refundable low-income housing credit for 2010 (sunset 12/31/10).....	tyba 12/31/09	-4,406	102	281	435	504	521	523	523	523	523	-3,084	-471
<b>Total of Community Assistance Provisions.....</b>		<b>-5,167</b>	<b>-278</b>	<b>13</b>	<b>168</b>	<b>226</b>	<b>239</b>	<b>261</b>	<b>296</b>	<b>347</b>	<b>490</b>	<b>-5,038</b>	<b>-3,407</b>
<b>III. Disaster Relief Provisions</b>													
1. Individual casualty losses attributable to Federally declared disasters deductible without regard to AGI; \$500 floor applicable to all casualty losses (sunset 12/31/10).....	[4]	-437	-291	---	---	---	---	---	---	---	---	-728	-728
2. Expensing of qualified disaster expenses (sunset 12/31/10).....	doa 12/31/09	-20	-17	1	1	1	1	1	1	---	---	-34	-32
3. 5-year carryback of net operating losses attributable to Federally declared disasters (sunset 12/31/10).....	doa 12/31/09	-21	-380	53	57	49	37	28	21	15	12	-242	-129
4. Relax certain mortgage revenue bond requirements following Federally declared disasters (sunset 12/31/10) [5].....	bia 12/31/09	-2	-5	-7	-7	-7	-7	-7	-7	-7	-7	-28	-63
5. Additional depreciation allowance for qualified disaster assistance property (sunset 12/31/10).....	doa 12/31/09	-440	-768	-504	-110	23	6	37	132	105	85	-1,799	-1,434
6. Increased expensing for qualified disaster assistance property under section 179 (sunset 12/31/10).....	doa 12/31/09	-18	-12	10	6	5	4	2	1	1	---	-9	-1
<b>Total of Disaster Relief Provisions.....</b>		<b>-938</b>	<b>-1,473</b>	<b>-447</b>	<b>-53</b>	<b>71</b>	<b>41</b>	<b>61</b>	<b>148</b>	<b>114</b>	<b>90</b>	<b>-2,840</b>	<b>-2,387</b>
<b>IV. Energy Provisions</b>													
1. Incentives for biodiesel and renewable diesel:													
a. Biodiesel (sunset 12/31/10).....	saua 12/31/09	-726	-268	---	---	---	---	---	---	---	---	-994	-994
b. Renewable diesel (sunset 12/31/10).....	saua 12/31/09	-10	-4	---	---	---	---	---	---	---	---	-14	-14
2. Alternative motor vehicle credit for heavy hybrids (sunset 12/31/10).....	ppa 12/31/09	-3	-3	-1	-1	[1]	[2]	[2]	---	---	---	-8	-7
3. Alternative fuel credit for natural gas, and liquefied petroleum gas (except for forklift use of LPG) (sunset 12/31/10).....	fsoua 12/31/09	-94	-30	---	---	---	---	---	---	---	---	-125	-125
4. Special rule for sales or dispositions to implement FERC or State electric restructuring policy for qualified electric utilities (sunset 12/31/10).....	da 12/31/09	-221	-88	49	49	49	49	49	49	17	---	-163	---
<b>Total of Energy Provisions.....</b>		<b>-1,054</b>	<b>-393</b>	<b>48</b>	<b>48</b>	<b>49</b>	<b>49</b>	<b>49</b>	<b>49</b>	<b>17</b>	<b>---</b>	<b>-1,304</b>	<b>-1,140</b>

Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2010-14	2010-19
<b>V. Foreign Account Tax Compliance.....</b>	<b>various</b>	<b>343</b>	<b>448</b>	<b>710</b>	<b>769</b>	<b>804</b>	<b>840</b>	<b>878</b>	<b>917</b>	<b>958</b>	<b>1,001</b>	<b>3,074</b>	<b>7,668</b>
<b>VI. Other Revenue Provisions</b>													
A. Income of Partners for Performing Investment Management Services Treated as Ordinary Income Received for Performance of Services.....	[6]	2,057	3,546	3,177	2,486	2,050	1,776	1,861	2,354	2,667	2,642	13,316	24,616
B. Increase the Required Corporate Estimated Tax Payments Factor for Corporations with Assets of at Least \$1 Billion for Payments Due in July, August, and September 2014 by 26.5 Percentage Points.....	DOE	---	---	---	---	13,776	-13,776	---	---	---	---	13,776	---
C. Tax Expenditure Study.....	DOE	----- <i>No Revenue Effect</i> -----											
<b>Total of Other Revenue Provisions.....</b>		<b>2,057</b>	<b>3,546</b>	<b>3,177</b>	<b>2,486</b>	<b>15,826</b>	<b>-12,000</b>	<b>1,861</b>	<b>2,354</b>	<b>2,667</b>	<b>2,642</b>	<b>27,092</b>	<b>24,616</b>
<b>NET TOTAL .....</b>		<b>-10,597</b>	<b>-9,049</b>	<b>1,760</b>	<b>2,183</b>	<b>15,822</b>	<b>-11,648</b>	<b>2,669</b>	<b>3,259</b>	<b>3,339</b>	<b>3,390</b>	<b>114</b>	<b>1,120</b>

Joint Committee on Taxation

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

Legend for "Effective" column:

dsbiUSA = distilled spirits brought into the United States after  
 apoia = amounts paid or incurred after  
 bia = bonds issued after  
 cma = contributions made after  
 cmi = contributions made in  
 cyba = calendar years beginning after  
 da = dispositions after  
 dda = decedents dying after  
 dma = distributions made after

dmi = distributions made in  
 doa = disasters occurring after  
 DOE = date of enactment  
 ea = exchanges after  
 epoia = expenses paid or incurred after  
 epoi = expenses paid or incurred in  
 fsoua = fuel sold or used after  
 iha = individuals hired after  
 pa = periods after

paa = property acquired after  
 pca = productions commencing after  
 pma = payments made after  
 ppa = property purchased after  
 ppisa = property placed in service after  
 proaa = payments received or accrued after  
 saua = sales and uses after  
 tyba = taxable years beginning after

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

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

[3] Estimate provided by the Congressional Budget Office.

[4] Effective for disasters occurring after December 31, 2009 and taxable years beginning after December 31, 2009 for the \$500 limitation provision.

[5] Extends provisions in Internal Revenue Code sections 143(k)(11) and 143(k)(13).

[6] For purposes of the revenue estimate, it is assumed that the provision is generally effective for taxable years ending after December 31, 2009, for dispositions of partnership interests and partnership distributions after December 31, 2009, in the case of other income and gain in connection with investment management services on January 1, 2010, and the amendment for publicly traded partnerships applies after December 31, 2009.