## ESTIMATED REVENUE EFFECTS OF THE MANAGER'S AMENDMENT TO H.R. 4849, THE "SMALL BUSINESS AND INFRASTRUCTURE JOBS TAX ACT OF 2010," SCHEDULED FOR CONSIDERATION BY THE HOUSE COMMITTEE ON RULES MARCH 22, 2010

## 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. Small Business Tax Incentives A. General Provision - Temporary Exclusion of	saa 3/15/10													
<ul><li>100% of Gain on Certain Small Business Stock</li><li>B. Limitations and Reporting on Certain Penalties</li><li>1. Limitation on penalties for failure to disclose reportable transactions based on resulting tax</li></ul>	& before 1/1/12	2	16	6			-338	-923	-454	-123	-91	-57	-314	-1,962
benefits	paa 12/31/06	-40	-45	-21	-16	-8	-8	-8	-8	-8	-8	-8	-137	-176
enforcement tools C. Other Provisions	DOE [1] -						No	Revenue I	Effect					
1. Nonrecourse small business investment company loans from the Small Business Administration to														
<ul><li>be treated as amounts at risk</li><li>2. Increase in amount allowed as a deduction for</li></ul>	aloga DOE tybi		-4	-18	-27	-37	-57	-80	-111	-151	-200	-257	-143	-942
start-up expenditures	2010 and 2011	-127	-350	-248	8	36	34	32	30	28	26	23	-647	-508
Total of Business Tax Incentives		-165	-383	-281	-35	-9	-369	-979	-543	-254	-273	-299	-1,241	-3,588
II. Infrastructure Provisions														
<ul> <li>A. Extend Build America Bonds With Direct-Pay Subsidy Rate Decreasing to 33% for Governmental Capital Project Financing Bonds Issued During 2011, 31% for Such Bonds Issued During 2012, and 30% for Such Bonds Issued After December 31, 2012, and</li> </ul>														
<ul> <li>Before April 1, 2013 [2]</li> <li>B. Exempt-Facility Bonds for Sewage and Water Supply Facilities</li> <li>1. Provide that the volume cap for private activity bonds shall not apply to bonds for facilities for</li> </ul>	DOE		-145	-563	-781	-853	-853	-853	-853	-853	-853	-853	-3,195	-7,460
the furnishing of water and sewage facilities	oia DOE	-1	-3	-7	-14	-23	-31	-39	-47	-55	-63	-71	-79	-354

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Provision	Effective	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2010-15	2010-20
2. Permit Indian tribes to issue tax-exempt private														
activity bonds for sewage and water supply														
facilities	oia DOE	[3]	[3]	-1	-1	-1	-2	-2	-2	-3	-3	-3	-5	-18
C. Extend Exemption from AMT Tax Treatment for														
Certain Tax-Exempt Bonds (sunset 12/31/11)	oia 12/31/10		-13	-25	-25	-25	-25	-24	-24	-22	-21	-20	-113	-224
D. Low-Income Housing Credit Provisions														
(Create 4% Cash Out) [2]	[4]	-1,599	-701	-8	-8	-8	-8	-8	-8	-8	-8	-8	-2,332	-2,372
E. Extension and Additional Allocations of														
Recovery Zone Bond Authority [2]	DOE	-10	-104	-242	-266	-259	-256	-249	-249	-249	-249	-249	-1,137	-2,385
F. Exempt New Market Tax Credits from the AMT	[5]	-1	-5	-18	-34	-49	-58	-61	-57	-47	-18		-165	-349
Total of Infrastructure Provisions		-1,611	-971	-864	-1,129	-1,218	-1,233	-1,236	-1,240	-1,237	-1,215	-1,204	-7,026	-13,162
III. Revenue Raising Provisions														
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A. Limitation on Treaty Benefits	pma DOE	302	636	668	702	719	737	756	775	794	814	832	3,764	7,735
B. Treatment of Securities of a Controlled														
Corporation Exchanged for Assets in Certain														
Reorganizations	gea DOE	10	25	25	25	25	25	25	25	25	25	25	135	260
C. Repeal 80/20 Rules	tyba 12/31/10		50	100	100	100	100	100	100	100	100	100	450	950
D. Require Information Reporting for Rental	•													
Property Expense Payments	pma 12/31/10		[6]	227	239	251	261	275	285	299	314	325	978	2,476
E. Application of Levy to Payments to Federal	•													
Vendors Relating to Property	laa DOE	6	13	13	13	14	14	14	15	15	15	15	73	147
F. Application of Continuous Levy to Tax														
Liabilities of Certain Federal Contractors	lia 12/31/10		104	98	100	102	104	106	108	110	112	114	506	1,056
G. Require a Minimum 10-Year Term for Grantor														
Retained Annuity Trusts ("GRATs")	tma DOE		4	12	121	260	381	507	621	743	857	945	778	4,450
H. Increase Information Return Penalties	irrtbfo/a 1/1/11		30	41	42	42	43	43	43	44	45	47	197	419
I. Crude Tall Oil Ineligible for Cellulosic Biofuel														
Producer Credit	fsouo/a 1/1/10		528	523	436	242	121	35					1,850	1,885
J. Modifications to Corporate Estimated Tax													,	,
Payments Due in July, August, and September														
2014, 2015, and 2019 [7]	DOE					2,219	-59	-2,160			852	-852	2,160	
Total of Revenue Raising Provisions		318	1,390	1,707	1,778	3,974	1,727	-299	1,972	2,130	3,134	1,551	10,891	19,378
		1 150	26	E()	<i>c</i> 1 <i>A</i>	2 7 47	105	2 51 4	100	(20)	1 646	10	2 624	1 (10
NET TOTAL		-1,458	36	562	614	2,747	125	-2,514	189	639	1,646	48	2,624	2,628

Joint Committee on Taxation

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

[Footnotes for Table 10-1 035 R3 appear on the following page]

Footnotes for Table 10-1 035 R3:

Legend for "Effective" column:														
aloga = amounts loaned or guaranteed after	laa = levies approved after						saa = stock acquired after							
DOE = date of enactment	lia = levies issued after						tma = transfers made after							
fsouo/a = fuels sold or used on or after	oia = obligations issued after						tyba = taxable years beginning after							
gea = generally exchanges after	paa = penalties assessed after						tybi = taxable years beginning in							
irrtbfo/a = information returns required to be filed on or after	pma = payments made after													
[1] First report shall be submitted not later than December 31, 2010.														
[2] Estimate includes the following increase in outlays:	<u>2010</u>	2011	<u>2012</u>	<u>2013</u>	2014	2015	2016	<u>2017</u>	<u>2018</u>	2019	<u>2020</u>	2010-15	2010-20	
Extend Build America Bonds		672	2,701	3,995	4,514	4,514	4,514	4,514	4,514	4,514	4,514	16,396	38,966	
Low-Income Housing Credit Provisions	1,605	705										2,310	2,310	
Recovery Zone Bonds	14	70	141	141	141	141	141	141	141	141	141	648	1,353	
[3] Loss of less than \$500.00														

[3] Loss of less than \$500,00.

[4] The provision relating to elective payments in lieu of low-income housing credit for certain bond-financed buildings is effective for buildings placed-in-service after the date of enactment.

[5] Effective for qualified equity investments initially made after March 15, 2010, and before January 1, 2012.

[6] Negligible revenue gain.

[7] 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 4.5 percentage points, for payments due in July, August, and September 2015, by 3.5 percentage points, and for payments due in July, August, and September 2015, by 3.5 percentage points.