#10-2 215
VERY PRELIMINARY
9-Dec-10

## ESTIMATED REVENUE EFFECTS OF THE SENATE AMENDMENT TO THE HOUSE AMENDMENT TO THE SENATE AMENDMENT TO THE "TAX HIKE PREVENTION ACT OF 2010," SCHEDULED FOR CONSIDERATION BY THE UNITED STATES SENATE

## Fiscal Years 2011 - 2020

[Millions of Dollars]

													ı
Provision	Effective	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2011-15	2011-20
I. Temporary Extension of Tax Relief													
A. Temporary Extension of 2001 Tax Relief													
1. Individual income tax rate relief:													
a. Retain 10% income tax bracket (sunset													
12/31/12) [1]	tyba 12/31/10	-30,990	-44,807	-13,511	[2]							-89,308	-89,308
b. Retain the 25% and the 28% income tax brackets													
(sunset 12/31/12)	tyba 12/31/10	-12,792	-18,376	-5,526	[2]							-36,693	-36,693
c. Retain the 33% and the 35% income tax brackets													
(sunset 12/31/12)	tyba 12/31/10	-19,714	-31,276	-9,783	[2]							-60,774	-60,774
d. Repeal overall limitation on itemized deduction													
and the personal exemption phaseout (sunset													
12/31/12)	tyba 12/31/10	-4,862	-10,384	-5,489	[2]							-20,735	-20,735
2. Retain the child tax credit at \$1,000; refundable up													
to greater of 15% of earned income in excess of													
\$10,000 (indexed from 2001) or the taxpayer's													
social security tax liability to the extent that it													
exceeds the taxpayer's earned income credit; allow													
credit against the AMT; repeal AMT offset of													
refundable credits (sunset 12/31/12) [1]	tyba 12/31/10	-7,075	-35,565	-29,056								-71,697	-71,697
3. Marriage penalty relief:													
a. Standard deduction and 15% rate bracket set at													
2 times single for married filing jointly (sunset													
12/31/12) [1]	tyba 12/31/10	-6,287	-8,962	-2,686	[2]							-17,935	-17,935
b. EIC modification and simplification - increase													
in joint returns beginning and ending income level													
for phaseout by \$3,000 indexed after 2008; simplify	y												
definition of earned income; use AGI instead of													
modified AGI; simplify definition of qualifying													
child and tie-breaker rules; and allow math error													
procedure with Federal Case registry data												0.04-	0.005
beginning in 2004 (sunset 12/31/12) [1]	tyba 12/31/10	-44	-4,424	-4,469								-8,937	-8,937

Provision	Effective	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2011-15	2011-20
4. Education Tax Relief:													
a. Coverdell Education Savings Accounts ("ESAs") -													
increase the annual contribution limit to \$2,000;													
allow ESA contributions for special needs													
beneficiaries above the age of 18; allow													
corporations and other entities to contribute to													
ESAs; allow contributions until April 15 of the													
following year; allow a taxpayer to exclude ESA													
distributions from gross income and claim the													
HOPE or Lifetime Learning credits as long as they													
are not used for the same expenses; repeal excise t	ax												
on contributions made to ESA when contribution													
made by anyone on behalf of same beneficiary to													
QTP; modify phaseout range for married taxpayer	s;												
allow tax-free expenditures for elementary and													
secondary school expenses; expand the definition													
qualified expenses to include certain computers an													
related items (sunset 12/31/12)	tyba 12/31/10	-11	-17	-5								-32	-32
b. Employer provided educational assistance -													
extend the exclusion for undergraduate													
courses and graduate level courses (sunset													
12/31/12) [3]	cba 12/31/10	-707	-964	-243								-1,914	-1,914
c. Student loan interest deduction - eliminate the													
60-month rule and the disallowance for voluntary													
payments; increase phaseout ranges to													
\$50,000-\$65,000 single/ \$100,000-\$130,000	. 10/01/10			<b>7</b> 60								1 2 7 1	1.251
joint, indexed for inflation (sunset 12/31/12)	ipa 12/31/10	-63	-631	-560								-1,254	-1,254
d. Eliminate the tax on awards under the National													
Health Service Corps Scholarship program and F.													
Edward Hebert Armed Forces Health Professions													
Scholarship and Financial Assistance Program	. 1 12/21/10	0	25	27								70	70
(sunset 12/31/12)	tyba 12/31/10	-9	-35	-27								-70	-70
e. Increase arbitrage rebate exception for													
governmental bonds used to finance qualified													
school construction from \$10 million to \$15	his 10/21/10	[0]	1	2	2	2	2	2	2	2	2	0	24
million (sunset 12/31/12)	bia 12/31/10	[2]	-1	-2	-3	-3	-3	-3	-3	-3	-3	-9	-24
f. Issuance of tax-exempt private activity bonds for													
qualified education facilities with annual State													
volume caps the greater of \$10 per resident or \$5	bia 12/31/10	[2]	-1	-3	-5	-5	-5	-5	-5	-5	-5	-14	-39
million (sunset 12/31/12)	01a 12/31/10	[2]	-1	-3	-3	-3	-3	-3	-3	-3	-3	-14	-39

Provision	Effective	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2011-15	2011-20
5. Dependent care tax credit - increase the credit rate to 35%, increase the eligible expenses to \$3,000 for one child and \$6,000 for two or more children (not indexed), and increase the start of the phase-out to		-	222	222								100	
\$15,000 of AGI (sunset 12/31/12) [1]	tyba 12/31/10	-76	-302	-222								-600	-600
allow the credit to apply to the AMT (sunset 12/31/12) [1]	tyba 12/31/10		-95	-221								-315	-315
childcare expenditures and 10% for child care resource (sunset 12/31/12)	tyba 12/31/10	-11	-33	-15								-58	-58
tax income to the Trust not the beneficiaries (sunset 12/31/12)	tyba 12/31/10	-2	-5	-2								-9	-9
B. Temporary Extension of 2003 Tax Relief 1. Tax capital gains with a 0%/15% rate structure (sunset 12/31/12)	tyba 12/31/10	-10,477	2,355	-1,915	-15,840							-25,877	-25,877
Tax dividends with a 0%/15% rate structure (sunset 12/31/12)  C. Temporary Extension of 2009 Tax Relief	tyba 12/31/10	-4,677	-13,555	-9,042								-27,274	-27,274
Extension of American opportunity tax credit (sunset 12/31/12) [1]      Reduce the earnings threshold for the refundable	tyba 12/31/10	-1,194	-7,094	-9,277								-17,566	-17,566
portion of the child tax credit to \$3,000 (sunset 12/31/12) [1]	tyba 12/31/10		-9,826	-9,917								-19,743	-19,743
Increase in earned income tax credit percentage (sunset 12/31/12) [1]      EIC modification and simplification - increase in	tyba 12/31/10	-18	-1,845	-1,822								-3,685	-3,685
joint returns beginning and ending income level for phaseout by \$5,000 indexed after 2008 (sunset													
12/31/12) [1]	tyba 12/31/10	-16	-1,553	-1,532								-3,101	-3,101

Provision	Effective	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2011-15	2011-20
II. Temporary Alternative Minimum Tax Relief - set the AMT exemption amount at \$47,450 (\$72,450 joint) in 2010 and \$48,450 (\$74,450 joint) in 2011 and allow personal credits against the AMT (sunset 12/31/11)	tyba 12/31/09	-85,833	-67,597	16,754								-136,676	-136,676
III. Temporary Estate and Gift Tax Relief - \$5 Million Unified and Indexed Exemption Amount; 35% Maximum Rate; Portability of Exemption Amount; and Decedents Dying in 2010 can Elect into EGTRRA (sunset 12/31/12)	_	-4,546	-28,050	-29,349	-3,483	-2,088	-981	-53	130	135	136	-67,515	-68,149
IV. Temporary Extension of Investment Incentives  1. Increase additional first-year depreciation to 100 percent (sunset 12/31/11); extend 50 percent additional first-year depreciation for property		~~ U.O.	7.1.100	2.605	27.510	10.550	15 (51		T.074	4.005	2.555	41.055	20.002
placed in service after 12/31/11 (sunset 12/31/12)  2. Election to accelerate AMT credit in lieu of additional first-year depreciation (sunset 12/31/12)	ppisa 9/8/10 [4]	-55,419 -11	-54,422 -536	2,687 -212	25,519	19,778	15,671 19	11,161	7,071	4,297 7	2,775	-61,857 -693	-20,883 -639
3. Section 179 expensing amounts and threshold limits \$125,000/ \$500,000 (sunset 12/31/12)	tyba 12/31/11		-3,266	-2,160	1,791	1,131	822	636	401	227	110	-2,504	-307
Total of Temporary Extension of Investment Incentive	es	-55,430	-58,224	315	27,347	20,938	16,512	11,810	7,481	4,531	2,891	-65,054	-21,829
V. Temporary Extension of Unemployment Insurance					Estim	ate to be Pi	rovided by	the Congre	essional Bu	ıdget Offic	e		
VI. Temporary Employee Payroll Tax Holiday - provide an employee-side payroll tax holiday that reduces the employee side of the OASDI by 2 percentage points (sunset 12/31/11)	tyba 12/31/10	-67,239	-44,414									-111,653	-111,653
VII. Temporary Extension of Certain Expiring Provisions A. Energy													
Incentives for biodiesel and renewable diesel (sunset 12/31/11)      Placed-in-service date for facilities eligible to claim	fsoua 12/31/09	-1,677	-300									-1,977	-1,977
the refined coal production credit (excluding steel industry fuel) (sec. 45(d)) (sunset 12/31/11)	ppisa 12/31/09	-15	-20	-23	-24	-24	-24	-25	-26	-26	-24	-105	-230
homes (sunset 12/31/11)	haa 12/31/09	-66	-25	-12	-11	-9	-8	-5	-1			-124	-138

Provision	Effective	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2011-15	2011-20
4. Incentives for alternative fuel and alternative													
fuel mixtures (modified to exclude black liquor)													
(sunset 12/31/11)	fsoua 12/31/09	-176	-26									-202	-202
5. Special rule to implement electric transmission													
restructuring (sunset 12/31/11)	da 12/31/09	-232	-92	51	51	51	51	51	51	18		-171	
6. Extension of suspension of 100 percent-of-net-													
income limitation on percentage depletion for oil													
and natural gas from marginal properties (sunset													
12/31/11)	tyba 12/31/09	-182	-42									-224	-224
7. Grants for specified energy property in lieu													
of tax credits (sunset 12/31/11) [1]	ppisa DOE	-1,941	-1,045									-2,987	-2,987
8. Incentives for alcohol fuels (extension of present law	7)												
a. Extension of income tax credit for alcohol used													
as fuel; extension of excise tax credit for alcohol													
used as fuel; extension of payment for alcohol	pa 12/31/11&												
fuel mixture (sunset 12/31/11)	saua 12/31/10	-3,558	-1,311									-4,869	-4,869
b. Extension of additional duties on ethanol													
(sunset 12/31/11) [5]	pa 12/31/11	8	3									10	10
B. Individual Tax Relief													
1. Above-the-line deduction of up to \$250 for													
teacher classroom expenses (sunset 12/31/11)	tyba 12/31/09	-39	-195	-156								-390	-390
2. Deduction of State and local general sales taxes													
(sunset 12/31/11)	tyba 12/31/09	-2,829	-2,393	-314								-5,536	-5,536
3. Contributions of capital gain real property made for	cmi												
qualified conservation purposes (sunset 12/31/11)	tyba 12/31/09	-63	-48									-111	-111
4. Deduction for qualified tuition and related			4.50										
expenses (sunset 12/31/11) [6]	tyba 12/31/09	-711	-450									-1,161	-1,161
5. Tax-free distributions from IRAs to certain public													
charities for individuals age 70 1/2 or older, not to													
exceed \$100,000 per taxpayer per year; distributions													
made in January 2011 may count against the 2010													
\$100,000 limit and satisfy the 2010 minimum	1 1 1 10/01/00	515	107	20	20	21	22	2.4	25	26	20	004	070
distribution requirement (sunset 12/31/11)	dmi tyba 12/31/09	-517	-197	-29	-30	-31	-32	-34	-35	-36	-38	-804	-979
6. Estate tax look-through for certain RIC stock	11 12/21/00	~	-									10	10
held by nonresidents (sunset 12/31/11)	dda 12/31/09	-5	-5									-10	-10
7. Refunds disregarded in the administration of Federal													
programs and federally assisted programs (sunset	oro 12/21/10	1	4									o	o
12/31/12) [1] [5]	ara 12/31/10	-4	-4									-8	-8
	mbo/a 12/31/10	-102	-34									-136	-136
transit and parking benefits (sunset 12/31/11) [/]	11100/a 12/31/10	-102	-34									-130	-130

Provision	Effective	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2011-15	2011-20
C. Business Tax Relief													
1. Tax credit for research and experimentation													
expenses (sunset 12/31/11)	apoia 12/31/09	-5,984	-2,055	-923	-813	-715	-631	-575	-547	-530	-501	-10,490	-13,272
2. Indian employment tax credit (sunset 12/31/11)	tyba 12/31/09	-59	-33	-9	-1							-102	-102
3. New markets tax credit (\$3.5 billion allocation)													
(sunset 12/31/11)	cyba 12/31/09	-5	-29	-94	-180	-221	-252	-279	-288	-267	-194	-530	-1,810
4. 50% tax credit for certain expenditures for	epoid												
maintaining railroad tracks (sunset 12/31/11)	tyba 12/31/09	-232	-99	[2]								-331	-331
5. Mine rescue team training credit (sunset 12/31/11)	tyba 12/31/09	-2	-1	-1	[2]	[2]	[2]					-4	-5
6. Employer wage credit for activated military	-												
reservists (sunset 12/31/11)	pma 12/31/09	-2	-1	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	-3	-3
7. 15-year straight-line cost recovery for qualified	•												
leasehold, restaurant, and retail improvements and													
new restaurants (sunset 12/31/11)	ppisa 12/31/09	-281	-359	-397	-395	-389	-385	-380	-369	-350	-324	-1,821	-3,629
8. 7-year recovery period for certain motorsports	••												
racing track facilities (sunset 12/31/11)	ppisa 12/31/09	-40	-3	-1			-1	1	3	3	3	-45	-36
9. Accelerated depreciation for business property	**												
on Indian reservations (sunset 12/31/11)	ppisa 12/31/09	-98	-23	5	17	27	22	12	1	-2	-1	-72	-41
10. Enhanced charitable deduction for contributions	11												
of food inventory (sunset 12/31/11)	cma 12/31/09	-92	-42									-134	-134
11. Enhanced charitable deduction for contributions of													
book inventories to public schools (sunset													
12/31/11)	cma 12/31/09	-37	-16									-53	-53
12. Enhanced charitable deduction for corporate													
contributions of computer inventory for educational													
purposes (sunset 12/31/11)	cmd tyba 12/31/09	-245	-105									-350	-350
13. Election to expense mine safety equipment (sunset													
12/31/11)	ppisa 12/31/09	-20	1	5	4	3	3	2	1	[8]		-7	-1
14. Special expensing rules for certain film and	pp154 12/01/05		•		·			_	•	[0]		,	-
television productions (sunset 12/31/11)	qfatpca 12/31/09	-162	-158	39	45	34	29	23	21	16	12	-202	-101
15. Expensing of "Brownfields" environmental	qranpea 12/01/09	102	100			٥.				10			101
remediation costs (sunset 12/31/11)	epoia 12/31/09	-493	-536	-66	83	91	86	77	67	57	50	-921	-583
16. Deduction allowable with respect to income	<b>opola 12</b> /01/09	.,,	000	00	00	7.	00		0,	0,	20	/	202
attributable to domestic production activities													
in Puerto Rico (sunset 12/31/11)	tyba 12/31/09	-229	-186									-415	-415
17. Modify tax treatment of certain payments	tyba 12/31/07	-22)	-100									-413	-413
under existing arrangements to controlling													
exempt organizations (sunset 12/31/11)	proaa 12/31/09	-34	-5									-40	-40
18. Treatment of certain dividends of regulated	produ 12/31/07	-54	-5									-40	-40
investment companies ("RICs") (sunset 12/31/11)	[9]	-108	-66									-174	-174
investment companies ( Ries ) (sunset 12/31/11)	[7]	-100	-00									-1/4	~1/ <del>~</del>

Provision	Effective	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2011-15	2011-20
19. Extend the treatment of RICs as "qualified													
investment entities" under section 897 (FIRPTA)													
(sunset 12/31/11)	1/1/10	-23	-36									-59	-59
20. Exception under subpart F for active financing													
income (sunset 12/31/11)	tyba 12/31/09	-5,200	-3,957									-9,157	-9,157
21. Look-through treatment of payments between													
related CFCs under foreign personal holding													
company income rules (sunset 12/31/11)	tyba 2009	-814	-691									-1,505	-1,505
22. Basis adjustment to stock of S corporations													
making charitable contributions of property													
,	cmi tyba 12/31/09	-19	-36	-6	-3	-3	-3	-3	-3	-3	-3	-67	-82
23. Empowerment zone tax incentives (sunset													
12/31/11)	tyba 12/31/09	-330	-46	3	1		-4	-1	-4	-4	-4	-371	-387
24. Tax incentives for investment in the District													
of Columbia (sunset 12/31/11)	tyba 12/31/09	-88	-21	-2	-1	-4	-7	-4	-4	-4	-4	-116	-138
25. Temporary 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) [10]	abiUSa 12/31/09	-235	-27									-262	-262
26. Economic development credit for American													
Samoa (sunset 12/31/11)	tyba 12/31/09	-15	-12									-27	-27
27. Work opportunity tax credit (sunset 12/31/11)	wpoifibwa 8/31/11	[2]	-131	-16	-8	-5	-2					-160	-162
28. Alternative fuel vehicle refueling property													
(non-hydrogen refueling property) (sunset		_											
12/31/11)	ppisa 12/31/10	-7	-6	-2	-1	-1	[8]	[8]	[8]	[8]	[8]	-17	-16
29. Qualified zone academy bonds (\$400 million										4.0		40	
allocation) (sunset 12/31/11)	oia 12/31/10	[2]	-3	-8	-16	-21	-22	-22	-21	-19	-19	-48	-151
30. Premiums for mortgage insurance deductible as													
interest that is qualified residence interest (sunset	10/01/10	2.51	0.7									2.40	2.10
12/31/11)	apoaa 12/31/10	-261	-87									-348	-348
31. Credit for energy efficient appliances (sunset	12/21/10	-	17	1.4	0	0		~	4		2		70
12/31/11)	apa 12/31/10	-7	-17	-14	-9	-8	-6	-5	-4	-4	-3	-55	-78
32. Extension and modification of section 25C	. 12/21/10	110	477									<b>5</b> 0.6	506
nonbusiness energy property (sunset 12/31/11)	ppisa 12/31/10	-119	-477									-596	-596
33. Special rules applicable to qualified small	222 12/21/10	1 5				<i>(</i> 2	760	420	07	74	47	-40	1 445
business stock (sunset 12/31/11)	saa 12/31/10	15	6			-62	-768	-420	-97	-74	-47	-40	-1,445
D. Temporary Disaster Relief Provisions	_												
1. New York Liberty Zone - tax-exempt bond financing		0	10	12	10	10	12	10	12	10	12	-56	-116
(sunset 12/31/11)	bia 12/31/09	-8	-12	-12	-12	-12	-12	-12	-12	-12	-12	-36	-110

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Provision	Effective	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2011-15	2011-20
2. GO Zone:													
a. Increase in rehabilitation credit (sunset													
12/31/11)	1/1/10	-39	-21	[2]	1	1	1	2	2	2	1	-58	-50
b. Extend the placed-in-service deadline for GO													
Zone low-income housing credits (sunset													
12/31/11)	ppisa 12/31/10	-8	-34	-34	-34	-34	-34	-34	-34	-34	-34	-144	-314
c. Tax-exempt bond financing (sunset 12/31/11)	1/1/11	-5	-18	-26	-26	-26	-26	-25	-25	-25	-25	-100	-226
d. Bonus depreciation for specified GO Zone													
extension property (sunset 12/31/11)	ppisa 12/31/09	-171	-61	-4	-1	2	4	6	7	7	7	-234	-202
Total of Temporary Extension of Certain Expiring Pro	visions	-27,566	-15,587	-2,046	-1,363	-1,356	-2,021	-1,650	-1,317	-1,287	-1,160	-47,919	-55,349
NET TOTAL		-339,639	-401,268	-119,651	6,653	17,486	13,502	10,099	6,286	3,371	1,859	-836,417	-801,296

Joint Committee on Taxation

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NOTE: Details may not add to totals due to rounding. Revenue provisions as submitted in statutory draft MAT10778, as modified.

## Legend for "Effective" column:

abiUSa = articles brought into the United States after
apa = appliances produced after
apoia = amounts paid or incurred after
apoaa = amounts paid or accrued after
ara = amounts received after
bia = bonds issued after
bia = courses beginning after
cma = contributions made after
cmd = contributions made during
cmi = contributions made in
cyba = calendar years beginning after

da = dispositions after
dda = decedents dying after
dda/gsta = decedents dying after and generationskipping transfers after
dmi = distributions made in
epoia = expenses paid or incurred after
Epoia = expenditures paid or incurred after
epoid = expenses paid or incurred during
fsoua = fuel sold or used after
gma = gifts made after
haa = homes acquired after

ipa = interest paid after
 oia = obligations issued after
 pma = payments made after
 ppisa = property placed in service after
 proaa = payments received or accrued after
 qfatpca = qualified film and television
 productions commencing after
 saa = stocks acquired after
 tyba = taxable years beginning after
 wpoifibwa = wages paid or incurred for individuals
 beginning work after

## Footnotes for Table #10-2 215:

[1] Estimate includes the following outlay effects:	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2011-15</u>	<u>2011-20</u>
Retain 10% bracket		1,198	1,239								2,437	2,437
Retain the child tax credit at \$1,000; refundable; AMT rules		16,457	16,530								32,987	32,987
Marriage penalty - standard deduction and 15% rate		2,000	2,030								4,030	4,030
EIC modification and simplification (\$3,000)		3,724	3,781								7,505	7,505
Dependent care tax credit		49	146								195	195
Adoption credit			53								53	53
American opportunity tax credit		2,086	2,172								4,258	4,258
Reduce the earnings threshold for the refundable portion of the												
child tax credit to \$3,000.		9,826	9,917								19,743	19,743
Increase in earned income tax credit percentage		1,694	1,688								3,382	3,382
EIC modification and simplification (\$5,000)		1,270	1,250								2,520	2,520
Grants for specified energy property in lieu of tax credits	1,941	1,045									2,987	2,987
Refunds disregarded in the administration of Federal programs and												
federally assisted programs [5]	4	4									8	8
[2] Loss of less than \$500,000.												
[3] Estimate includes the following effects:	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2011-15</u>	<u>2011-20</u>
Total Revenue Effects.	-707	-964	-243								-1,914	-1,913
On-budget effects	-460	-653	-164								-1,277	-1,277
Off-budget effects	-246	-311	-79								-636	-636
[4] Effective for property placed in service after December 31, 2010, in taxable year	rs ending	after such o	late.									
[5] Estimate provided by the Congressional Budget Office.												
[6] Estimate includes interaction with the extension of the American Opportunity ta	x credit.											
[7] Estimate includes the following off-budget effects:	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2011-15</u>	<u>2011-20</u>
Parity for exclusion for employer-provided mass transit and parking												
benefits	-34	-11									-45	-45

<sup>[8]</sup> Gain of less than \$500,000.

<sup>[9]</sup> Effective for dividends with respect to taxable years of regulated investment companies beginning after December 31, 2009.

<sup>[10]</sup> Estimate provided by the Congressional Budget Office and is preliminary and subject to change.