JOINT COMMITTEE ON TAXATION
July 10, 1997
JCX-37-97

COMPARISON OF THE ESTIMATED BUDGET EFFECTS OF THE REVENUE PROVISIONS OF H.R. 2014 AS PASSED BY THE HOUSE AND THE SENATE

Fiscal Years 1997 - 2007

[Millions of Dollars]

Provision	Effective	House Bill 1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	1997-02	1997-07	Senate Amendment 1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	1997-02	1997-07
I. IDENTICAL PROVISIONS																											
Education Tax Incentives																											
A. Tax Benefits Relating to Education Expenses																											
1. Penalty-free withdrawals from all IRAs for undergraduate, post-secondary vocational, and graduate education expenses [1]	tyba 12/31/97	---	-72	-213	-200	-149	-125	-114	-98	-93	-92	-91	-758	-1,246	---	-78	-201	-181	-175	-177	-179	-182	-184	-186	-189	-812	-1,732
2. Treatment of cancellation of certain student loans	Da DOE	[2]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[4]	[4]	[2]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[4]	[4]
Alternative Minimum Tax Provisions																											
1. Reverse IRS position on AMT treatment of certain installment sales by farmers	di tyba 12/31/87	-8	-157	-158	-167	-164	-157	-148	22	22	21	21	-811	-872	-8	-157	-158	-167	-164	-157	-148	22	22	21	21	-811	-872
Estate, Gift and Generation-Skipping Tax Provisions																											
A. Estate and Gift Tax Provisions																											
1. No interest on certain portion of estate tax extended under section 6166 and interest rate reduced to 45% of present-law interest but nondeductible	dda 12/31/97	---	---	-10	-20	-32	-45	-59	-73	-88	-103	-119	-107	-549	---	---	-10	-20	-32	-45	-59	-73	-88	-103	-119	-107	-549
2. 20-year installment payment where estate consists largely of interest in closely held business	dda 12/31/97	---	---	---	---	---	---	-14	-10	-7	-5	-2	---	-38	---	---	---	---	---	---	-14	-10	-7	-5	-2	---	-38
3. Extension of treatment of certain rents under section 2032A to lineal descendants	roa 12/31/76	---	-25	-2	-2	-2	-2	-2	-2	-2	-2	-2	-33	-43	---	-25	-2	-2	-2	-2	-2	-2	-2	-2	-2	-33	-43
B. Generation-Skipping Tax Provisions																											
1. Expand exception from generation-skipping transfer tax for transfers to individuals with deceased parents	gsta 12/31/97	---	---	-4	-4	-4	-4	-4	-5	-5	-5	-6	-16	-41	---	---	-4	-4	-4	-4	-4	-5	-5	-5	-6	-16	-41
Expiring Tax Provisions																											
1. Orphan drug tax credit (permanent)	6/1/97	---	-29	-28	-30	-32	-34	-35	-37	-39	-40	-42	-152	-346	---	-29	-28	-30	-32	-34	-35	-37	-39	-40	-42	-152	-346
Miscellaneous Provisions																											
A. Provisions Relating to Excise Taxes																											
1. Repeal excise tax on recreational motorboat diesel fuel	1/1/98	---	-4	-5	-5	-1	-1	-1	-1	-1	-1	-1	-16	-22	---	-4	-5	-5	-1	-1	-1	-1	-1	-1	-1	-16	-22
B. Provisions Relating to Disasters																											
1. Modify tax treatment of livestock sold on account of certain weather-related conditions	sea 12/31/96	---	-12	-2	-2	-2	-1	-1	-1	-1	-1	-1	-18	-23	---	-12	-2	-2	-2	-1	-1	-1	-1	-1	-1	-18	-23
C. Provisions Relating to Pensions																											
1. Extend moratorium on nondiscrimination rules for public pension plans (permanent)	DOE	*Negligible Revenue Effect*													*Negligible Revenue Effect*												
2. ESOP provision - permit cash distributions in lieu of stock in the S corporation	tyba 12/31/97	*Negligible Revenue Effect*													*Negligible Revenue Effect*												
D. Other Provisions																											
1. Shrinkage allowance for inventory accounting	---	---	-7	-21	-23	-25	-27	-29	-31	-33	-35	-37	-103	-268	---	-7	-21	-23	-25	-27	-29	-31	-33	-35	-37	-103	-268
2. Exclusion from UBTI for certain corporate sponsorship payments	psora 12/31/97	*Negligible Revenue Effect*													*Negligible Revenue Effect*												
3. Clarify tax-exempt status of certain State workmen's compensation funds	tyba 12/31/97	---	[3]	[3]	-1	-1	-1	-1	-1	-1	-1	-1	-2	-6	---	[3]	[3]	-1	-1	-1	-1	-1	-1	-1	-1	-2	-6
Revenue-Raising Provisions																											
A. Corporate Organizations and Reorganizations																											
1. Tax treatment of certain extraordinary dividends	da 9/13/95	---	440	-90	-51	-7	42	71	77	82	89	95	334	748	---	44	-93	-54	-10	38	73	79	85	92	98	-75	352
2. Tax treatment of redemptions involving related corporations	da/a 6/8/97	---	10	10	5	5	5	5	5	5	5	5	35	60	---	10	10	5	5	5	5	5	5	5	5	35	60