

**ESTIMATED REVENUE EFFECTS OF S. _____,
THE "SMALL BUSINESS AND WORK OPPORTUNITY ACT OF 2007,"
AS REPORTED BY THE COMMITTEE ON FINANCE**

Fiscal Years 2007 - 2016

[Millions of Dollars]

Provision	Effective	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2007-11	2007-16
I. Small Business Provisions													
A. General Provisions													
1. Extension of increased expensing for small business - increase section 179 expensing from \$25,000 to \$100,000 and increase the phaseout threshold amount from \$200,000 to \$400,000; include software in section 179 property; and extend indexing of both the deduction limit and the phaseout threshold (sunset 12/31/10).....	tyba 12/31/09	---	---	---	-2,964	-1,897	1,732	1,092	792	613	375	-4,861	-257
2. Extension of the 15-year straight-line cost recovery period for qualified leasehold and restaurant improvements (sunset 3/31/08).....	ppisa 12/31/07	---	-30	-88	-114	-112	-109	-100	-95	-100	-98	-345	-847
3. 15-year recovery period for new restaurant buildings (sunset 3/31/08).....	ppisa DOE	-22	-66	-94	-99	-99	-98	-97	-95	-93	-86	-379	-847
4. 15-year recovery period for retail improvements (sunset 3/31/08).....	ppisa DOE	-22	-76	-119	-127	-123	-114	-106	-108	-109	-108	-467	-1,012
5. Increase gross receipts threshold for cash accounting to \$10M regardless of inventories, index for inflation, and reset testing period.....	tyba DOE	-9	-278	-151	-52	-57	-63	-69	-76	-84	-92	-547	-931
6. Extension and modification of combined Work Opportunity Tax Credit and Welfare-to-work credit - expansions on post 9/11 disabled veterans, high-risk youth, and vocational rehabilitation referrals (sunset 12/31/12).....	wpoifibwa 12/31/07	---	-150	-411	-569	-657	-726	-591	-302	-143	-75	-1,788	-3,624
7. Treatment of certified professional employer organizations as employers.....	[1]	---	---	-2	-3	-4	-4	-4	-5	-5	-6	-8	-32
B. Subchapter S Provisions													
1. Exclude capital gains from passive investment income.....	tyba DOE	---	-15	-30	-32	-34	-35	-37	-40	-43	-46	-111	-312
2. Treatment of qualifying director shares.....	tyba 12/31/06	-4	-10	-14	-18	-20	-21	-22	-23	-23	-23	-66	-178
3. Recapture of bad debt reserves.....	tyba 12/31/06	11	27	-22	-40	-36	-23	-21	-22	-23	-24	-60	-173
4. Treatment of sale of interest in a qualified subchapter S subsidiary.....	tyba 12/31/06	-1	-3	-3	-4	-4	-4	-5	-5	-5	-6	-15	-40
5. Elimination of all earnings and profits attributable to pre-1983 years.....	tyba DOE	-3	-2	-2	-2	-2	-2	-2	-2	-2	-2	-11	-21
6. Expansion of qualifying beneficiaries of an electing small business trust.....	DOE	---	-1	-2	-3	-4	-4	-4	-5	-5	-5	-10	-33
Total of Small Business Provisions		-50	-604	-938	-4,027	-3,049	529	34	14	-22	-196	-8,668	-8,307

Provision	Effective	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2007-11	2007-16
II. Provisions That Raise Revenue													
1. Modify the effective date for the application of the AJCA 2004 leasing (SILO) provision - apply loss limitation to leases with foreign entities regardless of when the lease was entered into	tyba 12/31/06	1,018	1,662	896	407	290	288	260	135	-239	-629	4,273	4,088
2. Tax treatment of inversion transactions.....	tyba 2006	42	86	99	107	115	123	123	143	153	162	449	1,153
3. Deny deduction for punitive damages.....	dpoio/a DOE	3	37	29	30	31	32	33	34	35	36	130	299
4. Denial of deduction for certain fines, penalties, and other amounts.....	generally apoio/a DOE	25	87	31	15	15	15	15	15	15	15	172	244
5. Impose mark-to-market on individuals who expatriate	[2]	13	57	54	50	46	43	41	39	38	36	220	417
6. Limitation on annual amounts which may be deferred under nonqualified deferred compensation arrangements.....	tyba 12/31/06	43	59	60	63	83	94	97	100	103	106	307	806
7. Increase in certain criminal penalties.....	aaftaoa DOE	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	1	5
8. Double certain penalties, fines, and interest on underpayments related to certain offshore financial arrangements	oyo/a DOE	1	1	1	1	1	1	1	1	1	1	5	10
9. Increase in penalty for bad checks and money orders.....	comora DOE	2	2	2	2	2	2	2	2	2	2	10	20
10. Change the tax treatment of contingent convertible debt instruments	diiio/a DOE	8	37	52	62	63	58	49	45	39	35	222	448
11. Extension of IRS user fees (sunset 9/30/16) [4]	ra 9/30/14	---	---	---	---	---	---	---	---	30	30	---	60
12. Modification of collection due process procedures for employment tax liabilities.....	lio/a 120da DOE	---	58	50	28	20	17	20	23	26	29	156	271
13. Modifications to Whistleblower reforms [5].....	ipo/a DOE	1	6	15	23	32	42	51	63	79	90	77	402
14. Modify definition of covered employee for denial of deduction for excessive employee remuneration.....	tyba 12/31/06	1	3	4	5	7	10	14	18	20	23	20	105
Total of Provisions That Raise Revenue		1,157	2,095	1,293	793	705	725	706	618	302	-64	6,042	8,328
NET TOTAL		1,107	1,491	355	-3,234	-2,344	1,254	740	632	280	-260	-2,626	21

Joint Committee on Taxation

NOTE: Details may not add to totals due to rounding. Date of enactment is assumed to be April 1, 2007.

Legend for "Effective" column:

aaftaoa = actions and failures to act occurring after
 apoio/a = amounts paid or incurred on or after
 comora = checks or money orders received after
 diio/a = debt instrument issued on or after
 DOE = date of enactment

dpoio/a = damages paid or incurred on or after
 oyo/a = open years on or after
 ppisa = property placed in service after
 ipo/a = information provided on or after
 lio/a = levies issued on or after

tyba = taxable years beginning after
 ra = requests after
 wpoifibwa = wages paid or incurred for individuals beginning work after
 120da = 120 days after

[1] Effective with respect to wages paid for services performed on or after January 1 of the first calendar year beginning more than 12 months after the date of enactment.

[2] Generally effective for U.S. citizens who expatriate or long-term residents who terminate their residency on or after the date of enactment.

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

[4] Estimate provided by the Congressional Budget Office.

[5] Net of outlays.