

JOINT COMMITTEE ON TAXATION
December 12, 2007
JCX-114-07

**ESTIMATED REVENUE EFFECTS OF H.R. 4351,
THE "AMT RELIEF ACT OF 2007,"
SCHEDULED FOR CONSIDERATION BY THE HOUSE OF REPRESENTATIVES ON DECEMBER 12, 2007**

Fiscal Years 2008 - 2017

[Millions of Dollars]

Provision	Effective	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2008-12	2008-17
I. Individual Tax Relief Provisions													
1. Set AMT exemption amounts at \$44,350/\$66,250 for 2007 and extend application of nonrefundable credits.....	tyba 12/31/06	-50,593	---	---	---	---	---	---	---	---	---	-50,593	-50,593
2. Abatement of incentive stock option AMT liability, penalty, and interest.....	DOE	-174	-174	-151	-151	-136	-114	-99	-91	-84	-76	-786	-1,249
3. Increase in AMT refundable credit - remove AGI limits from refundable AMT credit and change usage rate of unused credit from 20% to 50%.....	tyba 12/31/06	-1,298	-385	-18	133	128	47	86	99	99	98	-1,440	-1,011
4. Set refundable threshold for the child tax credit at \$8,500 (sunset 12/31/08).....	tyba 12/31/07	---	-2,869	---	---	---	---	---	---	---	---	-2,869	-2,869
Total of Individual Tax Relief Provisions		-52,065	-3,428	-169	-18	-8	-67	-13	8	15	22	-55,688	-55,722
II. Revenue Provisions													
A. Nonqualified Deferred Compensation for Services Performed by Foreign Firms in Non-Treaty Jurisdictions with Investment Asset and ECI Exception.....	spa 12/31/07 [1]	2,235	2,930	2,539	2,427	2,136	1,585	990	498	5,945	2,425	12,267	23,711
B. Codification of Economic Substance Doctrine and Related Penalties.....	teia DOE & tyba DOE	170	242	286	343	411	495	512	524	539	559	1,451	4,081

Provision	Effective	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2008-12	2008-17
C. Other Provisions													
1. Delay implementation of worldwide allocation of interest expense until 2018.....	DOE	---	999	2,736	2,845	2,958	3,077	3,200	3,328	3,461	3,610	9,538	26,214
2. Increase in penalty for failure to file partnership returns (\$100 per partner).....	rrtbfa DOE	29	60	62	65	67	69	72	74	77	79	283	655
3. Penalty for failure to file S corporation returns (\$100 per shareholder).....	rrtbfa DOE	35	90	93	96	99	103	106	110	114	118	412	963
4. Increase the minimum penalty for failure to file from \$100 to \$150.....	rrtbfa 12/31/07	3	12	12	13	13	13	13	13	13	13	53	118
5. Increase by 52.5 percentage points the required corporate estimated tax payments factor for corporations with assets of at least \$1 billion for payments due in July, August, and September 2012.....	DOE	---	---	---	---	31,707	-31,707	---	---	---	---	31,707	---
Total of Revenue Provisions		2,472	4,333	5,728	5,789	37,391	-26,365	4,893	4,547	10,149	6,804	55,711	55,742
NET TOTAL		-49,593	905	5,559	5,771	37,383	-26,432	4,880	4,555	10,164	6,826	23	20

Joint Committee on Taxation

NOTE: Details may not add to totals due to rounding. Date of enactment is assumed to be December 20, 2007.

Legend for "Effective" column:

DOE = date of enactment

rrtbfa = returns required to be filed after

spa = services performed after

teia = transactions entered into after

tyba = taxable years beginning after

[1] In the case of compensation attributable to services performed on or before December 31, 2007, effective for last tax year beginning before 2017.