

<ul style="list-style-type: none"> ▪ Modify the definition of “control” for purposes of section 249 ▪ Require accrual of income on forward sale of corporate stock 	<p>192</p> <p>303</p>
<p>Subtotal, Financial Institutions</p>	<p>64,748</p>
<p>➤ International Activity of Worldwide American Businesses</p> <ul style="list-style-type: none"> ▪ Defer deduction of interest expense related to deferred income ▪ Determine the foreign tax credit on a pooling basis ▪ Tax currently excess returns associated with transfers of intangibles offshore (modification to “transfer pricing” rules) ▪ Limit shifting of income through intangible property transfers (modification to “transfer pricing” rules) ▪ Disallow the deduction for excess non-taxed reinsurance premiums paid to affiliates ▪ Limit earnings stripping by expatriated entities ▪ Modify tax rules for dual capacity taxpayers ▪ Tax gain from the sale of a partnership interest on a look-through basis ▪ Prevent use of leveraged distributions from related foreign corporations to avoid dividend treatment ▪ Extend section 338(h)(16) to certain asset acquisitions ▪ Remove foreign taxes from a section 902 corporation’s foreign tax pool when earnings are eliminated 	<p>37,253</p> <p>60,835</p> <p>22,973</p> <p>1,623</p> <p>2,449</p> <p>4,432</p> <p>10,724</p> <p>2,561</p> <p>3,323</p> <p>960</p> <p>389</p>
<p>Subtotal, International Activity of Worldwide American Businesses</p>	<p>147,522</p>
<p>➤ American Energy Producers</p> <ul style="list-style-type: none"> ▪ Repeal the Section 199 domestic manufacturing deduction for oil and natural gas companies, building on restrictions on the value of this benefit placed on oil & gas companies during the 110th Congress ▪ Repeal percentage depletion for oil and natural gas ▪ Repeal expensing of intangible drilling costs ▪ Increase geological and geophysical amortization period for independent producers to seven years ▪ Repeal deduction for tertiary injectants ▪ Repeal passive loss exception for working interests in oil and natural gas properties ▪ Repeal expensing of coal exploration and development costs ▪ Repeal percentage depletion for hard mineral fossil fuels ▪ Repeal capital gains treatment for royalties ▪ Repeal domestic manufacturing deduction for hard mineral fossil fuels 	<p>11,612</p> <p>11,465</p> <p>13,902</p> <p>1,400</p> <p>100</p> <p>82</p> <p>440</p> <p>1,744</p> <p>422</p> <p>271</p>
<p>Subtotal, American Energy Producers</p>	<p>41,438</p>
<p>➤ Insurance</p> <ul style="list-style-type: none"> ▪ Modify rules that apply to sales of life insurance contracts ▪ Modify dividends-received deduction for life insurance company separate accounts ▪ Extend pro rata interest expense disallowance for corporate-owned 	<p>811</p> <p>7,706</p> <p>7,310</p>

life insurance	
Subtotal, Insurance	15,827
➤ Repeal the Last-In-First-Out (LIFO) inventory accounting method, eliminating a well-established accounting method that has been used by a variety of large and small businesses in a wide range of industries (e.g., manufacturing, energy, natural resources, wholesale distribution, and retail) since the 1930s	73,782
➤ Repeal lower-of-cost-or-market inventory accounting method	13,059
➤ Re-characterize “carried interest” (i.e., the share of profits from certain investment funds that is provided to the investment manager) as ordinary income rather than capital gain	13,496
➤ Deny deduction for punitive damages	319
➤ Reinstate Superfund excise taxes used to clean up toxic hazards at contaminated sites; these taxes were permitted to expire in 1995 pending structural reform of the Superfund program that has not yet occurred	20,958
➤ Make unemployment insurance surtax (i.e., the “FUTA surtax”) permanent	13,936
➤ Implement standards clarifying when employee leasing companies can be held liable for their clients’ Federal employment taxes	65
➤ Modify rules pertaining to the classification of employees as independent contractors	8,372
SUBTOTAL, OTHER AMERICAN EMPLOYERS	413,522
ESTATE AND GIFT TAXES	
➤ Modify rules regarding valuation for transfer and income tax purposes	2,014
➤ Modify rules on valuation discounts	18,079
➤ Require a minimum term for grantor retained annuity trusts (GRATs)	3,334
➤ Reviving estate tax to 2009 levels in 2013	118,797
➤ Coordinate certain income and transfer tax rules applicable to grantor trusts	910
➤ Extend the lien on estate tax deferrals provided under section 6166	160
SUBTOTAL, ESTATE AND GIFT TAXES	143,294
OTHER REVENUE-RAISING PROVISIONS	
➤ Preserve cost-sharing of inland waterways capital costs	1,100
➤ Require information reporting for private separate accounts of life insurance companies	10
➤ Levy payments to Medicare providers with delinquent tax debt	717
➤ Implement IRS program integrity allocation adjustments	43,652
➤ Require a certified Taxpayer Identification Number for contractors	1,413
➤ Impose a penalty on failure to comply with electronic filing requirements	10
➤ Repeal non-qualified preferred stock (NQPS) designation	388
➤ “Strengthen unemployment insurance system solvency”	47,843
➤ Repeal gain limitation for dividends received in reorganization exchanges	874

➤ Increase oil spill liability trust fund financing rate by one cent	717
➤ Eliminate special depreciation rules for purchases of general aviation passenger aircraft	2,206
➤ Expand the definition of built-in loss for purposes of partnership loss transfers	64
➤ Extend partnership basis limitation rules to nondeductible expenditures	826
➤ Limit the importation of losses under section 267(d)	767
➤ Eliminate the deduction for contributions of conservation easements on golf courses	593
➤ Eliminate special rules modifying the amount of estimated tax payments by corporations	300
➤ Streamline audit and adjustment procedures for large partnerships	1,714
➤ Revise offer-in-compromise application rules	20
➤ Make repeated willful failure to file a tax return a felony	10
➤ Facilitate tax compliance with local jurisdictions	8
➤ Extend statute of limitations where State adjustment affects Federal tax liability	25
➤ Improve investigative disclosure statute	10
➤ Allow the IRS to absorb credit and debit card processing fees for certain tax payments	19
➤ Extend IRS math error authority in certain circumstances	173
➤ Authorize Treasury to locate and recover assets of the United States and to retain a portion of amounts collected to pay for the costs of recovery	20
➤ Provide authority to contact delinquent debtors via their cell phones	120
➤ Reauthorize special assessment from domestic nuclear facilities	2,194
➤ Establish an AML hardrock reclamation fund	1,800
➤ Increase duck stamp fees	140
➤ Establish a mandatory surcharge for air traffic services	7,460
➤ Authorize the Bureau of Engraving and Printing to conduct a coupon program to distribute electronic currency readers	170
➤ Increase employee contributions to CSRS and FERS	27,427
➤ Implement a phased retirement option for Federal Employees	31
SUBTOTAL, OTHER REVENUE-RAISING PROVISIONS	142,821
TOTAL TAX INCREASES AND OTHER REVENUE INCREASES	2,132,696

ⁱ Unless otherwise noted, all figures represent Administration estimates. For official Congressional scorekeeping purposes, these provisions will be re-estimated by the Joint Committee on Taxation, which could result in variations in particular scores.