

H.R. 4213, the *American Jobs and Closing Tax Loopholes Act of 2010*

List of revenue provisions in the bill passed by the House of Representatives on May 28, 2010

Extension to 12/31/2010, business tax provisions:

Tax credit for research and experimentation expenses

Indian employment tax credit

New markets tax credit

50% tax credit for certain expenditures for maintaining railroad tracks

Mine rescue training credit

Employer wage credit for activated military reservists

5-year depreciation for certain farming business machinery and equipment

15-year straight-line cost recovery for leasehold, restaurant and retail improvements

7-year recovery period for motorsports entertainment complexes

Accelerated depreciation for business property on Indian reservations

Enhanced charitable deduction for contributions of food inventory

Enhanced charitable deduction for contributions of book inventory

Enhanced charitable deduction for computer contributions

Election to expense mine safety equipment

Expensing rules for film and television productions

Expensing of brownfields environmental remediation costs

Deduction with respect to Puerto Rico domestic production activity income

Ta treatment of payments to controlling exempt organizations

UBTI exclusion for gain or loss on sale of brownfield sites

REIT timber provisions relating to royalties, gains, prohibited transactions

1042 withholding exemption for foreign investors receiving interest-related dividends and short-term capital gain dividends from RICs (mutual funds)

Treatment of RICs as qualified investment entities under IRC Sec. 897

Exception under Subpart F for active financing income

Look-through treatment of payments between related controlled foreign corporations

Basis adjustment to stock of S corps making charitable contributions of property

Empowerment zone tax incentives

District of Columbia investment tax incentives

Renewal community tax incentives

Puerto Rico and Virgin Islands run excise tax limit

American Samoa payment in lieu of economic development credit

Election to utilize unused AMT credits determined by domestic investments

Study of expiring tax provisions

Extension to 12/31/2010, individual tax relief provisions:

Deduction for certain expenses of elementary and secondary school teachers

Additional standard deduction for state and local real property taxes

Deduction of state and local general sales taxes

Contributions of capital gain real property for conservation purposes

Deduction for qualified tuition and related expenses (but modified so the deduction is

unavailable to a taxpayer for whom a credit for higher education under the Hope and Lifetime Learning Credits would have provided a greater net reduction in tax liability)

Tax-free distributions from IRAs to certain public charities

Look-through of certain RIC stock in determining gross estate of nonresidents

Election for direct payment of low-income housing credit

Foreign transaction provisions designated as revenue offsets:

Prevent splitting foreign tax credits from the income to which they relate

Deny foreign tax credit for income from covered asset acquisitions not subject to U.S. taxation

Separate application of foreign tax credit limitation to items resourced under treaties

Limitation on the amount of foreign taxes deemed paid with respect to Sec. 956 inclusions

Special rule with respect to certain redemptions by foreign subsidiaries

Modified affiliation rules for allocating interest expense

Repeal of the 80/20 rules for companies and for interest paid by resident alien individuals

Source rules for income on guarantees

Modification of statute of limitations for failure to disclose certain foreign transactions

Corporate provisions designated as revenue offsets:

Treatment of securities of a controlled corporation exchanged for assets in reorgs

Taxation of boot received in reorgs

2015 increase in corporate estimated tax payments for largest corporations

Pension provisions:

Pension funding relief for single-employer plans, multiemployer plans, and rollover of amounts received in airline carrier bankruptcy

Defined contribution plan fee disclosure

Other provisions affect infrastructure incentives; energy tax provisions that are extended through 12/31/2010; temporary disaster relief provisions; an increase in the Oil Spill Liability Trust Fund; duties on cotton fabrics; establishing a data match program to identify tax-delinquent providers of unemployment health and other assistance; and the Cobell settlement for members of Indian tribes; please see the Joint Committee on Taxation technical explanation.