

104TH CONGRESS
1ST SESSION

H. R. 1121

To make technical corrections relating to the Revenue Reconciliation Act of 1990 and the Revenue Reconciliation Act of 1993, and for other purposes.

IN THE HOUSE OF REPRESENTATIVES

MARCH 3, 1995

Mr. ARCHER (for himself and Mr. GIBBONS) introduced the following bill;
which was referred to the Committee on Ways and Means

A BILL

To make technical corrections relating to the Revenue Reconciliation Act of 1990 and the Revenue Reconciliation Act of 1993, and for other purposes.

1 *Be it enacted by the Senate and House of Representa-*
2 *tives of the United States of America in Congress assembled,*

3 **SECTION 1. SHORT TITLE; ETC.**

4 (a) SHORT TITLE.—This Act may be cited as the
5 “Tax Technical Corrections Act of 1995”.

6 (b) AMENDMENT OF 1986 CODE.—Except as other-
7 wise expressly provided, whenever in this Act an amend-
8 ment or repeal is expressed in terms of an amendment
9 to, or repeal of, a section or other provision, the reference

1 shall be considered to be made to a section or other provi-
2 sion of the Internal Revenue Code of 1986.

3 **SEC. 2. AMENDMENTS RELATED TO REVENUE RECONCILI-**
4 **ATION ACT OF 1990.**

5 (a) AMENDMENTS RELATED TO SUBTITLE A.—

6 (1) Subparagraph (B) of section 59(j)(3) is
7 amended by striking “section 1(i)(3)(B)” and insert-
8 ing “section 1(g)(3)(B)”.

9 (2) Clause (i) of section 151(d)(3)(C) is amend-
10 ed by striking “joint of a return” and inserting
11 “joint return”.

12 (3) Subsection (b) of section 1 (as in effect on
13 the day before the date of the enactment of the Rev-
14 enue Reconciliation Act of 1993) is amended by
15 striking “\$26,500” in the table contained therein
16 and inserting “\$26,050”.

17 (b) AMENDMENTS RELATED TO SUBTITLE B.—

18 (1) Paragraph (1) of section 11212(e) of the
19 Revenue Reconciliation Act of 1990 is amended by
20 striking “Paragraph (1) of section 6724(d)” and in-
21 sserting “Subparagraph (B) of section 6724(d)(1)”.

22 (2)(A) Subparagraph (B) of section 4093(c)(2),
23 as in effect before the amendments made by the
24 Revenue Reconciliation Act of 1993, is amended by
25 inserting before the period “unless such fuel is sold

1 for exclusive use by a State or any political subdivi-
2 sion thereof”.

3 (B) Paragraph (4) of section 6427(l), as in ef-
4 fect before the amendments made by the Revenue
5 Reconciliation Act of 1993, is amended by inserting
6 before the period “unless such fuel was used by a
7 State or any political subdivision thereof”.

8 (3) Paragraph (1) of section 6416(b) is amend-
9 ed by striking “chapter 32 or by section 4051” and
10 inserting “chapter 31 or 32”.

11 (4) Section 7012 is amended—

12 (A) by striking “production or importation
13 of gasoline” in paragraph (3) and inserting
14 “taxes on gasoline and diesel fuel”, and

15 (B) by striking paragraph (4) and redesign-
16 ating paragraphs (5) and (6) as paragraphs
17 (4) and (5), respectively.

18 (5) Subsection (c) of section 5041 is amended
19 by striking paragraph (6) and by inserting the fol-
20 lowing new paragraphs:

21 “(6) CREDIT FOR TRANSFEREE IN BOND.—If—

22 “(A) wine produced by any person would
23 be eligible for any credit under paragraph (1)
24 if removed by such person during the calendar
25 year,

1 “(B) wine produced by such person is re-
2 moved during such calendar year by any other
3 person (hereafter in this paragraph referred to
4 as the ‘transferee’) to whom such wine was
5 transferred in bond and who is liable for the tax
6 imposed by this section with respect to such
7 wine, and

8 “(C) such producer holds title to such wine
9 at the time of its removal and provides to the
10 transferee such information as is necessary to
11 properly determine the transferee’s credit under
12 this paragraph,

13 then, the transferee (and not the producer) shall be
14 allowed the credit under paragraph (1) which would
15 be allowed to the producer if the wine removed by
16 the transferee had been removed by the producer on
17 that date.

18 “(7) REGULATIONS.—The Secretary may pre-
19 scribe such regulations as may be necessary to carry
20 out the purposes of this subsection, including regula-
21 tions—

22 “(A) to prevent the credit provided in this
23 subsection from benefiting any person who pro-
24 duces more than 250,000 wine gallons during a
25 calendar year, and

1 “(B) to assure proper reduction of such
2 credit for persons producing more than 150,000
3 wine gallons of wine during a calendar year.”

4 (6) Paragraph (3) of section 5061(b) is amend-
5 ed to read as follows:

6 “(3) section 5041(f),”.

7 (7) Section 5354 is amended by inserting “(tak-
8 ing into account the appropriate amount of credit
9 with respect to such wine under section 5041(c))”
10 after “any one time”.

11 (c) AMENDMENTS RELATED TO SUBTITLE C.—

12 (1) Paragraph (4) of section 56(g) is amended
13 by redesignating subparagraphs (I) and (J) as sub-
14 paragraphs (H) and (I), respectively.

15 (2) Subparagraph (B) of section 6724(d)(1) is
16 amended—

17 (A) by striking “or” at the end of clause
18 (xii), and

19 (B) by striking the period at the end of
20 clause (xiii) and inserting “, or”.

21 (3) Subsection (g) of section 6302 is amended
22 by inserting “, 22,” after “chapters 21”.

23 (4) The earnings and profits of any insurance
24 company to which section 11305(c)(3) of the Reve-
25 nue Reconciliation Act of 1990 applies shall be de-

1 terminated without regard to any deduction allowed
2 under such section; except that, for purposes of ap-
3 plying sections 56 and 902, and subpart F of part
4 III of subchapter N of chapter 1 of the Internal
5 Revenue Code of 1986, such deduction shall be
6 taken into account.

7 (5) Subparagraph (D) of section 6038A(e)(4) is
8 amended—

9 (A) by striking “any transaction to which
10 the summons relates” and inserting “any af-
11 fected taxable year”, and

12 (B) by adding at the end thereof the fol-
13 lowing new sentence: “For purposes of this sub-
14 paragraph, the term ‘affected taxable year’
15 means any taxable year if the determination of
16 the amount of tax imposed for such taxable
17 year is affected by the treatment of the trans-
18 action to which the summons relates.”.

19 (6) Subparagraph (A) of section 6621(c)(2) is
20 amended by adding at the end thereof the following
21 new sentence: “The preceding sentence shall be ap-
22 plied without regard to any such letter or notice
23 which is withdrawn by the Secretary.”.

1 (7) Clause (i) of section 6621(c)(2)(B) is
2 amended by striking “this subtitle” and inserting
3 “this title”.

4 (d) AMENDMENTS RELATED TO SUBTITLE D.—

5 (1) Notwithstanding section 11402(c) of the
6 Revenue Reconciliation Act of 1990, the amendment
7 made by section 11402(b)(1) of such Act shall apply
8 to taxable years ending after December 31, 1989.

9 (2) Clause (ii) of section 143(m)(4)(C) is
10 amended—

11 (A) by striking “any month of the 10-year
12 period” and inserting “any year of the 4-year
13 period”,

14 (B) by striking “succeeding months” and
15 inserting “succeeding years”, and

16 (C) by striking “over the remainder of
17 such period (or, if lesser, 5 years)” and insert-
18 ing “to zero over the succeeding 5 years”.

19 (e) AMENDMENTS RELATED TO SUBTITLE E.—

20 (1)(A) Clause (ii) of section 56(d)(1)(B) is
21 amended to read as follows:

22 “(ii) appropriate adjustments in the
23 application of section 172(b)(2) shall be
24 made to take into account the limitation of
25 subparagraph (A).”

1 (B) For purposes of applying sections 56(g)(1)
2 and 56(g)(3) of the Internal Revenue Code of 1986
3 with respect to taxable years beginning in 1991 and
4 1992, the reference in such sections to the alter-
5 native tax net operating loss deduction shall be
6 treated as including a reference to the deduction
7 under section 56(h) of such Code as in effect before
8 the amendments made by section 1915 of the En-
9 ergy Policy Act of 1992.

10 (2) Clause (i) of section 613A(c)(3)(A) is
11 amended by striking “the table contained in”.

12 (3) Section 6501 is amended—

13 (A) by striking subsection (m) (relating to
14 deficiency attributable to election under section
15 44B) and by redesignating subsections (n) and
16 (o) as subsections (m) and (n), respectively, and

17 (B) by striking “section 40(f) or 51(j)” in
18 subsection (m) (as redesignated by subpara-
19 graph (A)) and inserting “section 40(f), 43, or
20 51(j)”.

21 (4) Subparagraph (C) of section 38(c)(2) (as in
22 effect on the day before the date of the enactment
23 of the Revenue Reconciliation Act of 1990) is
24 amended by inserting before the period at the end

1 of the first sentence the following: “and without re-
2 gard to the deduction under section 56(h)”.

3 (5) The amendment made by section
4 1913(b)(2)(C)(i) of the Energy Policy Act of 1992
5 shall apply to taxable years beginning after Decem-
6 ber 31, 1990.

7 (f) AMENDMENTS RELATED TO SUBTITLE F.—

8 (1)(A) Section 2701(a)(3) is amended by add-
9 ing at the end thereof the following new subpara-
10 graph:

11 “(C) VALUATION OF QUALIFIED PAYMENTS
12 WHERE NO LIQUIDATION, ETC. RIGHTS.—In the
13 case of an applicable retained interest which is
14 described in subparagraph (B)(i) but not sub-
15 paragraph (B)(ii), the value of the distribution
16 right shall be determined without regard to this
17 section.”

18 (B) Section 2701(a)(3)(B) is amended by in-
19 serting “CERTAIN” before “QUALIFIED” in the head-
20 ing thereof.

21 (C) Sections 2701 (d)(1) and (d)(4) are each
22 amended by striking “subsection (a)(3)(B)” and in-
23 serting “subsection (a)(3) (B) or (C)”.

24 (2) Clause (i) of section 2701(a)(4)(B) is
25 amended by inserting “(or, to the extent provided in

1 regulations, the rights as to either income or cap-
2 ital)” after “income and capital”.

3 (3)(A) Section 2701(b)(2) is amended by add-
4 ing at the end thereof the following new subpara-
5 graph:

6 “(C) APPLICABLE FAMILY MEMBER.—For
7 purposes of this subsection, the term ‘applicable
8 family member’ includes any lineal descendant
9 of any parent of the transferor or the transfer-
10 or’s spouse.”

11 (B) Section 2701(e)(3) is amended—

12 (i) by striking subparagraph (B), and

13 (ii) by striking so much of paragraph (3)
14 as precedes “shall be treated as holding” and
15 inserting:

16 “(3) ATTRIBUTION OF INDIRECT HOLDINGS
17 AND TRANSFERS.—An individual”.

18 (C) Section 2704(c)(3) is amended by striking
19 “section 2701(e)(3)(A)” and inserting “section
20 2701(e)(3)”.

21 (4) Clause (i) of section 2701(c)(1)(B) is
22 amended to read as follows:

23 “(i) a right to distributions with re-
24 spect to any interest which is junior to the
25 rights of the transferred interest,”.

1 (5)(A) Clause (i) of section 2701(c)(3)(C) is
2 amended to read as follows:

3 “(i) IN GENERAL.—Payments under
4 any interest held by a transferor which
5 (without regard to this subparagraph) are
6 qualified payments shall be treated as
7 qualified payments unless the transferor
8 elects not to treat such payments as quali-
9 fied payments. Payments described in the
10 preceding sentence which are held by an
11 applicable family member shall be treated
12 as qualified payments only if such member
13 elects to treat such payments as qualified
14 payments.”

15 (B) The first sentence of section
16 2701(c)(3)(C)(ii) is amended to read as follows: “A
17 transferor or applicable family member holding any
18 distribution right which (without regard to this sub-
19 paragraph) is not a qualified payment may elect to
20 treat such right as a qualified payment, to be paid
21 in the amounts and at the times specified in such
22 election.”.

23 (C) The time for making an election under the
24 second sentence of section 2701(c)(3)(C)(i) of the
25 Internal Revenue Code of 1986 (as amended by sub-

1 paragraph (A)) shall not expire before the due date
2 (including extensions) for filing the transferor's re-
3 turn of the tax imposed by section 2501 of such
4 Code for the first calendar year ending after the
5 date of enactment.

6 (6) Section 2701(d)(3)(A)(iii) is amended by
7 striking "the period ending on the date of".

8 (7) Subclause (I) of section 2701(d)(3)(B)(ii) is
9 amended by inserting "or the exclusion under sec-
10 tion 2503(b)," after "section 2523,".

11 (8) Section 2701(e)(5) is amended—

12 (A) by striking "such contribution to cap-
13 ital or such redemption, recapitalization, or
14 other change" in subparagraph (A) and insert-
15 ing "such transaction", and

16 (B) by striking "the transfer" in subpara-
17 graph (B) and inserting "such transaction".

18 (9) Section 2701(d)(4) is amended by adding at
19 the end thereof the following new subparagraph:

20 "(C) TRANSFER TO TRANSFERORS.—In
21 the case of a taxable event described in para-
22 graph (3)(A)(ii) involving a transfer of an ap-
23 plicable retained interest from an applicable
24 family member to a transferor, this subsection

1 shall continue to apply to the transferor during
2 any period the transferor holds such interest.”

3 (10) Section 2701(e)(6) is amended by insert-
4 ing “or to reflect the application of subsection (d)”
5 before the period at the end thereof.

6 (11)(A) Section 2702(a)(3)(A) is amended—

7 (i) by striking “to the extent” and insert-
8 ing “if” in clause (i),

9 (ii) by striking “or” at the end of clause
10 (i),

11 (iii) by striking the period at the end of
12 clause (ii) and inserting “, or”, and

13 (iv) by adding at the end thereof the fol-
14 lowing new clause:

15 “(iii) to the extent that regulations
16 provide that such transfer is not inconsis-
17 tent with the purposes of this section.”

18 (B)(i) Section 2702(a)(3) is amended by strik-
19 ing “incomplete transfer” each place it appears and
20 inserting “incomplete gift”.

21 (ii) The heading for section 2702(a)(3)(B) is
22 amended by striking “INCOMPLETE TRANSFER” and
23 inserting “INCOMPLETE GIFT”.

24 (g) AMENDMENTS RELATED TO SUBTITLE G.—

1 (1)(A) Subsection (a) of section 1248 is amend-
2 ed—

3 (i) by striking “, or if a United States per-
4 son receives a distribution from a foreign cor-
5 poration which, under section 302 or 331, is
6 treated as an exchange of stock” in paragraph
7 (1), and

8 (ii) by adding at the end thereof the follow-
9 ing new sentence: “For purposes of this section,
10 a United States person shall be treated as hav-
11 ing sold or exchanged any stock if, under any
12 provision of this subtitle, such person is treated
13 as realizing gain from the sale or exchange of
14 such stock.”.

15 (B) Paragraph (1) of section 1248(e) is amend-
16 ed by striking “, or receives a distribution from a
17 domestic corporation which, under section 302 or
18 331, is treated as an exchange of stock”.

19 (C) Subparagraph (B) of section 1248(f)(1) is
20 amended by striking “or 361(c)(1)” and inserting
21 “355(c)(1), or 361(c)(1)”.

22 (D) Paragraph (1) of section 1248(i) is amend-
23 ed to read as follows:

24 “(1) IN GENERAL.—If any shareholder of a 10-
25 percent corporate shareholder of a foreign corpora-

1 tion exchanges stock of the 10-percent corporate
2 shareholder for stock of the foreign corporation,
3 such 10-percent corporate shareholder shall recog-
4 nize gain in the same manner as if the stock of the
5 foreign corporation received in such exchange had
6 been—

7 “(A) issued to the 10-percent corporate
8 shareholder, and

9 “(B) then distributed by the 10-percent
10 corporate shareholder to such shareholder in re-
11 demption or liquidation (whichever is appro-
12 priate).

13 The amount of gain recognized by such 10-percent
14 corporate shareholder under the preceding sentence
15 shall not exceed the amount treated as a dividend
16 under this section.”

17 (2) Section 897 is amended by striking sub-
18 section (f).

19 (3) Paragraph (13) of section 4975(d) is
20 amended by striking “section 408(b)” and inserting
21 “section 408(b)(12)”.

22 (4) Clause (iii) of section 56(g)(4)(D) is amend-
23 ed by inserting “, but only with respect to taxable
24 years beginning after December 31, 1989” before
25 the period at the end thereof.

1 (5)(A) Paragraph (11) of section 11701(a) of
2 the Revenue Reconciliation Act of 1990 (and the
3 amendment made by such paragraph) are hereby re-
4 pealed, and section 7108(r)(2) of the Revenue Rec-
5 onciliation Act of 1989 shall be applied as if such
6 paragraph (and amendment) had never been en-
7 acted.

8 (B) Subparagraph (A) shall not apply to any
9 building if the owner of such building establishes to
10 the satisfaction of the Secretary of the Treasury or
11 his delegate that such owner reasonably relied on the
12 amendment made by such paragraph (11).

13 (h) AMENDMENTS RELATED TO SUBTITLE H.—

14 (1)(A) Clause (vi) of section 168(e)(3)(B) is
15 amended by striking “or” at the end of subclause
16 (I), by striking the period at the end of subclause
17 (II) and inserting “, or”, and by adding at the end
18 thereof the following new subclause:

19 “(III) is described in section
20 48(l)(3)(A)(ix) (as in effect on the day be-
21 fore the date of the enactment of the Reve-
22 nue Reconciliation Act of 1990).”

23 (B) Subparagraph (K) of section 168(g)(4) is
24 amended by striking “section 48(a)(3)(A)(iii)” and
25 inserting “section 48(l)(3)(A)(ix) (as in effect on the

1 day before the date of the enactment of the Revenue
2 Reconciliation Act of 1990”.

3 (2) Clause (ii) of section 172(b)(1)(E) is
4 amended by striking “subsection (m)” and inserting
5 “subsection (h)”.

6 (3) Sections 805(a)(4)(E), 832(b)(5)(C)(ii)(II),
7 and 832(b)(5)(D)(ii)(II) are each amended by strik-
8 ing “243(b)(5)” and inserting “243(b)(2)”.

9 (4) Subparagraph (A) of section 243(b)(3) is
10 amended by inserting “of” after “In the case”.

11 (5) The subsection heading for subsection (a) of
12 section 280F is amended by striking “INVESTMENT
13 TAX CREDIT AND”.

14 (6) Clause (i) of section 1504(c)(2)(B) is
15 amended by inserting “section” before “243(b)(2)”.

16 (7) Paragraph (3) of section 341(f) is amended
17 by striking “351, 361, 371(a), or 374(a)” and in-
18 serting “351, or 361”.

19 (8) Paragraph (2) of section 243(b) is amended
20 to read as follows:

21 “(2) AFFILIATED GROUP.—For purposes of this
22 subsection:

23 “(A) IN GENERAL.—The term ‘affiliated
24 group’ has the meaning given such term by sec-
25 tion 1504(b), except that for such purposes sec-

1 tions 1504(b)(2), 1504(b)(4), and 1504(c) shall
2 not apply.

3 “(B) GROUP MUST BE CONSISTENT IN
4 FOREIGN TAX TREATMENT.—The requirements
5 of paragraph (1)(A) shall not be treated as
6 being met with respect to any dividend received
7 by a corporation if, for any taxable year which
8 includes the day on which such dividend is re-
9 ceived—

10 “(i) 1 or more members of the affili-
11 ated group referred to in paragraph (1)(A)
12 choose to any extent to take the benefits of
13 section 901, and

14 “(ii) 1 or more other members of such
15 group claim to any extent a deduction for
16 taxes otherwise creditable under section
17 901.”

18 (9) The amendment made by section
19 11813(b)(17) of the Revenue Reconciliation Act of
20 1990 shall be applied as if the material stricken by
21 such amendment included the closing parenthesis
22 after “section 48(a)(5)”.

23 (10) Paragraph (1) of section 179(d) is amend-
24 ed—

1 (A) by striking “in a trade or business”
2 and inserting “a trade or business”, and

3 (B) by adding at the end thereof the fol-
4 lowing new sentence: “Such term shall not in-
5 clude any property described in section 50(b)
6 and shall not include air conditioning or heating
7 units and horses”.

8 (11) Subparagraph (E) of section 50(a)(2) is
9 amended by striking “section 48(a)(5)(A)” and in-
10 sserting “section 48(a)(5)”.

11 (12) The amendment made by section
12 11801(c)(9)(G)(ii) of the Revenue Reconciliation Act
13 of 1990 shall be applied as if it struck “Section
14 422A(c)(2)” and inserted “Section 422(c)(2)”.

15 (13) Subparagraph (B) of section 424(c)(3) is
16 amended by striking “a qualified stock option, an in-
17 centive stock option, an option granted under an em-
18 ployee stock purchase plan, or a restricted stock op-
19 tion” and inserting “an incentive stock option or an
20 option granted under an employee stock purchase
21 plan”.

22 (14) Subparagraph (E) of section 1367(a)(2) is
23 amended by striking “section 613A(c)(13)(B)” and
24 inserting “section 613A(c)(11)(B)”.

1 (15) Subparagraph (B) of section 460(e)(6) is
2 amended by striking “section 167(k)” and inserting
3 “section 168(e)(2)(A)(ii)”.

4 (16) Subparagraph (C) of section 172(h)(4) is
5 amended by striking “subsection (b)(1)(M)” and in-
6 serting “subsection (b)(1)(E)”.

7 (17) Section 6503 is amended—

8 (A) by redesignating the subsection relat-
9 ing to extension in case of certain summonses
10 as subsection (j), and

11 (B) by redesignating the subsection relat-
12 ing to cross references as subsection (k).

13 (18) Paragraph (4) of section 1250(e) is hereby
14 repealed.

15 (19) Subsection (c) of section 2104 is amended
16 by striking “subparagraph (A), (C), or (D)” and in-
17 serting “subparagraph (A)”.

18 (i) EFFECTIVE DATE.—Except as otherwise expressly
19 provided—

20 (1) the amendments made by this section shall
21 be treated as amendments to the Internal Revenue
22 Code of 1986 as amended by the Revenue Reconcili-
23 ation Act of 1993; and

24 (2) any amendment made by this section shall
25 apply to periods before the date of the enactment of

1 this section in the same manner as if it had been in-
2 cluded in the provision of the Revenue Reconciliation
3 Act of 1990 to which such amendment relates.

4 **SEC. 3. AMENDMENTS RELATED TO REVENUE RECONCILI-**
5 **ATION ACT OF 1993.**

6 (a) AMENDMENT RELATED TO SECTION 13114.—
7 Paragraph (2) of section 1044(c) is amended to read as
8 follows:

9 “(2) PURCHASE.—The taxpayer shall be consid-
10 ered to have purchased any property if, but for sub-
11 section (d), the unadjusted basis of such property
12 would be its cost within the meaning of section
13 1012.”

14 (b) AMENDMENTS RELATED TO SECTION 13142.—

15 (1) Subparagraph (B) of section 13142(b)(6) of
16 the Revenue Reconciliation Act of 1993 is amended
17 to read as follows:

18 “(B) FULL-TIME STUDENTS, WAIVER AU-
19 THORITY, AND PROHIBITED DISCRIMINATION.—
20 The amendments made by paragraphs (2), (3),
21 and (4) shall take effect on the date of the en-
22 actment of this Act.”

23 (2) Subparagraph (C) of section 13142(b)(6) of
24 such Act is amended by striking “paragraph (2)”
25 and inserting “paragraph (5)”.

1 (c) AMENDMENT RELATED TO SECTION 13161.—

2 (1) IN GENERAL.—Subsection (e) of section
3 4001 (relating to inflation adjustment) is amended
4 to read as follows:

5 “(e) INFLATION ADJUSTMENT.—

6 “(1) IN GENERAL.—The \$30,000 amount in
7 subsection (a) and section 4003(a) shall be increased
8 by an amount equal to—

9 “(A) \$30,000, multiplied by

10 “(B) the cost-of-living adjustment under
11 section 1(f)(3) for the calendar year in which
12 the vehicle is sold, determined by substituting
13 ‘calendar year 1990’ for ‘calendar year 1992’ in
14 subparagraph (B) thereof.

15 “(2) ROUNDING.—If any amount as adjusted
16 under paragraph (1) is not a multiple of \$2,000,
17 such amount shall be rounded to the next lowest
18 multiple of \$2,000.”

19 (2) EFFECTIVE DATE.—The amendment made
20 by paragraph (1) shall take effect on the date of the
21 enactment of this Act.

22 (d) AMENDMENT RELATED TO SECTION 13201.—
23 Clause (ii) of section 135(b)(2)(B) is amended by insert-
24 ing before the period at the end thereof the following: “,

1 determined by substituting ‘calendar year 1989’ for ‘cal-
2 endar year 1992’ in subparagraph (B) thereof”.

3 (e) AMENDMENTS RELATED TO SECTION 13203.—

4 Subsection (a) of section 59 is amended—

5 (1) by striking “the amount determined under
6 section 55(b)(1)(A)” in paragraph (1)(A) and
7 (2)(A)(i) and inserting “the pre-credit tentative min-
8 imum tax”,

9 (2) by striking “specified in section
10 55(b)(1)(A)” in paragraph (1)(C) and inserting
11 “specified in subparagraph (A)(i) or (B)(i) of section
12 55(b)(1) (whichever applies)”,

13 (3) by striking “which would be determined
14 under section 55(b)(1)(A)” in paragraph (2)(A)(ii)
15 and inserting “which would be the pre-credit ten-
16 tative minimum tax”, and

17 (4) by adding at the end thereof the following
18 new paragraph:

19 “(4) PRE-CREDIT TENTATIVE MINIMUM TAX.—
20 For purposes of this subsection, the term ‘pre-credit
21 tentative minimum tax’ means—

22 “(A) in the case of a taxpayer other than
23 a corporation, the amount determined under the
24 first sentence of section 55(b)(1)(A)(i), or

1 “(B) in the case of a corporation, the
2 amount determined under section
3 55(b)(1)(B)(i).”

4 (f) AMENDMENTS RELATED TO SECTION 13221.—

5 (1) Subparagraph (A) of section 7518(g)(6) is
6 amended by striking “34 percent” and inserting “35
7 percent”.

8 (2) Sections 1201(a) and 1561(a) are each
9 amended by striking “last sentence” each place it
10 appears and inserting “last 2 sentences”.

11 (g) AMENDMENTS RELATED TO SECTION 13222.—

12 (1) Subparagraph (B) of section 6033(e)(1) is
13 amended by adding at the end thereof the following
14 new clause:

15 “(iii) COORDINATION WITH SECTION
16 527(f).—This subsection shall not apply to
17 any amount on which tax is imposed by
18 reason of section 527(f).”.

19 (2) Clause (i) of section 6033(e)(1)(B) is
20 amended by striking “this subtitle” and inserting
21 “section 501”.

22 (h) AMENDMENT RELATED TO SECTION 13225.—

23 Paragraph (3) of section 6655(g) is amended by striking
24 all that follows “‘3rd month’” in the sentence following
25 subparagraph (C) and inserting “, subsection (e)(2)(A)

1 shall be applied by substituting ‘2 months’ for ‘3 months’
2 in clause (i)(I), the election under clause (i) of subsection
3 (e)(2)(C) may be made separately for each installment,
4 and clause (ii) of subsection (e)(2)(C) shall not apply.”.

5 (i) AMENDMENTS RELATED TO SECTION 13231.—

6 (1) Subparagraph (G) of section 904(d)(3) is
7 amended by striking “section 951(a)(1)(B)” and in-
8 serting “subparagraph (B) or (C) of section
9 951(a)(1)”.

10 (2) Paragraph (1) of section 956A(b) is amend-
11 ed to read as follows:

12 “(1) the amount (not including a deficit) re-
13 ferred to in section 316(a)(1) to the extent such
14 amount was accumulated in prior taxable years be-
15 ginning after September 30, 1993, and”.

16 (3) Subsection (f) of section 956A is amended
17 by inserting before the period at the end thereof:
18 “and regulations coordinating the provisions of sub-
19 sections (c)(3)(A) and (d)”.

20 (4) Subsection (b) of section 958 is amended by
21 striking “956(b)(2)” each place it appears and in-
22 serting “956(c)(2)”.

23 (5)(A) Subparagraph (A) of section 1297(d)(2)
24 is amended by striking “The adjusted basis of any
25 asset” and inserting “The amount taken into ac-

1 count under section 1296(a)(2) with respect to any
2 asset”.

3 (B) The paragraph heading of paragraph (2) of
4 section 1297(d) is amended to read as follows:

5 “(2) AMOUNT TAKEN INTO ACCOUNT.—”.

6 (6) Subsection (e) of section 1297 is amended
7 by inserting “For purposes of this part—” after the
8 subsection heading.

9 (j) AMENDMENT RELATED TO SECTION 13241.—
10 Subparagraph (B) of section 40(e)(1) is amended to read
11 as follows:

12 “(B) for any period before January 1,
13 2001, during which the rates of tax under sec-
14 tion 4081(a)(2)(A) are 4.3 cents per gallon.”

15 (k) AMENDMENT RELATED TO SECTION 13261.—
16 Clause (iii) of section 13261(g)(2)(A) of the Revenue Rec-
17 onciliation Act of 1993 is amended by striking “by the
18 taxpayer” and inserting “by the taxpayer or a related per-
19 son”.

20 (l) AMENDMENT RELATED TO SECTION 13301.—
21 Subparagraph (B) of section 1397B(d)(5) is amended by
22 striking “preceding”.

23 (m) CLERICAL AMENDMENTS.—

24 (1) Subsection (d) of section 39 is amended—

1 (A) by striking “45” in the heading of
2 paragraph (5) and inserting “45A”, and

3 (B) by striking “45” in the heading of
4 paragraph (6) and inserting “45B”.

5 (2) Subparagraph (A) of section 108(d)(9) is
6 amended by striking “paragraph (3)(B)” and insert-
7 ing “paragraph (3)(C)”.

8 (3) Subparagraph (C) of section 143(d)(2) is
9 amended by striking the period at the end thereof
10 and inserting a comma.

11 (4) Clause (ii) of section 163(j)(6)(E) is amend-
12 ed by striking “which is a” and inserting “which is”.

13 (5) Subparagraph (A) of section 1017(b)(4) is
14 amended by striking “subsection (b)(2)(D)” and in-
15 serting “subsection (b)(2)(E)”.

16 (6) So much of section 1245(a)(3) as precedes
17 subparagraph (A) thereof is amended to read as fol-
18 lows:

19 “(3) SECTION 1245 PROPERTY.—For purposes
20 of this section, the term ‘section 1245 property’
21 means any property which is or has been property
22 of a character subject to the allowance for deprecia-
23 tion provided in section 167 and is either—”.

24 (7) Paragraph (2) of section 1394(e) is amend-
25 ed—

1 (A) by striking “(i)” and inserting “(A)”,
2 and

3 (B) by striking “(ii)” and inserting “(B)”.

4 (8) Subsection (m) of section 6501 (as redesignated by section 2) is amended by striking “or
5 51(j)” and inserting “45B, or 51(j)”.

7 (9)(A) The section 6714 added by section
8 13242(b)(1) of the Revenue Reconciliation Act of
9 1993 is hereby redesignated as section 6715.

10 (B) The table of sections for part I of sub-
11 chapter B of chapter 68 is amended by striking
12 “6714” in the item added by such section
13 13242(b)(2) of such Act and inserting “6715”.

14 (10) Paragraph (2) of section 9502(b) is
15 amended by inserting “and before” after “1982,”.

16 (11) Subsections (a)(2) and (a)(3) of section
17 13206 of the Revenue Reconciliation Act of 1993
18 are each amended by striking “this section” and in-
19 serting “this subsection”.

20 (12) Paragraph (1) of section 13215(c) of the
21 Revenue Reconciliation Act of 1993 is amended by
22 striking “Public Law 92-21” and inserting “Public
23 Law 98-21”.

24 (13) Paragraph (2) of section 13311(e) of the
25 Revenue Reconciliation Act of 1993 is amended by

1 striking “section 1393(a)(3)” and inserting “section
2 1393(a)(2)”.

3 (14) Subparagraph (B) of section 117(d)(2) is
4 amended by striking “section 132(f)” and inserting
5 “section 132(h)”.

6 (n) EFFECTIVE DATE.—Any amendment made by
7 this section shall take effect as if included in the provision
8 of the Revenue Reconciliation Act of 1993 to which such
9 amendment relates.

10 **SEC. 4. MISCELLANEOUS PROVISIONS.**

11 (a) APPLICATION OF AMENDMENTS MADE BY TITLE
12 XII OF OMNIBUS BUDGET RECONCILIATION ACT OF
13 1990.—Except as otherwise expressly provided, whenever
14 in title XII of the Omnibus Budget Reconciliation Act of
15 1990 an amendment or repeal is expressed in terms of
16 an amendment to, or repeal of, a section or other provi-
17 sion, the reference shall be considered to be made to a
18 section or other provision of the Internal Revenue Code
19 of 1986.

20 (b) TREATMENT OF CERTAIN AMOUNTS UNDER
21 HEDGE BOND RULES.—

22 (1) Clause (iii) of section 149(g)(3)(B) is
23 amended to read as follows:

24 “(iii) AMOUNTS HELD PENDING REIN-
25 VESTMENT OR REDEMPTION.—Amounts

1 held for not more than 30 days pending re-
2 investment or bond redemption shall be
3 treated as invested in bonds described in
4 clause (i).”

5 (2) The amendment made by paragraph (1)
6 shall take effect as if included in the amendments
7 made by section 7651 of the Omnibus Budget Rec-
8 onciliation Act of 1989.

9 (c) TREATMENT OF CERTAIN DISTRIBUTIONS
10 UNDER SECTION 1445.—

11 (1) IN GENERAL.—Paragraph (3) of section
12 1445(e) is amended by adding at the end thereof
13 the following new sentence: “Rules similar to the
14 rules of the preceding provisions of this paragraph
15 shall apply in the case of any distribution to which
16 section 301 applies and which is not made out of the
17 earnings and profits of such a domestic corpora-
18 tion.”

19 (2) EFFECTIVE DATE.—The amendment made
20 by paragraph (1) shall apply to distributions after
21 the date of the enactment of this Act.

22 (d) TREATMENT OF CERTAIN CREDITS UNDER SEC-
23 TION 469.—

24 (1) IN GENERAL.—Subparagraph (B) of section
25 469(c)(3) is amended by adding at the end thereof

1 the following new sentence: “If the preceding sen-
2 tence applies to the net income from any property
3 for any taxable year, any credits allowable under
4 subpart B (other than section 27(a)) or D of part
5 IV of subchapter A for such taxable year which are
6 attributable to such property shall be treated as
7 credits not from a passive activity to the extent the
8 amount of such credits does not exceed the regular
9 tax liability of the taxpayer for the taxable year
10 which is allocable to such net income.”

11 (2) EFFECTIVE DATE.—The amendment made
12 by paragraph (1) shall apply to taxable years begin-
13 ning after December 31, 1986.

14 (e) TREATMENT OF DISPOSITIONS UNDER PASSIVE
15 LOSS RULES.—

16 (1) IN GENERAL.—Subparagraph (A) of section
17 469(g)(1) is amended to read as follows:

18 “(A) IN GENERAL.—If all gain or loss real-
19 ized on such disposition is recognized, the ex-
20 cess of—

21 “(i) any loss from such activity for
22 such taxable year (determined after the ap-
23 plication of subsection (b)), over

24 “(ii) any net income or gain for such
25 taxable year from all other passive activi-

1 ties (determined after the application of
2 subsection (b)),
3 shall be treated as a loss which is not from a
4 passive activity.”

5 (2) EFFECTIVE DATE.—The amendment made
6 by paragraph (1) shall apply to taxable years begin-
7 ning after December 31, 1986.

8 (f) MISCELLANEOUS AMENDMENTS TO FOREIGN
9 PROVISIONS.—

10 (1) COORDINATION OF UNIFIED ESTATE TAX
11 CREDIT WITH TREATIES.—Subparagraph (A) of sec-
12 tion 2102(c)(3) is amended by adding at the end
13 thereof the following new sentence: “For purposes
14 of the preceding sentence, property shall not be
15 treated as situated in the United States if such
16 property is exempt from the tax imposed by this
17 subchapter under any treaty obligation of the United
18 States.”

19 (2) TREATMENT OF CERTAIN INTEREST PAID
20 TO RELATED PERSON.—

21 (A) IN GENERAL.—Subparagraph (B) of
22 section 163(j)(1) is amended by inserting before
23 the period at the end thereof the following:
24 “(and clause (ii) of paragraph (2)(A) shall not

1 apply for purposes of applying this subsection
2 to the amount so treated)''.

3 (B) EFFECTIVE DATE.—The amendment
4 made by subparagraph (A) shall apply as if in-
5 cluded in the amendments made by section
6 7210(a) of the Revenue Reconciliation Act of
7 1989.

8 (3) TREATMENT OF INTEREST ALLOCABLE TO
9 EFFECTIVELY CONNECTED INCOME.—

10 (A) IN GENERAL.—

11 (i) Subparagraph (B) of section
12 884(f)(1) is amended by striking “to the
13 extent” and all that follows down through
14 “subparagraph (A)” and inserting “to the
15 extent that the allocable interest exceeds
16 the interest described in subparagraph
17 (A)”.

18 (ii) The second sentence of section
19 884(f)(1) is amended by striking “reason-
20 ably expected” and all that follows down
21 through the period at the end thereof and
22 inserting “reasonably expected to be alloca-
23 ble interest.”

24 (iii) Paragraph (2) of section 884(f) is
25 amended to read as follows:

1 “(2) ALLOCABLE INTEREST.—For purposes of
2 this subsection, the term ‘allocable interest’ means
3 any interest which is allocable to income which is ef-
4 fectively connected (or treated as effectively con-
5 nected) with the conduct of a trade or business in
6 the United States.”

7 (B) EFFECTIVE DATE.—The amendments
8 made by subparagraph (A) shall take effect as
9 if included in the amendments made by section
10 1241(a) of the Tax Reform Act of 1986.

11 (4) CLARIFICATION OF SOURCE RULE.—

12 (A) IN GENERAL.—Paragraph (2) of sec-
13 tion 865(b) is amended by striking “863(b)”
14 and inserting “863”.

15 (B) EFFECTIVE DATE.—The amendment
16 made by subparagraph (A) shall take effect as
17 if included in the amendments made by section
18 1211 of the Tax Reform Act of 1986.

19 (5) REPEAL OF OBSOLETE PROVISIONS.—

20 (A) Paragraph (1) of section 6038(a) is
21 amended by striking “, and” at the end of sub-
22 paragraph (E) and inserting a period, and by
23 striking subparagraph (F).

24 (B) Subsection (b) of section 6038A is
25 amended by adding “and” at the end of para-

1 graph (2), by striking “, and” at the end of
2 paragraph (3) and inserting a period, and by
3 striking paragraph (4).

4 (g) TREATMENT OF ASSIGNMENT OF INTEREST IN
5 CERTAIN BOND-FINANCED FACILITIES.—

6 (1) IN GENERAL.—Subparagraph (A) of section
7 1317(3) of the Tax Reform Act of 1986 is amended
8 by adding at the end thereof the following new sen-
9 tence: “A facility shall not fail to be treated as de-
10 scribed in this subparagraph by reason of an assign-
11 ment (or an agreement to an assignment) by the
12 governmental unit on whose behalf the bonds are is-
13 sued of any part of its interest in the property fi-
14 nanced by such bonds to another governmental
15 unit.”

16 (2) EFFECTIVE DATE.—The amendment made
17 by paragraph (1) shall take effect as if included in
18 such section 1317 on the date of the enactment of
19 the Tax Reform Act of 1986.

20 (h) CLARIFICATION OF TREATMENT OF MEDICARE
21 ENTITLEMENT UNDER COBRA PROVISIONS.—

22 (1) IN GENERAL.—

23 (A) Subclause (V) of section
24 4980B(f)(2)(B)(i) is amended to read as fol-
25 lows:

1 “(V) MEDICARE ENTITLEMENT
2 FOLLOWED BY QUALIFYING EVENT.—
3 In the case of a qualifying event de-
4 scribed in paragraph (3)(B) that oc-
5 curs less than 18 months after the
6 date the covered employee became en-
7 titled to benefits under title XVIII of
8 the Social Security Act, the period of
9 coverage for qualified beneficiaries
10 other than the covered employee shall
11 not terminate under this clause before
12 the close of the 36-month period be-
13 ginning on the date the covered em-
14 ployee became so entitled.”

15 (B) Clause (v) of section 602(2)(A) of the
16 Employee Retirement Income Security Act of
17 1974 is amended to read as follows:

18 “(v) MEDICARE ENTITLEMENT FOL-
19 LOWED BY QUALIFYING EVENT.—In the
20 case of a qualifying event described in sec-
21 tion 603(2) that occurs less than 18
22 months after the date the covered em-
23 ployee became entitled to benefits under
24 title XVIII of the Social Security Act, the
25 period of coverage for qualified bene-

1 ficiaries other than the covered employee
2 shall not terminate under this subpara-
3 graph before the close of the 36-month pe-
4 riod beginning on the date the covered em-
5 ployee became so entitled.”

6 (C) Clause (iv) of section 2202(2)(A) of
7 the Public Health Service Act is amended to
8 read as follows:

9 “(iv) MEDICARE ENTITLEMENT FOL-
10 LOWED BY QUALIFYING EVENT.—In the
11 case of a qualifying event described in sec-
12 tion 2203(2) that occurs less than 18
13 months after the date the covered em-
14 ployee became entitled to benefits under
15 title XVIII of the Social Security Act, the
16 period of coverage for qualified bene-
17 ficiaries other than the covered employee
18 shall not terminate under this subpara-
19 graph before the close of the 36-month pe-
20 riod beginning on the date the covered em-
21 ployee became so entitled.”

22 (2) EFFECTIVE DATE.—The amendments made
23 by this subsection shall apply to plan years begin-
24 ning after December 31, 1989.

25 (i) TREATMENT OF CERTAIN REMIC INCLUSIONS.—

1 (1) IN GENERAL.—Subsection (a) of section
2 860E is amended by adding at the end thereof the
3 following new paragraph:

4 “(6) COORDINATION WITH MINIMUM TAX.—For
5 purposes of part VI of subchapter A of this chap-
6 ter—

7 “(A) the reference in section 55(b)(2) to
8 taxable income shall be treated as a reference
9 to taxable income determined without regard to
10 this subsection,

11 “(B) the alternative minimum taxable in-
12 come of any holder of a residual interest in a
13 REMIC for any taxable year shall in no event
14 be less than the excess inclusion for such tax-
15 able year, and

16 “(C) any excess inclusion shall be dis-
17 regarded for purposes of computing the alter-
18 native tax net operating loss deduction.

19 The preceding sentence shall not apply to any orga-
20 nization to which section 593 applies, except to the
21 extent provided in regulations prescribed by the Sec-
22 retary under paragraph (2).”

23 (2) EFFECTIVE DATE.—The amendment made
24 by paragraph (1) shall take effect as if included in
25 the amendments made by section 671 of the Tax Re-

1 form Act of 1986 unless the taxpayer elects to apply
2 such amendment only to taxable years beginning
3 after the date of the enactment of this Act.

4 (j) EXEMPTION FROM HARBOR MAINTENANCE TAX
5 FOR CERTAIN PASSENGERS.—

6 (1) IN GENERAL.—Subparagraph (D) of section
7 4462(b)(1) (relating to special rule for Alaska, Ha-
8 waii, and possessions) is amended by inserting be-
9 fore the period the following: “, or passengers trans-
10 ported on United States flag vessels operating solely
11 within the State waters of Alaska or Hawaii and ad-
12 jacent international waters”.

13 (2) EFFECTIVE DATE.—The amendment made
14 by paragraph (1) shall take effect as if included in
15 the amendments made by section 1402(a) of the
16 Harbor Maintenance Revenue Act of 1986.

17 (k) AMENDMENTS RELATED TO REVENUE PROVI-
18 SIONS OF ENERGY POLICY ACT OF 1992.—

19 (1) Effective with respect to taxable years be-
20 ginning after December 31, 1990, subclause (II) of
21 section 53(d)(1)(B)(iv) is amended to read as fol-
22 lows:

23 “(II) the adjusted net minimum
24 tax for any taxable year is the amount
25 of the net minimum tax for such year

1 increased in the manner provided in
2 clause (iii).”

3 (2) Subsection (g) of section 179A is redesign-
4 nated as subsection (f).

5 (3) Subparagraph (E) of section 6724(d)(3) is
6 amended by striking “section 6109(f)” and inserting
7 “6109(h)”.

8 (4)(A) Subsection (d) of section 30 is amend-
9 ed—

10 (i) by inserting “(determined without re-
11 gard to subsection (b)(3))” before the period at
12 the end thereof, and

13 (ii) by adding at the end thereof the follow-
14 ing new paragraph:

15 “(4) ELECTION TO NOT TAKE CREDIT.—No
16 credit shall be allowed under subsection (a) for any
17 vehicle if the taxpayer elects to not have this section
18 apply to such vehicle.”

19 (B) Subsection (m) of section 6501 (as redesign-
20 nated by section 101) is amended by striking “sec-
21 tion 40(f)” and inserting “section 30(d)(4), 40(f)”.

22 (5) Subclause (III) of section 501(c)(21)(D)(ii)
23 is amended by striking “section 101(6)” and insert-
24 ing “section 101(7)” and by striking “1752(6)” and
25 inserting “1752(7)”.

1 (6) Paragraph (1) of section 1917(b) of the En-
2 ergy Policy Act of 1992 shall be applied as if “at a
3 rate” appeared instead of “at the rate” in the mate-
4 rial proposed to be stricken.

5 (7) Paragraph (2) of section 1921(b) of the En-
6 ergy Policy Act of 1992 shall be applied as if a
7 comma appeared after “(2)” in the material pro-
8 posed to be stricken.

9 (8) Subsection (a) of section 1937 of the En-
10 ergy Policy Act of 1992 shall be applied as if “Sub-
11 part B” appeared instead of “Subpart C”.

12 (I) TREATMENT OF QUALIFIED FOOTBALL COACHES
13 PLAN.—

14 (1) IN GENERAL.—Section 1022 of title II of
15 the Employee Retirement Income Security Act of
16 1974 is amended by adding at the end thereof the
17 following new subsection:

18 “(i) QUALIFIED FOOTBALL COACHES PLAN.—For
19 purposes of determining the qualified plan status of a
20 qualified football coaches plan, section 3(37)(F) shall be
21 treated as part of this title and a qualified football coaches
22 plan shall be treated as a multiemployer collectively bar-
23 gained plan for purposes of the Internal Revenue Code
24 of 1986.”

1 (2) EFFECTIVE DATE.—The amendment made
2 by paragraph (1) shall apply to years beginning
3 after the date of the enactment of Public Law 100–
4 202.

5 (m) DETERMINATION OF UNRECOVERED INVEST-
6 MENT IN ANNUITY CONTRACT.—

7 (1) IN GENERAL.—Subparagraph (A) of section
8 72(b)(4) is amended by inserting “(determined with-
9 out regard to subsection (c)(2))” after “contract”.

10 (2) EFFECTIVE DATE.—The amendment made
11 by paragraph (1) shall take effect as if included in
12 the amendments made by section 1122(c) of the Tax
13 Reform Act of 1986.

14 (n) MODIFICATIONS TO ELECTION TO INCLUDE
15 CHILD’S INCOME ON PARENT’S RETURN.—

16 (1) ELIGIBILITY FOR ELECTION.—Clause (ii) of
17 section 1(g)(7)(A) (relating to election to include
18 certain unearned income of child on parent’s return)
19 is amended to read as follows:

20 “(ii) such gross income is more than
21 the amount described in paragraph
22 (4)(A)(ii)(I) and less than 10 times the
23 amount so described.”.

1 (2) COMPUTATION OF TAX.—Subparagraph (B)
2 of section 1(g)(7) (relating to income included on
3 parent’s return) is amended—

4 (A) by striking “\$1,000” in clause (i) and
5 inserting “twice the amount described in para-
6 graph (4)(A)(ii)(I)”, and

7 (B) by amending subclause (II) of clause
8 (ii) to read as follows:

9 “(II) for each such child, 15 per-
10 cent of the lesser of the amount de-
11 scribed in paragraph (4)(A)(ii)(I) or
12 the excess of the gross income of such
13 child over the amount so described,
14 and”.

15 (3) MINIMUM TAX.—Subparagraph (B) of sec-
16 tion 59(j)(1) is amended by striking “\$1,000” and
17 inserting “twice the amount in effect for the taxable
18 year under section 63(c)(5)(A)”.

19 (4) EFFECTIVE DATE.—The amendments made
20 by this subsection shall apply to taxable years begin-
21 ning after December 31, 1994.

22 (o) MISCELLANEOUS CLERICAL AMENDMENTS.—

23 (1) Subclause (II) of section 56(g)(4)(C)(ii) is
24 amended by striking “of the subclause” and insert-
25 ing “of subclause”.

1 (2) Paragraph (2) of section 72(m) is amended
2 by inserting “and” at the end of subparagraph (A),
3 by striking subparagraph (B), and by redesignating
4 subparagraph (C) as subparagraph (B).

5 (3) Paragraph (2) of section 86(b) is amended
6 by striking “adusted” and inserting “adjusted”.

7 (4)(A) The heading for section 112 is amended
8 by striking “**COMBAT PAY**” and inserting “**COM-**
9 **BAT ZONE COMPENSATION**”.

10 (B) The item relating to section 112 in the
11 table of sections for part III of subchapter B of
12 chapter 1 is amended by striking “combat pay” and
13 inserting “combat zone compensation”.

14 (C) Paragraph (1) of section 3401(a) is amend-
15 ed by striking “combat pay” and inserting “combat
16 zone compensation”.

17 (5) Clause (i) of section 172(h)(3)(B) is amend-
18 ed by striking the comma at the end thereof and in-
19 serting a period.

20 (6) Clause (ii) of section 543(a)(2)(B) is
21 amended by striking “section 563(c)” and inserting
22 “section 563(d)”.

23 (7) Paragraph (1) of section 958(a) is amended
24 by striking “sections 955(b)(1)(A) and (B),

1 955(c)(2)(A)(ii), and 960(a)(1)” and inserting “sec-
2 tion 960(a)(1)”.

3 (8) Subsection (g) of section 642 is amended by
4 striking “under 2621(a)(2)” and inserting “under
5 section 2621(a)(2)”.

6 (9) Section 1463 is amended by striking “this
7 subsection” and inserting “this section”.

8 (10) Subsection (k) of section 3306 is amended
9 by inserting a period at the end thereof.

10 (11) The item relating to section 4472 in the
11 table of sections for subchapter B of chapter 36 is
12 amended by striking “and special rules”.

13 (12) Paragraph (2) of section 4978(b) is
14 amended by striking the period at the end of sub-
15 paragraph (A) and inserting a comma, and by strik-
16 ing the period and quotation marks at the end of
17 subparagraph (B) and inserting a comma.

18 (13) Paragraph (3) of section 5134(c) is
19 amended by striking “section 6662(a)” and inserting
20 “section 6665(a)”.

21 (14) Paragraph (2) of section 5206(f) is
22 amended by striking “section 5(e)” and inserting
23 “section 105(e)”.

1 (15) Paragraph (1) of section 6050B(c) is
2 amended by striking “section 85(c)” and inserting
3 “section 85(b)”.

4 (16) Subsection (k) of section 6166 is amended
5 by striking paragraph (6).

6 (17) Subsection (e) of section 6214 is amended
7 to read as follows:

8 “(e) CROSS REFERENCE.—

**“For provision giving Tax Court jurisdiction to
order a refund of an overpayment and to award
sanctions, see section 6512(b)(2).”**

9 (18) The section heading for section 6043 is
10 amended by striking the semicolon and inserting a
11 comma.

12 (19) The item relating to section 6043 in the
13 table of sections for subpart B of part III of sub-
14 chapter A of chapter 61 is amended by striking the
15 semicolon and inserting a comma.

16 (20) The table of sections for part I of sub-
17 chapter A of chapter 68 is amended by striking the
18 item relating to section 6662.

19 (21)(A) Section 7232 is amended—

20 (i) by striking “**LUBRICATING OIL,**” in
21 the heading, and

22 (ii) by striking “lubricating oil,” in the
23 text.

1 (B) The table of sections for part II of sub-
2 chapter A of chapter 75 is amended by striking “lu-
3 bricating oil,” in the item relating to section 7232.

4 (22) Paragraph (1) of section 6701(a) of the
5 Omnibus Budget Reconciliation Act of 1989 is
6 amended by striking “subclause (IV)” and inserting
7 “subclause (V)”.

8 (23) Clause (ii) of section 7304(a)(2)(D) of
9 such Act is amended by striking “subsection (c)(2)”
10 and inserting “subsection (c)”.

11 (24) Paragraph (1) of section 7646(b) of such
12 Act is amended by striking “section 6050H(b)(1)”
13 and inserting “section 6050H(b)(2)”.

14 (25) Paragraph (10) of section 7721(c) of
15 such Act is amended by striking “section
16 6662(b)(2)(C)(ii)” and inserting “section
17 6661(b)(2)(C)(ii)”.

18 (26) Subparagraph (A) of section 7811(i)(3) of
19 such Act is amended by inserting “the first place it
20 appears” before “in clause (i)”.

21 (27) Paragraph (10) of section 7841(d) of
22 such Act is amended by striking “section 381(a)”
23 and inserting “section 381(c)”.

1 (28) Paragraph (2) of section 7861(c) of such
2 Act is amended by inserting “the second place it ap-
3 pears” before “and inserting”.

4 (29) Paragraph (1) of section 460(b) is amend-
5 ed by striking “the look-back method of paragraph
6 (3)” and inserting “the look-back method of para-
7 graph (2)”.

8 (30) Subparagraph (C) of section 50(a)(2) is
9 amended by striking “subsection (c)(4)” and insert-
10 ing “subsection (d)(5)”.

11 (31) Subparagraph (B) of section 172(h)(4) is
12 amended by striking the material following the head-
13 ing and preceding clause (i) and inserting “For pur-
14 poses of subsection (b)(2)—”.

15 (32) Subparagraph (A) of section 355(d)(7) is
16 amended by inserting “section” before “267(b)”.

17 (33) Subparagraph (C) of section 420(e)(1) is
18 amended by striking “mean” and inserting “means”.

19 (34) Paragraph (4) of section 537(b) is amend-
20 ed by striking “section 172(i)” and inserting “sec-
21 tion 172(f)”.

22 (35) Subparagraph (B) of section 613(e)(1) is
23 amended by striking the comma at the end thereof
24 and inserting a period.

1 (36) Paragraph (4) of section 856(a) is amend-
2 ed by striking “section 582(c)(5)” and inserting
3 “section 582(c)(2)”.

4 (37) Sections 904(f)(2)(B)(i) and
5 907(c)(4)(B)(iii) are each amended by inserting “(as
6 in effect on the day before the date of the enactment
7 of the Revenue Reconciliation Act of 1990)” after
8 “section 172(h)”.

9 (38) Subsection (b) of section 936 is amended
10 by striking “subparagraphs (D)(ii)(I)” and inserting
11 “subparagraphs (D)(ii)”.

12 (39) Subsection (c) of section 2104 is amended
13 by striking “subparagraph (A), (C), or (D) of sec-
14 tion 861(a)(1)” and inserting “section
15 861(a)(1)(A)”.

16 (40) Paragraph (1) of section 5002(b) is
17 amended by striking “section 5041(c)” and inserting
18 “section 5041(d)”.

19 (41) Section 6038 is amended by redesignating
20 the subsection relating to cross references as sub-
21 section (f).

22 (42) Clause (iv) of section 6103(e)(1)(A) is
23 amended by striking all that follows “provisions of”
24 and inserting “section 1(g) or 59(j);”.

1 (43) The subsection (f) of section 6109 of the
2 Internal Revenue Code of 1986 which was added by
3 section 2201(d) of Public Law 101-624 is redesign-
4 nated as subsection (g).

5 (44) Subsection (b) of section 7454 is amended
6 by striking “section 4955(e)(2)” and inserting “sec-
7 tion 4955(f)(2)”.

8 (45) Subsection (d) of section 11231 of the
9 Revenue Reconciliation Act of 1990 shall be applied
10 as if “comma” appeared instead of “period” and as
11 if the paragraph (9) proposed to be added ended
12 with a comma.

13 (46) Paragraph (1) of section 11303(b) of the
14 Revenue Reconciliation Act of 1990 shall be applied
15 as if “paragraph” appeared instead of “subpara-
16 graph” in the material proposed to be stricken.

17 (47) Subsection (f) of section 11701 of the Rev-
18 enue Reconciliation Act of 1990 is amended by in-
19 serting “(relating to definitions)” after “section
20 6038(e)”.

21 (48) Subsection (i) of section 11701 of the Rev-
22 enue Reconciliation Act of 1990 shall be applied as
23 if “subsection” appeared instead of “section” in the
24 material proposed to be stricken.

1 (49) Subparagraph (B) of section 11801(c)(2)
2 of the Revenue Reconciliation Act of 1990 shall be
3 applied as if “section 56(g)” appeared instead of
4 “section 59(g)”.

5 (50) Subparagraph (C) of section 11801(c)(8)
6 of the Revenue Reconciliation Act of 1990 shall be
7 applied as if “reorganizations” appeared instead of
8 “reorganization” in the material proposed to be
9 stricken.

10 (51) Subparagraph (H) of section 11801(c)(9)
11 of the Revenue Reconciliation Act of 1990 shall be
12 applied as if “section 1042(c)(1)(B)” appeared in-
13 stead of “section 1042(c)(2)(B)”.

14 (52) Subparagraph (F) of section 11801(c)(12)
15 of the Revenue Reconciliation Act of 1990 shall be
16 applied as if “and (3)” appeared instead of “and
17 (E)”.

18 (53) Subparagraph (A) of section 11801(c)(22)
19 of the Revenue Reconciliation Act of 1990 shall be
20 applied as if “chapters 21” appeared instead of
21 “chapter 21” in the material proposed to be
22 stricken.

23 (54) Paragraph (3) of section 11812(b) of the
24 Revenue Reconciliation Act of 1990 shall be applied

1 by not executing the amendment therein to the
2 heading of section 42(d)(5)(B).

3 (55) Clause (i) of section 11813(b)(9)(A) of the
4 Revenue Reconciliation Act of 1990 shall be applied
5 as if a comma appeared after “(3)(A)(ix)” in the
6 material proposed to be stricken.

7 (56) Subparagraph (F) of section 11813(b)(13)
8 of the Revenue Reconciliation Act of 1990 shall be
9 applied as if “tax” appeared after “investment” in
10 the material proposed to be stricken.

11 (57) Paragraph (19) of section 11813(b) of the
12 Revenue Reconciliation Act of 1990 shall be applied
13 as if “Paragraph (20) of section 1016(a), as redesign-
14 nated by section 11801,” appeared instead of “Para-
15 graph (21) of section 1016(a)”.

16 (58) Paragraph (5) section 8002(a) of the Sur-
17 face Transportation Revenue Act of 1991 shall be
18 applied as if “4481(e)” appeared instead of
19 “4481(c)”.

20 (59) Section 7872 is amended—

21 (A) by striking “foregone” each place it
22 appears in subsections (a) and (e)(2) and in-
23 serting “forgone”, and

24 (B) by striking “FOREGONE” in the head-
25 ing for subsection (e) and the heading for para-

1 graph (2) of subsection (e) and inserting “FOR-
2 GONE”.

3 (60) Paragraph (7) of section 7611(h) is
4 amended by striking “appropriate” and inserting
5 “appropriate”.

6 (61) The heading of paragraph (3) of section
7 419A(c) is amended by striking “SEVERENCE” and
8 inserting “SEVERANCE”.

9 (62) Clause (ii) of section 807(d)(3)(B) is
10 amended by striking “Commissioners’ ” and insert-
11 ing “Commissioners’ ”.

12 (63) Subparagraph (B) of section 1274A(c)(1)
13 is amended by striking “instrument” and inserting
14 “instrument”.

15 (64) Subparagraph (B) of section 724(d)(3) by
16 striking “Subparagraph” and inserting “Subpara-
17 graph”.

18 (65) The last sentence of paragraph (2) of sec-
19 tion 42(c) is amended by striking “of 1988”.

20 (66) Paragraph (1) of section 9707(d) is
21 amended by striking “diligence,” and inserting “dili-
22 gence”.

23 (67) Subsection (c) of section 4977 is amended
24 by striking “section 132(g)(2)” and inserting “sec-
25 tion 132(h)”.

1 (68) The last sentence of section 401(a)(20) is
2 amended by striking “section 211” and inserting
3 “section 521”.

4 (69) Subparagraph (A) of section 402(g)(3) is
5 amended by striking “subsection (a)(8)” and insert-
6 ing “subsection (e)(3)”.

7 (70) The last sentence of section 403(b)(10) is
8 amended by striking “an direct” and inserting “a di-
9 rect”.

10 (71) Subparagraph (A) of section 4973(b)(1) is
11 amended by striking “sections 402(c)” and inserting
12 “section 402(c)”.

13 (72) Paragraph (12) of section 3405(e) is
14 amended by striking “(b)(3)” and inserting
15 “(b)(2)”.

16 (73) Paragraph (41) of section 521(b) of the
17 Unemployment Compensation Amendments of 1992
18 shall be applied as if “section” appeared instead of
19 “sections” in the material proposed to be stricken.

20 (74) Paragraph (27) of section 521(b) of the
21 Unemployment Compensation Amendments of 1992
22 shall be applied as if “Section 691(c)(5)” appeared
23 instead of “Section 691(c)”.

1 (75) Paragraph (5) of section 860F(a) is
2 amended by striking “paragraph (1)” and inserting
3 “paragraph (2)”.

4 (76) Paragraph (1) of section 415(k) is amend-
5 ed by adding “or” at the end of subparagraph (C),
6 by striking subparagraphs (D) and (E), and by re-
7 designating subparagraph (F) as subparagraph (D).

8 (77) Paragraph (2) of section 404(a) is amend-
9 ed by striking “(18),”.

10 (78) Clause (ii) of section 72(p)(4)(A) is
11 amended to read as follows:

12 “(ii) SPECIAL RULE.—The term
13 ‘qualified employer plan’ shall not include
14 any plan which was (or was determined to
15 be) a qualified employer plan or a govern-
16 ment plan.”

17 (79) Sections 461(i)(3)(C) and
18 1274(b)(3)(B)(i) are each amended by striking “sec-
19 tion 6662(d)(2)(C)(ii)” and inserting “section
20 6662(d)(2)(C)(iii)”.

21 (80) Subsection (a) of section 164 is amended
22 by striking the paragraphs relating to the genera-
23 tion-skipping tax and the environmental tax imposed
24 by section 59A and by inserting after paragraph (3)
25 the following new paragraphs:

1 “(4) The GST tax imposed on income distribu-
2 tions.

3 “(5) The environmental tax imposed by section
4 59A.”

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