

114TH CONGRESS
2D SESSION

S. 2775

To amend the Internal Revenue Code of 1986 to make technical corrections,
and for other purposes.

IN THE SENATE OF THE UNITED STATES

APRIL 11, 2016

Mr. HATCH (for himself and Mr. WYDEN) introduced the following bill; which
was read twice and referred to the Committee on Finance

A BILL

To amend the Internal Revenue Code of 1986 to make
technical corrections, 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; TABLE OF CONTENTS; ETC.**

4 (a) **SHORT TITLE.**—This Act may be cited as the
5 “Technical Corrections Act of 2016”.

6 (b) **AMENDMENT.**—Except as otherwise expressly
7 provided, whenever in this Act an amendment or repeal
8 is expressed in terms of an amendment to, or repeal of,
9 a section or other provision, the reference shall be consid-

1 ered to be made to a section or other provision of the In-
 2 ternal Revenue Code of 1986.

3 (c) TABLE OF CONTENTS.—The table of contents for
 4 this Act is as follows:

- Sec. 1. Short title; table of contents; etc.
- Sec. 2. Amendments relating to Protecting Americans from Tax Hikes Act of 2015.
- Sec. 3. Amendment relating to Consolidated Appropriations Act, 2016.
- Sec. 4. Amendments relating to Fixing America’s Surface Transportation Act.
- Sec. 5. Amendments relating to Surface Transportation and Veterans Health Care Choice Improvement Act of 2015.
- Sec. 6. Amendments relating to Stephen Beck, Jr., ABLE Act of 2014.
- Sec. 7. Amendment relating to American Taxpayer Relief Act of 2012.
- Sec. 8. Amendment relating to United States–Korea Free Trade Agreement Implementation Act.
- Sec. 9. Clerical corrections.
- Sec. 10. Deadwood-related provisions.

5 **SEC. 2. AMENDMENTS RELATING TO PROTECTING AMERI-**
 6 **CANS FROM TAX HIKES ACT OF 2015.**

7 (a) AMENDMENT RELATING TO SECTION 105.—Sec-
 8 tion 132(f)(6)(A) is amended by striking the second sen-
 9 tence.

10 (b) AMENDMENTS RELATING TO SECTION 121.—
 11 Section 41(c) is amended—

12 (1) by striking paragraph (4), and

13 (2) by striking the last sentence of paragraph

14 (5)(C).

15 (c) AMENDMENTS RELATING TO SECTION 143.—

16 (1) Section 168(k)(2)(B)(i)(III) is amended by
 17 inserting “binding” before “contract”.

18 (2) Section 168(k)(5)(F) is amended—

1 (A) by striking “(or is grafted to a plant
2 that has already been planted before such
3 date)”,

4 (B) by inserting “or grafted” after “which
5 is planted”, and

6 (C) by striking “(or so grafted)” in clauses
7 (i) and (ii) and inserting “or grafted”.

8 (3) Section 168(k)(6) is amended to read as fol-
9 lows:

10 “(6) PHASE-DOWN.—In the case of qualified
11 property placed in service by the taxpayer after De-
12 cember 31, 2017 (December 31, 2018, in the case
13 of property described in subparagraph (2)(B) or
14 (C)), paragraph (1)(A) shall be applied by sub-
15 stituting for ‘50 percent’—

16 “(A) ‘40 percent’ in the case of—

17 “(i) property placed in service in 2018
18 (other than property described in subpara-
19 graph (2)(B) or (C)), and

20 “(ii) property described in subpara-
21 graph (2)(B) or (C) which is placed in
22 service in 2019, and

23 “(B) ‘30 percent’ in the case of—

1 “(i) property placed in service in 2019
2 (other than property described in subpara-
3 graph (2)(B) or (C)), and

4 “(ii) property described in subpara-
5 graph (2)(B) or (C) which is placed in
6 service in 2020.”.

7 (4) Section 168(k)(7) is amended by striking
8 “paragraphs (1) and (2)(F)” and inserting “para-
9 graphs (1), (2)(F), and (4)”.

10 (d) AMENDMENTS RELATING TO SECTION 202.—

11 (1) Section 6722(c)(3)(A) is amended by strik-
12 ing “filed” in the flush matter at the end and insert-
13 ing “furnished”.

14 (2) Section 202(e) of the Protecting Americans
15 from Tax Hikes Act of 2015 is amended by striking
16 “provided” and inserting “furnished”.

17 (e) AMENDMENTS RELATING TO SECTION 203.—

18 (1) Section 6109(i)(1)(B) is amended by strik-
19 ing “Internal Revenue Service” and inserting “Inter-
20 nal Revenue Service, a community-based certified ac-
21 ceptance agent approved by the Secretary,”.

22 (2) Section 6109(i)(3) is amended—

23 (A) in subparagraph (A)—

1 (i) by inserting “ending after the
2 issuance of such number” before the period
3 at the end of the first sentence, and

4 (ii) by striking “on the last day of
5 such third consecutive taxable year” and
6 inserting “on the day after the due date
7 for the return of tax for such third con-
8 secutive taxable year”, and

9 (B) by striking subparagraph (B)(ii) and
10 inserting the following:

11 “(ii) if the individual does not file a
12 return of tax (or is not included as a de-
13 pendent on the return of tax of another
14 taxpayer) for 3 consecutive taxable years
15 at least one of which ends after December
16 18, 2015, the due date for the return of
17 tax for such third consecutive taxable
18 year.”.

19 (3) Section 203(f) of the Protecting Americans
20 from Tax Hikes Act of 2015 is amended by striking
21 “The amendments” and inserting “Except to the ex-
22 tent provided in section 6109(i)(3) of the Internal
23 Revenue Code of 1986, the amendments”.

1 (f) AMENDMENTS RELATING TO SECTION 204.—Sec-
2 tion 204(b) of the Protecting Americans from Tax Hikes
3 Act of 2015 is amended—

4 (1) by striking paragraph (2), and

5 (2) by striking so much as precedes “amend-
6 ment made by this section” and inserting the fol-
7 lowing: “(b) EFFECTIVE DATE.—The”.

8 (g) AMENDMENTS RELATING TO SECTION 205.—

9 (1) Section 24(e)(2) is amended by striking
10 “identifying number” and inserting “taxpayer identi-
11 fication number”.

12 (2) Section 205(c) of such Act is amended—

13 (A) by striking paragraph (2), and

14 (B) by striking so much as precedes “shall
15 apply to any return of tax” and inserting the
16 following: “(c) EFFECTIVE DATE.—The amend-
17 ments made by this section”.

18 (h) AMENDMENTS RELATING TO SECTION 206.—

19 Section 206(b) of such Act is amended—

20 (1) by striking “Except as provided in para-
21 graph (2), the amendment” in paragraph (1) and in-
22 serting “The amendment”, and

23 (2) by striking paragraph (2) and redesignating
24 paragraph (3) as paragraph (2).

1 (i) AMENDMENT RELATING TO SECTION 209.—Sec-
2 tion 209(d)(2) of the Protecting Americans from Tax
3 Hikes Act of 2015 is amended by striking “amendment
4 made by subsection (b)” and inserting “amendments made
5 by subsections (b) and (c)”.

6 (j) AMENDMENTS RELATED TO SECTIONS 102, 206,
7 207, 208, AND 211.—

8 (1) Section 25A(b)(1) is amended—

9 (A) in subparagraph (A) by striking
10 “\$1,000” and inserting “\$2,000”, and

11 (B) in subparagraph (B)—

12 (i) by striking “50 percent” and in-
13 serting “25 percent”,

14 (ii) by striking “\$1,000” and insert-
15 ing “\$2,000”, and

16 (iii) by striking “the applicable limit”
17 and inserting “\$4,000”.

18 (2) Subparagraphs (A) and (C) of section
19 25A(b)(2) are amended by striking “2” in the head-
20 ing and text of each subparagraph and inserting
21 “4”.

22 (3) Section 25A(b)(4) is amended to read as
23 follows:

1 “(4) RESTRICTIONS ON TAXPAYERS WHO IM-
2 PROPERLY CLAIMED AMERICAN OPPORTUNITY TAX
3 CREDIT IN PRIOR YEARS.—

4 “(A) TAXPAYERS MAKING PRIOR FRAUDU-
5 LENT OR RECKLESS CLAIMS.—

6 “(i) IN GENERAL.—No American Op-
7 portunity Tax Credit shall be allowed
8 under this section for any taxable year in
9 the disallowance period.

10 “(ii) DISALLOWANCE PERIOD.—For
11 purposes of subparagraph (A), the dis-
12 allowance period is—

13 “(I) the period of 10 taxable
14 years after the most recent taxable
15 year for which there was a final deter-
16 mination that the taxpayer’s claim of
17 the American Opportunity Tax Credit
18 under this section was due to fraud,
19 and

20 “(II) the period of 2 taxable
21 years after the most recent taxable
22 year for which there was a final deter-
23 mination that the taxpayer’s claim of
24 the American Opportunity Tax Credit
25 under this section was due to reckless

1 or intentional disregard of rules and
2 regulations (but not due to fraud).

3 “(B) TAXPAYERS MAKING IMPROPER
4 PRIOR CLAIMS.—In the case of a taxpayer who
5 is denied the American Opportunity Tax Credit
6 under this section for any taxable year as a re-
7 sult of the deficiency procedures under sub-
8 chapter B of chapter 63, no American Oppor-
9 tunity Tax Credit shall be allowed under this
10 section for any subsequent taxable year unless
11 the taxpayer provides such information as the
12 Secretary may require to demonstrate eligibility
13 for such credit.”.

14 (4) Section 25A(d) is amended to read as fol-
15 lows:

16 “(d) LIMITATIONS BASED ON MODIFIED ADJUSTED
17 GROSS INCOME.—

18 “(1) AMERICAN OPPORTUNITY TAX CREDIT.—

19 The American Opportunity Tax Credit (determined
20 without regard to this paragraph) shall be reduced
21 (but not below zero) by the amount which bears the
22 same ratio to such credit (as so determined) as—

23 “(A) the excess of—

24 “(i) the taxpayer’s modified adjusted
25 gross income for such taxable year, over

1 “(ii) \$80,000 (\$160,000 in the case of
2 a joint return), bears to

3 “(B) \$10,000 (\$20,000 in the case of a
4 joint return).

5 “(2) LIFETIME LEARNING CREDIT.—The Life-
6 time Learning Credit (determined without regard to
7 this paragraph) shall be reduced (but not below
8 zero) by the amount which bears the same ratio to
9 such credit (as so determined) as—

10 “(A) the excess of—

11 “(i) the taxpayer’s modified adjusted
12 gross income for such taxable year, over

13 “(ii) \$40,000 (\$80,000 in the case of
14 a joint return), bears to

15 “(B) \$10,000 (\$20,000 in the case of a
16 joint return).

17 “(3) MODIFIED ADJUSTED GROSS INCOME.—
18 For purposes of this subsection, the term ‘modified
19 adjusted gross income’ means the adjusted gross in-
20 come of the taxpayer for the taxable year increased
21 by any amount excluded from gross income under
22 section 911, 931, or 933.”.

23 (5) Section 25A(f)(1) is amended by adding at
24 the end the following new subparagraph:

1 “(D) REQUIRED COURSE MATERIALS
 2 TAKEN INTO ACCOUNT FOR AMERICAN OPPOR-
 3 TUNITY TAX CREDIT.—For purposes of deter-
 4 mining the American Opportunity Tax Credit,
 5 subparagraph (A) shall be applied by sub-
 6 stituting ‘tuition, fees, and course materials’ for
 7 ‘tuition and fees.’”.

8 (6) Section 25A(g)(1) is amended—

9 (A) by striking “No credit” and inserting
 10 the following:

11 “(A) IN GENERAL.—No credit”, and

12 (B) by adding at the end the following new
 13 subparagraph:

14 “(B) ADDITIONAL IDENTIFICATION RE-
 15 QUIREMENTS WITH RESPECT TO AMERICAN OP-
 16 PORTUNITY TAX CREDIT.—

17 “(i) STUDENT.—The requirements of
 18 subparagraph (A) shall not be treated as
 19 met with respect to the American Oppor-
 20 tunity Tax Credit unless the individual’s
 21 taxpayer identification number was issued
 22 on or before the due date for filing the re-
 23 turn of tax for the taxable year.

24 “(ii) TAXPAYER.—No American Op-
 25 portunity Tax Credit shall be allowed

1 under this section if the taxpayer identi-
2 fication number of the taxpayer was issued
3 after the due date for filing the return for
4 the taxable year.

5 “(iii) INSTITUTION.—No American
6 Opportunity Tax Credit shall be allowed
7 under this section unless the taxpayer in-
8 cludes the employer identification number
9 of any institution to which qualified tuition
10 and related expenses were paid with re-
11 spect to the individual.”.

12 (7) Section 25A(h) is amended to read as fol-
13 lows:

14 “(h) INFLATION ADJUSTMENT.—

15 “(1) IN GENERAL.—In the case of a taxable
16 year beginning after 2001, the \$40,000 and \$80,000
17 amounts in subsection (d)(2) shall each be increased
18 by an amount equal to—

19 “(A) such dollar amount, multiplied by

20 “(B) the cost-of-living adjustment deter-
21 mined under section 1(f)(3) for the calendar
22 year in which the taxable year begins, deter-
23 mined by substituting ‘calendar year 2000’ for
24 ‘calendar year 1992’ in subparagraph (B)
25 thereof.

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

5 (8) Section 25A(i) is amended to read as fol-
6 lows:

7 “(i) PORTION OF AMERICAN OPPORTUNITY TAX
8 CREDIT MADE REFUNDABLE.—40 percent of so much of
9 the credit allowed under subsection (a) as is attributable
10 to the American Opportunity Tax Credit (determined after
11 application of subsection (d) and without regard to this
12 paragraph and section 26(a)) shall be treated as a credit
13 allowable under subpart C (and not allowed under sub-
14 section (a)). The preceding sentence shall not apply to any
15 taxpayer for any taxable year if such taxpayer is a child
16 to whom subsection (g) of section 1 applies for such tax-
17 able year.”.

18 (9) The heading for section 25A is amended by
19 striking “**HOPE**” and inserting “**AMERICAN OP-**
20 **PORTUNITY**”.

21 (10) The item relating to section 25A in the
22 table of contents for subpart A of part IV of sub-
23 chapter A of chapter 1 is amended to read as fol-
24 lows:

“Sec. 25A. American Opportunity and Lifetime Learning credits.”.

1 (11) The heading for section 25A(b) is amend-
2 ed by striking “HOPE SCHOLARSHIP CREDIT” and
3 inserting “AMERICAN OPPORTUNITY TAX CREDIT”.

4 (12) The heading for section 25A(b)(2) is
5 amended by striking “HOPE SCHOLARSHIP CREDIT”
6 and inserting “AMERICAN OPPORTUNITY TAX CRED-
7 IT”.

8 (13) The heading for section 25A(c)(2)(A) is
9 amended by striking “HOPE SCHOLARSHIP” and in-
10 serting “AMERICAN OPPORTUNITY TAX CREDIT”.

11 (14) Section 25A, as amended by the preceding
12 provisions of this Act, is amended by striking “Hope
13 Scholarship Credit” each place it appears in the text
14 and inserting “American Opportunity Tax Credit”.

15 (15) The heading for section 529(c)(3)(B)(v) is
16 amended by striking “HOPE” and inserting “AMER-
17 ICAN OPPORTUNITY”.

18 (16) The heading for section 530(d)(2)(C) is
19 amended by striking “HOPE” and inserting “AMER-
20 ICAN OPPORTUNITY”.

21 (17) Section 6211(b)(4)(A), as amended by this
22 Act, is amended by striking “subsection (i)(5)” and
23 inserting “subsection (i)”.

24 (18) Section 6213(g)(2)(Q) is amended to read
25 as follows:

1 “(Q) an omission of information required
2 by section 25A(b)(4)(B) or an entry on the re-
3 turn claiming the American Opportunity Tax
4 Credit for a taxable year for which such credit
5 is disallowed under section 25A(b)(4)(A).”.

6 (19) Section 207(b)(1) of the Protecting Ameri-
7 cans from Tax Hikes Act of 2015 is amended by
8 striking “the American opportunity tax credit under
9 section 25A(i) of such Code” and inserting “the
10 American Opportunity Tax Credit under section 25A
11 of such Code”.

12 (k) AMENDMENT RELATING TO SECTION 311.—The
13 last sentence of section 355(h)(2)(B) is amended by strik-
14 ing “80 percent” both places it appears and inserting “at
15 least 80 percent”.

16 (l) AMENDMENTS RELATING TO SECTION 322.—

17 (1) Section 897(k)(2) is amended—

18 (A) by striking so much of subparagraph
19 (B) as precedes “amounts realized by the quali-
20 fied shareholder” and inserting the following:

21 “(B) EXCEPTION.—In the case of a quali-
22 fied shareholder with 1 or more applicable in-
23 vestors—

24 “(i) subparagraph (A)(i) shall not
25 apply to the applicable percentage of the

1 stock of the real estate investment trust
2 held by the qualified shareholder, and

3 “(ii) the applicable percentage of the”,
4 and

5 (B) by adding at the end the following new
6 subparagraph:

7 “(F) APPLICABLE PERCENTAGE.—For
8 purposes of subparagraph (B), the term ‘appli-
9 cable percentage’ means the percentage of the
10 value of the interests (other than interests held
11 solely as a creditor) in the qualified shareholder
12 held by applicable investors.”.

13 (2) Section 897(k)(2)(E) is amended by strik-
14 ing “and (C)” and inserting “and (D)”.

15 (3) Section 897(k)(3)(B)(i) is amended by
16 striking so much as precedes “for a reduced rate of
17 withholding” and inserting the following:

18 “(i) which—

19 “(I) is eligible for benefits under
20 the comprehensive income tax treaty
21 described in subparagraph (A)(i)(I),
22 but only if the dividends article of
23 such treaty imposes conditions on the
24 benefits allowable in the case of divi-

1 dends paid by a real estate investment
2 trust, and
3 “(II) is eligible under such trea-
4 ty”.

5 (4) Section 897(k)(3)(B)(ii) is amended—

6 (A) by inserting “and” at the end of sub-
7 clause (II), and

8 (B) by striking “United States corpora-
9 tion” in subclause (III) and inserting “domestic
10 corporation”.

11 (5) Section 322 of the Protecting Americans
12 from Tax Hikes Act of 2015 is amended by striking
13 subsections (b)(2) and (c)(3), and the Internal Rev-
14 enue Code of 1986 shall be applied as if such sub-
15 sections, and amendments made thereby, had never
16 been enacted.

17 (6) Section 322(c)(2) of such Act is amended
18 by striking “take effect on” and inserting the fol-
19 lowing: “apply with respect to testing periods (as de-
20 fined in section 897(h)(4)(D) of the Internal Rev-
21 enue Code of 1986) ending on or after”.

22 (m) EFFECTIVE DATE.—The amendments made by
23 this section shall take effect as if included in the provision
24 of the Protecting Americans from Tax Hikes Act of 2015
25 to which they relate.

1 **SEC. 3. AMENDMENT RELATING TO CONSOLIDATED APPRO-**
2 **PRIATIONS ACT, 2016.**

3 (a) AMENDMENT RELATING TO SECTION 305 OF DI-
4 VISION P.—Section 199(c)(3)(C)(i) is amended by striking
5 “under subsection (d)(9)(B)” and inserting “(as defined
6 in subsection (d)(9)(B))”.

7 (b) EFFECTIVE DATE.—The amendment made by
8 this section shall take effect as if included in section 305
9 of division P of the Consolidated Appropriations Act,
10 2016.

11 **SEC. 4. AMENDMENTS RELATING TO FIXING AMERICA’S**
12 **SURFACE TRANSPORTATION ACT.**

13 (a) AMENDMENTS RELATING TO SECTION 32101.—
14 Section 7345(e)(1) is amended—

15 (1) by striking “or the Tax Court” and insert-
16 ing “, or against the Commissioner in the Tax
17 Court,” and

18 (2) by adding at the end the following: “For
19 purposes of the preceding sentence, the court first
20 acquiring jurisdiction over such an action shall have
21 sole jurisdiction.”.

22 (b) EFFECTIVE DATE.—The amendments made by
23 this section shall take effect as if included in section
24 32101 of the Fixing America’s Surface Transportation
25 Act.

1 **SEC. 5. AMENDMENTS RELATING TO SURFACE TRANSPOR-**
2 **TATION AND VETERANS HEALTH CARE**
3 **CHOICE IMPROVEMENT ACT OF 2015.**

4 (a) AMENDMENT RELATING TO SECTION 2004.—

5 Section 6662(k) is amended to read as follows:

6 “(k) INCONSISTENT ESTATE BASIS REPORTING.—

7 For purposes of this section, there is an ‘inconsistent es-
8 tate basis’ if the adjusted basis of property (to which sec-
9 tion 1014(f) applies) claimed on a return exceeds the
10 amount that would have been so claimed if the basis of
11 such property had been properly determined under such
12 section.”.

13 (b) AMENDMENTS RELATING TO SECTION 2008.—

14 Section 9503(e)(2) is amended—

15 (1) by striking “per gallon” in subparagraph
16 (C) and inserting “per energy equivalent of a gallon
17 of diesel (as defined in section 4041(a)(2)(D))”, and

18 (2) by striking “per gallon” in subparagraph
19 (D) and inserting “per energy equivalent of a gallon
20 of gasoline (as defined in section 4041(a)(2)(C))”.

21 (c) EFFECTIVE DATE.—The amendments made by
22 this section shall take effect as if included in the provision
23 of the Surface Transportation and Veterans Health Care
24 Choice Improvement Act of 2015 to which they relate.

1 **SEC. 6. AMENDMENTS RELATING TO STEPHEN BECK, JR.,**
2 **ABLE ACT OF 2014.**

3 (a) AMENDMENTS RELATING TO SECTION 208.—
4 Section 208(h) of the Stephen Beck, Jr., ABLE Act of
5 2014 is amended—

6 (1) by striking so much as precedes “made by
7 this section” and inserting the following:

8 “(h) EFFECTIVE DATE.—

9 “(1) IN GENERAL.—Except as provided in para-
10 graph (2), the amendments”,

11 (2) by inserting “, and statements required to
12 be furnished,” after “returns required to be filed”,
13 and

14 (3) by adding at the end the following new
15 paragraph:

16 “(2) SUBSECTION (c).—The amendment made
17 by subsection (c) shall apply to returns or claims for
18 refund filed after December 31, 2014.”.

19 (b) EFFECTIVE DATE.—The amendments made by
20 this section shall take effect as if included in section 208
21 of the Stephen Beck, Jr., ABLE Act of 2014.

22 **SEC. 7. AMENDMENT RELATING TO AMERICAN TAXPAYER**
23 **RELIEF ACT OF 2012.**

24 (a) AMENDMENT RELATING TO SECTION 104.—Sec-
25 tion 6211(b)(4)(A) is amended by striking “subsection
26 (i)(6)” and inserting “subsection (i)(5)”.

1 (b) EFFECTIVE DATE.—The amendment made by
2 this section shall take effect as if included in section 104
3 of the American Taxpayer Relief Act of 2012.

4 **SEC. 8. AMENDMENT RELATING TO UNITED STATES–KOREA**
5 **FREE TRADE AGREEMENT IMPLEMENTATION**
6 **ACT.**

7 (a) AMENDMENT RELATING TO SECTION 501.—Sec-
8 tion 501(b) of the United States–Korea Free Trade
9 Agreement Implementation Act is amended by striking
10 “returns required to be filed” and inserting “documents
11 prepared”.

12 (b) EFFECTIVE DATE.—The amendment made by
13 this section shall take effect as if included in section 501
14 of the United States–Korea Free Trade Agreement Imple-
15 mentation Act.

16 **SEC. 9. CLERICAL CORRECTIONS.**

17 (a) Section 24(d) is amended by redesignating para-
18 graph (5) as paragraph (3).

19 (b)(1) Section 42(f)(5)(B)(ii)(I) is amended by strik-
20 ing “(d)(6)(C)” and inserting “(d)(6)(B)”.

21 (2) Section 42(k)(2)(B) is amended by striking
22 “(d)(6)(B)” and inserting “(d)(6)(C)”.

23 (3) Section 42(d)(4)(C)(i) is amended by striking “as
24 defined in paragraph (5)(C)” and inserting “as defined
25 in paragraph (5)(B)(ii)”.

1 (4) Section 42(m)(1)(B)(ii)(III) is amended by strik-
2 ing “as defined in subsection (d)(5)(C)” and inserting “as
3 defined in subsection (d)(5)(B)(ii)”.

4 (c) Section 48(a)(6)(B) is amended by striking
5 “property energy property” and inserting “energy prop-
6 erty”.

7 (d) Section 58(a)(2)(A) is amended by striking
8 “461(j)” and inserting “461(k)”.

9 (e) Section 139E(c)(3) is amended by striking
10 “2013” and inserting “2014”.

11 (f) Section 168(e)(3)(C)(i) is amended by striking
12 “and”.

13 (g) Section 199 is amended by striking so much of
14 subsection (a) as precedes “There shall be allowed” and
15 inserting “(a) ALLOWANCE OF DEDUCTION.—”.

16 (h) The second sentence of section 355(h)(2)(B) is
17 amended by striking “of assets”.

18 (i)(1) Section 461 is amended by redesignating the
19 second subsection (j) (relating to farming syndicate de-
20 fined) as subsection (k).

21 (2) Section 461(i)(4) is amended by striking “sub-
22 section (j)” and inserting “subsection (k)”.

23 (j) Section 464(d)(2)(B)(iii) is amended by striking
24 “subsection (c)(2)(E)” and inserting “section
25 461(k)(2)(E)”.

1 (k) Section 852(a)(1)(B) is amended by striking
2 “265,” and inserting “265 and”.

3 (l) Subparagraphs (A) and (B) of section 856(e)(7)
4 are each amended by striking “paragraph (4)(B)(iii)” and
5 inserting “paragraph (4)(B)(iv)”.

6 (m) Paragraphs (1), (3), (4), and (5) of section
7 856(m) are each amended by striking “subsection
8 (c)(4)(B)(iii)” and inserting “subsection (c)(4)(B)(iv)”.

9 (n) Section 864(d)(8) is amended by striking “section
10 956(b)(3)” and inserting “section 956(e)(3)”.

11 (o) The heading for section 897(k)(2) is amended by
12 striking “USRPI” and inserting “UNITED STATES REAL
13 PROPERTY INTEREST”.

14 (p) Subparagraphs (B) and (C) of section 1256(e)(3)
15 are each amended by striking “section 464(e)(2)” and in-
16 serting “section 461(k)(4)”.

17 (q) Section 1400F(d) is amended by striking “for
18 ‘December 31, 2014.’” and inserting “for ‘December 31,
19 2016.’”.

20 (r)(1) Subsections (e) and (i) of section 7422 and sec-
21 tions 3121(b)(5)(E), 6110(j)(1)(B), 7428(a), and
22 7430(c)(6) are each amended by striking “United States
23 Claims Court” and inserting “United States Court of Fed-
24 eral Claims”.

1 (2) Subsections (a), (b), and (c)(1)(C)(iii) of section
2 7428 are each amended by striking “Claims Court” and
3 inserting “Court of Federal Claims”.

4 (3) The heading for section 4961(c)(1) is amended
5 by striking “UNITED STATES CLAIMS COURT” and insert-
6 ing “UNITED STATES COURT OF FEDERAL CLAIMS”.

7 (s) Section 4980I(b)(3)(C)(v) is amended by striking
8 “for for” and inserting “for”.

9 (t) Subchapter C of chapter 63 is amended—

10 (1) by striking “**PART 1—PROCEDURE**” and
11 inserting “**PART III—PROCEDURE**”, and

12 (2) by striking “**PART 2—DEFINITIONS AND**
13 **SPECIAL RULES**” and inserting “**PART IV—DEFI-**
14 **NITIONS AND SPECIAL RULES**”.

15 (u) Section 32103(a) of the Fixing America’s Surface
16 Transportation Act is amended by striking “section
17 52106” and inserting “section 32102”.

18 (v) Section 6213(g)(2)(P) is amended—

19 (1) by striking “section 24(h)(2)” and inserting
20 “section 24(g)(2)”, and

21 (2) by striking “subsection (h)(1)” and insert-
22 ing “subsection (g)(1)”.

23 (w) Section 6235(a) is amended by striking “sub-
24 part” and inserting “subchapter”.

1 (x) Section 6501(m) is amended by striking “any
2 election” and all that follows through “(or any” and in-
3 serting the following: “any election under section
4 30B(h)(9), 30C(e)(4), 30D(e)(4), 35(g)(11), 40(f), 43,
5 45B, 45C(d)(4), 45H(g), or 51(j) (or any”.

6 (y) Each of the following sections are amended by
7 inserting “an amount equal to” after “increased by” and
8 by inserting “for the calendar year” after “section
9 1(f)(3)”:

10 (1) Section 6651(i).

11 (2) Section 6652(c)(7)(A).

12 (3) Section 6695(h)(1).

13 (4) Section 6698(e)(1).

14 (5) Section 6699(e)(1).

15 (6) Section 6721(f)(1).

16 (7) Section 6722(f)(1).

17 (z) The heading for section 6676(c) is amended by
18 striking “REASONABLE BASIS” and inserting “REASON-
19 ABLE CAUSE”.

20 (aa) Section 6700(a) is amended by striking “the
21 \$1,000” and inserting “\$1,000”.

22 (bb) Section 9503(c)(5) is amended by striking “and
23 before October 1, 2011,”.

24 (cc) Section 302 of division P of the Consolidated Ap-
25 propriations Act, 2016 is amended—

1 (1) in subsection (a), by inserting “of the Inter-
 2 nal Revenue Code of 1986” after “section
 3 48(a)(5)(C)”, and

4 (2) in subsection (b), by inserting “of such
 5 Code” after “section 48(a)”.

6 **SEC. 10. DEADWOOD-RELATED PROVISIONS.**

7 (a) Section 25A(e)(1) is amended by striking
 8 “(\$5,000 in the case of taxable years beginning before
 9 January 1, 2003)”.

10 (b) Section 56(d)(1)(A)(ii)(I) is amended by inserting
 11 “(as in effect before its repeal by the Tax Increase Preven-
 12 tion Act of 2014)” after “section 172(b)(1)(H)”.

13 (c) Section 139(c)(2) is amended by striking “section
 14 165(h)(3)(C)(i)” and inserting “section 165(i)(5)(A)”.

15 (d) Section 163(d)(4) is amended by striking sub-
 16 paragraph (E).

17 (e) Section 530(b)(3) is amended—

18 (1) by striking “(as defined in section
 19 170(e)(6)(F)(i))” in subparagraph (A)(iii), and

20 (2) by adding at the end the following new sub-
 21 paragraph:

22 “(C) COMPUTER TECHNOLOGY OR EQUIP-
 23 MENT.—The term ‘computer technology or
 24 equipment’ means computer software (as de-
 25 fined by section 197(e)(3)(B)), computer or pe-

1 ripheral equipment (as defined by section
2 168(i)(2)(B)), and fiber optic cable related to
3 computer use.”.

4 (f) Section 810(b) is amended by striking paragraph
5 (4).

6 (g) Section 856(m) is amended by striking paragraph
7 (6).

8 (h)(1) Section 1252(a)(1) is amended by striking
9 “during a taxable year beginning”.

10 (2) Section 1252(a)(1)(A) is amended—

11 (A) by striking “sections” and inserting “sec-
12 tion”, and

13 (B) by striking “and 182” and all that follows
14 through “Tax Reform Act of 1986”).

15 (3) Section 1252(a)(2) is amended—

16 (A) by striking “sections” and inserting “sec-
17 tion”, and

18 (B) by striking “or 182” and all that follows
19 and inserting a period.

20 (i) Section 7448(d) is amended by striking “at 4 per-
21 cent per annum to December 31, 1947, and 3 percent per
22 annum thereafter” and inserting “at 3 percent per
23 annum”.

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