

106TH CONGRESS
1ST SESSION

S. 892

To amend the Internal Revenue Code of 1986 to permanently extend the subpart F exemption for active financing income.

IN THE SENATE OF THE UNITED STATES

APRIL 27, 1999

Mr. HATCH (for himself, Mr. BAUCUS, Mr. MACK, Mr. BRYAN, Mr. MURKOWSKI, and Mr. BREAUX) 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 permanently extend the subpart F exemption for active financing income.

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. PERMANENT SUBPART F EXEMPTION FOR AC-**
4 **TIVE FINANCING INCOME.**

5 (a) BANKING, FINANCING, OR SIMILAR BUSI-
6 NESSES.—Subsection (h) of section 954 of the Internal
7 Revenue Code of 1986 (relating to special rule for income
8 derived in the active conduct of banking, financing, or
9 similar businesses) is amended by striking paragraph (9).

1 (b) INSURANCE BUSINESSES.—Subsection (a) of sec-
2 tion 953 of such Code (defining insurance income) is
3 amended by striking paragraph (10) and by redesignating
4 paragraph (11) as paragraph (10).

5 (c) EFFECTIVE DATE.—The amendments made by
6 this section shall apply to taxable years of a foreign cor-
7 poration beginning after December 31, 1998, and to tax-
8 able years of United States shareholders with or within
9 which such taxable years of such foreign corporation end.

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