

112TH CONGRESS
2D SESSION

H. R. 5705

To amend the Internal Revenue Code of 1986 to permanently modify the limitations on the deduction of interest by financial institutions which hold tax-exempt bonds, and for other purposes.

IN THE HOUSE OF REPRESENTATIVES

MAY 9, 2012

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

A BILL

To amend the Internal Revenue Code of 1986 to permanently modify the limitations on the deduction of interest by financial institutions which hold tax-exempt bonds, 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.**

4 This Act may be cited as the “Municipal Bond Mar-
5 ket Support Act of 2012”.

1 **SEC. 2. PERMANENT MODIFICATION OF SMALL ISSUER EX-**
2 **CEPTION TO TAX-EXEMPT INTEREST EX-**
3 **PENSE ALLOCATION RULES FOR FINANCIAL**
4 **INSTITUTIONS.**

5 (a) PERMANENT INCREASE IN LIMITATION.—Sub-
6 paragraphs (C)(i), (D)(i), and (D)(iii)(II) of section
7 265(b)(3) of the Internal Revenue Code of 1986 are each
8 amended by striking “\$10,000,000” and inserting
9 “\$30,000,000”.

10 (b) PERMANENT MODIFICATION OF OTHER SPECIAL
11 RULES.—Paragraph (3) of section 265(b) of the Internal
12 Revenue Code of 1986 is amended—

13 (1) by redesignating clauses (iv), (v), and (vi)
14 of subparagraph (G) as clauses (ii), (iii), and (iv) of
15 such subparagraph, respectively, and

16 (2) by striking so much of subparagraph (G) as
17 precedes such clauses and inserting the following:

18 “(G) QUALIFIED 501(c)(3) BONDS TREAT-
19 ED AS ISSUED BY EXEMPT ORGANIZATION.—In
20 the case of a qualified 501(c)(3) bond (as de-
21 fined in section 145), this paragraph shall be
22 applied by treating the 501(c)(3) organization
23 for whose benefit such bond was issued as the
24 issuer.

25 “(H) SPECIAL RULE FOR QUALIFIED
26 FINANCINGS.—

1 “(i) IN GENERAL.—In the case of a
2 qualified financing issue—

3 “(I) subparagraph (F) shall not
4 apply, and

5 “(II) any obligation issued as a
6 part of such issue shall be treated as
7 a qualified tax-exempt obligation if
8 the requirements of this paragraph
9 are met with respect to each qualified
10 portion of the issue (determined by
11 treating each qualified portion as a
12 separate issue which is issued by the
13 qualified borrower with respect to
14 which such portion relates).”.

15 (c) INFLATION ADJUSTMENT.—Paragraph (3) of sec-
16 tion 265(b) of the Internal Revenue Code of 1986, as
17 amended by subsection (b), is amended by adding at the
18 end the following new subparagraph:

19 “(I) INFLATION ADJUSTMENT.—In the
20 case of any calendar year after 2012, the
21 \$30,000,000 amounts contained in subpara-
22 graphs (C)(i), (D)(i), and (D)(iii)(II) shall each
23 be increased by an amount equal to—

24 “(i) such dollar amount, multiplied by

1 “(ii) the cost-of-living adjustment de-
2 termined under section 1(f)(3) for such
3 calendar year, determined by substituting
4 ‘calendar year 2011’ for ‘calendar year
5 1992’ in subparagraph (B) thereof.

6 Any increase determined under the preceding
7 sentence shall be rounded to the nearest mul-
8 tiple of \$100,000.”.

9 (d) EFFECTIVE DATE.—The amendments made by
10 this section shall apply to obligations issued after the date
11 of the enactment of this Act.

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