

HR 4151

Fairness, Simplification and Competitiveness for American Business Act of 2002

Congress: 107 (2001–2003, Ended)

Chamber: House

Policy Area: Taxation

Introduced: Apr 10, 2002

Current Status: Referred to the House Committee on Ways and Means.

Latest Action: Referred to the House Committee on Ways and Means. (Apr 10, 2002)

Official Text: <https://www.congress.gov/bill/107th-congress/house-bill/4151>

Sponsor

Name: Rep. Houghton, Amo [R-NY-31]

Party: Republican • **State:** NY • **Chamber:** House

Cosponsors

No cosponsors are listed for this bill.

Committee Activity

Committee	Chamber	Activity	Date
Ways and Means Committee	House	Referred To	Apr 10, 2002

Subjects & Policy Tags

Policy Area:

Taxation

Related Bills

No related bills are listed.

Fairness, Simplification and Competitiveness for American Business Act of 2002 - Revises Internal Revenue Code (the Code) rules relating to U.S. businesses operating abroad.

Revises provisions concerning treatment of controlled foreign corporations, including: (1) expanding the de minimis rule; (2) excluding from the definition of "foreign base company oil related income" the pipeline transportation of oil or gas within such foreign country; (3) repealing rules applicable to foreign personal holding companies and foreign investment companies; and (4) amending the definition of foreign personal holding company income to include income from certain personal services contracts and sale of such contracts.

Sets forth provisions concerning foreign tax credit, including: (1) extending the period in which excess foreign taxes may be carried; (2) defining overall domestic loss and setting forth provisions for determining taxable income for any taxpayer sustaining such a loss; (3) issuing special rules relating to financial services income; (4) dictating rules for the treatment of dividends from certain corporations and extending the look-through treatment for such corporations; (5) extending the carryforward period for foreign tax credits; (6) repealing the limitation of such credits under the alternative minimum tax; and (7) eliminating limitation on such credits with regard to oil or gas extraction taxes.

Makes other revisions, including: (1) expanding the deduction for dividends from foreign corporations with U.S. income; (2) exempting certain foreign corporations from uniform capitalization rules; (3) setting forth provisions concerning airline mileage awards to certain foreign persons; and (4) repealing the special capital gains tax on nonresident aliens.

Permits, for interest allocation rule purposes, treating each electing worldwide affiliated group as an affiliated group, subject to exceptions.

Makes permanent the subpart F exception for active income financing (presently, the exception expires for taxable years beginning after December 31, 2006).

Repeals provisions of the FSC Repeal and Extraterritorial Income Exclusion Act of 2000 (which amended the Code) which, subject to exception, excluded from extraterritorial income from gross income.

Actions Timeline

- **Apr 10, 2002:** Introduced in House
- **Apr 10, 2002:** Introduced in House
- **Apr 10, 2002:** Sponsor introductory remarks on measure. (CR E485)
- **Apr 10, 2002:** Referred to the House Committee on Ways and Means.