

ID: CCA_2019061914364532

UILC: 195.00-00

Number: **201927021**

Release Date: 7/5/2019

From: [REDACTED]

Sent: Wednesday, June 19, 2019 2:36:45 PM

To: [REDACTED]

Cc: [REDACTED]

Bcc:

Subject: RE: Start-up Expenses - PUBWE-111132-19

Hi . In addition to the JCT report and the statutory language of section 195(b)(3), the following also supports the office's position that the increased amounts in section 195(b)(3) were only for the taxable year beginning in 2010:

1. The Senate Finance's Summary of the Small Business Jobs Act states "For the taxable year beginning in 2010, this bill would **temporarily** increase the amount of start-up expenditures that may be deducted to \$10,000 subject to a \$60,000 phase-out threshold." (emphasis added).
2. Pages 28-29 of the CRS report to Congress on Small Business Legislation: H.R. 3854 and H.R. 5297, provides that these increased amounts are available in the 2010 tax year only.