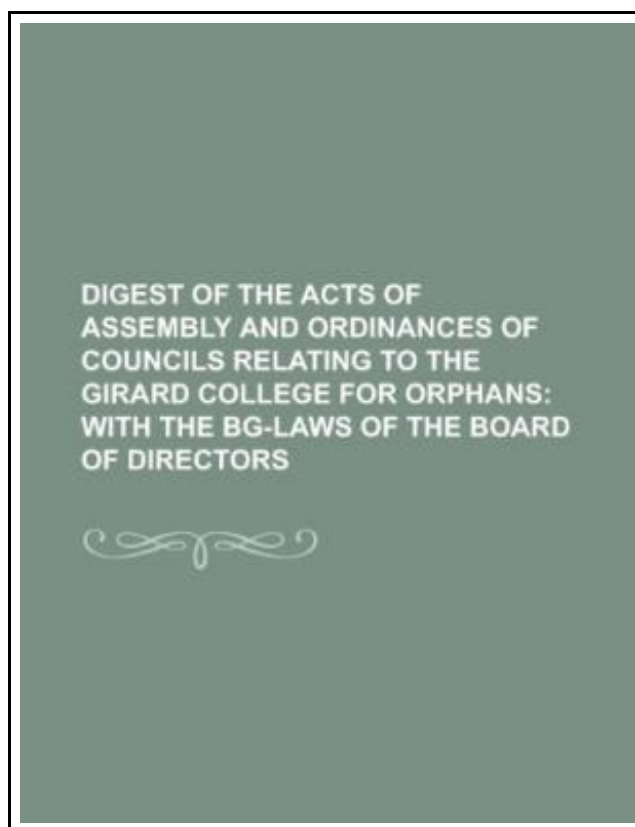


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RareBooksClub. Paperback. Book Condition: New. This item is printed on demand. Paperback. 120 pages. Original publisher: Washington, D. C. : U. S. Govt. Accountability Office, 2009 OCLC Number: (OCoLC)549459881 Subject: Research and development tax credit -- United States. Excerpt: . . . 1. All members of the same controlled group of corporations shall be treated as a single taxpayer, 6 and 2. The credit (if any) allowable under this section to each such member shall be its proportionate share of the qualified research expenses and basic research payments giving rise to the credit. Congress directed that Treasury regulations drafted to implement these aggregation rules be consistent with these stated principles. As discussed in a later section, some tax practitioners say that Treasurys regulations on this issue are unnecessarily burdensome. One of the key measures that we will use to compare credit designs is the The Marginal Incentive marginal effective rate (MER) of the credit, which quantifies the incentive Provided by the Research that a credit provides to marginal spending and which can be simply stated Tax Credit as MER change in the credit benefit marginal qualified research expenses (QREs) The MER is the same as the marginal rate of incentive that we presented in figure 1. It measures the reduction in the after-tax price of marginal research due to the credit. In the example of a flat credit with a 20-percent statutory rate shown in that figure, the taxpayer received 20 when it increased its spending by 100, giving it an MER of 20 percent (the credit 7 reduces the price of marginal research by 20 percent). However, factors other than just the statutory rate of a tax credit can also be important in determining its marginal incentive. Measures that take those...



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