

104TH CONGRESS
1ST SESSION

S. 1106

To amend the Internal Revenue Code of 1986 to provide the same insurance reserve treatment to financial guaranty insurance as applies to mortgage guaranty insurance, lease guaranty insurance, and tax-exempt bond insurance.

IN THE SENATE OF THE UNITED STATES

AUGUST 2 (legislative day, JULY 10), 1995

Mr. D'AMATO (for himself and Mr. MOYNIHAN) 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 provide the same insurance reserve treatment to financial guaranty insurance as applies to mortgage guaranty insurance, lease guaranty insurance, and tax-exempt bond insurance.

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. INSURANCE RESERVE RULES FOR FINANCIAL**
4 **GUARANTY INSURANCE.**

5 (a) IN GENERAL.—Section 832(e)(6) of the Internal
6 Revenue Code of 1986 is amended—

1 (1) by inserting “or a company which writes
2 financial guaranty insurance” after “section 103” in
3 the first sentence, and

4 (2) in the second sentence—

5 (A) by inserting “and to financial guaranty
6 insurance” after “section 103,”,

7 (B) by inserting “financial guaranty insur-
8 ance or ” after “in the case of”, and

9 (C) by inserting “such financial guaranty
10 or” after “revenues related to”.

11 (b) CONFORMING AMENDMENT.—The heading for
12 section 832(e)(6) of such Code is amended by inserting
13 “; FINANCIAL GUARANTY INSURANCE” after “OBLIGA-
14 TIONS”.

15 (c) EFFECTIVE DATE.—The amendments made by
16 this section shall apply to taxable years beginning after
17 December 31, 1995.

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