

**AMENDMENT TO RULES COMMITTEE PRINT 115-
39
OFFERED BY MR. DOGGETT OF TEXAS**

Page 385, strike line 1 and all that follows through page 386, line 2.

Page 388, after line 19, insert the following:

1 (a) **SHORT TITLE.**—The amendments made by this
2 section may be cited as the “Stop the Outsourcing of
3 American Jobs Amendment”.

Page 388, starting line 18, strike “**WITH FOREIGN HIGH RETURNS**” and insert “**OF NET CFC INCOME**”.

Page 389, line 1, strike “**FOREIGN HIGH RETURN AMOUNT**” and insert “**NET CFC INCOME**”.

Page 389, starting line 7, striking “50 percent of such shareholder’s foreign high return amount for such taxable year” and insert “such shareholder’s net CFC income for such taxable year”.

Page 389, line 10, strike “**FOREIGN HIGH RETURN AMOUNT**” and all that follows through “**NET CFC TESTED**” on page 390, line 14.

Page 390, line 16, strike “tested”.

Page 390, line 21, strike “tested” and insert “specified”.

Page 391, line 5, strike “tested” and insert “specified”.

Page 391, line 13, strike “TESTED INCOME; TESTED LOSS” and insert “SPECIFIED INCOME; SPECIFIED LOSS”.

Page 391, line 15, strike “TESTED” and insert “SPECIFIED”.

Page 391, line 15, strike “tested” and insert “specified”.

Page 392, starting line 15, strike “foreign high return amount” and insert “net CFC income”.

Page 392, line 19, strike “any gross income” and all that follows through “(VI)” on page 393, line 5.

Page 393, line 10, insert “and” after the comma.

Page 393, line 11, strike “(VII)” and insert “(V)”.

Page 393, line 13, strike “and” and insert “over”.

Page 393, strike lines 14 and 15.

Page 393, line 22, strike “TESTED” and insert “SPECIFIED”.

Page 393, line 22, strike “tested” and insert “specified”.

Page 394, strike line 4 and all that follows through “(f)” on page 397, line 10, and insert “(c)”.

Page 398, line 12, strike “(g)” and insert “(d)”.

Page 398, line 16, strike “(h)” and insert “(e)”.

Page 398, line 19, strike “any foreign high return amount” and insert “any net CFC income”.

Page 399, line 3, strike “ENTIRE FOREIGN HIGH RETURN” and all that follows through “(3)” on line 11.

Page 399, starting line 16, strike “foreign high return amount” and insert “net CFC income”.

Page 399, line 19, strike “foreign high return amount” and insert “net CFC income”.

Page 399, line 23, strike “tested” and insert “specified”.

Page 399, line 25, strike “tested” and insert “specified”.

Page 400, line 1, strike “foreign high return amount” and insert “net CFC income”.

Page 400, starting line 2, strike “foreign high return amount” and insert “net CFC income”.

Page 400, line 9, strike “(c)(1)(A)” and insert “(b)(1)(A)”.

Page 400, line 11, strike “(4)” and insert “(3)”.

Page 400, line 23, strike “(c)(1)(A)” and insert “(b)(1)(A)”.

Page 401, line 2, strike “(c)(1)(B)” and insert “(b)(1)(B)”.

Page 401, line 12, strike “TESTED” and insert “SPECIFIED”.

Page 401, line 17, strike “80 percent of”.

Page 401, starting line 18, strike “foreign high return percentage” and insert “CFC income percentage”.

Page 401, line 20, strike “tested” and insert “specified”.

Page 401, line 24, strike “FOREIGN HIGH RETURN PERCENTAGE” and insert “CFC INCOME PERCENTAGE”.

Page 401, starting line 25, strike “foreign high return percentage” and insert “CFC income percentage”.

Page 402, starting line 4, strike “foreign high return amount” and insert “net CFC income”.

Page 402, line 8, strike “section 951A(c)(1)(A)” and insert “section 951A(b)(1)(A)”.

Page 402, line 10, strike “TESTED” and insert “SPECIFIED”.

Page 402, line 11, strike “tested” and insert “specified”.

Page 402, line 17, strike “section 951A(c)(2)(A)(i)” and insert “section 951A(b)(2)(A)(i)”.

Page 403, starting line 20, strike “(determined by substituting ‘100 percent’ for ‘80 percent’ in such section)”.

Page 403, starting line 23, strike “foreign high return amount” and insert “net CFC income”.

Page 404, line 2, strike “Section 170(b)(2)(D)” and all that follows through “(4)” on page 405, line 11.

Page 405, line 18, strike “(5)” and insert “(2)”.

Page 405, line 23, strike “(6)” and insert “(3)”.

Page 406, in the item after line 2, strike “Foreign high return amount” and insert “Net CFC income”.

