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APPENDIX C

Estimates of Tax Liabilities for Four Tax Base Variants for 1953

NOTES TO TABLE 5

Column 2. The tax liability figures presented in Table 5 differ somewhat from those published in *Statistics of Income* for 1953. To make the estimates presented in columns 3 and 4, an estimate of the tax base and its distribution was necessary. Since *Statistics of Income* for 1953 includes no data on the tax base itself, it was necessary to compute a tax base from the available data and recompute the 1953 tax liability to insure comparability between column 2 and columns 3 and 4. The published estimate of individual income tax liability, based on figures reported on tax returns, is \$29,431 million. Our computed figure is \$29,366 million, a difference of 0.22 per cent.

To obtain our estimate we constructed a frequency distribution of returns by AGI less deductions and number of exemptions. AGI less deductions was obtained by subtracting personal deductions (estimated as described in Appendix B) from the amount of AGI reported on taxable returns in each income group, and dividing by the number of returns in that group. The amount of error resulting from the use of averages was relatively small, since the available data permitted computations on the basis of twenty-five income groups, which made for small class intervals.

A somewhat arbitrary rearranging of the frequencies by exemption classes was necessary to include exemptions for age and blindness. *Statistics of Income* classifies the frequencies only by the number of ordinary exemptions. We therefore had to apportion the blind and aged exemptions among the regular exemption classes to obtain figures of total exemptions per return. In each adjusted gross income group, blind and aged exemptions were assumed to be claimed only on returns with one, two, or three regular exemptions. Blind and aged exemptions were distributed in the following manner: one-sixth into the class with one regular exemption; one-half into the class with two; and one-third into the class with three. The number of blind and aged exemptions claimed somewhat exceeded the number of returns with such exemptions. The excess was assigned to the two-regular-exemption class, but no return was assumed to have more than two blind and aged exemp-

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tions. Once the blind and aged exemptions had thus been assigned to ordinary exemption classes, the number of returns affected were shifted into a correspondingly higher exemption class, and the result was a distribution of returns by total number of exemptions. The procedure just described was carried out separately for joint returns, since they cannot have less than two regular exemptions. It was assumed that 60 per cent of the returns with blind and aged exemptions fell into the class with two regular exemptions, and the rest into that with three regular exemptions.

The alternative tax returns were allocated, for each income group, among the exemption classes in the same proportion as the total number of returns in that income group were distributed among the exemption classes.

The next step was to obtain average taxable income for the frequencies in each cell by subtracting from its average AGI less deductions the value of the exemption. By multiplying the average taxable income by the corresponding frequencies, and summing the amounts thus obtained for each cell, we obtained an aggregate tax base from which tax liabilities could be computed.

Columns 3, 4, and 5. The estimates of total tax liability due on taxable returns when only exemptions are allowed were made by the same method as that for column 2, except that we subtracted the amount of exemptions from average AGI rather than average AGI less deductions for each income group of the distribution. For column 4, we simply computed the tax liability on the average AGI less deductions in each AGI group and multiplied this by the frequencies in the group.

For column 5, the adjusted gross income itself, as reported on taxable returns, constituted the tax base.

The four tax bases underlying the figures in Table 5 are presented in Tables C-1 to C-4, distributed by rate brackets and AGI groups. From the table the reader will be able to repeat our computations with such alternate sets of bracket rates as he might find of interest or consider more appropriate.

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TABLE C-1, *concluded*
 Taxable Net Income, by Rate Brackets and by Adjusted Gross Income Groups, 1953
(thousands of dollars)

AGI GROUP	Net Income ^a	Total			RATE BRACKETS	
		Taxable Net Income ^a	0-2	2-4	4-6	6-8
Under 2	3,368,136	3,368,136				
2-3	7,561,161	7,561,161				
3-5	28,607,318	25,933,123	2,674,195			
5-10	46,161,260	39,028,785	6,436,512	621,884	74,079	
10-20	14,264,812	5,763,418	5,555,606	2,004,734	590,256	202,804
20-50	9,758,112	1,570,938	1,570,938	1,570,938	1,570,938	1,371,834
50-100	3,198,446	226,116	226,116	226,116	226,116	226,116
100-500	1,678,610	55,936	55,936	55,936	55,936	55,936
500 and over	291,438	1,728	1,728	1,728	1,728	1,728
Total	114,889,293	83,509,341	16,521,031	4,481,336	2,519,053	1,858,418
			RATE BRACKETS			
		38-44	44-50	50-60	60-70	70-80
						80-90
Under 2						
2-3						
3-5						
5-10						
10-20						
20-50						
50-100						
100-500						
500 and over						
Total	208,551	144,960	154,499	75,720	58,487	43,740

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TABLE C-1, concluded

AGI GROUP	RATE BRACKETS						<i>Capital Gains Subject to Alternative Tax:</i>
	10-12	12-14	14-16	16-18	18-20	20-22	
Under 2							
2-3							
3-5							
5-10	72,328	64,890	10,776	96,255	76,837	41,702	61,336
10-20	644,270	627,772	463,726	226,116	226,116	226,116	84,040
20-50							6,588
50-100	226,116	226,116	226,116	55,936	55,936	375,582	171,502
100-500	55,936	55,936	55,936	1,728	1,728	111,872	44,772
500 and over	1,728						
Total	1,000,378	976,442	758,282	380,035	360,617	325,482	552,246
201							
Under 2							
2-3							
3-5							
5-10							1,294
10-20							85,080
20-50							189,848
50-100							307,872
100-500	27,530		53,608		8,300	4,673	137,802
500 and over	8,640		43,103		23,838	138,097	
Total	36,170		96,711		32,138	142,770	721,896

a Excludes capital gains subject to alternative tax which appear in the last column.

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TABLE C-2
Taxable Net Income if Deductions Had Not Been Allowed,
by Rate Brackets and by Adjusted Gross Income Groups, 1933
(thousands of dollars)

AGI GROUP	Total Taxable Net Income ^a	RATE BRACKETS				
		0-2	2-4	4-6	6-8	8-10
Under 2	4,469,087	246,585	61,653	238,353	18,928	
2-3	9,749,027	9,502,442	5,947,589	1,198,568	239,580	
3-5	36,756,189	30,746,947	11,716,105	3,409,293	1,570,938	1,570,938
5-10	56,980,575	43,736,699	5,759,790	1,570,938	226,116	226,116
10-20	16,697,018	5,763,418	1,570,938	55,936	55,936	55,936
20-50	11,095,575	1,570,938	226,116	55,936	1,728	1,728
50-100	3,684,308	55,936	1,728	6,601,174	3,286,619	2,133,276
100-500	2,055,101					
500 and over	388,991					
Total	141,875,871	96,073,311	25,524,787			
				RATE BRACKETS		
		38-44	44-50	50-60	60-70	70-80
						80-90
Under 2						
2-3						
3-5						
5-10						
10-20						
20-50						
50-100						
100-500						
500 and over						
Total	217,764	217,764	270,832	142,742	75,720	75,720

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TABLE C-2, concluded

AGI GROUP	RATE BRACKETS						<i>Capital Gains Subject to Alternative Tax</i>
	10-12	12-14	14-16	16-18	18-20	20-22	
<i>Under 2</i>							
2-3							
3-5							
5-10							
10-20	158,275	72,528	64,920	10,796	102,738	83,440	85,042
20-50	1,072,851	631,606	628,705	481,753	226,116	226,116	452,232
50-100	226,116	226,116	226,116	226,116	226,116	226,116	507,549
100-500	55,936	55,936	55,936	55,936	55,936	55,936	55,782
500 and over	1,728	1,728	1,728	1,728	1,728	1,728	167,808
Total	1,514,906	987,714	977,405	776,329	386,513	367,220	51,184
							5,184
<i>2-3</i>							
3-5							
5-10							
10-20							
20-50							
50-100							
100-500	65,229		112,658		25,200		13,085
500 and over	8,640		43,200		43,200		216,191
Total	73,869		155,858		68,400		229,276
							721,896

a Excludes capital gains subject to alternative tax which appear in the last column.

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TABLE C-3
Taxable Net Income if Exemptions Had Not Been Allowed,
by Rate Brackets and by Adjusted Gross Income Groups, 1953
(*thousands of dollars*)

AGI GROUP	<i>Total Taxable Net Income</i>	RATE BRACKETS			
		0-2	2-4	4-6	8-10
Under 2	8,212,607	8,212,607	892,011	81,435	7,846
2-3	15,462,179	14,570,168	7,001,185	1,481,160	1,250,702
3-5	54,962,321	47,879,801	21,520,440	4,008,607	1,570,938
5-10	70,925,941	47,701,116	5,763,418	1,570,938	1,570,938
10-20	17,269,327	15,763,418	1,570,938	226,116	226,116
20-50	10,615,345	1,570,938	226,116	55,936	55,936
50-100	3,318,682	226,116	55,936	55,936	55,936
100-500	1,707,331	55,936	1,728	1,728	1,728
500 and over	292,285	1,728	1,728	1,728	1,728
Total	182,765,918	125,981,828	37,031,772	7,425,920	3,320,799
			RATE BRACKETS		
		38-44	44-50	50-60	60-70
					70-80
					80-90
Under 2					
2-3					
3-5					
5-10					
10-20					
20-50					
50-100					
100-500					
500 and over					
Total	217,764	149,278	170,629	75,720	61,441

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TABLE C-3, concluded

ACI GROUP	RATE BRACKETS							<i>Capital Gains Subject to Alternative Tax</i>
	10-12	12-14	14-16	16-18	18-20	20-22	22-26	
<i>Under 2</i>								
2-3								
3-5								
5-10	105,904	72,412	40,524					
10-20	960,372	631,606	599,292	252,076	86,932	62,249	61,386	88,348
20-50	226,116	226,116	226,116	226,116	226,116	226,116	422,036	237,199
50-100	55,936	55,936	55,936	55,936	55,936	55,936	111,872	44,772
100-500	1,728	1,728	1,728	1,728	1,728	1,728	3,456	167,808
500 and over							5,184	5,184
Total	1,350,056	987,798	923,596	535,856	370,712	346,029	598,700	498,539
								236,208
<i>90-100</i>								
<i>100-150</i>								
<i>150-200</i>								
<i>200 and over</i>								
<i>Under 2</i>								
2-3								
3-5								
5-10								
10-20								
20-50								
50-100								
100-500	27,530		56,223		8,388		4,856	
500 and over	8,640		43,200		24,112		138,573	
Total	36,170		99,423		32,500		143,429	
								721,896

^a Excludes capital gains subject to alternative tax which appear in the last column.

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TABLE C-4
Taxable Net Income if neither Deductions nor Exemptions Had Been Allowed,
by Rate Brackets and by Adjusted Gross Income Groups, 1953
(thousands of dollars)

AGI GROUP	Total Taxable Net Income ^a	RATE BRACKETS			
		0-2	2-4	4-6	6-8
Under 2	9,313,411	9,313,411	2,199,795	762,388	491,617
2-3	17,650,047	15,450,252	11,408,919	3,424,076	83,797
3-5	63,113,542	50,942,235	30,076,651	5,597,709	1,514,482
5-10	81,757,257	47,681,116	5,763,418	1,570,938	625,632
10-20	19,699,545	5,763,418	1,570,938	1,570,938	1,570,938
20-50	11,952,384	226,116	226,116	226,116	226,116
50-100	3,804,480	55,936	55,936	55,936	55,936
100-500	2,083,631	1,728	1,728	1,728	1,728
500 and over	389,840				
Total	209,764,137	131,005,150	51,303,501	11,638,891	3,860,817
					RATE BRACKETS
Under 2	38-44	44-50	50-60	60-70	70-80
2-3					80-90
3-5					
5-10					
10-20					
20-50					
50-100					
100-500					
500 and over					
Total	217,764	217,764	286,256	156,987	75,720

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TABLE C-4, concluded

ACI GROUP	RATE BRACKETS					
	10-12	12-14	14-16	16-18	18-20	20-22
Under 2						
2-3						
3-5						
5-10	249,467	72,412	40,595	272,739	89,018	110,465
10-20	1,570,938	648,514	631,606	603,495	226,116	226,116
20-50	226,116	226,116	226,116	226,116	55,936	452,232
50-100	55,936	55,936	55,936	55,936	55,936	562,029
100-500	1,728	1,728	1,728	1,728	1,728	111,872
500 and over						167,808
Total	2,104,185	1,004,706	987,798	927,870	556,519	3,456
RATE BRACKETS						
90-100		100-150		150-200		200 and over
Capital Gains Subject to Alternative Tax						
Under 2						
2-3						
3-5						
5-10						
10-20						
20-50						
50-100						
100-500	67,080		117,196	25,350	13,495	1,294
500 and over	8,640		43,200	43,200	217,040	85,080
Total	75,720		160,396	68,550	230,535	185,848
						307,872
						187,802
						721,896

^a Excludes capital gains subject to alternative tax which appear in the last column.