

Combined Reporting Discussion Guide

For each item in italics, members will first develop pros, and then cons.

1. Who is in the taxable group?
 - a. Unitary group
 - i. What percentage of ownership determines control?
 - ii. *Worldwide*
 - iii. *Water's edge*
 - iv. *Worldwide / water's edge election*
 - b. *Affiliated group election?*
 - c. How long do elections last?
2. Apportionment
 - a. *Joyce*
 - b. *Finnigan*
 - c. *Throwback / throwout?*
 - d. *100% allocation of nonoperational income?*
 - e. *Single sales for everyone?*
 - f. *Maintain single sales for manufacturers?*
3. *Only allow credits and NOLs at the member level?*
4. *Disallow effect of activity of non-nexus members prior to the start of combined reporting?*
5. *Allow for effect of combined reporting on financial statements?*
6. For which tax year after enactment should combined reporting be effective?
7. *Should the corporate income tax rate be adjusted?*
8. Resources for the Comptroller's Office
9. *Mandate electronic filing?*
10. *Adopt combined reporting?*