

103<sup>D</sup> CONGRESS  
2<sup>D</sup> SESSION

# H. R. 4747

To amend the Internal Revenue Code of 1986 to allow claims for credits and refunds in certain cases where the statute of limitations is open for the assessment of a deficiency.

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## IN THE HOUSE OF REPRESENTATIVES

JULY 13, 1994

Mr. MORAN introduced the following bill; which was referred to the Committee on Ways and Means

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## A BILL

To amend the Internal Revenue Code of 1986 to allow claims for credits and refunds in certain cases where the statute of limitations is open for the assessment of a deficiency.

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. CLAIMS FOR CREDITS AND REFUNDS PER-**

4 **MITTED IN CERTAIN CASES WHERE STATUTE**

5 **OF LIMITATIONS IS OPEN FOR ASSESSMENT**

6 **OF DEFICIENCY.**

7 (a) IN GENERAL.—Subsection (d) of section 6511 of

8 the Internal Revenue Code of 1986 (relating to limitations

1 on credit or refund) is amended by adding at the end the  
2 following new paragraph:

3 “(7) SPECIAL PERIOD OF LIMITATION WHERE STAT-  
4 UTE IS OPEN FOR ASSESSMENT OF DEFICIENCY.—If  
5 the claim for credit or refund relates to an overpay-  
6 ment of the tax imposed by subtitle A with respect  
7 to a taxable year for which an assessment of a defi-  
8 ciency may be made by reason of 6501(e), in lieu of  
9 the 3-year period referred to in subsection (a), the  
10 limitation shall be 6 years.”

11 (b) EFFECTIVE DATE.—The amendment made by  
12 subsection (a) shall apply to taxable years with respect to  
13 which the statute of limitations for the assessment of a  
14 deficiency has not expired before the date of the enactment  
15 of this Act.

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