

19-1 March 02, 2020

## **FINANCE MEMORANDUM**

### **Application of IRC §280F Limits to Sport Utility Vehicles**

This Finance Memorandum supersedes Finance Memorandum 18-1 and is intended to provide guidance to taxpayers and tax professionals in complying with the New York City tax provisions enacted in 2004 limiting the depreciation and first year expense deductions for sport utility vehicles ("SUVs").

**Background.** Section 280F of the Internal Revenue Code ("IRC") limits the amount a taxpayer may take as a depreciation deduction under IRC sections 167 or 168 for a passenger automobile. IRC section 280F imposes the same limitations on the amount that a taxpayer may deduct in lieu of depreciation under IRC section 179. (Collectively the "280F limits".) Under IRC section 280F(d)(5), a "passenger automobile" is generally defined as a four-wheeled vehicle "which is manufactured primarily for use on public streets, roads or highways, and which is rated at 6000 pounds unloaded gross weight or less." IRC §280F(d)(5)(i) and (ii). Because SUVs are typically rated at more than 6000 pounds unloaded gross vehicle weight, the 280F limits do not apply to many SUVs.

**New York City Decoupling Provisions for SUVs.** Part S of Chapter 60 of the Laws of 2004 applies the 280F limits to all SUVs, regardless of weight, for purposes of the New York City General Corporation Tax ("GCT"), Unincorporated Business Tax ("UBT") and Banking Corporation Tax ("Bank Tax") for tax years beginning on and after January 1, 2004 (the "City SUV limits"). A similar limitation is incorporated in the Business Corporation Tax enacted as Part D of Chapter 60 of the Laws of 2015 and effective for tax years beginning on or after January 1, 2015. On the sale or other disposition of an SUV subject to the City SUV limits, the taxpayer must adjust any gain or loss to be included in City entire net income to reflect the applicable City SUV limits on the taxpayer's depreciation and section 179 deductions.

**IRC Section 179.** The American Jobs Creation Act of 2004, P.L. 108-357, (the "AJCA") amended IRC section 179 to limit the amount that a taxpayer may deduct for an SUV in lieu of depreciation to \$25,000 rather than the \$100,000 amount that would otherwise apply. IRC § 179(b)(5). The AJCA is effective for SUVs placed into service on or after October 22, 2004. See AJCA § 910(b). For tax years beginning after 2018, this limit is adjustable for inflation. IRC Section 179(b)(6)(A) as amended by Tax Cuts and Jobs Act of 2017.

SUV Defined. The \$25,000 limit on the section 179 deductions for SUVs does not affect the City SUV limits. However, in completing Form NYC-399Z until further notice, taxpayers may rely on the definition of a "sport utility vehicle" enacted by the AJCA, which is as follows:

- (i) In general. The term "sport utility vehicle" means any 4-wheeled vehicle—
  - (I) which is primarily designed or which can be used to carry passengers over public streets, roads, or highways (except any vehicle operated exclusively on a rail or rails),
  - (II) which is not subject to section 280F, and
  - (III) which is rated at not more than 14,000 pounds gross vehicle weight.
- (ii) Certain vehicles excluded. Such term does not include any vehicle which—
  - (I) is designed to have a seating capacity of more than 9 persons behind the driver's seat,
  - (II) is equipped with a cargo area of at least 6 feet in interior length which is an open area or is designed for use as an open area but is enclosed by a cap and is not readily accessible directly from the passenger compartment, or
  - (III) has an integral enclosure, fully enclosing the driver compartment and load carrying device, does not have seating rearward of the driver's seat, and has no body section protruding more than 30 inches ahead of the leading edge of the windshield.

IRC §179(b)(5)(B).

Economic Stimulus Act of 2008 and other federal legislation effecting depreciation. Section 102 of the Economic Stimulus Act of 2008, Pub.L. No. 110-185, 122 Stat. 613 (Feb. 13, 2008) amended IRC section 168(k). As amended, section 168(k)(1)(A) provided a 50-percent additional first year depreciation deduction for certain new property acquired by the taxpayer after December 31, 2007, and before January 1, 2009 so long as no written binding contract for the acquisition of the property existed prior to January 1, 2008. The Economic Stimulus Act also amended §168(k)(2)(F)(i) to increase the first year depreciation allowed under §280F(a)(1)(A) by \$8,000 for passenger automobiles to which the 50-percent additional first year depreciation deduction applies.

Section 168(k) has been amended several times since 2008 to extend the years in which the 50-percent additional first year depreciation deduction is available. Consequently, the years in which the first year depreciation for passenger automobiles under §280F(a)(1)(A) is increased by \$8,000 have also been extended.

Prior to the legislation enacted in 2017, the most recent extension of the 50% bonus depreciation was enacted under Section 143 of the Protecting Americans from Tax Hikes Act of 2015, Pub. L. No. 114-113, Div Q (December 18, 2015) ("2015 PATH Act"). The 2015 PATH Act extended bonus depreciation so that it was available for property acquired and placed in service during 2015-2019; bonus depreciation was extended through 2020 for certain property with a longer production period. Under the 2015 PATH Act, the bonus depreciation is 50% for property placed in service during 2015-2017, 40% for property placed in service during 2018, and 30% for property placed in service during 2019.

The first year depreciation for passenger automobiles under §280F(a)(1)(A) is increased by \$8,000 for the 2015 tax year for certain qualified property. However, in the case of a passenger automobile placed in service after December 31, 2016, the first year additional depreciation under §280F(a)(1)(A) as modified by §168(k)(2)(F) is phased down to \$6,400 in the case of an automobile placed in service during 2018 and to \$4,800 in the case of automobile placed in service during 2019.

The Tax Cuts and Jobs Act (“Tax Cuts Act”), Pub. L. No. 115-97 has significantly changed future bonus depreciation while preserving some of the features of the 2015 PATH Act as it applies to earlier acquired property. Section 13201 of the Tax Cuts Act generally increases bonus depreciation to 100% for qualified property acquired and placed in service after September 27, 2017 and before January 1, 2023, phasing down afterwards through 2026. In the case of property acquired by the taxpayer before September 28, 2017 and placed into service before January 1, 2018, bonus depreciation remains at 50% and the phase-down of depreciation for future years remains the same. The Tax Cuts Act extends the \$8,000 increase in the first year depreciation limit on passenger automobile depreciation for vehicles placed in service before December 31, 2026. This extension is only applicable if the vehicle was acquired after September 27, 2017. However, if the vehicle was acquired before September 28, 2017 and placed in service after that date, the phase down of the first year additional depreciation enacted under the 2015 PATH Act is still applicable.

However, as explained below, the federal provisions regarding bonus depreciation will only affect the applicable City SUV limits with respect to the recovery of the costs of Qualified Resurgence Zone property under the Unincorporated Business Tax (UBT) and the Bank Tax.

The limit applicable to a passenger automobile eligible for “bonus depreciation” under IRC section 168(k) in the first year the automobile is placed in service is higher than for other passenger automobiles. However, pursuant to the generally applicable decoupling provisions with respect to bonus depreciation enacted in 2002, which apply to section 168(k) as amended in 2008, and in subsequent years, the bonus depreciation under IRC section 168(k) is only available for qualified New York Liberty Zone property and Qualified Resurgence Zone property. See NYC Local Law 17 of 2002. For GCT and Business Corporation Tax purposes since the 2008 tax year, however, SUVs cannot qualify as either Qualified New York Liberty Zone property or Qualified Resurgence Zone property. See Administrative Code of the City of New York (“Administrative Code”) §§ 11-602(8)(k), 11-602(8)(o), 11-652(8)(k) and 11-652(8)(o). Therefore, under the GCT and Business Corporation Tax, no bonus depreciation is permitted.

For UBT and Bank Tax purposes, with respect to SUV’s placed into service after December 31, 2007 and before January 1, 2020, bonus depreciation is theoretically available for Qualified New York Liberty Zone property, as defined in IRC section 1400L(b)(2), or Qualified Resurgence Zone property, as defined in sections 11-507(22) and 11-641(p) of the Administrative Code. However, in order to be “Liberty Zone property,” an SUV had to have been placed into service before January 1, 2006. Hence, an SUV placed into service in 2008 or later cannot qualify as “Liberty Zone property.” Accordingly, for UBT and Bank Tax purposes, the higher 280F limits for bonus depreciation property will apply only to SUVs that are Qualified Resurgence Zone property.

Calculation of City SUV Limits. As explained above, the applicable deduction under the City SUV

limits is based on the 280F limits that would apply if the SUV were a "passenger automobile" as defined in that section. The City SUV limits apply to depreciation deductions and IRC section 179 deductions that a taxpayer may take in tax years beginning on and after January 1, 2004 for an SUV regardless of when the SUV was placed in service.

Each year, the Internal Revenue Service publishes the applicable 280F limits for passenger automobiles placed into service during that calendar year. The limit applicable to a passenger automobile eligible for "bonus depreciation" under IRC section 168(k) (as amended by the Economic Stimulus Act of 2008, the American Recovery and Reinvestment Act of 2009, the Small Business Jobs Act, the 2010 Tax Relief Act, the 2012 Taxpayer Relief Act, the 2014 Tax Act, the 2015 PATH Act and the Tax Cuts Act) in the first year the automobile is placed in service is higher than for other passenger automobiles. However, as explained above, these higher limits will only apply for UBT and Bank Tax purposes and then only to SUVs that are Qualified Resurgence Zone property. Note also that no federal bonus depreciation of any kind was available for passenger automobiles placed into service on or after January 1, 2005 and before January 1, 2008.

The applicable 280F limit will depend on both the calendar year in which the taxpayer placed the vehicle in service and the number of taxable years the vehicle has been in use.

The 280F limits published in 2003 through 2017 for trucks and vans are slightly higher than those for standard passenger automobiles due to the use of different inflation adjustments. See Rev. Proc. 2017-29, 2017-14 IRB 1065, March 24, 2017. For 2018 and 2019, the 280F limits for trucks and vans are the same as those for passenger automobiles. See Rev. Proc. 2018-25, 2018-18 IRB 543, April 17, 2018 and Rev. Proc. 2019-26, 2019-24 IRB, May 21, 2019.

The applicable City SUV limits for tax years beginning in 2004 through 2019 are set forth in the attached New York City SUV Limitation Schedule ("Limitation Schedule"). For subsequent years, the Limitation Schedules will be updated. The updated Limitation Schedules will be available on the New York City Department of Finance website at [nyc.gov/finance](http://nyc.gov/finance).

**Special Note for UBT and Bank Tax taxpayer eligible for 100 percent bonus depreciation on SUVs.** For federal income tax purposes, taxpayers eligible for 100 percent bonus depreciation for a passenger automobile under the Tax Cuts Act face a significant issue with respect to the election of 100 percent bonus depreciation and the applicable IRC section 280F limitations. If the unadjusted depreciable basis of a passenger automobile exceeds the first year limitation under IRC section 280F(a)(1)(A)(i), the excess amount will not be a deductible depreciation expense until the *first taxable year following the recovery period* under IRC section 280F(a)(1)(B)(i). For example, a taxpayer who purchased and placed in service a passenger automobile in 2019 and who elects 100 percent bonus depreciation would be able to deduct IRC section 208F limit of \$18,100 in 2019. Any remaining basis in the automobile would not be eligible for a depreciation deduction until 2025, after the end of the automobile's recovery period. Inasmuch as for New York City UBT and Bank Tax purposes, the 280F limitations apply to all SUVs, whether or not they are passenger automobiles, the same issue will exist for UBT and Bank Tax taxpayers with SUVs eligible for 100 percent bonus depreciation. See Administrative Code §§11-507(23), 11-507(24) and 11-641(r).

In Rev. Proc. 2019-13, 2019-9 IRB, 2/13/2019, the IRS created a safe harbor to address this issue. The safe harbor allows for certain alternative methods for determining depreciation deductions for passenger automobiles that qualify for the 100% additional first year depreciation deduction under Code Sec.168(k) and that are subject to the depreciation limitations for passenger automobiles in Code Sec. 280F(a). New York City taxpayers eligible for bonus depreciation and subject to the City's SUV limits may use Rev. Proc. 2019-13 to determine City depreciation for an SUV, subject to the applicable 280F limitations. If, instead, an eligible City taxpayer elects 100 percent depreciation for an SUV, that City taxpayer will not be permitted any additional depreciation deductions for UBT or Bank Tax purposes until after the expiration of the recovery period.

The Department of Finance has issued this Finance Memorandum for the purpose of advising taxpayers and tax professionals of, and explaining the Department's current position and procedures with respect to, the issue addressed so that they may act accordingly. Finance Memoranda are advisory in nature and are merely explanatory. Finance Memoranda are not declaratory rulings or rules of the Department of Finance and do not have legal force or effect, do not set precedent and are not binding on taxpayers.

**NEW YORK CITY SUV LIMITATION SCHEDULE**

**TABLE 2004-A**

Table 2004-A summarizes the City SUV limits for tax years beginning in **2004** for SUVs built on **truck chassis** placed in service in tax years beginning in **2000 through 2004**.

| Tax Year of Use of SUV Beginning in 2004 | SUV Placed in Service in Calendar Year | City SUV Limit for SUV that is Liberty Zone or Resurgence Zone Property | City SUV Limit on SUV that is not Liberty Zone or Resurgence Zone Property |
|--|--|---|--|
| First                                    | 2004 <sup>1</sup>                      | \$10,910  | \$3,260  |
| Second                                   | 2004                                   | \$5,300   | \$5,300  |
|  | 2003 <sup>2</sup>                      | \$5,400   | \$5,400  |
| Third                                    | 2003                                   | \$3,250   | \$3,250  |
|  | 2002                                   | \$2,950   | \$2,950  |
| Fourth                                   | 2002 <sup>3</sup>                      | \$1,775   | \$1,775  |
|  | 2001 <sup>4</sup>                      | \$1,775   | \$1,775  |
| Fifth                                    | 2001                                   | \$1,775   | \$1,775  |
|  | 2000 <sup>5</sup>                      | \$1,775   | \$1,775  |

**TABLE 2004-B**

Table 2004-B summarizes the City SUV limits for tax years beginning in **2004** for SUVs built on **car chassis** placed in service in tax years beginning in **2000 through 2004**.

| Tax Year of Use of SUV Beginning in 2004 | SUV Placed in Service in Calendar Year | City SUV Limit for SUV that is Liberty Zone or Resurgence Zone Property | City SUV Limit on SUV that is not Liberty Zone or Resurgence Zone Property |
|--|--|---|--|
| First                                    | 2004                                   | \$10,610  | \$2,960  |
| Second                                   | 2004                                   | \$4,800   | \$4,800  |
|  | 2003                                   | \$4,900   | \$4,900  |
| Third                                    | 2003                                   | \$2,950   | \$2,950  |
|  | 2002                                   | \$2,950   | \$2,950  |
| Fourth                                   | 2002                                   | \$1,775   | \$1,775  |
|  | 2001                                   | \$1,775   | \$1,775  |
| Fifth                                    | 2001                                   | \$1,775   | \$1,775  |
|  | 2000                                   | \$1,775   | \$1,775  |

<sup>1</sup>The City SUV limits for vehicles placed into service during the calendar year 2004 are derived from Rev. Proc. 2004-20, 2004-13 I.R.B. 642, March 29, 2004.

<sup>2</sup>The City SUV limits for vehicles placed into service during calendar year 2003 are derived from Rev. Proc. 2003-75, 2003-2 C.B. 1018, November 10, 2003.

<sup>3</sup>The City SUV limits for vehicles placed into service during the calendar year 2002 are derived from Rev. Proc. 2002-14, 2002-1 CB 450.

<sup>4</sup>The City SUV limits for vehicles placed into service during the calendar year 2001 are derived from Rev. Proc. 2001-19, 2001-1 CB 732, February 26, 2001.

<sup>5</sup>The City SUV limits for vehicles placed into service during the calendar year 2000 are derived from Rev. Proc. 2000-18, 2000-1 CB 722, Table 1, February 28, 2000. For SUVs placed into service in year before 2000, see the 280F limits applicable for the calendar year in which the SUV was placed into service as provided by the IRS in the applicable Revenue Procedure.

**TABLE 2005-A**

Table 2005-A summarizes the City SUV limits for tax years beginning in **2005** applicable to SUVs built on **truck chassis** placed in service in tax years beginning in **2001 through 2005**.

| Tax Year of Use of SUV Beginning in 2005 | SUV Placed in Service in Calendar Year | City SUV Limit on SUV For 2005 |
|--|--|--------------------------------|
| First                                    | 2005 <sup>6</sup>                      | \$3,260                        |
| Second                                   | 2005                                   | \$5,200                        |
|  | 2004                                   | \$5,300                        |
| Third                                    | 2004                                   | \$3,150                        |
|  | 2003                                   | \$3,250                        |
| Fourth                                   | 2003                                   | \$1,975                        |
|  | 2002                                   | \$1,775                        |
| Fifth                                    | 2002                                   | \$1,775                        |
|  | 2001                                   | \$1,775                        |

**TABLE 2005-B**

Table 2005-B summarizes the City SUV limits for tax years beginning in **2005** applicable to SUVs built on **car chassis** placed in service in tax years beginning in **2001 through 2005**.

| Tax Year of Use of SUV Beginning in 2005 | SUV Placed in Service in Calendar Year | City SUV Limit on SUV For 2005 |
|--|--|--------------------------------|
| First                                    | 2005                                   | \$2,960                        |
| Second                                   | 2005                                   | \$4,700                        |
|  | 2004                                   | \$4,800                        |
| Third                                    | 2004                                   | \$2,850                        |
|  | 2003                                   | \$2,950                        |
| Fourth                                   | 2003                                   | \$1,775                        |
|  | 2002                                   | \$1,775                        |
| Fifth                                    | 2002                                   | \$1,775                        |
|  | 2001                                   | \$1,775                        |

<sup>6</sup>The City SUV limits for vehicles placed into service during the calendar year 2005 are derived from Rev. Proc. 2005-13, 2005-12 I.R.B. 759, Table 2, March 21, 2005. For the years 2001 through 2004, the city SUV limits are derived from the same sources as noted in footnotes 1 through 5. For SUVs placed into service in the year 2000, use the amounts set forth for the fifth year in the Table 2004-A. For SUVs placed into service before 2000 see footnote 5.

**TABLE 2006-A**

Table 2006-A summarizes the City SUV limits for tax years beginning in **2006** for SUVs built on **truck chassis** placed in service in tax years beginning in **2002 through 2006**.

| Tax Year of Use of SUV Beginning in 2006 | SUV Placed in Service in Calendar Year | City SUV Limit on SUV For 2006 |
|--|--|--------------------------------|
| First                                    | 2006 <sup>7</sup>                      | \$3,260                        |
| Second                                   | 2006                                   | \$5,200                        |
|  | 2005                                   | \$5,200                        |
| Third                                    | 2005                                   | \$3,150                        |
|  | 2004                                   | \$3,150                        |
| Fourth                                   | 2004                                   | \$1,875                        |
|  | 2003                                   | \$1,975                        |
| Fifth                                    | 2003                                   | \$1,975                        |
|  | 2002                                   | \$1,775                        |

**TABLE 2006-B**

Table 2006-B summarizes the City SUV limits for tax years beginning in **2006** for SUVs built on **car chassis** placed in service in tax years beginning in **2002 through 2006**.

| Tax Year of Use of SUV Beginning in 2006 | SUV Placed in Service in Calendar Year | City SUV Limit on SUV For 2006 |
|--|--|--------------------------------|
| First                                    | 2006                                   | \$2,960                        |
| Second                                   | 2006                                   | \$4,800                        |
|  | 2005                                   | \$4,700                        |
| Third                                    | 2005                                   | \$2,850                        |
|  | 2004                                   | \$2,850                        |
| Fourth                                   | 2004                                   | \$1,675                        |
|  | 2003                                   | \$1,775                        |
| Fifth                                    | 2003                                   | \$1,775                        |
|  | 2002                                   | \$1,775                        |

<sup>7</sup>The City SUV limits for vehicles placed into service during the calendar year 2006 are derived from Rev. Proc. 2006-18, 2006-12 I.R.B. 645, Table 2, March 16, 2006. For the years 2002 through 2005, the city SUV limits are derived from the same sources as noted in footnotes 1 through 3 and footnote 6. For SUVs placed into service in the year 2001, use the amount set forth for the fifth year in Table 2005-A that is derived from the source noted in footnote 4. For SUVs placed into service in the year 2000, use the amount set forth for the fifth year in Table 2004-A that is derived from the source noted in footnote 5. For SUVs placed into service before 2000, see footnote 5.



**TABLE 2007-A**

Table 2007-A summarizes the City SUV limits for tax years beginning in 2007 for SUVs built on **truck chassis** placed in service in tax years beginning in **2003 through 2007**.

| Tax Year of Use of SUV Beginning in 2007 | SUV Placed in Service in Calendar Year | City SUV Limit on SUV For 2007 |
|--|--|--------------------------------|
| First                                    | 2007 <sup>8</sup>                      | \$3,260                        |
| Second                                   | 2007                                   | \$5,200                        |
|  | 2006                                   | \$5,200                        |
| Third                                    | 2006                                   | \$3,150                        |
|  | 2005                                   | \$3,150                        |
| Fourth                                   | 2005                                   | \$1,875                        |
|  | 2004                                   | \$1,875                        |
| Fifth                                    | 2004                                   | \$1,875                        |
|  | 2003                                   | \$1,975                        |

**TABLE 2007-B**

Table 2007-B summarizes the City SUV limits for tax years beginning in 2007 for SUVs built on **car chassis** placed in service in tax years beginning in **2003 through 2007**.

| Tax Year of Use of SUV Beginning in 2007 | SUV Placed in Service in Calendar Year | City SUV Limit on SUV For 2007 |
|--|--|--------------------------------|
| First                                    | 2007                                   | \$3,060                        |
| Second                                   | 2007                                   | \$4,900                        |
|  | 2006                                   | \$4,800                        |
| Third                                    | 2006                                   | \$2,850                        |
|  | 2005                                   | \$2,850                        |
| Fourth                                   | 2005                                   | \$1,675                        |
|  | 2004                                   | \$1,675                        |
| Fifth                                    | 2004                                   | \$1,675                        |
|  | 2003                                   | \$1,775                        |

<sup>8</sup>The City limits for vehicles placed into service beginning the calendar year 2007 are derived from Rev. Proc. 2007-30, 2007-18 I.R.B. 1104, Table 2, April 13, 2007. For the years 2003 through 2006, the city SUV limits are derived from the same sources as noted in footnotes 1 through 2 and footnotes 6 through 7. For SUVs placed into service in the year 2002 use the amount set forth for the fifth year in Table 2006-A that is derived from the source noted in footnote 3. For SUVs placed into service in the year 2001, use the amounts set forth for fifth year in Table 2005-A that is derived from the source noted in footnote 4. For SUVs placed into service in the year 2000, use the amount set forth for the fifth year in Table 2004-A that is derived from the source noted in footnote 5. For SUVs placed into service before 2000, see footnote 5.

**TABLE 2008-A**

The following Table 2008-A summarizes the City SUV limits for tax years beginning in 2008 applicable to SUVs built on **truck chassis** placed in service in tax years beginning in **2004 through 2008.**<sup>9</sup>

|   | <b>SUV Placed in Service in Calendar Year</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Allowed</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Not Allowed</b> |
|---|---|--|--|
| Tax year beginning in 2008 is first year of use of SUV  | 2008  | \$11,160 <sup>10</sup>   | \$3,160  |
| Tax year beginning in 2008 is second year of use of SUV | 2008  | \$5,100  | \$5,100  |
|   | 2007  | \$5,200  | \$5,200  |
| Tax year beginning in 2008 is third year of use of SUV  | 2007  | \$3,050  | \$3,050  |
|   | 2006  | \$3,150  | \$3,150  |
| Tax year beginning in 2008 is fourth year of use of SUV | 2006  | \$1,875  | \$1,875  |
|   | 2005  | \$1,875  | \$1,875  |
| Tax year beginning in 2008 is fifth year of use of SUV  | 2005  | \$1,875  | \$1,875  |
|   | 2004  | \$1,875  | \$1,875  |

**TABLE 2008-B**

The following Table 2008-B summarizes the City SUV limits for tax years beginning in 2008 applicable to SUVs built on **car chassis** placed in service in tax years beginning in **2004 through 2008.**

|   | <b>SUV Placed in Service in Calendar Year</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Allowed</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Not Allowed</b> |
|---|---|--|--|
| Tax year beginning in 2008 is first year of use of SUV  | 2008  | \$10,960   | \$2,960  |
| Tax year beginning in 2008 is second year of use of SUV | 2008  | \$4,800  | \$4,800  |
|   | 2007  | \$4,900  | \$4,900  |
| Tax year beginning in 2008 is third year of use of SUV  | 2007  | \$2,850  | \$2,850  |
|   | 2006  | \$2,850  | \$2,850  |
| Tax year beginning in 2008 is fourth year of use of SUV | 2006  | \$1,775  | \$1,775  |
|   | 2005  | \$1,675  | \$1,675  |
| Tax year beginning in 2008 is fifth year of use of SUV  | 2005  | \$1,675  | \$1,675  |
|   | 2004  | \$1,675  | \$1,675  |

<sup>9</sup>This chart does not function differently from the charts for previous years. Column 1 was changed for clarity only.

<sup>10</sup>The City limits for vehicles placed into service beginning the calendar year 2008 are derived from Rev Proc. 2008-22, 2008-12 IRB 658, March 4, 2008. For the years 2004 through 2007, the city SUV limits are derived from the same sources as noted in footnote 1 and footnotes 6 through 8. For SUVs placed into service in the year 2003, use the amount set forth for the fifth year in Table 2007-A or Table 2007-B (if built on a car chassis) that is derived from the source noted in footnote 2. For SUVs placed into service in the year 2002 use the amount set forth for the fifth year in Table 2006-A that is derived from the source noted in footnote 3. For SUVs placed into service in the year 2001, use the amounts set forth for fifth year in Table 2005-A that is derived from the source noted in footnote 4. For SUVs placed into service in the year 2000, use the amount set forth for the fifth year in Table 2004-A that is derived from the source noted in footnote 5. For SUVs placed into service before 2000, see footnote 5.

**TABLE 2009-A**

The following Table 2009-A summarizes the City SUV limits for tax years beginning in 2009 applicable to SUVs built on **truck chassis** placed in service in tax years beginning in **2005 through 2009**.<sup>11</sup>

|   | <b>SUV Placed in Service in Calendar Year</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Allowed</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Not Allowed</b> |
|---|---|--|--|
| Tax year beginning in 2009 is first year of use of SUV  | 2009  | \$11,060 <sup>12</sup>   | \$3,060  |
| Tax year beginning in 2009 is second year of use of SUV | 2009  | \$4,900  | \$4,900  |
|   | 2008  | \$5,100  | \$5,100  |
| Tax year beginning in 2009 is third year of use of SUV  | 2008  | \$3,050  | \$3,050  |
|   | 2007  | \$3,050  | \$3,050  |
| Tax year beginning in 2009 is fourth year of use of SUV | 2007  | \$1,875  | \$1,875  |
|   | 2006  | \$1,875  | \$1,875  |
| Tax year beginning in 2009 is fifth year of use of SUV  | 2006  | \$1,875  | \$1,875  |
|   | 2005  | \$1,875  | \$1,875  |

**TABLE 2009-B**

The following Table 2009-B summarizes the City SUV limits for tax years beginning in 2009 applicable to SUVs built on **car chassis** placed in service in tax years beginning in **2005 through 2009**.

|   | <b>SUV Placed in Service in Calendar Year</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Allowed</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Not Allowed</b> |
|---|---|--|--|
| Tax year beginning in 2009 is first year of use of SUV  | 2009  | \$10,960   | \$2,960  |
| Tax year beginning in 2009 is second year of use of SUV | 2009  | \$4,800  | \$4,800  |
|   | 2008  | \$4,800  | \$4,800  |
| Tax year beginning in 2009 is third year of use of SUV  | 2008  | \$2,850  | \$2,850  |
|   | 2007  | \$2,850  | \$2,850  |
| Tax year beginning in 2009 is fourth year of use of SUV | 2007  | \$1,775  | \$1,775  |
|   | 2006  | \$1,775  | \$1,775  |
| Tax year beginning in 2009 is fifth year of use of SUV  | 2006  | \$1,775  | \$1,775  |
|   | 2005  | \$1,675  | \$1,675  |

<sup>11</sup> See footnote 9.

<sup>12</sup> The City limits for vehicles placed into service beginning the calendar year 2009 are derived from Rev. Proc. 2009-24, 2009-17 IRB 885, April 9, 2009. For the years 2005 through 2008, the city SUV limits are derived from the same sources as noted in footnotes 6 through 8 and footnote 10. For SUVs placed into service in year 2004, use the amount set forth for the fifth year the in Table 2008-A or Table 2008-B (if built on a car chassis) that is derived from the source noted in footnote 1. For SUVs placed into service in the year 2003, use the amount set forth for the fifth year in Table 2007-A or Table 2007-B (if built on a car chassis) that is derived from the source noted in footnote 2. For SUVs placed into service in the year 2002, use the amount set forth for the fifth year in Table 2006-A that is derived from the source noted in footnote 3. For SUVs placed into service in the year 2001, use the amounts set forth for the fifth year in Table 2005-A that is derived from the source noted in footnote 4. For SUVs placed into service in the year 2000, use the amount set forth for the fifth year in Table 2004-A that is derived from the source noted in footnote 5. For SUVs placed into service before 2000, see footnote 5.

**TABLE 2010-A**

The following Table 2010-A summarizes the City SUV limits for tax years beginning in 2010 applicable to SUVs built on **truck chassis** placed in service in tax years beginning in **2006 through 2010**.<sup>13</sup>

|   | <b>SUV Placed in Service in Calendar Year</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Allowed</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Not Allowed</b> |
|---|---|--|--|
| Tax year beginning in 2010 is first year of use of SUV  | 2010  | \$11,160 <sup>14</sup>   | \$3,160  |
| Tax year beginning in 2010 is second year of use of SUV | 2010  | \$5,100  | \$5,100  |
|   | 2009  | \$4,900  | \$4,900  |
| Tax year beginning in 2010 is third year of use of SUV  | 2009  | \$2,950  | \$2,950  |
|   | 2008  | \$3,050  | \$3,050  |
| Tax year beginning in 2010 is fourth year of use of SUV | 2008  | \$1,875  | \$1,875  |
|   | 2007  | \$1,875  | \$1,875  |
| Tax year beginning in 2010 is fifth year of use of SUV  | 2007  | \$1,875  | \$1,875  |
|   | 2006  | \$1,875  | \$1,875  |

**TABLE 2010-B**

The following Table 2010-B summarizes the City SUV limits for tax years beginning in 2010 applicable to SUVs built on **car chassis** placed in service in tax years beginning in **2006 through 2010**.

|   | <b>SUV Placed in Service in Calendar Year</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Allowed</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Not Allowed</b> |
|---|---|--|--|
| Tax year beginning in 2010 is first year of use of SUV  | 2010  | \$11,060   | \$3,060  |
| Tax year beginning in 2010 is second year of use of SUV | 2010  | \$4,900  | \$4,900  |
|   | 2009  | \$4,800  | \$4,800  |
| Tax year beginning in 2010 is third year of use of SUV  | 2009  | \$2,850  | \$2,850  |
|   | 2008  | \$2,850  | \$2,850  |
| Tax year beginning in 2009 is fourth year of use of SUV | 2008  | \$1,775  | \$1,775  |
|   | 2007  | \$1,775  | \$1,775  |
| Tax year beginning in 2009 is fifth year of use of SUV  | 2007  | \$1,775  | \$1,775  |
|   | 2006  | \$1,775  | \$1,775  |

<sup>13</sup> See footnote 9.

<sup>14</sup> The city limits for vehicles placed into service beginning the calendar year 2010 are derived from Rev. Proc. 2010-18, 2010-9 IRB 427, February 16, 2010 and Rev. Proc. 2011-21, 2011-12 IRB, March 1, 2011. For the years 2006 through 2009, the city SUV limits are derived from the same sources noted in footnotes 7, 8, 10 and 12. For SUVs placed in service in year 2005, use the amount set forth for the fifth year in Table 2009-A or Table 2009-B (if built on a car chassis) that is derived from the source noted in footnote 6. For SUVs placed into service in the year 2004 use the amount set forth for the fifth year in Table 2008-A or 2008-B (if built on a car chassis) that is derived from the source noted in footnote 1. For SUV's placed into service in the year 2003, use the amount set forth for the fifth year in Table 2007-A or 2007-B (if built on a car chassis) that is derived from the source noted in footnote 2. For SUVs placed into service in the year 2002, use the amount set forth in Table 2006-A that is derived from the source noted in footnote 3. For SUVs placed into service in the year 2001, use the amounts set forth for the fifth year in Table 2005-A that is derived from the source noted in footnote 4. For SUVs placed into service in the year 2000, use the amount set forth for the fifth year in Table 2004-A that is derived from the source noted in footnote 5. For SUVs placed into service before 2000, see footnote 5.

**TABLE 2011-A**

The following Table 2011-A summarizes the City SUV limits for tax years beginning in 2011 applicable to SUVs built on **truck chassis** placed in service in tax years beginning in **2007 through 2011**.

|   | <b>SUV Placed in Service in Calendar Year</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Allowed</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Not Allowed</b> |
|---|---|--|--|
| Tax year beginning in 2011 is first year of use of SUV  | 2011  | \$11,260 <sup>15</sup>   | \$3,260  |
| Tax year beginning in 2011 is second year of use of SUV | 2011  | \$5,200  | \$5,200  |
|   | 2010  | \$5,100  | \$5,100  |
| Tax year beginning in 2011 is third year of use of SUV  | 2010  | \$3,050  | \$3,050  |
|   | 2009  | \$2,950  | \$2,950  |
| Tax year beginning in 2011 is fourth year of use of SUV | 2009  | \$1,775  | \$1,775  |
|   | 2008  | \$1,875  | \$1,875  |
| Tax year beginning in 2011 is fifth year of use of SUV  | 2008  | \$1,875  | \$1,875  |
|   | 2007  | \$1,875  | \$1,875  |

**TABLE 2011-B**

The following Table 2011-B summarizes the City SUV limits for tax years beginning in 2011 applicable to SUVs built on **car chassis** placed in service in tax years beginning in **2007 through 2011**.

|   | <b>SUV Placed in Service in Calendar Year</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Allowed</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Not Allowed</b> |
|---|---|--|--|
| Tax year beginning in 2011 is first year of use of SUV  | 2011  | \$11,060   | \$3,060  |
| Tax year beginning in 2011 is second year of use of SUV | 2011  | \$4,900  | \$4,900  |
|   | 2010  | \$4,900  | \$4,900  |
| Tax year beginning in 2011 is third year of use of SUV  | 2010  | \$2,950  | \$2,950  |
|   | 2009  | \$2,850  | \$2,850  |
| Tax year beginning in 2011 is fourth year of use of SUV | 2009  | \$1,775  | \$1,775  |
|   | 2008  | \$1,775  | \$1,775  |
| Tax year beginning in 2011 is fifth year of use of SUV  | 2008  | \$1,775  | \$1,775  |
|   | 2007  | \$1,775  | \$1,775  |

<sup>15</sup> The city limits for vehicles placed into service beginning the calendar year 2011 are derived from Rev. Proc. 2011-21, 2011-12 IRB 560, March 1, 2011. For the years 2007 through 2010, the city SUV limits are derived from the same sources noted in footnotes 8, 10, 12 and 14. For SUVs placed in service in year 2006, use the amount set forth for the fifth year in Table 2010-A or Table 2010-B (if built on a car chassis) that is derived from the source noted in footnote 7. For SUVs placed in service in year 2005, use the amount set forth for the fifth year in Table 2009-A or Table 2009-B (if built on a car chassis) that is derived from the source noted in footnote 6. For SUVs placed into service in the year 2004 use the amount set forth for the fifth year in Table 2008-A or 2008-B (if built on a car chassis) that is derived from the source noted in footnote 1. For SUV's placed into service in the year 2003, use the amount set forth for the fifth year in Table 2007-A or 2007-B (if built on a car chassis) that is derived from the source noted in footnote 2. For SUVs placed into service in the year 2002, use the amount set forth in Table 2006-A that is derived from the source noted in footnote 3. For SUVs placed into service in the year 2001, use the amounts set forth for the fifth year in Table 2005-A that is derived from the source noted in footnote 4. For SUVs placed into service in the year 2000, use the amount set forth for the fifth year in Table 2004-A that is derived from the source noted in footnote 5. For SUVs placed into service before 2000, see footnote 5.

**TABLE 2012-A**

The following Table 2012-A summarizes the City SUV limits for tax years beginning in 2012 applicable to SUVs built on **truck chassis** placed in service in tax years beginning in **2008 through 2012**.

|   | <b>SUV Placed in Service in Calendar Year</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Allowed</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Not Allowed</b> |
|---|---|--|--|
| Tax year beginning in 2012 is first year of use of SUV  | 2012  | \$11,360 <sup>16</sup>   | \$3,360  |
| Tax year beginning in 2012 is second year of use of SUV | 2012  | \$5,300  | \$5,300  |
|   | 2011  | \$5,200  | \$5,200  |
| Tax year beginning in 2012 is third year of use of SUV  | 2011  | \$3,150  | \$3,150  |
|   | 2010  | \$3,050  | \$3,050  |
| Tax year beginning in 2012 is fourth year of use of SUV | 2010  | \$1,875  | \$1,875  |
|   | 2009  | \$1,775  | \$1,775  |
| Tax year beginning in 2012 is fifth year of use of SUV  | 2009  | \$1,775  | \$1,775  |
|   | 2008  | \$1,875  | \$1,875  |

**TABLE 2012-B**

The following Table 2012-B summarizes the City SUV limits for tax years beginning in 2012 applicable to SUVs built on **car chassis** placed in service in tax years beginning in **2008 through 2012**.

|   | <b>SUV Placed in Service in Calendar Year</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Allowed</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Not Allowed</b> |
|---|---|--|--|
| Tax year beginning in 2012 is first year of use of SUV  | 2012  | \$11,160   | \$3,160  |
| Tax year beginning in 2012 is second year of use of SUV | 2012  | \$5,100  | \$5,100  |
|   | 2011  | \$4,900  | \$4,900  |
| Tax year beginning in 2012 is third year of use of SUV  | 2011  | \$2,950  | \$2,950  |
|   | 2010  | \$2,950  | \$2,950  |
| Tax year beginning in 2012 is fourth year of use of SUV | 2010  | \$1,775  | \$1,775  |
|   | 2009  | \$1,775  | \$1,775  |
| Tax year beginning in 2012 is fifth year of use of SUV  | 2009  | \$1,775  | \$1,775  |
|   | 2008  | \$1,775  | \$1,775  |

<sup>16</sup> The city limits for vehicles placed into service beginning the calendar year 2012 are derived from Rev. Proc. 2012-23, 2012-14 IRB 712, March 2, 2012. For the years 2008 through 2011, the city SUV limits are derived from the same sources noted in footnotes 10, 12, 14 and 15. For SUVs placed in service in 2007, use the amount set forth in the fifth year in Table 2011-A or Table 2011-B (if built on a car chassis) that is derived from the source noted in footnote 8. For SUVs placed in service in year 2006, use the amount set forth for the fifth year in Table 2010-A or Table 2010-B (if built on a car chassis) that is derived from the source noted in footnote 7. For SUVs placed in service in year 2005, use the amount set forth for the fifth year in Table 2009-A or Table 2009-B (if built on a car chassis) that is derived from the source noted in footnote 6. For SUVs placed into service in the year 2004 use the amount set forth for the fifth year in Table 2008-A or 2008-B (if built on a car chassis) that is derived from the source noted in footnote 1. For SUV's placed into service in the year 2003, use the amount set forth for the fifth year in Table 2007-A or 2007-B (if built on a car chassis) that is derived from the source noted in footnote 2. For SUVs placed into service in the year 2002, use the amount set forth in Table 2006-A that is derived from the source noted in footnote 3. For SUVs placed into service in the year 2001, use the amounts set forth for the fifth year in Table 2005-A that is derived from the source noted in footnote 4. For SUVs placed into service in the year 2000, use the amount set forth for the fifth year in Table 2004-A that is derived from the source noted in footnote 5. For SUVs placed into service before 2000, see footnote 5.

**TABLE 2013-A**

The following Table 2013-A summarizes the City SUV limits for tax years beginning in 2013 applicable to SUVs built on **truck chassis** placed in service in tax years beginning in **2009 through 2013**.

|   | <b>SUV Placed in Service in Calendar Year</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Allowed</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Not Allowed</b> |
|---|---|--|--|
| Tax year beginning in 2013 is first year of use of SUV  | 2013  | \$11,360 <sup>17</sup>   | \$3,360  |
| Tax year beginning in 2013 is second year of use of SUV | 2013  | \$5,400  | \$5,400  |
|   | 2012  | \$5,300  | \$5,300  |
| Tax year beginning in 2013 is third year of use of SUV  | 2012  | \$3,150  | \$3,150  |
|   | 2011  | \$3,150  | \$3,150  |
| Tax year beginning in 2013 is fourth year of use of SUV | 2011  | \$1,875  | \$1,875  |
|   | 2010  | \$1,875  | \$1,875  |
| Tax year beginning in 2013 is fifth year of use of SUV  | 2010  | \$1,875  | \$1,875  |
|   | 2009  | \$1,775  | \$1,775  |

**TABLE 2013-B**

The following Table 2013-B summarizes the City SUV limits for tax years beginning in 2013 applicable to SUVs built on **car chassis** placed in service in tax years beginning in **2009 through 2013**.

|   | <b>SUV Placed in Service in Calendar Year</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Allowed</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Not Allowed</b> |
|---|---|--|--|
| Tax year beginning in 2013 is first year of use of SUV  | 2013  | \$11,160   | \$3,160  |
| Tax year beginning in 2013 is second year of use of SUV | 2013  | \$5,100  | \$5,100  |
|   | 2012  | \$5,100  | \$5,100  |
| Tax year beginning in 2013 is third year of use of SUV  | 2012  | \$3,050  | \$3,050  |
|   | 2011  | \$2,950  | \$2,950  |
| Tax year beginning in 2013 is fourth year of use of SUV | 2011  | \$1,775  | \$1,775  |
|   | 2010  | \$1,775  | \$1,775  |
| Tax year beginning in 2013 is fifth year of use of SUV  | 2010  | \$1,775  | \$1,775  |
|   | 2009  | \$1,775  | \$1,775  |

<sup>17</sup> The city limits for vehicles placed into service beginning the calendar year 2013 are derived from Rev. Proc. 2013-21, 2013-12 IRB 660, February 25, 2013. For the years 2009 through 2012, the city SUV limits are derived from the same sources noted in footnotes 12, 14, 15 and 16. For SUVs placed in service in 2008, use the amount set forth in the fifth year in Table 2012-A or Table 2012-B (if built on a car chassis) from the source noted in footnote 10. For SUVs placed in service in 2007, use the amount set forth in the fifth year in Table 2011-A or Table 2011-B (if built on a car chassis) that is derived from the source noted in footnote 8. For SUVs placed in service in year 2006, use the amount set forth for the fifth year in Table 2010-A or Table 2010-B (if built on a car chassis) that is derived from the source noted in footnote 7. For SUVs placed in service in year 2005, use the amount set forth for the fifth year in Table 2009-A or Table 2009-B (if built on a car chassis) that is derived from the source noted in footnote 6. For SUVs placed into service in the year 2004 use the amount set forth for the fifth year in Table 2008-A or 2008-B (if built on a car chassis) that is derived from the source noted in footnote 1. For SUVs placed into service in the year 2003, use the amount set forth for the fifth year in Table 2007-A or 2007-B (if built on a car chassis) that is derived from the source noted in footnote 2. For SUVs placed into service in the year 2002, use the amount set forth in Table 2006-A that is derived from the source noted in footnote 3. For SUVs placed into service in the year 2001, use the amounts set forth for the fifth year in Table 2005-A that is derived from the source noted in footnote 4. For SUVs placed into service in the year 2000, use the amount set forth for the fifth year in Table 2004-A that is derived from the source noted in footnote 5. For SUVs placed into service before 2000, see footnote 5.

**TABLE 2014-A**

The following Table 2014-A summarizes the City SUV limits for tax years beginning in 2014 applicable to SUVs built on **truck chassis** placed in service in tax years beginning in **2010 through 2014**.

|   | <b>SUV Placed in Service in Calendar Year</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Allowed</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Not Allowed</b> |
|---|---|--|--|
| Tax year beginning in 2014 is first year of use of SUV  | 2014  | \$11,460 <sup>18</sup>   | \$3,460  |
| Tax year beginning in 2014 is second year of use of SUV | 2014  | \$5,500  | \$5,500  |
|   | 2013  | \$5,400  | \$5,400  |
| Tax year beginning in 2014 is third year of use of SUV  | 2013  | \$3,250  | \$3,250  |
|   | 2012  | \$3,150  | \$3,150  |
| Tax year beginning in 2014 is fourth year of use of SUV | 2012  | \$1,875  | \$1,875  |
|   | 2011  | \$1,875  | \$1,875  |
| Tax year beginning in 2014 is fifth year of use of SUV  | 2011  | \$1,875  | \$1,875  |
|   | 2010  | \$1,875  | \$1,875  |

**TABLE 2014-B**

The following Table 2014-B summarizes the City SUV limits for tax years beginning in 2014 applicable to SUVs built on **car chassis** placed in service in tax years beginning in **2010 through 2014**.

|   | <b>SUV Placed in Service in Calendar Year</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Allowed</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Not Allowed</b> |
|---|---|--|--|
| Tax year beginning in 2014 is first year of use of SUV  | 2014  | \$11,160   | \$3,160  |
| Tax year beginning in 2014 is second year of use of SUV | 2014  | \$5,100  | \$5,100  |
|   | 2013  | \$5,100  | \$5,100  |
| Tax year beginning in 2014 is third year of use of SUV  | 2013  | \$3,050  | \$3,050  |
|   | 2012  | \$3,050  | \$3,050  |
| Tax year beginning in 2014 is fourth year of use of SUV | 2012  | \$1,875  | \$1,875  |
|   | 2011  | \$1,775  | \$1,775  |
| Tax year beginning in 2014 is fifth year of use of SUV  | 2011  | \$1,775  | \$1,775  |
|   | 2010  | \$1,775  | \$1,775  |

<sup>18</sup> The city limits for vehicles placed into service beginning the calendar year 2014 are derived from Rev. Proc. 2014-21, 2014-11 IRB 641, February 25, 2014 as modified by Rev. Proc. 2015-19, 2015-8 IRB, February 6, 2015. For the years 2010 through 2013, the city SUV limits are derived from the same sources noted in footnotes 14 through 17. For SUVs placed in service in 2009, use the amount set forth in the fifth year in Table 2013-A or Table 2013-B (if built on a car chassis) from the source noted in footnote 12. For SUVs placed in service in 2008, use the amount set forth in the fifth year in Table 2012-A or Table 2012-B (if built on a car chassis) from the source noted in footnote 10. For SUVs placed in service in 2007, use the amount set forth in the fifth year in Table 2011-A or Table 2011-B (if built on a car chassis) that is derived from the source noted in footnote 8. For SUVs placed in service in year 2006, use the amount set forth for the fifth year in Table 2010-A or Table 2010-B (if built on a car chassis) that is derived from the source noted in footnote 7. For SUVs placed in service in year 2005, use the amount set forth for the fifth year in Table 2009-A or Table 2009-B (if built on a car chassis) that is derived from the source noted in footnote 6. For SUVs placed into service in the year 2004 use the amount set forth for the fifth year in Table 2008-A or 2008-B (if built on a car chassis) that is derived from the source noted in footnote 1. For SUV's placed into service in the year 2003, use the amount set forth for the fifth year in Table 2007-A or 2007-B (if built on a car chassis) that is derived from the source noted in footnote 2. For SUVs placed into service in the year 2002, use the amount set forth in Table 2006-A that is derived from the source noted in footnote 3. For SUVs placed into service in the year 2001, use the amounts set forth for the fifth year in Table 2005-A that is derived from the source noted in footnote 4. For SUVs placed into service in the year 2000, use the amount set forth for the fifth year in Table 2004-A that is derived from the source noted in footnote 5. For SUVs placed into service before 2000, see footnote 5.



**TABLE 2015-A**

The following Table 2015-A summarizes the City SUV limits for tax years beginning in 2015 applicable to SUVs built on **truck chassis** placed in service in tax years beginning in **2011 through 2015**.

|   | <b>SUV Placed in Service in Calendar Year</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Allowed</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Not Allowed</b> |
|---|---|--|--|
| Tax year beginning in 2015 is first year of use of SUV  | 2015  | \$11,460 <sup>19</sup>   | \$3,460  |
| Tax year beginning in 2015 is second year of use of SUV | 2015  | \$5,600  | \$5,600  |
|   | 2014  | \$5,500  | \$5,500  |
| Tax year beginning in 2015 is third year of use of SUV  | 2014  | \$3,350  | \$3,350  |
|   | 2013  | \$3,250  | \$3,250  |
| Tax year beginning in 2015 is fourth year of use of SUV | 2013  | \$1,975  | \$1,975  |
|   | 2012  | \$1,875  | \$1,875  |
| Tax year beginning in 2015 is fifth year of use of SUV  | 2012  | \$1,875  | \$1,875  |
|   | 2011  | \$1,875  | \$1,875  |

**TABLE 2015-B**

The following Table 2015-B summarizes the City SUV limits for tax years beginning in 2015 applicable to SUVs built on **car chassis** placed in service in tax years beginning in **2011 through 2015**.

|   | <b>SUV Placed in Service in Calendar Year</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Allowed</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Not Allowed</b> |
|---|---|--|--|
| Tax year beginning in 2015 is first year of use of SUV  | 2015  | \$11,160   | \$3,160  |
| Tax year beginning in 2015 is second year of use of SUV | 2015  | \$5,100  | \$5,100  |
|   | 2014  | \$5,100  | \$5,100  |
| Tax year beginning in 2015 is third year of use of SUV  | 2014  | \$3,050  | \$3,050  |
|   | 2013  | \$3,050  | \$3,050  |
| Tax year beginning in 2015 is fourth year of use of SUV | 2013  | \$1,875  | \$1,875  |
|   | 2012  | \$1,875  | \$1,875  |
| Tax year beginning in 2015 is fifth year of use of SUV  | 2012  | \$1,875  | \$1,875  |
|   | 2011  | \$1,775  | \$1,775  |

<sup>19</sup> The city limits for vehicles placed into service beginning the calendar year 2015 are derived from Rev. Proc. 2015-19, 2015-8 IRB 656, February 2, 2015 as modified by Rev. Proc. 2016-23, 2016-16 IRB, April 1, 2016. For the years 2011 through 2014, the city SUV limits are derived from the same sources noted in footnotes 15 through 18. For SUVs placed in service in 2010, use the amount set forth in the fifth year in Table 2014-A or Table 2014-B (if built on a car chassis) from the source noted in footnote 14. For SUVs placed in service in 2009, use the amount set forth in the fifth year in Table 2013-A or Table 2013-B (if built on a car chassis) from the source noted in footnote 12. For SUVs placed in service in 2008, use the amount set forth in the fifth year in Table 2012-A or Table 2012-B (if built on a car chassis) from the source noted in footnote 10. For SUVs placed in service in 2007, use the amount set forth in the fifth year in Table 2011-A or Table 2011-B (if built on a car chassis) that is derived from the source noted in footnote 8. For SUVs placed in service in year 2006, use the amount set forth for the fifth year in Table 2010-A or Table 2010-B (if built on a car chassis) that is derived from the source noted in footnote 7. For SUVs placed in service in year 2005, use the amount set forth for the fifth year in Table 2009-A or Table 2009-B (if built on a car chassis) that is derived from the source noted in footnote 6. For the amounts to be used for SUVs placed into service for years prior to 2005, consult footnote 18.

**TABLE 2016-A**

The following Table 2016-A summarizes the City SUV limits for tax years beginning in 2016 applicable to SUVs built on **truck chassis** placed in service in tax years beginning in **2012 through 2016**.

|   | <b>SUV Placed in Service in Calendar Year</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Allowed</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Not Allowed</b> |
|---|---|--|--|
| Tax year beginning in 2016 is first year of use of SUV  | 2016  | \$11,560 <sup>20</sup>   | \$3,560  |
| Tax year beginning in 2016 is second year of use of SUV | 2016  | \$5,700  | \$5,700  |
|   | 2015  | \$5,600  | \$5,600  |
| Tax year beginning in 2016 is third year of use of SUV  | 2015  | \$3,350  | \$3,350  |
|   | 2014  | \$3,350  | \$3,250  |
| Tax year beginning in 2016 is fourth year of use of SUV | 2014  | \$1,975  | \$1,975  |
|   | 2013  | \$1,975  | \$1,975  |
| Tax year beginning in 2016 is fifth year of use of SUV  | 2013  | \$1,975  | \$1,975  |
|   | 2012  | \$1,875  | \$1,875  |

**TABLE 2016-B**

The following Table 2016-B summarizes the City SUV limits for tax years beginning in 2016 applicable to SUVs built on **car chassis** placed in service in tax years beginning in **2012 through 2016**.

|   | <b>SUV Placed in Service in Calendar Year</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Allowed</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Not Allowed</b> |
|---|---|--|--|
| Tax year beginning in 2016 is first year of use of SUV  | 2016  | \$11,160   | \$3,160  |
| Tax year beginning in 2016 is second year of use of SUV | 2016  | \$5,100  | \$5,100  |
|   | 2015  | \$5,100  | \$5,100  |
| Tax year beginning in 2016 is third year of use of SUV  | 2015  | \$3,050  | \$3,050  |
|   | 2014  | \$3,050  | \$3,050  |
| Tax year beginning in 2016 is fourth year of use of SUV | 2014  | \$1,875  | \$1,875  |
|   | 2013  | \$1,875  | \$1,875  |
| Tax year beginning in 2016 is fifth year of use of SUV  | 2013  | \$1,875  | \$1,875  |
|   | 2012  | \$1,875  | \$1,875  |

<sup>20</sup> The City limits for vehicles placed into service in calendar year 2016 and for vehicles placed into service during 2015 for which bonus depreciation was allowed are derived from Rev. Proc. 2016-23, 2016-16 IRB, April 1, 2016. For other vehicles placed into service in 2015, the city limits are derived from Rev. Proc. 2015-19, 2015-8 IRB 656, February 2, 2015. For the years 2011 through 2014, the city SUV limits are derived from the same sources noted in footnotes 15 through 18. For SUVs placed in service in 2010, use the amount set forth in the fifth year in Table 2014-A or Table 2014-B (if built on a car chassis) from the source noted in footnote 14. For SUVs placed in service in 2009, use the amount set forth in the fifth year in Table 2013-A or Table 2013-B (if built on a car chassis) from the source noted in footnote 12. For SUVs placed in service in 2008, use the amount set forth in the fifth year in Table 2012-A or Table 2012-B (if built on a car chassis) from the source noted in footnote 10. For SUVs placed in service in 2007, use the amount set forth in the fifth year in Table 2011-A or Table 2011-B (if built on a car chassis) that is derived from the source noted in footnote 8. For SUVs placed in service in year 2006, use the amount set forth for the fifth year in Table 2010-A or Table 2010-B (if built on a car chassis) that is derived from the source noted in footnote 7. For SUVs placed in service in year 2005, use the amount set forth for the fifth year in Table 2009-A or Table 2009-B (if built on a car chassis) that is derived from the source noted in footnote 6. For the amounts to be used for SUVs placed into service for years prior to 2005, consult footnote 18.

**TABLE 2017-A**

The following Table 2017-A summarizes the City SUV limits for tax years beginning in 2017 applicable to SUVs built on **truck chassis** placed in service in tax years beginning in **2013 through 2017**.

|   | <b>SUV Placed in Service in Calendar Year</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Allowed</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Not Allowed</b> |
|---|---|--|--|
| Tax year beginning in 2017 is first year of use of SUV  | 2017  | \$11,560 <sup>21</sup>   | \$3,560  |
| Tax year beginning in 2017 is second year of use of SUV | 2017  | \$5,700  | \$5,700  |
|   | 2016  | \$5,700  | \$5,700  |
| Tax year beginning in 2017 is third year of use of SUV  | 2016  | \$3,350  | \$3,350  |
|   | 2015  | \$3,350  | \$3,350  |
| Tax year beginning in 2017 is fourth year of use of SUV | 2015  | \$1,975  | \$1,975  |
|   | 2014  | \$1,975  | \$1,975  |
| Tax year beginning in 2017 is fifth year of use of SUV  | 2014  | \$1,975  | \$1,975  |
|   | 2013  | \$1,975  | \$1,975  |

**TABLE 2017-B**

The following Table 2017-B summarizes the City SUV limits for tax years beginning in 2017 applicable to SUVs built on **car chassis** placed in service in tax years beginning in **2013 through 2017**.

|   | <b>SUV Placed in Service in Calendar Year</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Allowed</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Not Allowed</b> |
|---|---|--|--|
| Tax year beginning in 2017 is first year of use of SUV  | 2017  | \$11,160   | \$3,160  |
| Tax year beginning in 2017 is second year of use of SUV | 2017  | \$5,100  | \$5,100  |
|   | 2016  | \$5,100  | \$5,100  |
| Tax year beginning in 2017 is third year of use of SUV  | 2016  | \$3,050  | \$3,050  |
|   | 2015  | \$3,050  | \$3,050  |
| Tax year beginning in 2017 is fourth year of use of SUV | 2015  | \$1,875  | \$1,875  |
|   | 2014  | \$1,875  | \$1,875  |
| Tax year beginning in 2017 is fifth year of use of SUV  | 2014  | \$1,875  | \$1,875  |
|   | 2013  | \$1,875  | \$1,875  |

<sup>21</sup> The City limits for vehicles placed into service in calendar 2017 are derived from Rev. Proc. 2017-29, 2017-14 IRB 1065, March 24, 2017. The City limits for vehicles placed into service in calendar year 2016 are derived from Rev. Proc. 2016-23, 2016-16 IRB 581, April 1, 2016. For vehicles placed into service in 2015, the city limits are derived from Rev. Proc. 2015-19, 2015-8 IRB 656, February 2, 2015. For the years 2011 through 2014, the city SUV limits are derived from the same sources noted in footnotes 15 through 18. For SUVs placed in service in 2011 or 2012, use the amount set forth in the fifth year in table 2015-A or Table 2015-B (if built on a car chassis). For SUVs placed in service in 2010, use the amount set forth in the fifth year in Table 2014-A or Table 2014-B (if built on a car chassis) from the source noted in footnote 14. For SUVs placed in service in 2009, use the amount set forth in the fifth year in Table 2013-A or Table 2013-B (if built on a car chassis) from the source noted in footnote 12. For SUVs placed in service in 2008, use the amount set forth in the fifth year in Table 2012-A or Table 2012-B (if built on a car chassis) from the source noted in footnote 10. For SUVs placed in service in 2007, use the amount set forth in the fifth year in Table 2011-A or Table 2011-B (if built on a car chassis) that is derived from the source noted in footnote 8. For SUVs placed in service in year 2006, use the amount set forth for the fifth year in Table 2010-A or Table 2010-B (if built on a car chassis) that is derived from the source noted in footnote 7. For SUVs placed in service in year 2005, use the amount set forth for the fifth year in Table 2009-A or Table 2009-B (if built on a car chassis) that is derived from the source noted in footnote 6. For the amounts to be used for SUVs placed into service for years prior to 2005, consult footnote 18.

**TABLE 2018-A**

The following Table 2018-A summarizes the City SUV limits for tax years beginning in 2018 applicable to SUVs built on **truck chassis** placed in service in tax years beginning in **2014 through 2018**.

|   | <b>SUV Placed in Service in Calendar Year</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Allowed</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Not Allowed</b> |
|---|---|--|--|
| Tax year beginning in 2018 is first year of use of SUV  | 2018  | \$18,000* <sup>22</sup><br>16,400                                    | \$10,000   |
| Tax year beginning in 2018 is second year of use of SUV | 2018  | \$16,000   | \$16,000   |
|   | 2017  | \$5,700  | \$5,700  |
| Tax year beginning in 2018 is third year of use of SUV  | 2017  | \$3,450  | \$3,450  |
|   | 2016  | \$3,350  | \$3,350  |
| Tax year beginning in 2018 is fourth year of use of SUV | 2016  | \$2,075  | \$2,075  |
|   | 2015  | \$1,975  | \$1,975  |
| Tax year beginning in 2018 is fifth year of use of SUV  | 2015  | \$1,975  | \$1,975  |
|   | 2014  | \$1,975  | \$1,975  |

**TABLE 2018-B**

The following Table 2018-B summarizes the City SUV limits for tax years beginning in 2018 applicable to SUVs built on **car chassis** placed in service in tax years beginning in **2014 through 2018**.

|   | <b>SUV Placed in Service in Calendar Year</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Allowed</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Not Allowed</b> |
|---|---|--|--|
| Tax year beginning in 2018 is first year of use of SUV  | 2018  | \$18,000*<br>16,400  | \$10,000   |
| Tax year beginning in 2018 is second year of use of SUV | 2018  | \$16,000   | \$16,000   |
|   | 2017  | \$5,100  | \$5,100  |
| Tax year beginning in 2018 is third year of use of SUV  | 2017  | \$3,050  | \$3,050  |
|   | 2016  | \$3,050  | \$3,050  |
| Tax year beginning in 2018 is fourth year of use of SUV | 2016  | \$1,875  | \$1,875  |
|   | 2015  | \$1,875  | \$1,875  |
| Tax year beginning in 2018 is fifth year of use of SUV  | 2015  | \$1,875  | \$1,875  |
|   | 2014  | \$1,875  | \$1,875  |

\*Acquired after September 27, 2017

<sup>22</sup> The City limits for vehicles placed into service in calendar 2018 are derived from Rev. Proc. 2018-25, 2018-18 IRB 543, April 17, 2018. The City limits for vehicles placed into service in calendar year 2017 are derived from Rev. Proc. 2017-29, 2017-14 IRB 1065, March 24, 2017. For vehicles placed into service in calendar year 2016, the city limits are derived from 2016-23, 2016-16 IRB 581, April 1, 2016. For vehicles placed into service in 2015, the city limits are derived from Rev. Proc. 2015-19, 2015-8 IRB 656, February 2, 2015. For information regarding the derivation of limits applicable to years prior to 2015, please refer to footnote 21. For SUVs placed in service in 2014 for which 2018 is the sixth year of use, the applicable limit is the same as the limit for the fifth year in the above chart. For SUVs placed in service in 2013, use the amount set forth in the fifth year in Table 2017-A or Table 2017-B (if built on a car chassis). For SUVs placed in service prior to 2013, refer to footnote 21.

**TABLE 2019-A**

The following Table 2019-A summarizes the City SUV limits for tax years beginning in 2019 applicable to SUVs built on **truck chassis** placed in service in tax years beginning in **2015 through 2019**.

|   | <b>SUV Placed in Service in Calendar Year</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Allowed</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Not Allowed</b> |
|---|---|--|--|
| Tax year beginning in 2019 is first year of use of SUV  | 2019  | \$18,100* <sup>23</sup><br>14,900                                    | \$10,100   |
| Tax year beginning in 2019 is second year of use of SUV | 2019  | \$16,100   | \$16,100   |
|   | 2018  | \$16,000   | \$16,000   |
| Tax year beginning in 2019 is third year of use of SUV  | 2018  | \$9,600  | \$9,600  |
|   | 2017  | \$3,450  | \$3,450  |
| Tax year beginning in 2019 is fourth year of use of SUV | 2017  | \$2,075  | \$2,075  |
|   | 2016  | \$2,075  | \$2,075  |
| Tax year beginning in 2019 is fifth year of use of SUV  | 2016  | \$2,075  | \$2,075  |
|   | 2015  | \$1,975  | \$1,975  |

**TABLE 2019-B**

The following Table 2019-B summarizes the City SUV limits for tax years beginning in 2019 applicable to SUVs built on **car chassis** placed in service in tax years beginning in **2015 through 2019**.

|   | <b>SUV Placed in Service in Calendar Year</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Allowed</b> | <b>City SUV Limit on SUV for which Bonus Depreciation Is Not Allowed</b> |
|---|---|--|--|
| Tax year beginning in 2019 is first year of use of SUV  | 2019  | \$18,100* <sup>23</sup><br>14,900                                    | \$10,100   |
| Tax year beginning in 2019 is second year of use of SUV | 2019  | \$16,100   | \$16,100   |
|   | 2018  | \$16,000   | \$16,000   |
| Tax year beginning in 2019 is third year of use of SUV  | 2018  | \$9,600  | \$9,600  |
|   | 2017  | \$3,050  | \$3,050  |
| Tax year beginning in 2019 is fourth year of use of SUV | 2017  | \$1,875  | \$1,875  |
|   | 2016  | \$1,875  | \$1,875  |
| Tax year beginning in 2019 is fifth year of use of SUV  | 2016  | \$1,875  | \$1,875  |
|   | 2015  | \$1,875  | \$1,875  |

\*Acquired after September 27, 2017

<sup>23</sup> The City limits for vehicles placed into service in calendar year 2019 are derived from Rev. Proc. 2019-26, 2019-24 IRB, May 21, 2019. The higher limits for SUVs placed in service in 2019 for which Bonus Depreciation is allowed are for SUVs acquired after September 27, 2017. The higher limits for SUVs placed in service for 2019 for which Bonus Depreciation is allowed are for SUVs acquired after September 27, 2017. For information on the safe harbor alternative depreciation methods regarding Bonus Depreciation, see Rev. Proc. 2019-13, 2019-9 IRB 744, February 13, 2019 and the information under "Special Note", pages 4 and 5 of this Finance Memorandum. The City limits for vehicles placed into service in calendar year 2018 are derived from Rev. Proc. 2018-25, 2018-18 IRB 543, April 17, 2018. The City limits for vehicles placed into service in calendar year 2017 are derived from Rev. Proc. 2017-29, 2017-14 IRB 1065, March 24, 2017. For vehicles placed into service in calendar year 2016, the city limits are derived from 2016-23, 2016-16 IRB 581, April 1, 2016. For vehicles placed into service in 2015, the city limits are derived from Rev. Proc. 2015-19, 2015-8 IRB 656, February 2, 2015. For SUVs placed in service in 2015 for which 2019 is the sixth year of use, the applicable limit is the same as the limit for the fifth year in the above chart. For SUVs placed in service in 2014, use the amount set forth in the fifth year in Table 2018-A or Table 2018-B (if built on a car chassis). For SUVs placed in service prior to 2014, refer to footnote 21.