## Tax-Exempt Bonds, 2006

by Cynthia Belmonte and Emily Shammas

The total amount of tax-exempt bonds issued by State and local governments declined 9.8 percent between Calendar Years 2005 and 2006, from $\$ 474.8$ billion in 2005 to $\$ 428.3$ billion in 2006. For 2006, Governmental bonds accounted for $\$ 319.4$ billion ( 74.6 percent) of total tax-exempt bond proceeds, while private activity bonds accounted for the remaining $\$ 108.9$ billion ( 25.4 percent).

Tax-exempt bonds are issued by State and local governments to finance a variety of projects, including construction or improvement of essential facilities and infrastructure, as well as to help provide services for citizens. ${ }^{1}$ Bonds issued by State and local governments are classified as either "Governmental" or "private activity," depending on whether the proceeds are used and secured by public or private entities and resources.

When a bond is issued, the issuer is obligated to repay the borrowed bond proceeds, at a specified rate of interest, by some future date. For Federal income tax purposes, investors who purchase Governmental bonds and certain types of private activity bonds are allowed to exclude the bond interest from their gross incomes. ${ }^{2}$ This tax exemption effectively lowers the borrowing cost incurred by tax-exempt debt issuers, since holders of tax-exempt bonds are generally willing to accept an interest rate lower than that earned on comparable taxable bonds.

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The interest exclusion for tax-exempt bonds is not allowed for arbitrage bonds and bonds not in registered form. ${ }^{3,4}$

Both Governmental and private activity bonds are obligations issued by or on behalf of State and local governmental units; it is the use of proceeds that differentiates the two. Governmental bond proceeds finance essential government operations, facilities, and services that are for general public use, and the debt service on these bonds is paid from general Governmental sources. Private activity bond proceeds are used by one or more private entities, and the debt service is paid or secured by one or more private entities. Specifically, Internal Revenue Code (IRC) section 141 defines a bond as a private activity bond if either of the following applies: 1) the private business tests set forth in IRC section 141(b); or 2 ) the private loan financing test set forth in IRC section 141(c). ${ }^{5}$ Interest income earned on private activity bonds is taxable. Over the years, Congress has deemed certain types of private activities necessary for the public good and, therefore, allows for a similar treatment of interest income as that allowed for Governmental bonds. Interest income earned on "qualified private activity bonds," as defined in IRC section 141(e), is generally tax-exempt. ${ }^{6,7}$

In recent years, Congress has expanded the list of qualified private activities eligible for tax-exempt financing. Some of the recently enacted tax-exempt bond legislation was introduced to encourage development and construction of key infrastructure in targeted communities, such as disaster-stricken areas around New York City and the Gulf Coast region. ${ }^{8}$

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## Bond Volume, by Term of Issue

Bonds are classified as either short-term or longterm, depending on the length of time from issuance to maturity. Bonds having maturities of less than 13 months are typically classified as short-term, while those having maturities of 13 months or more are classified as long-term. Governmental bond issues totaled $\$ 319.4$ billion in 2006, a 12.4-percent decrease from the record $\$ 364.5$ billion issued in 2005. Long-term bonds accounted for $\$ 272.2$ billion, more than 85 percent of all Governmental bond proceeds. Long-term bonds are generally used to finance construction or other capital improvement projects. The remaining $\$ 47.2$ billion of Governmental bonds was issued for short-term projects.

Most short-term Governmental bonds are issued in the form of tax anticipation notes (TANs), revenue anticipation notes (RANs), or bond anticipation notes (BANs). TANs and RANs generally mature within 1 year of issuance, at which time the proceeds are paid from specific tax receipts or other revenue sources. The proceeds of a BAN are typically used to pay for startup costs associated with a future, long-term bond-financed project. A renewal BAN can be issued on maturity of an outstanding BAN, until, eventually, the proceeds of the future bond issue are used to pay off, or retire, the outstanding BAN. Combined, TANs, RANs, and BANs comprised 89.5 percent of all short-term Governmental bond proceeds for 2006.

Tax-exempt private activity bond issues totaled $\$ 108.9$ billion in 2006, a 1.3-percent decrease from the $\$ 110.3$ billion issued in 2005. Short-term bonds accounted for $\$ 0.3$ billion, only 0.3 percent, of the total private activity bond proceeds for 2006.

## Long-Term Bond Volume, by Type of Issue

Total bond issuance is composed of both nonrefunding ("new money") issues and refunding issues. The proceeds of new money issues finance new capital projects, while proceeds of refunding issues retire outstanding debt of prior bond issues. A bond issue can include both new and refunding proceeds.

Figures A1 and A2 show total issuance, as well as the split between new money and refunding issues, for both Governmental and tax-exempt private activity bonds issued between 2001 and 2006. Of the $\$ 272.2$ billion of long-term Governmental bond proceeds issued during 2006, new money issues outnumbered refunding issues 2 to 1 . For tax-exempt
private activity bonds, this ratio was slightly less-of the $\$ 108.6$ billion of total long-term issues, 58.3 percent was new money, and 41.7 percent was refunding. For 2005, long-term new money and refunding proceeds were nearly equal, for both Governmental and tax-exempt private activity bonds.

Figure A3 charts the behavior of tax-exempt bond interest rates over the same period. Refunding activity occurs more often when interest rates are

## Figure A1

Volume of Long-Term Governmental Bonds Issued, by Type and Issue Year, 2001-2006


## Figure A2

Volume of Long-Term Private Activity Bonds Issued, by Type and Issue Year, 2001-2006
Billions of dollars


## Figure A3

Average Annual Interest Rates on Tax-Exempt State and Local Bonds, 2001-2006 [1]

[1] Interest rate data obtained from Federal Reserve Board, "Federal Statistical Release H.15: Selected Interest Rates, Historical Data." These data can be found at: http://www.federalreserve.gov/releases/H15/data.htm.
NOTE: Detail may not add to total because of rounding.
falling, as borrowers look to reduce future debt service payments over the life of the bond. The overall increase in refunding issues for Issue Years 2001 through 2005 illustrates this point. The sharp reduction in refundings between 2005 and 2006 might be attributed to uncertainty about market conditions and future changes in interest rates, as well as the reduced inventory of outstanding bonds resulting from refunding activity in recent years. ${ }^{9}$

## Long-Term Bond Volume, by Selected Purpose

Figure B presents the composition of long-term taxexempt bond proceeds, by selected purpose as well as type of issue, for both Governmental and private activity bond issues. More than half ( 61.9 percent) of the total $\$ 272.2$ billion long-term Governmental bond proceeds for 2006 financed education, utilities, and transportation projects. Just over one-fourth (26.3 percent) of the long-term Governmental bond proceeds were allocated for "other bond purposes" (i.e., specific purpose(s) did not apply or were not separately allocated by the issuer). For all of the Governmental bond purposes shown in Figure B, more proceeds were spent financing new capital projects than were put toward refunding prior bond issues.

Qualified section 501(c)(3) bonds, which include total qualified hospital bonds and qualified nonhos-
pital bonds issued to benefit entities exempt from income tax under IRC section 501(c)(3), combined, accounted for 51.9 percent of the $\$ 108.6$ billion of long-term private activity bonds issued for 2006. Private activity bonds issued to provide housing assistance in the form of qualified residential rental projects and qualified mortgages (including Gulf Opportunity Zone mortgages and qualified veterans' mortgages not shown in Figure B) accounted for another 28.9 percent of total proceeds.

## Overview of Bond Issues, by State

Total new money long-term Governmental bond volume increased $\$ 28.6$ billion ( 18.9 percent) from 2005 to 2006. States with significant increases in new money long-term Governmental bond issues from 2005 to 2006 include Tennessee, whose issuance jumped from $\$ 1.2$ billion in 2005 to $\$ 6.4$ billion in 2006; Wyoming, whose issuance rose 172.6 percent, from slightly less than $\$ 49$ million in 2005 to $\$ 133.7$ million in 2006; the District of Columbia, whose issuance more than doubled, from just less than $\$ 0.5$ billion in 2005 to $\$ 0.9$ billion in 2006; and Louisiana, whose issuance also more than doubled, from \$1.6 billion in 2005 to $\$ 3.3$ billion in 2006.

Vermont experienced a significant decrease in new money long-term Governmental bond issues, from $\$ 314.0$ million in 2005 to $\$ 94.4$ million in 2006, as did Massachusetts, whose issuance fell 47.5 percent, from $\$ 5.5$ billion in 2005 to $\$ 2.9$ billion in 2006. In all, 18 States reduced the amount of new money long-term Governmental bonds issued from 2005 to 2006, by $\$ 10.2$ billion, down from the 23 States whose combined issuance fell $\$ 23.7$ billion for the corresponding 2004 to 2005 timeframe.

Figure C1 presents the amount of Governmental bonds issued for the top 15 States, in terms of total dollar volume of new money long-term tax-exempt Governmental bonds issued for 2006. Combined, the top 15 States accounted for 68.2 percent of the total $\$ 180.2$ billion of new money long-term Governmental bond issues for the year. About $\$ 78.5$ billion (43.5 percent) of the total were issued by authorities in the following five States: California ( 12.8 percent), Texas ( 10.6 percent), New York ( 8.3 percent), Florida ( 7.4 percent), and Illinois (4.4 percent). According to 2006 Census estimates, together, these

[^1]
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## Figure B

Long-Term Governmental Bonds, by Selected Bond Purpose and Type of Issue, 2006


Long-Term Tax-Exempt Private Activity Bonds, by Selected Bond Purpose and Type of Issue, 2006 Billions of dollars


[^2]
## Figure C 1

## New Money Long-Term Governmental Bonds, by Selected Bond Purpose, for Top 15 States, Ranked by Total Governmental Bond Issuance, 2006

| State of issue | Total | Selected bond purpose |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Education |  | Other purposes [1] |  | Transportation |  | Utilities |  | Environment |  |
|  | Amount | Amount | Percentage of State total | Amount | Percentage of State total | Amount | Percentage of State total | Amount | Percentage of State total | Amount | Percentage of State total |
|  | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) | (11) |
| Total, all States | 180,167 | 57,162 | 31.7 | 46,480 | 25.8 | 28,912 | 16.0 | 26,980 | 15.0 | 9,849 | 5.5 |
| California | 23,069 | 9,698 | 42.0 | 4,625 | 20.0 | 3,509 | 15.2 | 2,396 | 10.4 | 1,736 | 7.5 |
| Texas | 19,175 | 6,625 | 34.6 | 2,249 | 11.7 | 4,494 | 23.4 | 4,990 | 26.0 | 216 | 1.1 |
| New York | 15,017 | 3,633 | 24.2 | 5,619 | 37.4 | 4,726 | 31.5 | 353 | 2.4 | 377 | 2.5 |
| Florida | 13,345 | 4,208 | 31.5 | 4,523 | 33.9 | 814 | 6.1 | 2,648 | 19.8 | 315 | 2.4 |
| Illinois | 7,845 | 2,757 | 35.1 | 1,656 | 21.1 | 1,842 | 23.5 | 749 | 9.5 | 567 | 7.2 |
| Tennessee | 6,404 | 283 | 4.4 | 516 | 8.1 | 34 | 0.5 | 5,327 | 83.2 | 4 | 0.1 |
| Pennsylvania | 5,399 | 2,155 | 39.9 | 1,706 | 31.6 | 568 | 10.5 | 70 | 1.3 | 572 | 10.6 |
| Missouri | 4,854 | 1,022 | 21.1 | 1,024 | 21.1 | 1,000 | 20.6 | 1,284 | 26.5 | 167 | 3.4 |
| Washington | 4,486 | 1,585 | 35.3 | 970 | 21.6 | 593 | 13.2 | 795 | 17.7 | 212 | 4.7 |
| Georgia | 4,409 | 1,132 | 25.7 | 1,355 | 30.7 | 960 | 21.8 | 35 | 0.8 | 585 | 13.3 |
| New Jersey | 4,142 | 1,579 | 38.1 | 771 | 18.6 | 1,314 | 31.7 | 21 | 0.5 | 234 | 5.6 |
| Colorado | 3,916 | 1,365 | 34.9 | 805 | 20.6 | 711 | 18.2 | 363 | 9.3 | 77 | 2.0 |
| Virginia | 3,842 | 1,663 | 43.3 | 1,325 | 34.5 | 129 | 3.4 | 193 | 5.0 | 135 | 3.5 |
| Arizona | 3,498 | 1,054 | 30.1 | 864 | 24.7 | 537 | 15.4 | 591 | 16.9 | 315 | 9.0 |
| North Carolina | 3,477 | 1,568 | 45.1 | 918 | 26.4 | 83 | 2.4 | 501 | 14.4 | 103 | 3.0 |

Footnotes at end of figure C2.
five States accounted for 36.7 percent of the total U.S. population. ${ }^{10}$

An examination of issuance by State reveals some differences in the allocation of proceeds by bond purpose. Overall, for 2006, 31.7 percent of the $\$ 180.2$ billion of new money long-term Governmental bonds was issued for educational purposes. However, of the total amount of new money longterm bonds issued in North Carolina, 45.1 percent was issued for education, compared to 24.2 percent in New York and 4.4 percent in Tennessee for the same purpose.

Transportation projects accounted for 16.0 percent of States' total new money long-term proceeds. In New Jersey, however, 31.7 percent of the total new money long-term Governmental bond proceeds was for transportation, while, in Florida, only 6.1 percent was allocated for the same purpose. Transportation bonds accounted for only 3.4 percent of

Virginia's total amount of new money long-term bond issues.

Tennessee allocated 83.2 percent of its total amount of new money long-term bonds to utility projects, considerably more than the U.S. total (15.0 percent). Missouri and Texas also spent large portions of their totals on utility projects-26.5 percent and 26.0 percent, respectively.

Total new money long-term tax-exempt private activity bond volume increased $\$ 8.6$ billion (15.7 percent) from 2005 to 2006. Figure C2 presents the amount of bonds issued for the top 15 states, in terms of total dollar volume of new money longterm tax-exempt private activity bonds. Mississippi substantially increased its issuance of new money long-term private activity bonds from 2005 to 2006, from $\$ 217.2$ million in 2005 to $\$ 814.2$ million in 2006. The majority of this increase is attributed to the $\$ 419.0$ million of Gulf Opportunity Zone and

[^3]
## Figure $\mathbf{Q}^{2}$

New Money Long-Term Tax-Exempt Private Activity Bonds, by Selected Bond Purpose, for Top 15 States, Ranked by Total Tax-Exempt Private Activity Bond Issuance, 2006

| State of issue | Total | Selected bond purpose |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Qualified section 501(c)(3) nonhospital |  | Qualified hospital |  | Qualified mortgage |  | Qualified residential rental |  | Airports, docks, and wharves [2] |  |
|  | Amount | Amount | Percentage of State total | Amount | Percentage of State total | Amount | Percentage of State total | Amount | Percentage of State total | Amount | Percentage of State total |
|  | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) | (11) |
| Total, all States | 63,286 | 19,791 | 31.3 | 14,846 | 23.5 | 10,318 | 16.3 | 6,036 | 9.5 | 3,496 | 5.5 |
| California | 6,031 | 2,957 | 49.0 | 745 | 12.4 | 423 | 7.0 | 1,451 | 24.1 | d | d |
| New York | 4,529 | 2,375 | 52.4 | 184 | 4.1 | 181 | 4.0 | 1,307 | 28.9 | 260 | 5.7 |
| Texas | 3,867 | 907 | 23.5 | 1,061 | 27.4 | 500 | 12.9 | 436 | 11.3 | d | d |
| Ohio | 3,443 | 603 | 17.5 | 1,360 | 39.5 | 910 | 26.4 | 161 | 4.7 | d | d |
| Florida | 2,929 | 631 | 21.5 | 926 | 31.6 | 522 | 17.8 | 267 | 9.1 | 284 | 9.7 |
| Pennsylvania | 2,668 | 1,368 | 51.3 | 435 | 16.3 | 416 | 15.6 | d | d | 0 | 0.0 |
| Indiana | 2,320 | 484 | 20.9 | 624 | 26.9 | 309 | 13.3 | d | d | d | d |
| North Carolina | 2,308 | 309 | 13.4 | 1,043 | 45.2 | 130 | 5.6 | d | d | d | d |
| Illinois | 2,034 | 847 | 41.6 | 366 | 18.0 | 520 | 25.6 | 203 | 10.0 | d | d |
| Washington | 1,852 | 813 | 43.9 | 480 | 25.9 | 188 | 10.2 | 243 | 13.1 | d | d |
| Maryland | 1,833 | 1,287 | 70.2 | 254 | 13.9 | 205 | 11.2 | 45 | 2.5 | d | d |
| Virginia | 1,814 | 690 | 38.0 | 391 | 21.6 | d | d | 119 | 6.6 | d | d |
| Massachusetts | 1,774 | 903 | 50.9 | 224 | 12.6 | d | d | 272 | 15.3 | 0 | 0.0 |
| Colorado | 1,710 | 464 | 27.1 | 861 | 50.4 | 135 | 7.9 | 80 | 4.7 | 58 | 3.4 |
| Wisconsin | 1,661 | 575 | 34.6 | 520 | 31.3 | 414 | 24.9 | d | d | d | d |

d-Data deleted to avoid disclosure of information about specific bonds. However, the data are included in the appropriate totals.
[1] For purposes of this figure, "other purposes" refer to obligations for which a specific purpose either did not apply or was not clearly indicated on the Form 8038-G. It does not include specific purposes, such as public safety and housing, that are not shown separately in this figure. See Table 1.
[2] For purposes of this figure, certain bond purposes were combined. For this reason, data in this figure will differ slightly from the data in Tables 8 and 9 .
NOTE: Detail may not add to totals because of rounding.

Gulf Opportunity Zone mortgage bonds issued to provide relief from the effects of Hurricane Katrina. Significant increases also occurred in Alabama, whose issuance more than tripled, from $\$ 243.9$ million in 2005 to $\$ 903.0$ million in 2006; California, whose issuance was up from $\$ 4.8$ billion in 2005 to $\$ 6.0$ billion in 2006; Texas, whose issuance increased from $\$ 2.8$ billion in 2005 to $\$ 3.9$ billion in 2006; Florida, whose issuance increased from $\$ 2.0$ billion in 2005 to $\$ 2.9$ billion in 2006; and Maryland, whose issuance doubled, from $\$ 0.9$ billion in 2005 to $\$ 1.8$ billion in 2006.

New York experienced a significant decrease in new money long-term private activity bond issuance, from $\$ 6.8$ billion in 2005 to $\$ 4.5$ billion in 2006, as did Arizona, whose issuance fell 63.2 percent, from
whose issuance fell 48.1 percent, from $\$ 1.8$ billion in 2005 to $\$ 0.9$ billion in 2006; and Michigan, whose issuance fell 31.2 percent, from $\$ 2.3$ billion in 2005 to $\$ 1.6$ billion in 2006. In all, 17 States issued a smaller amount of new money long-term private activity bonds in 2006 than in 2005, for a total reduction of $\$ 6.6$ billion.

Combined, the top 15 States accounted for 64.4 percent of the total $\$ 63.3$ billion of new money longterm private activity bond issues for the year. Close to one-third ( $\$ 20.8$ billion) of the total was issued by authorities in the following five States: California ( 9.5 percent), New York ( 7.2 percent), Texas ( 6.1 percent), Ohio ( 5.4 percent), and Florida ( 4.6 percent).

Similar to Governmental bond issuance, there were differences in the composition of total new money long-term private activity bond issuance, by
purpose, among the States. Examining the bond allocations by purpose for 2006, overall, 31.3 percent of the amount of new money long-term private activity bonds was issued for qualified IRC section 501(c)(3) nonhospital organizations. Another 23.5 percent was issued for qualified hospital bonds.

Of the total amount of new money long-term private activity bonds issued in Maryland, 70.2 percent was issued for IRC section 501(c)(3) nonhospital organizations, compared to 17.5 percent in Ohio and 13.4 percent in North Carolina for the same purpose. Qualified hospital bonds accounted for 50.4 percent of Colorado's new money long-term private activity bond issues, compared to 12.6 percent in Massachusetts and 4.1 percent in New York for the same purpose.

Together, States allocated only 9.5 percent of the $\$ 63.3$ billion of new money long-term private activity bonds in 2006 for qualified residential rental projects. However, both New York and California directed a much larger share of their total new money long-term issuances to this purpose, 28.9 percent and 24.1 percent, respectively.

Tax-exempt private activity bonds are subject to State volume limitations, or volume caps. Most types of private activity bonds are subject to the unified State volume cap, which limits the aggregate dollar amount of bonds that each State can issue annually. For each of the qualified issue types subject to the unified volume cap, there is no specific limit on the dollar amount of issuance; rather, each State must allocate issuance authority in such a way that the combined issuance does not exceed the annual volume cap. The unified State volume cap is adjusted annually for population growth and is also indexed for inflation. ${ }^{11}$ Other types of private activity bonds are subject to separate volume limitations based on the specific bond purpose, or types of projects being financed. Refunding bonds are not subject to volume cap limitations, as long as there is no increase in the principal amount of the outstanding bond. Issuers can elect to carry forward unused volume cap for a specified bond purpose, and bonds issued with respect to the specified bond purpose
during the following 3 calendar years are not subject to the volume cap.

Figure D shows the total amount of new money long-term tax-exempt private activity bond issuance, new issues subject to the unified State volume cap, amounts applied from prior-year carryforward elections, and volume cap allocations, by State, for 2006. The total amount of new bonds issued by a State can exceed that State's total volume cap allocation in instances where bonds are issued for purposes other than those subject to the unified State volume cap and where amounts are being carried forward from previous years' allocations.

Unlike private activity bonds, Governmental bonds are generally not subject to the volume cap; however, if more than $\$ 15$ million of the proceeds of an issue are used in private use or disproportionate use, then the amount in excess of $\$ 15$ million is subject to the volume cap, and the issuer is required to report the amount of the State volume cap allocated to the Governmental issue. ${ }^{12,13}$ For 2006, issuers reported allocating a combined $\$ 408.1$ million of State volume cap to the total $\$ 319.4$ billion of total Governmental bond issues. This indicates some private business involvement, but not in an amount sufficient to satisfy the 10 -percent use criteria for private activity bonds for each Governmental bond issue.

## Summary

Over 25,000 Governmental bonds were issued in 2006, raising $\$ 319.4$ billion of proceeds for public projects such as schools, transportation infrastructure, and utilities. Of the $\$ 272.2$ billion of long-term Governmental bonds issued, $\$ 180.2$ billion of proceeds were used to finance new projects, while the remaining $\$ 92.0$ billion of proceeds refunded prior Governmental bond issues. In addition, over 3,800 tax-exempt private activity bonds were issued in 2006, for a total $\$ 108.9$ billion in proceeds. These tax-exempt private activity bond proceeds financed qualified private facilities (such as residential rental facilities, single family housing, and airports), as well as the facilities of Internal Revenue Code section 501(c)(3) organizations (such as hospitals and

[^4]
## Figure D

## New Money Long-Term Tax-Exempt Private Activity Bonds, Carryforward, and Volume Cap, by State of Issue, 2006

[Money amounts are in millions of dollars]

| State of issue | Total amount of bonds issued | Amount subject to the unified State volume cap [1] | Amount not subject to the volume cap under a carryforward election [2] | Total volume cap allocation [3] |
| :---: | :---: | :---: | :---: | :---: |
|  | (1) | (2) | (3) | (4) |
| Total, all States | 63,285.9 | 24,023.0 | 11,098.7 | 26,751.0 |
| Alabama | 903.0 | 318.8 | 257.9 | 364.6 |
| Alaska | 730.6 | 386.8 | 339.8 | 246.6 |
| Arizona | 574.4 | 268.8 | d | 475.1 |
| Arkansas | 401.3 | 291.5 | d | 246.6 |
| California | 6,030.9 | 2,321.2 | 649.1 | 2,890.6 |
| Colorado | 1,710.4 | 327.4 | 162.3 | 373.2 |
| Connecticut | 910.6 | 339.8 | d | 280.8 |
| Delaware | 373.4 | 296.5 | 296.5 | 246.6 |
| District of Columbia | 775.0 | 44.7 | 41.8 | 246.6 |
| Florida | 2,928.8 | 1,060.6 | 606.0 | 1,423.2 |
| Georgia | 911.8 | 329.1 | 256.0 | 725.8 |
| Hawaii | d | d | d | 246.6 |
| Idaho | 250.9 | 243.9 | 195.0 | 246.6 |
| Illinois | 2,033.9 | 777.0 | 509.3 | 1,021.1 |
| Indiana | 2,319.6 | 501.6 | d | 501.8 |
| lowa | 577.3 | 301.5 | 142.3 | 246.6 |
| Kansas | 642.6 | 262.2 | 215.4 | 246.6 |
| Kentucky | 694.0 | 215.7 | 42.8 | 333.9 |
| Louisiana | 832.6 | 430.5 | 153.4 | 361.9 |
| Maine | 454.8 | 83.5 | 77.9 | 246.6 |
| Maryland | 1,833.1 | 264.7 | 236.9 | 448.0 |
| Massachusetts | 1,773.7 | 646.9 | d | 511.9 |
| Michigan | 1,596.0 | 451.5 | 241.6 | 809.7 |
| Minnesota | 1,190.4 | 444.4 | 137.0 | 410.6 |
| Mississippi | 814.2 | 356.8 | 299.3 | 246.6 |
| Missouri | 980.6 | 602.9 | 334.6 | 464.0 |

Footnotes at end of figure.
private universities). Of the $\$ 108.6$ billion of longterm private activity bonds issued, $\$ 63.3$ billion of proceeds were used to finance new projects, while the remaining $\$ 45.3$ billion of proceeds refunded prior tax-exempt private activity bond issues.

## Data Sources and Limitations

The data presented in this data release are based on the populations of Forms 8038, Information Return for Tax-Exempt Private Activity Bond Issues, and Forms 8038-G, Information Return for Tax-Exempt Governmental Obligations, filed with the Internal Revenue Service for bonds issued during Calendar

Year 2006. The data exclude returns filed for commercial paper transactions, as well as issues that are loans from the proceeds of another tax-exempt bond issue (pooled financings).

Bond issuers were required to file these tax-exempt bond information returns by the 15th day of the second calendar month after the close of the calendar quarter in which the bond was issued. However, in an effort to include as many applicable returns for a particular issue year as possible, the study period extended well beyond this timeframe. The study includes returns processed from January 1, 2006, to May 4, 2008, for bonds issued in 2006. Where pos-

## Figure D-Continued

## New Money Long-Term Tax-Exempt Private Activity Bonds, Carryforward, and Volume Cap, by State of Issue, 2006-Continued

| State of issue | Total amount of bonds issued | Amount subject to the unified State volume cap [1] | Amount not subject to the volume cap under a carryforward election [2] | Total volume cap allocation [3] |
| :---: | :---: | :---: | :---: | :---: |
|  | (1) | (2) | (3) | (4) |
| Montana | 442.4 | 330.0 | 270.1 | 246.6 |
| Nebraska | 461.4 | 407.4 | 349.8 | 246.6 |
| Nevada | 541.6 | 125.4 | 110.8 | 246.6 |
| New Hampshire | 419.4 | 214.5 | 51.8 | 246.6 |
| New Jersey | 1,221.1 | 458.8 | 94.7 | 697.4 |
| New Mexico | 235.4 | 189.7 | d | 246.6 |
| New York | 4,529.4 | 1,525.2 | 706.9 | 1,540.4 |
| North Carolina | 2,307.8 | 655.7 | 382.7 | 694.7 |
| North Dakota | 175.8 | 123.2 | d | 246.6 |
| Ohio | 3,443.2 | 1,472.7 | d | 917.1 |
| Oklahoma | 612.3 | 290.4 | 65.7 | 283.8 |
| Oregon | 291.8 | 25.1 | 21.4 | 291.3 |
| Pennsylvania | 2,667.5 | 859.5 | 521.9 | 994.4 |
| Rhode Island | 430.4 | 319.7 | 216.5 | 246.6 |
| South Carolina | 633.0 | 403.4 | 82.9 | 340.4 |
| South Dakota | 138.1 | 82.9 | d | 246.6 |
| Tennessee | 1,422.4 | 338.3 | 171.6 | 477.0 |
| Texas | 3,867.1 | 1,787.6 | 414.1 | 1,828.8 |
| Utah | 209.4 | 191.6 | 66.3 | 246.6 |
| Vermont | 377.4 | 311.8 | d | 246.6 |
| Virginia | 1,814.1 | 629.1 | 524.2 | 605.4 |
| Washington | 1,852.2 | 472.0 | 81.7 | 503.0 |
| West Virginia | 562.4 | 272.3 | 251.2 | 246.6 |
| Wisconsin | 1,661.1 | 539.8 | 420.3 | 442.9 |
| Wyoming | 387.0 | 386.3 | 230.8 | 246.6 |
| U.S. Possessions [4] | d | d | d | 313.0 |

d-Data deleted to avoid disclosure of information for specific bonds when compared to other published data. However, the data are included in the appropriate totals.
[1] These calculations are based on the data reported on Part II of Form 8038 for type of issue, and include the following: mass commuting facilities, water furnishing facilities, sewage facilities, solid waste disposal facilities, qualified residential rental projects, local electric energy or gas furnishing facilities, local district heating and cooling facilities, qualified hazardous waste facilities, high-speed intercity rail facilities, qualified mortgage bonds, qualified small issue bonds, qualified student loan bonds, and qualified redevelopment bonds. No distinction was made for governmentally-owned solid waste or high-speed intercity rail facilities (which are not subject to the volume cap). As a result, figures could be slightly overstated.
[2] As reported on Form 8038 , line 44b. An issuing authority can elect to carry forward its unused volume cap for one or more carryforward purposes (see IRC section $146(\mathrm{f})$ ). If the election is made, bonds issued with respect to a specified carryforward purpose are not subject to the volume cap under IRC section 146(a) during the 3 calendar years following the calendar year in which the carryforward arose, but only to the extent that the amount of such bonds does not exceed the amount of the carryforward elected for that purpose.
[3] The volume cap amount was calculated based on State population estimates produced by the U.S. Bureau of the Census and published in Internal Revenue Bulletin Number 200611 (Notice 2006-22). For 2006, the volume cap was the greater of $\$ 80$ per capita or $\$ 246.6$ million.
[4] U.S. possessions include Puerto Rico, the U.S. Virgin Islands, Guam, and the Northern Mariana Islands.
sible, data from amended returns filed and processed before the cutoff date were included. Late-filed returns for tax-exempt bonds issued during 2006 processed after the cutoff date were not included in the statistics.

During statistical processing, returns were subject to thorough testing and correction procedures
to ensure data accuracy and validity. Additional checks were conducted to identify and exclude duplicate returns. Wherever possible, returns with incomplete information, mathematical errors, or other reporting anomalies were edited to resolve internal inconsistencies. However, in other cases, it was not possible to reconcile reporting discrepancies. Thus,

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a certain amount of reporting and processing error may remain.

## Explanation of Selected Terms

Commercial paper-Commercial paper consists of short-term notes that are continually rolled-over. Maturities average about 30 days but can extend up to 270 days. Many localities use commercial paper to raise cash needed for current transactions.

Enterprise Zone facility bond-Established by the passage of the Revenue Reconciliation Act of 1993, this type of exempt facility bond may be issued for certain businesses in "empowerment zones" or "enterprise communities." Empowerment Zone and Enterprise Community designations are made by the Secretaries of Agriculture and Housing and Urban Development and last for a 10 -year period. The Taxpayer Relief Act of 1997 provided certain economically depressed census tracts within the District of Columbia designation as the "District of Columbia Enterprise Zone." Qualified enterprise zone facility bonds are generally subject to the same rules as exempt facility bonds.

Exempt facility bond-Bond issue of which 95 percent or more of the net proceeds is used to finance a tax-exempt facility (as listed in IRC sections 142(a)(1) through (13) and 142(k)). These facilities include airports, docks and wharves, mass commuting facilities, facilities for the furnishing of water, sewage facilities, solid waste disposal facilities, qualified residential rental projects, facilities for the local furnishing of electric energy or gas, local district heating or cooling facilities, qualified hazardous waste facilities, high-speed intercity rail facilities, environmental enhancements of hydroelectric generating facilities, and qualified public educational facilities.

Governmental bond-Any obligation issued by a State or local government unit that is not a private activity bond (see below). The interest on a Governmental bond is excluded from gross income under IRC section 103.

Gulf Opportunity Zone bond-The Gulf Opportunity Zone Act of 2005, signed into law as Public Law 109-135 on December 21, 2005, authorized a new category of tax-exempt bonds. The proceeds of such bonds are used to finance the construction and rehabilitation of certain residential and nonresidential property located in certain localities in Alabama, Louisiana, and Mississippi, designated as the "Gulf

Opportunity Zone." This area constitutes the portion of the Hurricane Katrina disaster area determined by the President to warrant individual or individual and public assistance from the Federal Government, under the Robert T. Stafford Disaster Relief and Emergency Assistance Act.

IRC section $1400 \mathrm{~N}(\mathrm{a})(2)$ defines a qualified Gulf Opportunity Zone Bond as any bond issued as part of an issue if it meets the following requirements: (1) 95 percent or more of the net proceeds is to be used for qualified project costs, or such issue meets the requirements of a qualified mortgage issue, except as otherwise provided in IRC section 1400 N (a); (2) such bond is issued by the State of Alabama, Louisiana, or Mississippi or any political subdivision thereof; (3) such bond is designated for purposes of IRC section 1400 N(a) either by the Governor, or approved bond commission, of such State; (4) the bond is issued after December 21, 2005, and before January 1, 2011; and (5) no portion of the proceeds of such issue is to be used to provide any property described in IRC section 144(c)(6)(B).

Gulf Opportunity Zone Bonds that meet the general requirements of a qualified mortgage bond issue, and the proceeds of such bond issues that finance residences located in the Gulf Opportunity Zone, shall be treated as qualified mortgage bonds ("Gulf Opportunity Zone Mortgage Bonds"), as described in IRC section $1400 \mathrm{~N}(\mathrm{a})(2)(\mathrm{A})(\mathrm{ii})$. The Act also authorized the issuance of "Gulf Opportunity Zone Advance Refunding Bonds," which allow for an additional advance refunding for certain bonds, issued by the States of Alabama, Louisiana, or Mississippi (or any political subdivision thereof), and outstanding on August 28, 2005. This provision was effective for bonds issued between December 21, 2005, and January 1, 2011. (See Internal Revenue Service Notice 2006-41, Internal Revenue Bulletin 2006-18, for additional information.)

New York Liberty Zone bonds-The Job Creation and Worker Assistance Act of 2002 created Section 1400L of the Internal Revenue Code of 1986 to provide various tax benefits for the area of New York City damaged or affected by the terrorist attack on September 11, 2001. IRC section 1400L(d) authorizes the issuance of an additional type of exempt facility bond, namely, "Liberty Bonds." Liberty Bonds are subject to the following additional requirements: (1) 95 percent or more of the net proceeds of such issue must be used for qualified project costs; (2) the
bond must be issued by the State of New York or any political subdivision thereof; (3) the Governor of the State of New York or the Mayor of the City of New York must designate the bond for purposes of section 1400L(d); and (4) the bond must be issued after March 9, 2002, and before January 1, 2005. The maximum aggregate face amount of bonds that may be designated as Liberty Bonds is $\$ 8$ billion.

Nongovernmental output property bond-Bonds used to finance the acquisition of property used by a nongovernmental entity in connection with an output facility (such as an electric or gas power project). This bond must meet additional tests under IRC section 141(d).

Pooled financing-An arrangement whereby a portion of the proceeds of a Governmental bond issue is used to make loans to other governmental units.

Private activity bond-Bond issue of which more than 10 percent of the proceeds is used for any private business use, and more than 10 percent of the payment of the principal or interest is either secured by an interest in property to be used for private business use (or payment for such property), or is derived from payments for property (or borrowed money) used for a private business use. A bond is also considered a private activity bond if the amount of the proceeds used to make or finance loans (other than loans described in IRC section 141(c)(2)) to persons other than governmental units exceeds the lesser of 5 percent of the proceeds or $\$ 5$ million.

Qualified green building and sustainable design project-Bond issue of which 95 percent or more of the net proceeds is used to finance qualified green building and sustainable design projects, as designated by the Secretary of the Treasury, after consultation with the Administrator of the Environmental Protection Agency. The project must be nominated by a State or local government, and the issuer must submit a detailed application to the Treasury Department for consideration, and, on approval, allocation of a specified issuance amount. Section 701 of the American Jobs Creation Act of 2004 added IRC sections 142(a)(14) and 142(l), authorizing up to $\$ 2$ billion of tax-exempt private activity bonds, not subject to the unified volume cap, for qualified green building and sustainable design projects, to be issued between December 31, 2004, and October 1, 2009. (See Internal Revenue Service Notice 200641, Internal Revenue Bulletin 2006-18, for additional information.)

Qualified highway or surface transfer freight facility bond-Bond issue of which 95 percent or more of the net proceeds is used to provide qualified highway or surface freight transfer facilities. Section 11143 of the Safe, Accountable, Flexible, Efficient, Transportation Equity Act: A Legacy for Users (SAF-ETEA-LU) Public Law 109-59, signed into law on August 10, 2005, added IRC sections 142(a)(15) and 142(m). Section 142(m)(1) defines the term "qualified highway or surface freight transfer facilities" as: (a) any surface transportation project that receives Federal assistance under title 23, United States Code (as in effect on August 10, 2005); (b) any project for an international bridge or tunnel for which an international entity authorized under Federal or State law is responsible and that receives Federal assistance under title 23, United States Code (as so in effect); or, (c) any facility for the transfer of freight from truck to rail or rail to truck (including any temporary storage facilities directly related to such transfers) that receives Federal assistance under either title 23 or title 49, United States Code (as so in effect). This legislation authorized issuance of up to $\$ 15$ billion of such bonds, not subject to the unified volume cap, applicable to bonds issued after August 10, 2005. Allocation of the $\$ 15$-billion national limitation is under the jurisdiction of the Department of Transportation. (See Internal Revenue Service Notice 200645, Internal Revenue Bulletin 2006-20, for additional information.)

Qualified mortgage bond-Bond issue of which the proceeds (except issuance costs and reasonably required reserves) are used to provide financing assistance for single-family residential property, and which meets the additional requirements in IRC section 143. Bond proceeds can be applied toward the purchase, improvement, or rehabilitation of owneroccupied residences, as well as to finance qualified home-improvement loans.

Qualified public educational facility bondBond issue of which 95 percent or more of the net proceeds is used to provide qualified public educational facilities, defined by IRC section 142(k)(1) as any school facility that is: (a) part of a public elementary or secondary school; and (b) is owned by a private, for-profit corporation under a publicprivate partnership agreement with a State or local educational agency. Under a "public-private partnership agreement," the corporation agrees to construct, rehabilitate, refurbish, or equip a school facility and,

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at the end of the term of the agreement, to transfer the school facility to the State or local educational agency for no additional consideration. Such bonds are not subject to the unified volume cap; rather, the annual State limit is equal to the lesser of $\$ 10$ per resident or $\$ 5$ million.

Qualified redevelopment bond-Bond issue of which 95 percent or more of the net proceeds is used to finance certain specified real property acquisition and redevelopment in blighted areas (see IRC section 144(c) for additional requirements).

Qualified section 501(c)(3) bond-Bonds issued by State and local governments to finance the activities of charitable organizations that are tax-exempt under IRC section 501(c)(3). A bond must meet the following conditions to be classified as a section 501(c)(3) bond: 1) all property financed by the net proceeds of the bond issue is to be owned by a section 501(c)(3) organization or a governmental unit; and 2) the bond would not be a private activity bond if section 501(c)(3) organizations were treated as governmental units with respect to their activities that are not related trades or businesses, and the private activity bond definition was applied using a 5-percent threshold rather than a 10 -percent threshold. The primary beneficiaries of these bonds are private, nonprofit hospitals, colleges, and universities. A qualified hospital bond issue is one in which 95 percent or more of the net proceeds is to be used for a hospital.

Qualified small issue bond-Bond issue generally not exceeding $\$ 1$ million, and of which 95 percent or more of the net proceeds is used to finance the acquisition of land and depreciable property or to refund such issues. In certain instances, an election to take certain capital expenditures into account can increase the limit on bond size, from $\$ 1$ million to $\$ 10$ million. These bonds may only be used to finance manufacturing facilities and to benefit certain first-time farmers.

Qualified student loan bond-Bond issue of which 90 percent or more of the net proceeds is used to make or finance student loans under a program of general application subject to the Higher Education Act of 1965 (see IRC section 144(b)(1)(A) for additional requirements), or of which 95 percent or more of the net proceeds is used to make or finance student loans under a program of general application approved by the State (see Code section 144(b)(1)(B) for additional requirements).

Qualified veterans' mortgage bond-In general, a bond issue of which 95 percent or more of the net proceeds is used to finance the purchase, improvement, or rehabilitation of owner-occupied residences for veterans who: 1) served prior to January 1, 1977; and, 2) applied for such a mortgage prior to the date 30 years after leaving active service or January 31, 1985, whichever is later. The payment of interest and principal must be secured by a general obligation of the State, and the bond must meet certain of the requirements of IRC section 143. The issuance of qualified veterans' mortgage bonds was limited to the following five states: Alaska, California, Oregon, Texas, and Wisconsin, each of which had a veterans' mortgage bond program in effect prior to June 22, 1984.

Tax Reform Act transition property bond- A bond issued under transitional rules contained in the Tax Reform Act of 1986. Proceeds from bonds issued under these rules include issues used to fund such items as pollution control facilities, parking facilities, industrial parks, sports stadiums, and convention facilities. Proceeds from other bonds issued under the transitional rules are included in this category only if they could not be identified as another issue type.

NOTE: Additional tax-exempt bond data, including data for prior years, can be found on the SOI Web site: http://www.irs.gov/taxstats. (Click on "Tax-Exempt Bonds.")

Table 1. Governmental Bonds, by Type and Term of Issue, 2006
[Money amounts are in millions of dollars]

| Type and term of issue | Number | Amount |
| :--- | :---: | :---: |
| All issues, total [1] | $\mathbf{2 5 , 2 2 6}$ | $\mathbf{3 1 9 , 3 9 4}$ |
| Short-term | 6,671 | 47,160 |
| Long-term | 18,555 | 272,234 |
| New money issues, total | $\mathbf{2 0 , 8 8 0}$ | $\mathbf{2 1 8 , 3 1 8}$ |
| Short-term | 5,064 | 38,150 |
| Long-term | 15,816 | 180,167 |
| Refunding issues, total | $\mathbf{6 , 4 1 2}$ | $\mathbf{1 0 1 , 0 7 6}$ |
| Short-term | 2,248 | 9,009 |
| Long-term | 4,164 | 92,067 |

[1] A given bond issue can include both new money and refunding proceeds. Thus, the number of new money issues plus the number of refunding issues will sometimes exceed the total number of issues. However, the money amounts add to the totals.
NOTE: Detail may not add to totals because of rounding.

Table 2. Long-Term Governmental Bonds, by Bond Purpose and Type of Issue, 2006
[Money amounts are in millions of dollars]

| Bond purpose | All issues |  | New money issues |  | Refunding issues |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Number | Amount | Number | Amount | Number | Amount |
|  | (1) | (2) | (3) | (4) | (5) | (6) |
| Total [1] | 18,555 | 272,234 | 15,816 | 180,167 | 4,164 | 92,067 |
| Education | 6,109 | 87,605 | 4,979 | 57,162 | 1,526 | 30,443 |
| Health and hospital | 445 | 4,899 | 403 | 3,381 | 80 | 1,518 |
| Transportation | 1,221 | 38,379 | 1,062 | 28,912 | 282 | 9,467 |
| Public safety | 2,399 | 7,261 | 2,291 | 5,390 | 203 | 1,872 |
| Environment | 1,296 | 16,696 | 1,062 | 9,849 | 447 | 6,847 |
| Housing | 143 | 930 | 116 | 444 | 38 | 487 |
| Utilities | 2,109 | 42,546 | 1,655 | 26,980 | 747 | 15,567 |
| Bond and tax/revenue anticipation notes | 319 | 2,204 | 297 | 1,570 | 45 | 634 |
| Other purposes [2] | 5,690 | 71,713 | 4,931 | 46,480 | 1,319 | 25,233 |

[1] A given bond issue can include more than one purpose and can include both new money and refunding proceeds. Thus, the summation of number of issues by purpose or by type of issue will sometimes exceed the total number of issues. However, the money amounts add to the totals.
[2] "Other purposes" refer to obligations for which a specific purpose either did not apply or was not clearly indicated on the Form 8038-G.
NOTE: Detail may not add to totals because of rounding.

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Table 3. Computation of Lendable Proceeds for Long-Term Governmental Bonds, by Bond Purpose, 2006

| Bond purpose | Entire issue price |  | Bond issuance costs |  | Credit enhancement |  | Allocation to reserve fund |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Number | Amount | Number | Amount | Number | Amount | Number | Amount |
|  | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) |
| Total [1] | 18,555 | 272,234 | 11,217 | 2,454 | 4,700 | 847 | 1,507 | 2,838 |
| Education | 6,109 | 87,605 | 3,880 | 771 | 2,010 | 188 | 317 | 385 |
| Health and hospital | 445 | 4,899 | 235 | 56 | 90 | 32 | 43 | 100 |
| Transportation | 1,221 | 38,379 | 814 | 257 | 309 | 121 | 97 | 399 |
| Public safety | 2,399 | 7,261 | 719 | 73 | 294 | 21 | 59 | 73 |
| Environment | 1,296 | 16,696 | 885 | 134 | 344 | 44 | 140 | 198 |
| Housing | 143 | 930 | 93 | 11 | 18 | 2 | 32 | 10 |
| Utilities | 2,109 | 42,546 | 1,741 | 407 | 782 | 150 | 306 | 685 |
| Bond and tax/revenue anticipation notes | 319 | 2,204 | 245 | 10 | 4 | [2] | 3 | 1 |
| Other purposes [3] | 5,690 | 71,713 | 3,675 | 736 | 1,371 | 288 | 554 | 989 |
| Bond purpose |  |  | Total lendable proceeds |  | Proceeds used to refund prior issues |  | Nonrefunding proceeds |  |
|  |  |  | Number | Amount | Number | Amount | Number | Amount |
| Total [1] |  |  | (9) | (10) | (11) | (12) | (13) | (14) |
|  |  |  | 18,555 | 266,095 | 4,164 | 90,333 | 15,816 | 175,762 |
| Education |  |  | 6,109 | 86,261 | 1,526 | 30,013 | 4,979 | 56,248 |
| Health and hospital |  |  | 445 | 4,710 | 80 | 1,453 | 403 | 3,257 |
| Transportation |  |  | 1,221 | 37,602 | 282 | 9,291 | 1,062 | 28,311 |
| Public safety |  |  | 2,399 | 7,095 | 203 | 1,839 | 2,291 | 5,256 |
| Environment |  |  | 1,296 | 16,320 | 447 | 6,732 | 1,062 | 9,588 |
| Housing |  |  | 143 | 907 | 38 | 478 | 116 | 429 |
| Utilities |  |  | 2,109 | 41,304 | 747 | 15,291 | 1,655 | 26,013 |
| Bond and tax/revenue anticipation notes |  |  | 319 | 2,194 | 45 | 633 | 297 | 1,561 |
| Other purposes [3] |  |  | 5,690 | 69,701 | 1,319 | 24,602 | 4,931 | 45,098 |

[1] A given bond issue can include more than one purpose. Thus, the summation of number of issues by purpose will sometimes exceed the total number of issues. However, the money amounts add to the totals.
[2] Indicates an amount less than $\$ 500,000$.
[3] "Other purposes" refer to obligations for which a specific purpose either did not apply or was not clearly indicated on the Form 8038-G.
NOTE: Detail may not add to totals because of rounding.

Table 4. New Money Long-Term Governmental Bonds, by Bond Purpose and Size of Entire Issue, 2006
[Money amounts are in millions of dollars, except for size of entire issue, which is in whole dollars]

| Bond purpose | All issues |  | Size of entire issue |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | $\begin{gathered} \text { Under } \\ \$ 500,000 \text { [1] } \end{gathered}$ |  | $\begin{gathered} \$ 500,000 \\ \text { under } \\ \$ 1,000,000 \end{gathered}$ |  | $\begin{gathered} \$ 1,000,000 \\ \text { under } \\ \$ 5,000,000 \end{gathered}$ |  |
|  | Number | Amount | Number | Amount | Number | Amount | Number | Amount |
|  | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) |
| Total [2] | 15,816 | 180,167 | 5,972 | 1,409 | 1,881 | 1,283 | 3,753 | 8,701 |
| Education | 4,979 | 57,162 | 1,733 | 413 | 543 | 375 | 1,045 | 2,442 |
| Health and hospital | 403 | 3,381 | 94 | 26 | 52 | 34 | 105 | 229 |
| Transportation | 1,062 | 28,912 | 357 | 78 | 117 | 71 | 269 | 488 |
| Public safety | 2,291 | 5,390 | 1,415 | 326 | 266 | 180 | 324 | 619 |
| Environment | 1,062 | 9,849 | 284 | 65 | 133 | 76 | 314 | 572 |
| Housing | 116 | 444 | 19 | 6 | 22 | 15 | 42 | 99 |
| Utilities | 1,655 | 26,980 | 340 | 82 | 198 | 126 | 568 | 1,216 |
| Bond and tax/revenue anticipation notes | 297 | 1,570 | 50 | 14 | 40 | 27 | 151 | 344 |
| Other purposes [3] | 4,931 | 46,480 | 1,739 | 400 | 571 | 379 | 1,226 | 2,693 |
| Size of entire issue-continued |  |  |  |  |  |  |  |  |
| Bond purpose | $\begin{gathered} \$ 5,000,000 \\ \text { under } \\ \$ 10,000,000 \end{gathered}$ |  | $\begin{aligned} & \$ 10,000,000 \\ & \text { under } \\ & \$ 25,000,000 \end{aligned}$ |  | $\begin{aligned} & \$ 25,000,000 \\ & \text { under } \\ & \$ 75,000,000 \end{aligned}$ |  | $\begin{aligned} & \$ 75,000,000 \\ & \text { or more } \end{aligned}$ |  |
|  | Number | Amount | Number | Amount | Number | Amount | Number | Amount |
|  | (9) | (10) | (11) | (12) | (13) | (14) | (15) | (16) |
| Total [2] | 1,546 | 10,265 | 1,276 | 18,367 | 880 | 32,887 | 508 | 107,255 |
| Education | 526 | 3,536 | 537 | 7,725 | 401 | 15,222 | 194 | 27,449 |
| Health and hospital | 53 | 345 | 45 | 623 | 31 | 919 | 23 | 1,206 |
| Transportation | 90 | 363 | 85 | 835 | 58 | 1,691 | 86 | 25,386 |
| Public safety | 120 | 626 | 78 | 752 | 55 | 1,302 | 33 | 1,585 |
| Environment | 127 | 592 | 92 | 977 | 58 | 1,397 | 54 | 6,170 |
| Housing | 13 | 70 | 9 | 116 | 6 | 98 | 5 | 39 |
| Utilities | 259 | 1,430 | 114 | 1,396 | 91 | 2,929 | 85 | 19,801 |
| Bond and tax/revenue anticipation notes | 32 | 210 | 12 | 162 | 9 | 328 | 3 | 486 |
| Other purposes [3] | 518 | 3,093 | 455 | 5,781 | 286 | 9,002 | 136 | 25,133 |

[1] Form 8038-G returns with an entire issue price less than $\$ 100,000$ are excluded from the study. Issuers of these bonds are instructed to file Form 8038-GC, Information Return for Small Tax-Exempt Governmental Bond Issues, Leases, and Installment Sales. Statistics of Income (SOI) does not process data from the Forms 8038 -GC filed with the Internal Revenue Service. [2] A given bond issue can include more than one purpose. Thus, the summation of number of issues by purpose will sometimes exceed the total number of issues. However, the money amounts add to the totals.
[3] "Other purposes" refer to obligations for which a specific purpose either did not apply or was not clearly indicated on the Form 8038-G. NOTE: Detail may not add to totals because of rounding.

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Table 5. New Money Long-Term Governmental Bonds, by State of Issue and Bond Purpose, 2006
[Money amounts are in millions of dollars]

| State of issue | Total [1] |  | Bond purpose |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Education |  | Health and hospital |  | Transportation |  | Public safety |  |
|  | Number | Amount | Number | Amount | Number | Amount | Number | Amount | Number | Amount |
| All States | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) |
|  | 15,816 | 180,167 | 4,979 | 57,162 | 403 | 3,381 | 1,062 | 28,912 | 2,291 | 5,390 |
| Alabama | 328 | 1,741 | 61 | 400 | 11 | 83 | 9 | 31 | 38 | 101 |
| Alaska | 40 | 792 | 17 | 160 | d | d | 5 | 168 | 3 | 1 |
| Arizona | 335 | 3,498 | 154 | 1,054 | d | d | 15 | 537 | 44 | 133 |
| Arkansas | 284 | 1,092 | 142 | 612 | 3 | 1 | 9 | 79 | 20 | 50 |
| California | 1,177 | 23,069 | 498 | 9,698 | 44 | 599 | 58 | 3,509 | 110 | 309 |
| Colorado | 311 | 3,916 | 67 | 1,365 | 9 | 180 | 22 | 711 | 43 | 381 |
| Connecticut | 131 | 2,251 | 52 | 252 | d | d | 14 | 23 | 34 | 52 |
| Delaware | 33 | 567 | 3 | 174 | 0 | 0 | 18 | 143 | 6 | 24 |
| District of Columbia | 8 | 932 | d | d | d | d | 0 | 0 | d | d |
| Florida | 543 | 13,345 | 69 | 4,208 | 8 | 406 | 33 | 814 | 92 | 355 |
| Georgia | 402 | 4,409 | 84 | 1,132 | 13 | 72 | 15 | 960 | 79 | 234 |
| Hawaii | 18 | 897 | d | d | 10 | 10 | 0 | 0 | d | d |
| Idaho | 81 | 805 | 21 | 311 | 5 | 54 | 15 | 203 | 10 | 4 |
| Illinois | 813 | 7,845 | 369 | 2,757 | 9 | 45 | 41 | 1,842 | 90 | 217 |
| Indiana | 409 | 2,891 | 133 | 1,332 | d | d | 23 | 187 | 88 | 201 |
| lowa | 351 | 1,383 | 89 | 510 | d | d | 35 | 36 | 34 | 138 |
| Kansas | 309 | 1,236 | 55 | 292 | 13 | 139 | 65 | 374 | 25 | 17 |
| Kentucky | 305 | 2,580 | 183 | 706 | d | d | 7 | 228 | 31 | 29 |
| Louisiana | 188 | 3,267 | 36 | 484 | 17 | 51 | 13 | 1,359 | 38 | 84 |
| Maine | 124 | 186 | 47 | 48 | d | d | 19 | 26 | 20 | 7 |
| Maryland | 180 | 2,249 | 54 | 923 | 9 | 35 | 14 | 172 | 43 | 82 |
| Massachusetts | 259 | 2,860 | 76 | 250 | d | d | 29 | 303 | 32 | 36 |
| Michigan | 547 | 3,281 | 184 | 1,173 | 12 | 47 | 32 | 331 | 64 | 70 |
| Minnesota | 640 | 3,038 | 100 | 886 | 9 | 21 | 33 | 121 | 40 | 82 |
| Mississippi | 245 | 987 | 38 | 176 | 12 | 68 | 9 | 159 | 29 | 19 |
| Missouri | 431 | 4,854 | 152 | 1,022 | d | d | 42 | 1,000 | 57 | 231 |
| Montana | 69 | 184 | 13 | 49 | d | d | 9 | 8 | 5 | 34 |
| Nebraska | 575 | 1,648 | 39 | 503 | d | d | 24 | 39 | 26 | 67 |
| Nevada | 69 | 2,606 | 13 | 665 | d | d | 6 | 438 | d | d |
| New Hampshire | 74 | 443 | 25 | 164 | 0 | 0 | 4 | 15 | 21 | 9 |
| New Jersey | 445 | 4,142 | 214 | 1,579 | 11 | 29 | 7 | 1,314 | 103 | 158 |
| New Mexico | 137 | 1,522 | 52 | 301 | 4 | 17 | 6 | 436 | 29 | 96 |
| New York | 756 | 15,017 | 355 | 3,633 | 6 | 71 | 58 | 4,726 | 109 | 171 |
| North Carolina | 471 | 3,477 | 85 | 1,568 | 8 | 22 | 23 | 83 | 158 | 133 |
| North Dakota | 121 | 244 | 29 | 79 | 0 | 0 | 8 | 8 | 0 | 0 |
| Ohio | 420 | 3,376 | 131 | 1,703 | 8 | 45 | 27 | 428 | 96 | 71 |
| Oklahoma | 343 | 1,281 | 238 | 658 | 12 | 74 | 13 | 30 | 18 | 60 |
| Oregon | 99 | 1,842 | 38 | 448 | d | d | 15 | 704 | 17 | 31 |
| Pennsylvania | 602 | 5,399 | 231 | 2,155 | 0 | 0 | 25 | 568 | 106 | 155 |
| Rhode Island | 52 | 768 | 15 | 245 | d | d | 8 | 298 | 12 | 27 |
| South Carolina | 262 | 3,101 | 75 | 1,901 | 6 | 60 | 13 | 152 | 58 | 42 |
| South Dakota | 68 | 192 | 20 | 67 | d | d | 9 | 3 | 13 | 31 |
| Tennessee | 208 | 6,404 | 35 | 283 | 6 | 155 | 17 | 34 | 40 | 62 |
| Texas | 1,217 | 19,175 | 337 | 6,625 | 35 | 155 | 59 | 4,494 | 145 | 415 |
| Utah | 141 | 1,000 | 23 | 389 | 4 | 102 | 12 | 197 | 27 | 43 |
| Vermont | 63 | 94 | d | d | 0 | 0 | d | d | 9 | 2 |
| Virginia | 236 | 3,842 | 90 | 1,663 | 3 | 8 | 12 | 129 | 58 | 340 |
| Washington | 241 | 4,486 | 77 | 1,585 | 19 | 209 | 11 | 593 | 32 | 30 |
| West Virginia | 110 | 284 | 10 | 85 | 3 | 6 | d | d | 48 | 18 |
| Wisconsin | 478 | 2,139 | 107 | 372 | 13 | 38 | 110 | 443 | 75 | 86 |
| Wyoming | 53 | 134 | 25 | 20 | 5 | 44 | d | d | 7 | 4 |
| U.S. Possessions [2] | 14 | 3,399 | 4 | 344 | d | d | 3 | 373 | d | d |

[^5]Table 5. New Money Long-Term Governmental Bonds, by State of Issue and Bond Purpose, 2006-Continued

| State of issue | Bond purpose-continued |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Environment |  | Housing |  | Utilities |  | Bond and tax/revenue anticipation notes |  | Other purposes [3] |  |
|  | Number | Amount | Number | Amount | Number | Amount | Number | Amount | Number | Amount |
| All States | (11) | (12) | (13) | (14) | (15) | (16) | (17) | (18) | (19) | (20) |
|  | 1,062 | 9,849 | 116 | 444 | 1,655 | 26,980 | 297 | 1,570 | 4,931 | 46,480 |
| Alabama | d | d | 0 | 0 | 49 | 402 | d | d | 160 | 709 |
| Alaska | 0 | 0 | d | d | 0 | 0 | 0 | 0 | 12 | 443 |
| Arizona | 12 | 315 | d | d | 13 | 591 | 0 | 0 | 99 | 864 |
| Arkansas | 16 | 69 | 0 | 0 | 62 | 135 | 0 | 0 | 43 | 145 |
| California | 54 | 1,736 | d | d | 57 | 2,396 | d | d | 353 | 4,625 |
| Colorado | 14 | 77 | d | d | 22 | 363 | d | d | 135 | 805 |
| Connecticut | 15 | 39 | 0 | 0 | 8 | 202 | d | d | 69 | 1,674 |
| Delaware | d | d | 0 | 0 | d | d | d | d | 8 | 96 |
| District of Columbia | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 6 | 464 |
| Florida | 25 | 315 | 5 | 13 | 67 | 2,648 | 5 | 64 | 241 | 4,523 |
| Georgia | 71 | 585 | 4 | 35 | 32 | 35 | 0 | 0 | 118 | 1,355 |
| Hawaii | 0 | 0 | 0 | 0 | d | d | 0 | 0 | 5 | 476 |
| Idaho | 6 | 26 | 0 | 0 | 6 | 15 | 7 | 47 | 13 | 144 |
| Illinois | 42 | 567 | d | d | 67 | 749 | d | d | 211 | 1,656 |
| Indiana | 32 | 532 | d | d | 26 | 251 | 21 | 45 | 74 | 286 |
| lowa | 32 | 99 | d | d | 36 | 138 | 16 | 78 | 133 | 345 |
| Kansas | 38 | 37 | 0 | 0 | 60 | 89 | 17 | 41 | 106 | 246 |
| Kentucky | 3 | 102 | d | d | 24 | 1,217 | 22 | 120 | 30 | 163 |
| Louisiana | 22 | 66 | 0 | 0 | 27 | 51 | 6 | 25 | 34 | 1,146 |
| Maine | 9 | 8 | 0 | 0 | d | d | 6 | 21 | 35 | 73 |
| Maryland | 40 | 199 | 4 | 21 | 9 | 172 | 4 | 4 | 74 | 640 |
| Massachusetts | 35 | 379 | d | d | 27 | 20 | 5 | 6 | 150 | 1,843 |
| Michigan | 86 | 831 | d | d | 42 | 510 | d | d | 121 | 309 |
| Minnesota | 36 | 94 | 6 | 13 | 84 | 199 | 48 | 124 | 303 | 1,499 |
| Mississippi | 9 | 3 | 0 | 0 | 4 | 112 | 0 | 0 | 144 | 450 |
| Missouri | 27 | 167 | d | d | 48 | 1,284 | d | d | 91 | 1,024 |
| Montana | 5 | 3 | d | d | 5 | 2 | d | d | 26 | 83 |
| Nebraska | 16 | 65 | d | d | 45 | 709 | 24 | 34 | 394 | 195 |
| Nevada | 13 | 516 | 0 | 0 | 9 | 33 | 0 | 0 | 22 | 923 |
| New Hampshire | d | d | d | d | 3 | 13 | 5 | 31 | 16 | 183 |
| New Jersey | 14 | 234 | 4 | 5 | 8 | 21 | 3 | 33 | 99 | 771 |
| New Mexico | 4 | 23 | 0 | 0 | 13 | 201 | 0 | 0 | 29 | 448 |
| New York | 28 | 377 | d | d | 22 | 353 | d | d | 202 | 5,619 |
| North Carolina | 24 | 103 | d | d | 31 | 501 | d | d | 166 | 918 |
| North Dakota | d | d | 13 | 9 | 54 | 112 | d | d | 13 | 31 |
| Ohio | 24 | 153 | 3 | 1 | 16 | 130 | 5 | 12 | 129 | 832 |
| Oklahoma | 3 | 5 | 0 | 0 | 39 | 274 | 0 | 0 | 35 | 180 |
| Oregon | 3 | 291 | 0 | 0 | 10 | 180 | d | d | 16 | 177 |
| Pennsylvania | 88 | 572 | 6 | 15 | 21 | 70 | 12 | 158 | 130 | 1,706 |
| Rhode Island | 5 | 29 | d | d | d | d | 0 | 0 | 24 | 159 |
| South Carolina | 15 | 31 | 9 | 19 | 17 | 559 | 0 | 0 | 80 | 336 |
| South Dakota | d | d | d | d | 13 | 73 | d | d | 7 | 16 |
| Tennessee | 9 | 4 | 7 | 7 | 65 | 5,327 | 16 | 16 | 51 | 516 |
| Texas | 36 | 216 | d | d | 295 | 4,990 | d | d | 326 | 2,249 |
| Utah | d | d | 0 | 0 | 38 | 144 | d | d | 32 | 114 |
| Vermont | 8 | 4 | 0 | 0 | 17 | 12 | d | d | 12 | 58 |
| Virginia | 15 | 135 | 3 | 17 | 22 | 193 | 4 | 31 | 72 | 1,325 |
| Washington | 10 | 212 | 10 | 52 | 29 | 795 | 9 | 40 | 51 | 970 |
| West Virginia | 16 | 50 | 0 | 0 | d | d | 4 | 1 | 25 | 44 |
| Wisconsin | 71 | 428 | 4 | 5 | 93 | 167 | 17 | 71 | 194 | 528 |
| Wyoming | d | d | 0 | 0 | 5 | 11 | 0 | 0 | 5 | 50 |
| U.S. Possessions [2] | d | d | 0 | 0 | d | d | d | d | 7 | 2,046 |

d-Data deleted to avoid disclosure of information about specific bonds. However, the data are included in the appropriate totals.
[1] A given bond issue can include more than one purpose. Thus, the summation of number of issues by purpose will sometimes exceed the total number of issues. However, the money amounts add to the totals.
[2] U.S. Possessions include Puerto Rico, the U.S. Virgin Islands, Guam, and the Northern Mariana Islands.
[3] "Other purposes" refer to obligations for which a specific purpose either did not apply or was not clearly indicated on the Form 8038-G.
NOTE: Detail may not add to totals because of rounding.

## Tax-Exempt Bonds, 2006

Statistics of Income Bulletin | Fall 2008

Table 6. Tax-Exempt Private Activity Bonds, by Type and Term of Issue, 2006
[Money amounts are in millions of dollars]

| Type and term of issue | Number | Amount |
| :--- | :---: | :---: |
| All issues, total [1] | 3,804 | $\mathbf{1 0 8 , 9 4 1}$ |
| Short-term | 58 | 360 |
| Long-term | 3,746 | 108,581 |
| New money issues, total | 3,048 | 63,467 |
| Short-term | 42 | 181 |
| Long-term | 3,006 | 63,286 |
| Refunding issues, total | $\mathbf{1 , 3 6 1}$ | $\mathbf{4 5 , 4 7 4}$ |
| Short-term | 20 | 179 |
| Long-term | 1,341 | 45,295 |

[1] A given bond issue can include both new money and refunding proceeds. Thus, the number of new money issues plus the number of refunding issues will sometimes exceed the total number of issues. However, the money amounts add to the totals.
NOTE: Detail may not add to totals because of rounding.

Table 7. Long-Term Tax-Exempt Private Activity Bonds, by Bond Purpose and Type of Issue, 2006
[Money amounts are in millions of dollars]

| Bond purpose | All issues |  | New money issues |  | Refunding issues |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Number | Amount | Number | Amount | Number | Amount |
|  | (1) | (2) | (3) | (4) | (5) | (6) |
| Total [1] | 3,746 | 108,581 | 3,006 | 63,286 | 1,341 | 45,295 |
| Airport | 60 | 5,339 | 42 | 2,894 | 24 | 2,445 |
| Docks and wharves | 25 | 1,584 | 12 | 602 | 16 | 982 |
| Water | 13 | 372 | 7 | 54 | 7 | 318 |
| Sewage | 24 | 117 | 18 | 83 | 7 | 34 |
| Solid waste disposal | 114 | 3,049 | 98 | 2,560 | 21 | 490 |
| Qualified residential rental | 574 | 7,757 | 458 | 6,036 | 136 | 1,721 |
| Local electricity or gas furnishing facilities | 7 | 383 | 4 | 128 | 3 | 254 |
| Local district heating or cooling facilities | 3 | 20 | 3 | 20 | 0 | 0 |
| Qualified hazardous waste facilities | d | d | d | d | d | d |
| Tax Reform Act of 1986 transition property | 54 | 3,405 | 3 | 16 | 53 | 3,389 |
| Qualified new empowerment zone | d | d | d | d | d | d |
| Qualified public educational facilities | d | d | d | d | d | d |
| Qualified green building and sustainable design | d | d | d | d | d | d |
| Qualified Gulf Opportunity Zone | 27 | 624 | d | d | d | d |
| Qualified New York Liberty Zone | 6 | 548 | 3 | 183 | 3 | 365 |
| Qualified mortgage | 301 | 22,480 | 230 | 10,318 | 203 | 12,162 |
| Qualified Gulf Opportunity Zone mortgage | 6 | 175 | d | d | d | d |
| Qualified veterans' mortgage | 8 | 954 | 3 | 105 | 6 | 849 |
| Qualified small issue | 534 | 974 | 496 | 878 | 51 | 97 |
| Qualified student loan | 36 | 4,217 | 35 | 3,938 | 9 | 279 |
| Qualified redevelopment | 4 | 21 | d | d | d | d |
| Qualified hospital | 417 | 24,248 | 340 | 14,846 | 172 | 9,403 |
| Qualified section 501(c)(3) nonhospital | 1,584 | 32,112 | 1,253 | 19,791 | 662 | 12,321 |
| Gulf Opportunity Zone advance refunding | d | d | d | d | d | d |
| Other purposes [2] | 14 | 55 | 13 | 29 | 4 | 26 |

d-Data deleted to avoid disclosure of information about specific bonds. However, the data are included in the appropriate totals.
[1] A given bond issue can include more than one purpose and can include both new money and refunding proceeds. Thus, the summation of number of issues by purpose or by type of issue will sometimes exceed the total number of issues. However, the money amounts add to the totals.
[2] For this table, "other purposes" refer to obligations for which a specific purpose either did not apply or was not clearly indicated on the Form 8038.
NOTE: Detail may not add to totals because of rounding.

Table 8. Computation of Lendable Proceeds for Long-Term Tax-Exempt Private Activity Bonds, by Selected Bond Purpose, 2006
[Money amounts are in millions of dollars]

| Selected bond purpose | Entire issue price |  | Bond issuance costs |  | Credit enhancement |  | Allocation to reserve fund |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Number | Amount | Number | Amount | Number | Amount | Number | Amount |
|  | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) |
| Total [1] | 3,746 | 108,581 | 2,259 | 727 | 970 | 513 | 626 | 1,299 |
| Airport | 60 | 5,339 | 49 | 41 | 33 | 23 | 17 | 167 |
| Docks and wharves | 25 | 1,584 | 24 | 10 | 15 | 5 | 7 | 13 |
| Water | 13 | 372 | d | d | d | d | d | d |
| Sewage | 24 | 117 | 18 | 1 | 4 | [2] | 3 | 3 |
| Solid waste disposal | 114 | 3,049 | 85 | 30 | 33 | 9 | 9 | 14 |
| Qualified residential rental | 574 | 7,757 | 119 | 18 | 31 | 5 | 38 | 18 |
| Qualified Gulf Opportunity Zone and Gulf Opportunity Zone mortgage | 33 | 799 | 25 | 6 | d | d | d | d |
| Qualified mortgage | 301 | 22,480 | 72 | 30 | 7 | [2] | 53 | 127 |
| Qualified veterans' mortgage | 8 | 954 | d | d | d | d | 0 | 0 |
| Qualified small issue | 534 | 974 | 233 | 13 | 90 | 4 | 8 | 2 |
| Qualified student loan | 36 | 4,217 | 27 | 19 | 11 | 2 | 17 | 23 |
| Qualified hospital | 417 | 24,248 | 335 | 195 | 152 | 240 | 87 | 356 |
| Qualified section 501(c)(3) nonhospital | 1,584 | 32,112 | 1,286 | 356 | 587 | 219 | 384 | 561 |
| All other bonds, combined [3] | 94 | 4,578 | 26 | 4 | 10 | 3 | 15 | 11 |
| Selected bond purpose |  |  | Total lendable proceeds |  | Proceeds used to refund prior issues |  | Nonrefunding proceeds |  |
|  |  |  | Number | Amount | Number | Amount | Number | Amount |
| Total [1] |  |  | (9) | (10) | (11) | (12) | (13) | (14) |
|  |  |  | 3,746 | 106,042 | 1,341 | 44,480 | 3,094 | 61,562 |
| Airport |  |  | 60 | 5,107 | 24 | 2,384 | 44 | 2,723 |
| Docks and wharves |  |  | 25 | 1,556 | 16 | 969 | 13 | 587 |
| Water |  |  | 13 | 369 | 7 | 317 | 7 | 52 |
| Sewage |  |  | 24 | 112 | 7 | 34 | 18 | 78 |
| Solid waste disposal |  |  | 114 | 2,996 | 21 | 488 | 98 | 2,509 |
| Qualified residential rental |  |  | 574 | 7,716 | 136 | 1,718 | 460 | 5,997 |
| Qualified Gulf Opportunity Zone and Gulf Opportunity Zone mortgage |  |  | 33 | 791 | 3 | 101 | 31 | 689 |
| Qualified mortgage |  |  | 301 | 22,323 | 203 | 12,093 | 242 | 10,229 |
| Qualified veterans' mortgage |  |  | 8 | 953 | 6 | 843 | 4 | 109 |
| Qualified small issue |  |  | 534 | 955 | 51 | 96 | 496 | 859 |
| Qualified student loan |  |  | 36 | 4,173 | 9 | 277 | 35 | 3,896 |
| Qualified hospital |  |  | 417 | 23,457 | 172 | 9,122 | 350 | 14,335 |
| Qualified section 501(c)(3) nonhospital |  |  | 1,584 | 30,975 | 662 | 11,947 | 1,314 | 19,029 |
| All other bonds, combined [3] |  |  | 94 | 4,559 | 67 | 4,091 | 33 | 469 |

d-Data deleted to avoid disclosure of information for specific bonds. However, the data are included in the appropriate totals.
[1] A given bond issue can include more than one purpose. Thus, the summation of number of issues by purpose will sometimes exceed the total number of issues. However, the money amounts add to the totals.
[2] Indicates an amount less than $\$ 500,000$.
[3] For purposes of this table, this category includes all issues for which a specific purpose either did not apply or was not clearly indicated on the Form 8038, as well as bonds issued for: local electricity or gas furnishing facilities, local district heating or cooling facilities, qualified hazardous waste facilities, facilities issued under a transitional rule of the Tax Reform Act of 1986, new empowerment zone facility bonds, qualified public educational facilities, qualified green building and sustainable design projects, New York Liberty Zone bonds, qualified redevelopment bonds, and Gulf Opportunity Zone advance refunding bonds.
NOTE: Detail may not add to totals because of rounding.

Table 9. New Money Long-Term Tax-Exempt Private Activity Bonds, by Selected Bond Purpose and Size of Entire Issue, 2006

| Selected bond purpose | All issues |  | Size of entire issue |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Under \$1,000,000 |  | $\begin{gathered} \$ 1,000,000 \text { under } \\ \$ 5,000,000 \end{gathered}$ |  | $\$ 5,000,000$ under$\$ 10,000,000$ \$10,000,000 |  |
|  | Number | Amount | Number | Amount | Number | Amount | Number | Amount |
|  | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) |
| Total [1] | 3,006 | 63,286 | 358 | 111 | 757 | 1,995 | 574 | 3,756 |
| Airport | 42 | 2,894 | d | d | d | d | 9 | 61 |
| Docks and wharves | 12 | 602 | 0 | 0 | 0 | 0 | d | d |
| Water | 7 | 54 | 0 | 0 | 3 | 8 | 0 | 0 |
| Sewage | 18 | 83 | 0 | 0 | 3 | 7 | 5 | 19 |
| Solid waste disposal | 98 | 2,560 | 4 | 1 | 14 | 44 | 17 | 94 |
| Qualified residential rental | 458 | 6,036 | 6 | 4 | 88 | 275 | 161 | 1,139 |
| Qualified Gulf Opportunity Zone and Gulf Opportunity Zone mortgage | 31 | 698 | 0 | 0 | d | d | 6 | 38 |
| Qualified mortgage | 230 | 10,318 | d | d | d | d | 3 | 29 |
| Qualified veterans' mortgage | 3 | 105 | 0 | 0 | 0 | 0 | 0 | 0 |
| Qualified small issue | 496 | 878 | 238 | 44 | 212 | 549 | 46 | 285 |
| Qualified student loan | 35 | 3,938 | 0 | 0 | 0 | 0 | 0 | 0 |
| Qualified hospital | 340 | 14,846 | 10 | 5 | 62 | 180 | 51 | 335 |
| Qualified section 501(c)(3) nonhospital | 1,253 | 19,791 | 87 | 53 | 350 | 877 | 277 | 1,736 |
| All other bonds, combined [2] | 33 | 484 | 4 | 2 | 11 | 26 | d | d |


| Selected bond purpose | Size of entire issue - continued |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | $\begin{gathered} \$ 10,000,000 \text { under } \\ \$ 25,000,000 \end{gathered}$ |  | $\begin{gathered} \$ 25,000,000 \text { under } \\ \$ 50,000,000 \end{gathered}$ |  | $\begin{gathered} \$ 50,000,000 \text { under } \\ \$ 100,000,000 \end{gathered}$ |  | $\begin{aligned} & \$ 100,000,000 \\ & \text { or more } \end{aligned}$ |  |
|  | Number | Amount | Number | Amount | Number | Amount | Number | Amount |
|  | (9) | (10) | (11) | (12) | (13) | (14) | (15) | (16) |
| Total [1] | 601 | 8,100 | 285 | 8,106 | 239 | 12,729 | 192 | 28,488 |
| Airport | 3 | 61 | 5 | 173 | 4 | 220 | 10 | 2,360 |
| Docks and wharves | d | d | 4 | 134 | 4 | 290 | d | d |
| Water | d | d | d | d | 0 | 0 | 0 | 0 |
| Sewage | 5 | 20 | d | d | d | d | d | d |
| Solid waste disposal | 26 | 362 | 19 | 675 | 11 | 612 | 7 | 772 |
| Qualified residential rental | 155 | 2,201 | 30 | 1,001 | 13 | 729 | 5 | 687 |
| Qualified Gulf Opportunity Zone and Gulf Opportunity Zone mortgage | 12 | 193 | 3 | 65 | 5 | 193 | d | d |
| Qualified mortgage | 52 | 700 | 49 | 1,212 | 65 | 3,043 | 52 | 5,329 |
| Qualified veterans' mortgage | 0 | 0 | d | d | d | d | 0 | 0 |
| Qualified small issue | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Qualified student loan | d | d | d | d | 15 | 981 | 16 | 2,848 |
| Qualified hospital | 54 | 689 | 48 | 1,312 | 52 | 2,602 | 63 | 9,722 |
| Qualified section 501(c)(3) nonhospital | 300 | 3,768 | 123 | 3,263 | 76 | 3,717 | 40 | 6,378 |
| All other bonds, combined [2] | 5 | 57 | 6 | 113 | 4 | 239 | d | d |

d-Data deleted to avoid disclosure of information for specific bonds. However, the data are included in the appropriate totals.
[1] A given bond issue can include more than one purpose. Thus, the summation of number of issues by purpose will sometimes exceed the total number of issues. However, the money amounts add to the totals.
[2] For purposes of this table, this category includes all issues for which a specific purpose either did not apply or was not clearly indicated on the Form 8038, as well as bonds issued for: local electricity or gas furnishing facilities, local district heating or cooling facilities, qualified hazardous waste facilities, facilities issued under a transitional rule of the Tax Reform Act of 1986, new empowerment zone facility bonds, qualified public educational facilities, qualified green building and sustainable design projects, New York Liberty Zone bonds, qualified redevelopment bonds, and Gulf Opportunity Zone advance refunding bonds.
NOTE: Detail may not add to totals because of rounding.

Table 10. New Money Long-Term Tax-Exempt Private Activity Bonds, by State of Issue and Selected Bond Purpose, 2006
[Money amounts are in millions of dollars]

| State of issue | Total [1] |  | Selected bond purpose |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Airports, docks, and wharves [2] |  | Water, sewage, and solid waste disposal [2] |  | Qualified residential rental |  | Qualified Gulf Opportunity Zone and Gulf Opportunity Zone mortgage |  |
|  | Number | Amount | Number | Amount | Number | Amount | Number | Amount | Number | Amount |
|  | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) |
| All States | 3,006 | 63,286 | 54 | 3,496 | 123 | 2,697 | 458 | 6,036 | 31 | 698 |
| Alabama | 49 | 903 | 4 | 75 | d | d | d | d | 10 | 163 |
| Alaska | 13 | 731 | 4 | 254 | 0 | 0 | 0 | 0 | 0 | 0 |
| Arizona | 28 | 574 | d | d | 6 | 82 | d | d | 0 | 0 |
| Arkansas | 21 | 401 | 0 | 0 | d | d | d | d | 0 | 0 |
| California | 223 | 6,031 | d | d | 13 | 208 | 120 | 1,451 | 0 | 0 |
| Colorado | 88 | 1,710 | 5 | 58 | d | d | 10 | 80 | 0 | 0 |
| Connecticut | 25 | 911 | 0 | 0 | d | d | d | d | 0 | 0 |
| Delaware | 14 | 373 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| District of Columbia | 18 | 775 | d | d | 0 | 0 | 3 | 19 | 0 | 0 |
| Florida | 115 | 2,929 | 9 | 284 | 6 | 240 | 26 | 267 | 0 | 0 |
| Georgia | 58 | 912 | 0 | 0 | 3 | 43 | 12 | 126 | 0 | 0 |
| Hawaii | d | d | d | d | 0 | 0 | 0 | 0 | 0 | 0 |
| Idaho | 15 | 251 | 0 | 0 | 4 | 38 | 0 | 0 | 0 | 0 |
| Illinois | 152 | 2,034 | d | d | d | d | 20 | 203 | 0 | 0 |
| Indiana | 74 | 2,320 | d | d | 5 | 97 | d | d | 0 | 0 |
| lowa | 160 | 577 | 0 | 0 | d | d | d | d | 0 | 0 |
| Kansas | 64 | 643 | 0 | 0 | d | d | d | d | 0 | 0 |
| Kentucky | 47 | 694 | d | d | 3 | 50 | d | d | 0 | 0 |
| Louisiana | 41 | 833 | 0 | 0 | 4 | 82 | 3 | 63 | 7 | 115 |
| Maine | 13 | 455 | 0 | 0 | 0 | 0 | d | d | 0 | 0 |
| Maryland | 53 | 1,833 | d | d | 0 | 0 | 6 | 45 | 0 | 0 |
| Massachusetts | 107 | 1,774 | 0 | 0 | 4 | 73 | 11 | 272 | 0 | 0 |
| Michigan | 72 | 1,596 | 0 | 0 | d | d | 6 | 258 | 0 | 0 |
| Minnesota | 146 | 1,190 | d | d | d | d | 13 | 62 | 0 | 0 |
| Mississippi | 19 | 814 | 0 | 0 | 0 | 0 | 0 | 0 | 14 | 419 |
| Missouri | 79 | 981 | d | d | 0 | 0 | 32 | 226 | 0 | 0 |
| Montana | 15 | 442 | 0 | 0 | 0 | 0 | d | d | 0 | 0 |
| Nebraska | 48 | 461 | d | d | d | d | 0 | 0 | 0 | 0 |
| Nevada | 10 | 542 | d | d | 0 | 0 | d | d | 0 | 0 |
| New Hampshire | 29 | 419 | 0 | 0 | 0 | 0 | d | d | 0 | 0 |
| New Jersey | 69 | 1,221 | d | d | d | d | 4 | 130 | 0 | 0 |
| New Mexico | 10 | 235 | 0 | 0 | 0 | 0 | d | d | 0 | 0 |
| New York | 188 | 4,529 | 7 | 260 | 4 | 3 | 46 | 1,307 | 0 | 0 |
| North Carolina | 39 | 2,308 | d | d | d | d | d | d | 0 | 0 |
| North Dakota | 24 | 176 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Ohio | 100 | 3,443 | d | d | 4 | 115 | 18 | 161 | 0 | 0 |
| Oklahoma | 24 | 612 | 0 | 0 | 0 | 0 | d | d | 0 | 0 |
| Oregon | 18 | 292 | d | d | 0 | 0 | 3 | 18 | 0 | 0 |
| Pennsylvania | 173 | 2,668 | 0 | 0 | 4 | 111 | d | d | 0 | 0 |
| Rhode Island | 17 | 430 | 0 | 0 | 0 | 0 | 4 | 95 | 0 | 0 |
| South Carolina | 29 | 633 | 0 | 0 | d | d | 6 | 46 | 0 | 0 |
| South Dakota | 21 | 138 | 0 | 0 | 4 | 1 | 0 | 0 | 0 | 0 |
| Tennessee | 60 | 1,422 | d | d | d | d | 12 | 89 | 0 | 0 |
| Texas | 147 | 3,867 | d | d | 19 | 659 | 39 | 436 | 0 | 0 |
| Utah | 17 | 209 | 0 | 0 | 0 | 0 | d | d | 0 | 0 |
| Vermont | 15 | 377 | 0 | 0 | 0 | 0 | d | d | 0 | 0 |
| Virginia | 66 | 1,814 | d | d | d | d | 6 | 119 | 0 | 0 |
| Washington | 76 | 1,852 | d | d | d | d | 18 | 243 | 0 | 0 |
| West Virginia | 24 | 562 | 0 | 0 | 3 | 119 | 0 | 0 | 0 | 0 |
| Wisconsin | 78 | 1,661 | d | d | 3 | 55 | d | d | 0 | 0 |
| Wyoming | 8 | 387 | 0 | 0 | d | d | 0 | 0 | 0 | 0 |
| U.S. Possessions [4] | d | d | d | d | 0 | 0 | 0 | 0 | 0 | 0 |

[^6]Table 10. New Money Long-Term Tax-Exempt Private Activity Bonds, by State of Issue and Selected Bond Purpose, 2006-Continued
[Money amounts are in millions of dollars]

| State of issue | Selected bond purpose-continued |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Qualified mortgage |  | Qualified small issue |  | Qualified hospital |  | Qualified section 501(c)(3) nonhospital |  | All other bonds, combined [3] |  |
|  | Number | Amount | Number | Amount | Number | Amount | Number | Amount | Number | Amount |
|  | (11) | (12) | (13) | (14) | (15) | (16) | (17) | (18) | (19) | (20) |
| All States | 230 | 10,318 | 496 | 878 | 340 | 14,846 | 1,253 | 19,791 | 71 | 4,527 |
| Alabama | 4 | 281 | 5 | 19 | 6 | 186 | 20 | 126 | d | d |
| Alaska | 3 | 253 | 0 | 0 | d | d | 3 | 32 | d | d |
| Arizona | d | d | d | d | 5 | 131 | 10 | 138 | d | d |
| Arkansas | 0 | 0 | 4 | 10 | 8 | 72 | 6 | 37 | d | d |
| California | 7 | 423 | d | d | 12 | 745 | 62 | 2,957 | 3 | 217 |
| Colorado | 7 | 135 | d | d | 6 | 861 | 45 | 464 | d | d |
| Connecticut | 3 | 268 | 0 | 0 | 8 | 373 | 11 | 197 | d | d |
| Delaware | 4 | 297 | 0 | 0 | 0 | 0 | 7 | 73 | 3 | 4 |
| District of Columbia | d | d | 0 | 0 | 0 | 0 | 11 | 187 | 0 | 0 |
| Florida | 16 | 522 | d | d | 10 | 926 | 37 | 631 | d | d |
| Georgia | 3 | 146 | 6 | 15 | 6 | 64 | 29 | 519 | 0 | 0 |
| Hawaii | 0 | 0 | 0 | 0 | d | d | d | d | d | d |
| Idaho | 6 | 195 | d | d | 0 | 0 | d | d | 0 | 0 |
| Illinois | 12 | 520 | 49 | 38 | 12 | 366 | 57 | 847 | 0 | 0 |
| Indiana | 3 | 309 | 20 | 67 | 7 | 624 | 34 | 484 | 0 | 0 |
| lowa | 5 | 183 | 96 | 23 | 9 | 90 | 36 | 165 | 8 | 60 |
| Kansas | 8 | 215 | 29 | 21 | 5 | 129 | 17 | 252 | 0 | 0 |
| Kentucky | 3 | 72 | 4 | 16 | 9 | 375 | 24 | 61 | d | d |
| Louisiana | 7 | 105 | d | d | 4 | 46 | 11 | 241 | d | d |
| Maine | d | d | 3 | 9 | 4 | 237 | 6 | 134 | 0 | 0 |
| Maryland | 3 | 205 | d | d | 3 | 254 | 38 | 1,287 | 0 | 0 |
| Massachusetts | d | d | 16 | 44 | 14 | 224 | 59 | 903 | d | d |
| Michigan | 0 | 0 | 24 | 72 | 20 | 894 | 22 | 250 | d | d |
| Minnesota | 8 | 261 | 15 | 23 | 7 | 196 | 97 | 546 | 3 | 73 |
| Mississippi | d | d | 0 | 0 | d | d | 0 | 0 | d | d |
| Missouri | 4 | 234 | 22 | 29 | 4 | 88 | 15 | 194 | d | d |
| Montana | d | d | 0 | 0 | 4 | 57 | 7 | 55 | d | d |
| Nebraska | 11 | 352 | 17 | 3 | d | d | 15 | 42 | 0 | 0 |
| Nevada | 3 | 55 | d | d | d | d | d | d | d | d |
| New Hampshire | 7 | 132 | d | d | 3 | 57 | 16 | 147 | d | d |
| New Jersey | 0 | 0 | 19 | 46 | 10 | 484 | 28 | 260 | 4 | 267 |
| New Mexico | d | d | 0 | 0 | d | d | 5 | 44 | d | d |
| New York | 3 | 181 | 8 | 34 | 26 | 184 | 93 | 2,375 | 4 | 185 |
| North Carolina | 4 | 130 | 4 | 11 | 10 | 1,043 | 16 | 309 | d | d |
| North Dakota | d | d | 4 | 2 | d | d | 17 | 38 | 0 | 0 |
| Ohio | 4 | 910 | 10 | 37 | 25 | 1,360 | 36 | 603 | d | d |
| Oklahoma | 9 | 149 | 4 | 2 | d | d | 7 | 118 | d | d |
| Oregon | d | d | d | d | 3 | 146 | 6 | 77 | d | d |
| Pennsylvania | 8 | 416 | 31 | 70 | 17 | 435 | 107 | 1,368 | d | d |
| Rhode Island | 4 | 120 | d | d | d | d | 5 | 92 | d | d |
| South Carolina | d | d | 6 | 27 | 3 | 119 | 10 | 110 | d | d |
| South Dakota | d | d | 11 | 4 | d | d | 4 | 19 | 0 | 0 |
| Tennessee | 3 | 172 | 3 | 12 | 9 | 771 | 29 | 288 | 0 | 0 |
| Texas | 20 | 500 | 0 | 0 | 15 | 1,061 | 50 | 907 | d | d |
| Utah | 7 | 67 | 4 | 12 | d | d | d | d | d | d |
| Vermont | 3 | 131 | 0 | 0 | d | d | 6 | 57 | d | d |
| Virginia | d | d | 3 | 7 | 5 | 391 | 49 | 690 | d | d |
| Washington | 6 | 188 | 8 | 27 | 8 | 480 | 34 | 813 | 0 | 0 |
| West Virginia | 3 | 136 | 4 | 17 | 4 | 273 | 10 | 18 | 0 | 0 |
| Wisconsin | 3 | 414 | 21 | 57 | 22 | 520 | 35 | 575 | d | d |
| Wyoming | d | d | d | d | 0 | 0 | d | d | d | d |
| U.S. Possessions [4] | 0 | 0 | 0 | 0 | 0 | 0 | d | d | 0 | 0 |

d-Data deleted to avoid disclosure of information about specific bonds. However, the data are included in the appropriate totals.
[1] A given bond issue can include more than one purpose. Thus, the summation of number of issues by purpose will sometimes exceed the total number of issues. However, the money amounts add to the totals.
[2] For purposes of this table, certain bond purposes were combined. For this reason, data in this table will differ slightly from the data in Tables 8 and 9
[3] This category includes all issues for which a specific purpose either did not apply or was not clearly indicated on the Form 8038, as well as bonds issued for: local electricity or gas furnishing facilities, local district heating or cooling facilities, qualified hazardous waste facilities, facilities issued under a transitional rule of the Tax Reform Act of 1986, new empowerment zone facility bonds, qualified public educational facilities, qualified green building and sustainable design projects, New York Liberty Zone bonds, qualified veterans' mortgage bonds, qualified student loan bonds, qualified redevelopment bonds, and Gulf Opportunity Zone advance refunding bonds
[4] U.S. Possessions include Puerto Rico, the U.S. Virgin Islands, Guam, and the Northern Mariana Islands.


[^0]:    ${ }^{1}$ The term "State" includes the District of Columbia and any possession of the United States.
    ${ }^{2}$ In addition, for State income tax purposes, most States allow for the exclusion of interest on bonds issued by government agencies within their own States, thus increasing the benefit to bondholders.
    ${ }^{3}$ An arbitrage bond is one in which any portion of the proceeds is used to purchase higher-yielding investments, or is used to replace proceeds which have been used to purchase higher-yielding investments. Certain rules allow for arbitrage earnings with respect to tax-exempt bonds within a specified time period, so long as these earnings are rebated to the Department of the Treasury.
    ${ }^{4}$ A registered bond is defined as: "a bond whose owner is designated on records maintained by a registrar, the ownership of which cannot be transferred without the registrar recording the transfer on its records." (From the Municipal Securities Rulemaking Board’s Glossary of Municipal Securities Terms [http://www.msrb.org/msrb1/glossary/](http://www.msrb.org/msrb1/glossary/). See also IRC section 149(a) for additional information.)
    5 The private business tests of IRC section 141(b) define a bond as a private activity bond if both of the following criteria are met: 1) more than 10 percent of the bond proceeds are used for a private business purpose; and, 2) more than 10 percent of the bond debt service is derived from private business use and is secured by privately used property. The private loan financing test of IRC section 141(c) defines a bond as a private activity bond if the amount of proceeds used to (directly or indirectly) finance loans to nongovernmental persons exceeds the lesser of $\$ 5$ million or 5 percent of the proceeds.

    6 Tax-exempt private activity bonds include "exempt facility bonds," qualified mortgage bonds, qualified veterans' mortgage bonds, qualified small issue bonds, qualified student loan bonds, qualified redevelopment bonds, and qualified section 501(c)(3) bonds (all of which are defined in the "Explanation of Terms" section of this data release). Examples of exempt facilities include airports; docks and wharves; sewage facilities; solid waste disposal facilities; qualified residential rental projects; and facilities for the local furnishing of electricity or gas. Qualified section 501(c)(3) bonds are issued by State and local governments to finance the activities of charitable and similar organizations that are tax-exempt under IRC section 501(c)(3). The primary beneficiaries of these bonds are hospitals, universities, and organizations that provide low-income housing or assisted living facilities.
    7 The interest income from qualified private activity bonds (other than qualified section 501(c)(3) bonds) is subject to the alternative minimum tax calculations.
    ${ }^{8}$ Legislation authorizing the issuance of New York Liberty Zone bonds was passed shortly after the terrorist attack on September 11, 2001. Legislation authorizing the issuance of Gulf Opportunity Zone bonds was passed in late 2005, following the Hurricane Katrina disaster. Additional information about these, and other types of tax-exempt bonds, can be found in the "Explanation of Terms" section of this data release.

[^1]:    9 There is a limit on the number of times tax-exempt bonds can be refunded. New tax-exempt Governmental bonds are limited to one advance refunding. Advance refundings are prohibited with respect to tax-exempt private activity bonds. Three exceptions to this rule are qualified section 501 (c)(3) bonds, certain bonds designated as "liberty advance refunding bonds," and bonds designated as "Gulf Opportunity Zone advance refunding bonds," all of which are allowed one advance refunding.

[^2]:    [1] "Other purposes" refer to obligations for which a specific purpose either did not apply or was not clearly indicated on Form 8038-G.

[^3]:    ${ }^{10}$ The resident population estimates were produced by the U.S. Bureau of the Census and published in Internal Revenue Bulletin Number 2006-11 (Notice 2006-22).

[^4]:    ${ }^{11}$ For 2006, the volume cap was the greater of $\$ 80$ per capita or $\$ 246,610,000$. Volume caps for U.S. possessions, with the exception of Puerto Rico, are determined under IRC section 146(d)(4).
    ${ }^{12}$ Disproportionate use occurs when the proceeds to be used for the private business use exceed the amount of proceeds used for the related Governmental use.
    ${ }^{13}$ IRC section $141(\mathrm{~b})(5)$ states that a Governmental bond will be treated as a private activity bond if: (1) the "nonqualified amount" exceeds $\$ 15$ million, but is less than the amount needed to meet any of the private activity bond tests; and (b) the issuer does not allocate a portion of its volume cap to the issue in an amount equal to the excess of such nonqualified amount over $\$ 15$ million.

[^5]:    Footnotes at end of table.

[^6]:    Footnotes at end of table.

