May 12, 2025

The Honorable Mike Johnson Speaker U.S. House of Representatives Washington, DC 20515

The Honorable Hakeem Jeffries Democratic Leader U.S. House of Representatives Washington, DC 20515 The Honorable John Thune Majority Leader U.S. Senate Washington, DC 20510

The Honorable Chuck Schumer Democratic Leader U.S. Senate Washington, DC 20510

Dear Speaker Johnson, Majority Leader Thune, Leader Jeffries, and Leader Schumer:

We, the undersigned organizations, representing thousands of businesses who collectively employ millions of Americans in all sectors of the U.S. economy, urge Congress to immediately enact three specific pro-growth tax relief proposals in the upcoming reconciliation bill authorized by H.Con.Res.14, the fiscal year 2025 budget resolution.

Tax policy plays a critical role in the ability of American businesses to thrive, create jobs in the U.S., and effectively compete in today's global economy. With recent reports of potentially slower growth in the American economy, pro-growth tax policy becomes even more compelling.

The first of the three pro-growth proposals would support innovation and job creation in America by reversing the amortization of research and development ("R&D") expenditures that took effect in 2022. As feared, this anti-growth tax policy has dampened national R&D activity. Since the amortization requirement went into effect, the rate of growth in R&D spending has declined at an alarming rate. After growing at a rate of 6.4% per year on average for five years prior to amortization came into effect, the rate of growth in R&D spending is now less than half of what it was prior to amortization. While America's competitors on the world stage have taken steps to make their R&D tax incentives more generous, amortization has taken the U.S. in the opposite direction, disincentivizing R&D. Restoring the full deductibility of R&D expenditures—as was the law for almost 70 years prior to 2022—will provide clearly proven, internationally competitive pro-growth tax policy.

The second of the pro-growth tax incentives would reduce the cost of debt financing for job-creating projects and investments by reverting the basis of the interest limitation rules from an earnings before interest and taxes ("EBIT") standard to an earnings before interest, taxes, depreciation, and amortization ("EBITDA") standard. The tighter EBIT-based interest deduction limits the amount of interest that businesses can deduct, increasing the cost of capital for significant investments. This stricter limitation, in combination with higher than anticipated interest rates, is reducing after-tax cashflow and adversely affecting investment, particularly in manufacturing. The United States is the only country that imposes this tight limitation on the deductibility of interest, impairing the competitive position of domestic companies.

The final pro-growth incentive is to restore full expensing for capital equipment purchases. The Tax Cuts and Jobs Act enabled businesses to immediately deduct 100% of a qualifying investment, but the 100% level began phasing down in 2023. Full expensing allowed domestic investment to reach new heights in the years following tax reform's enactment, powering economic growth and job creation. The phase down of full expensing, by comparison, made it more expensive for companies to purchase the equipment and machinery necessary for growth and expansion.

All three of these tax policies have a long history of bipartisan support and are critical to strengthening America's global competitiveness. When in force, they empowered businesses in the U.S. to innovate, create well-paying jobs, protect our national security, and remain at the cutting edge of the global economy. Restoring these provisions will have a profound impact on business investment, economic growth, and job creation.

With Congress engaged in the reconciliation bill process, now is the time to restore these three pro-growth tax policies. Congress should prioritize U.S. innovation, manufacturing and economic growth, particularly as strategic competitors like China are offering ever more generous incentives. Congress must act to protect the thousands of small and medium businesses, hundreds of thousands of family-supporting jobs and billions of dollars of pro-growth investments supported by these provisions.

We strongly urge Congress to bolster our economy and support American workers and families. Congress should restore immediate R&D expensing, a pro-growth interest deductibility standard, and full expensing for capital investments.

Sincerely,

Aerospace Industries Association

Alliance for Automotive Innovation

The Alliance for Competitive Taxation (ACT)

Aluminum Association

American Boiler Manufacturers Association (ABMA)

American Car Rental Association

American Chemistry Council

American Cleaning Institute

American Composites Manufacturers Association

American Council of Engineering Companies

American Exploration and Production Council

American Forest & Paper Association

American Foundry Society

American Frozen Food Institute

American Home Furnishings Alliance

American Iron and Steel Institute

American Petroleum Institute (API)

AMT—The Association For Manufacturing Technology

Autos Drive America

Beer Institute

BEMA

Business Roundtable

Cellulose Insulation Manufacturers Association

Composite Panel Association

CTIA

ECIA—Electronic Components Industry Association

Electronic Transactions Association

Flexible Packaging Association (FPA)

FMI—the Food Industry Association

General Aviation Manufacturers Association

The Hardwood Federation

Household & Commercial Products Association

INDA, Association of the Nonwoven Fabrics Industry

Independent Lubricant Manufacturers Association

Independent Petroleum Association of America

Industrial Fasteners Institute

Industrial Packaging Alliance of North America

Industrial Truck Association

Institute of Makers of Explosives

International Sign Association

Irrigation Association

MEMA. The Vehicle Suppliers Association

Metal Building Manufacturers Association

Metals Service Center Institute

Motion Picture Association

National Association of Manufacturers

National Council of Textile Organizations

National Defense Industrial Association (NDIA)

National Marine Manufacturers Association

National Mining Association

National Venture Capital Association

National Wooden Pallet & Container Association

NCTA: The Internet & Television Association

North American Association of Food Equipment Manufacturers (NAFEM)

North American Millers' Association

PEI—Petroleum Equipment Institute

Pet Food Institute

Plastics Industry Association

Plumbing Manufacturers International

PRINTING United Alliance

Railway Supply Institute

Recycled Materials Association (ReMA)

SEMI

Semiconductor Industry Association

Silicon Valley Leadership Group

Silicon Valley Tax Directors Group Software Finance and Tax Executives Council The Sulphur Institute TechNet Technology & Manufacturing Association

Telecommunications Industry Association (TIA)

Textile Care Allied Trades Association

TRSA, The Association for Linen, Uniform and Facility Services Industry

U.S. Chamber of Commerce

Valve Manufacturers Association

Window and Door Manufacturers Association