APPENDIX 11A
Tax Depreciation

Companies often calculate depreciation one way when figuring taxes and another way when reporting income to investors: Many use the **straight-line method** for stockholder reporting (or "book" purposes), but they use the fastest rate permitted by law for tax purposes. Under the straight-line method used for stockholder reporting, one normally takes the cost of the asset, subtracts its estimated salvage value, and divides the net amount by the asset's useful economic life. For example, consider an asset with a 5-year life that costs $100,000 and has a $12,500 salvage value; its annual straight-line depreciation charge is ($100,000 – $12,500)/5 = $17,500. Note, however, as we stated earlier, salvage value is a factor in financial reporting but it is *not* considered for tax depreciation purposes.

For tax purposes, Congress changes the permissible tax depreciation methods from time to time. Prior to 1954, the straight-line method was required for tax purposes, but in 1954 **accelerated methods** (double-declining balance and sum-of-years'-digits) were permitted. Then, in 1981, the old accelerated methods were replaced by a simpler procedure known as the Accelerated Cost Recovery System (ACRS). The ACRS system was changed again in 1986 as a part of the Tax Reform Act, and it is now known as the **Modified Accelerated Cost Recovery System (MACRS)**; a 1993 tax law made further changes in this area.

Note that U.S. tax laws are complicated, and in this text we can provide only an overview of MACRS that will give you a basic understanding of the impact of depreciation on capital budgeting decisions. Further, the tax laws change so often that the numbers we present may be outdated before the book is even published. Thus, when dealing with tax depreciation in real-world situations, current Internal Revenue Service (IRS) publications or individuals with expertise in tax matters should be consulted.

For tax purposes, the entire cost of an asset is expensed over its depreciable life. Historically, an asset's depreciable life was set equal to its estimated useful economic life; it was intended that an asset would be fully depreciated at approximately the same time that it reached the end of its useful economic life. However, MACRS totally abandoned that practice and set simple guidelines that created several classes of assets, each with a more-or-less arbitrarily prescribed life called a *recovery period* or *class life*. The MACRS class lives bear only a rough relationship to assets' expected useful economic lives.

A major effect of the MACRS system has been to shorten the depreciable lives of assets, thus giving businesses larger tax deductions early in the assets' lives and thereby increasing the present value of the cash flows. Table 11A-1 describes the types of property that fit into the different class life groups, and Table 11A-2 sets forth the MACRS recovery allowance percentages (depreciation rates) for selected classes of investment property.

TABLE 11A-1 Major Classes and Asset Lives for MACRS

CLASS	TYPE OF PROPERTY
3-year	Certain special manufacturing tools
5-year	Automobiles, light-duty trucks, computers, and certain special manufacturing equipment
7-year	Most industrial equipment, office furniture, and fixtures
10-year	Certain longer-lived types of equipment
27.5-year	Residential rental real property such as apartment buildings
39-year	All nonresidential real property, including commercial and industrial buildings

TABLE 11A-2 Recovery Allowance Percentage for Personal Property

OWNERSHIP YEAR	CLASS OF INVESTMENT			
	3-YEAR	5-YEAR	7-YEAR	10-YEAR
1	33%	20%	14%	10%
2	45	32	25	18
3	15	19	17	14
4	7	12	13	12
5		11	9	9
6		6	9	7
7			9	7
8			4	7
9				7
10				6
11				3
	100%	100%	100%	100%

Notes:

[a]We developed these recovery allowance percentages based on the 200% declining balance method prescribed by MACRS, with a switch to straight-line depreciation at some point in the asset's life. For example, consider the 5-year recovery allowance percentages. The straight-line percentage would be 20% per year, so the 200% declining balance multiplier is 2.0(20%) = 40% = 0.4. However, because the half-year convention applies, the MACRS percentage for Year 1 is 20%. For Year 2, there is 80% of the depreciable basis remaining to be depreciated, so the recovery allowance percentage is 0.40(80%) = 32%. In Year 3, 20% + 32% = 52% of the depreciation has been taken, leaving 48%, so the percentage is 0.4(48%) ≈ 19%. In Year 4, the percentage is 0.4(29%) ≈ 12%. After 4 years, straight-line depreciation exceeds the declining balance depreciation, so a switch is made to straight-line (which is permitted under the law). However, the half-year convention must also be applied at the end of the class life, and the remaining 17% of depreciation must be taken (amortized) over 1.5 years. Thus, the percentage in Year 5 is 17%/1.5 ≈ 11%, and in Year 6 it is 17% – 11% = 6%. Although the tax tables carry the allowance percentages out to two decimal places, we have rounded to the nearest whole number for ease of illustration. See the worksheet ***7. App. A*** in the file ***Ch11 Tool Kit.xls*** on the textbook's Web site for the exact recovery percentages specified by the IRS.

[b]Residential rental property (apartments) is depreciated over a 27.5-year life, whereas commercial and industrial structures are depreciated over 39 years. In both cases, straight-line depreciation must be used. The depreciation allowance for the first year is based, pro rata, on the month the asset was placed in service, with the remainder of the first year's depreciation being taken in the 28th or 40th year. A half-month convention is assumed; that is, an asset placed in service in February would receive 10.5 months of depreciation in the first year.

See **Ch11 Tool Kit.xls** *on the textbook's Web site for all calculations.*

Consider Table 11A-1, which gives the MACRS class lives and the types of assets that fall into each category. Property in the 27.5- and 39-year categories (real estate) must be depreciated by the straight-line method, but 3-, 5-, 7-, and 10-year property (personal property) can be depreciated either by the accelerated method set forth in Table 11A-2 or by the straight-line method.[1]

As we saw earlier in the chapter, higher depreciation expenses result in lower taxes in the early years and hence lead to a higher present value of cash flows. Therefore, since a firm has the choice of using straight-line rates or the accelerated rates shown in Table 11A-2, most elect to use the accelerated rates.

The yearly recovery allowance, or depreciation expense, is determined by multiplying each asset's *depreciable basis* by the applicable recovery percentage shown in Table 11A-2. You might be wondering why 4 years of deprecation rates are shown for property in the 3-year class. Under MACRS, the assumption is generally made that property is placed in service in the middle of the first year. Thus, for 3-year-class property, the recovery period begins in the middle of the year the asset is placed in service and ends 3 years later. The effect of the *half-year convention* is to extend the recovery period out one more year, so 3-year-class property is depreciated over 4 calendar years, 5-year property is depreciated over 6 calendar years, and so on. This convention is incorporated into Table 11A-2's recovery allowance percentages.[2]

Self-Test

What do the acronyms ACRS and MACRS stand for?
Briefly describe the tax depreciation system under MACRS.

[1]The Tax Code currently (for 2009) permits companies to *expense*, which is equivalent to depreciating over 1 year, up to $125,000 of equipment; see IRS Publication 946 for details. This is a benefit primarily for small companies. Thus, if a small company bought one asset worth up to $125,000, it could write the asset off in the year it was acquired. This is called "Section 179 expensing." We shall disregard this provision throughout the book. Also, Congress enacted the Job Creation and Worker Assistance Act of 2002 following the terrorist attacks on the World Trade Center and Pentagon. This act, among other things, temporarily changed how depreciation is charged for property acquired after September 10, 2001, and before September 11, 2004, and put in service before January 1, 2005. We shall disregard this provision throughout the book as well.

[2]The half-year convention also applies if the straight-line alternative is used, with half of one year's depreciation taken in the first year, a full year's depreciation taken in each of the remaining years of the asset's class life, and the remaining half-year's depreciation taken in the year following the end of the class life. You should recognize that virtually all companies have computerized depreciation systems. Each asset's depreciation pattern is programmed into the system at the time of its acquisition, and the computer aggregates the depreciation allowances for all assets when the accountants close the books and prepare financial statements and tax returns.