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Subject issues with draft means testing forms

1) In reviewing the Forms that came with the Draft Interim Rules I find that either the forms are confusing or in error. Under the transportation section (# 17, 18, and 19) the form calls for the operating expense under #17. Then under #18 the form deals with Vehicle One's Ownership costs.#19 deals with vehicle two's ownership costs. The form suggests that you are to claim an ownership interest (subtracting the car payment which will be reflected on Line 36). *The form appears to suggest that you should subtract the ownership expense even if the vehicle is paid for.*

Example: I was working through a means test yesterday and the debtor's had two vehicles that were paid for. Under #17, they would have been able to claim an expense of $336 operating costs for the two vehicles. Then under #18, they would have been able to claim an ownership expense of $475 even though they do not have a car note, and then another $338 under #18, **for a combined operating costs and ownership expense of $1149 per month for two paid for vehicles.**

The IRS Collection Financial Standards states that " The transportation standards consist of nationwide figures for monthly loan and lease payments referred to as ownership costs, and additional amounts for monthly operating costs broken down by Census Region...If a taxpayer has a car payment, the allowable ownership cost added to the allowable operating cost equals the allowable transportation expense. *If a taxpayer has no car payment, or no car, only the operating costs portion of the transportation standard is used to come up with the allowable transportation expense.*

I know that if the official form suggests that the debtor can claim both operating costs and ownership costs for cars that are paid for, then the debtor attorneys will try to claim both. Why are the Forms jumping to this conclusion?
2) The intent of the reform bill appears to be to allow the debtors to claim only the IRS allowed housing and utilities expense. Official Statement of Income and Expense Form from the Proposed Rules #16 asks for the local IRS housing and utilities amount not including the mortgage payment. Why do the forms suggest that you can claim entire housing deduction here and then the mortgage payment as a secured debt under #36?
Thanks,
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