

Debt Financing and Tax Status: Tests of the Substitution Effect and the Tax Exhaustion Hypothesis Using Firms' Responses to the Economic Recovery Tax Act of 1981

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ABSTRACT

This study tests the joint prediction of the substitution effect and the tax exhaustion hypothesis that an increase in non-debt tax shields leads to a decrease in leverage. Controls are introduced for the debt securability effect, the pecking order theory of financing, and the probability of losing tax shields. Using the relationship between changes in investment tax shields and changes in debt tax shields of firms in response to the Economic Recovery Tax Act of 1981, strong empirical support is found for predictions based on the substitution effect and the tax exhaustion hypothesis.

REFERENCES

Dammon, R. M. and L. W. Senbet, 1988, The effect of taxes and depreciation on corporate investment and financial leverage, *Journal of Finance* 43, 357-373.

[Web of Science®](#) | [Google Scholar](#)

DeAngelo, H. and R. Masulis, 1980, Optimal capital structure under corporate and personal taxation, *Journal of Financial Economics* 7, 3-29.

[Web of Science®](#) | [Google Scholar](#)

Gordon, R. and J. MacKie Mason, 1991, Effects of the Tax Reform Act of 1986 on corporate financial policy and organizational form, in J. Slemrod, ed.: *Do Taxes Matter?: The Impact of the Tax Reform Act of 1986* (M.I.T. Press, Cambridge, Mass.).

[Google Scholar](#)

Gravelle, J. G., 1982, Effects of the 1981 depreciation revisions on the taxation of income from business capital, *National Tax Journal* 35, 1-20.

[Web of Science®](#) | [Google Scholar](#)

MacKie, Mason J., 1990, Do taxes affect corporate financing decisions?, *Journal of Finance* 45, 1471-1493.

[Google Scholar](#)

Myers, S. C., 1984, The capital structure puzzle, *Journal of Finance* 39, 575–592.

[Web of Science®](#) | [Google Scholar](#)

Omer, T. C., K. H. Molloy, and D. Ziebart, 1991, Measurement of effective corporate tax rates using financial statement information, *Journal of the American Taxation Association* 13, 57–72.

[Google Scholar](#)

Scholes, M. and M. Wolfson, 1988, The cost of capital and changes in tax regimes, in H. Aaron, H. Galper, and J. Pechman, eds.: *Uneasy Compromise: Problems of a Hybrid Income *-Consumption Tax* (Brookings Institution, Washington, D.C.).

[Google Scholar](#)

Shaw, W. H., 1987, Safe harbor leasing or muddy waters, *Accounting Review* 52, 385–400.

[Google Scholar](#)

Shaw, W. H., 1985, Empirical evidence on the market impact of safe harbor leasing, Ph.D. Dissertation, University of Texas at Austin.

[Google Scholar](#)

Titman, S. and R. Wessels, 1988, The determinants of capital structure choice, *Journal of Finance* 43, 1–19.

[Web of Science®](#) | [Google Scholar](#)

Watts, R. and J. Zimmerman, 1986, *Positive Accounting Theory* (Prentice-Hall, Englewood Cliffs, N.J.).

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