

Commission on Applicability: Both CA § 402 and Covenant § 404 provide for a Commission on Applicability, but the CA provides that unless disapproved by one house of Congress within a year after transmittal, the Commission's recommendations will become effective.

Federal Court: CA §§ 501-507 provide for a federal territorial court which will become a constitutional court; Covenant §§ 405 and 406 provide that the U.S. will establish a court in the Marianas analagous to that in Guam.

Federal Income Tax Laws: CA §§ 601 to 603 implement the previous agreement with respect to these laws; Covenant §§ 403(a)(3) and 601(b) reflect the new U.S. position -- which may be that the federal Internal Revenue Code should become a territorial code for the Marianas. Also, compare CA § 605 (exclusive local power over local internal revenue laws) with Covenant § 601(b) (interim Marianas internal revenue laws shall be progressive and include estate and gift taxes).

Customs and Excise Taxes: CA §§ 607 to 611 implement the agreements with respect to these laws; Covenant deals with them in §§ 501 and 502. The differences here may be primarily technical.

Other U.S. Laws: The CA has special provisions for social security laws (CA § 604), immigration laws (CA § 701, presently reserved), and maritime laws (CA § 702). The Covenant does not deal with these laws specifically.

Debt Limit: CA contains no provision comparable to Covenant § 503(b) which imposes a debt limit on the Commonwealth Government.

Economic Support: CA § 801 lays out the general principles of U.S. economic support, and is comparable to Covenant § 601; the prime difference seems to be that the CA refers to the goal of a standard of living comparable to that in other parts of the U.S. while the Covenant refers to the goal merely of a higher standard of living. Provisions in both documents relating to Phase II support will have to be rewritten to take into account the agreements at Marianas IV, compare CA § 803 with Covenant § 602(a)(1). CA § 805 contains procedures for determining