



1301 K Street, NW
Suite 800W
Washington, DC 20005

Annual Federal Tax Policy Symposium

The Future of
International Transfer Pricing:
Practical and Policy Opportunities

February 7-8, 2002

The Ritz-Carlton Hotel
Washington, DC

December 11, 2001

Dear Colleague:

Please join us at our Annual Federal Tax Policy Symposium – *The Future of Transfer Pricing: Practical and Policy Implications* – to be held at The Ritz-Carlton in Washington, DC on February 7-8, 2002. The symposium will focus on the many aspects of international transfer pricing in today's global economy and create a common ground from which it can be analyzed. The open discussion and analysis of emerging transfer pricing issues will be conducted by leading tax and economic professionals from the U.S. and foreign governments, the private sector, and academia.

The Tax Council Policy Institute (TCPI) is a non-profit public policy research and educational organization. It was created to help bring about a better understanding of significant federal tax policies that impact our national economy through careful study, thoughtful evaluation and open discussion. The TCPI is affiliated with The Tax Council, an association for senior level tax professionals who work together to promote sound federal tax policies and a better understanding of our federal tax system.

Previous TCPI Annual Federal Tax Policy Symposia have been attended by hundreds of tax professionals. Regarding the symposium - *INDOPCO: Past, Present & Future* - the tax press reported, "the roster of participants ... reads like a "Who's Who" of the tax world. Panels of big league practitioners, notable academics, and top government legislative officials met in Washington for two days to flesh out controversial capitalization issues." TCPI's symposium - *The R&D Tax Credit in the New Economy* - was even more successful with over 425 participants attending the two-day symposium. *Tax Notes Today* stated, "the two-day conference ... which brought together members of Congress, government officials, congressional staff, and hundreds of practitioners ... could not have been more timely."

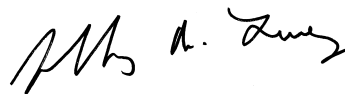
To assure that the symposia always meet the highest of professional standards, the TCPI engages the services of some of the leading tax professionals in the world. This year, PricewaterhouseCoopers LLP's Washington National Tax Services office, Miller & Chevalier, Chartered and Loyens & Loeff were selected to serve as the Program Managers for the transfer pricing symposium. The tax professionals leading the effort are Richard Barrett, PricewaterhouseCoopers, Samuel Maruca, Miller & Chevalier, and J.K. Harmen van Dam, Loyens & Loeff.

TCPI symposia are designed to provide the IRS, Treasury, Congress, the Courts, taxpayers, and tax professionals with a well-researched educational forum in which differing views can be presented and discussed fairly and openly. We look forward to your participation in our Annual Federal Tax Policy Symposia.

Sincerely,



Roger J. LeMaster
Executive Director



Jeffrey R. Levey, Chairman
TCPI Board of Directors

Tax Council Policy Institute

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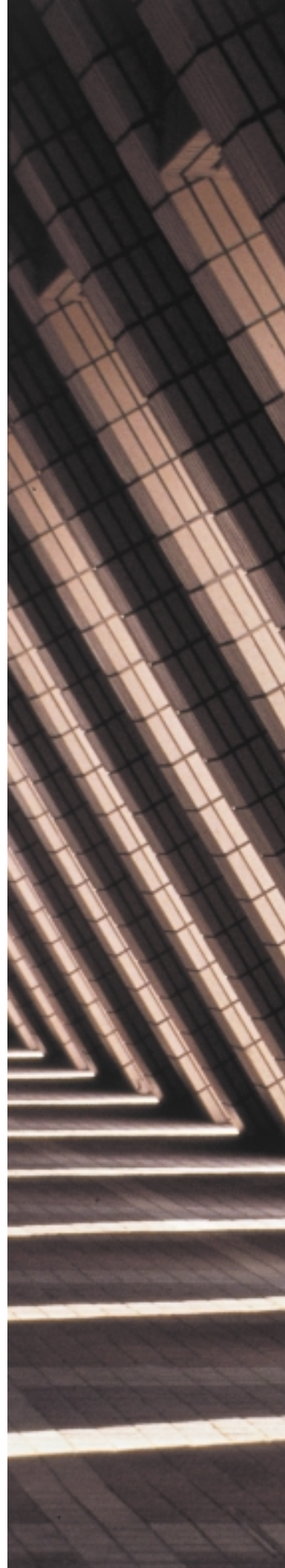
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Program Schedule

Thursday, February 7, 2002

- | | |
|-------------------------|--|
| 10:00 a.m. - 12:30 p.m. | Registration |
| 12:30 p.m. - 12:45 p.m. | Welcome Remarks

Mr. Barrett, Mr. Levey |
| 12:45 p.m. - 1:45 p.m. | Transfer Pricing Policy in the International Tax System—Past and Present

The session will focus on the specific tensions created as countries seek to preserve their existing aggregate tax base, and will focus on whether the arm's length standard as it is currently applied produces policies that are fair, efficient, and cost effective.

Mr. Wheeler, Moderator; Ms. Deanehan, Mr. Durst, Mr. Gibbs, Mr. van Hilten, Mr. Lewis |
| 1:45 p.m. - 3:30 p.m. | Practical Steps Toward Consistent International Application of Methodological Norms

The session will consist of two modules. The first module will focus on standardizing methodological approaches; whether traditional transactional methods can still be utilized to resolve pricing disputes, and the strengths and shortcomings of profits-based methodologies. The second module will focus on whether internationally accepted safe haven approaches can be developed for common related party relationships, such as distribution and contract manufacturing arrangements.

Mr. Zakupowsky, Moderator; Mr. Ackerman, Mr. Foley, Mr. Frisch, Mr. Happell, Mr. McAlonan, Mr. Messenger, Dr. Plotkin, Dr. Wright, Representative of the U.K. Inland Revenue |
| 3:45 p.m. - 4:45 p.m. | Fact Development and the Policies of Transfer Pricing Documentation

This session will address the question of whether standardization and simplification of documentation requirements is possible and how taxpayers can coordinate their efforts to respond to the disparate requirements of numerous countries.

Mr. Reilly, Moderator; Mr. Ainslie, Ms. Byrd, Mr. Grecian, Mr. Hammer, Mr. Maruca, Mr. Rolfe |
| 4:45 p.m. - 6:00 p.m. | Application of Transfer Pricing Rules to Branches and Permanent Establishments

The OECD is actively considering how transfer pricing rules should be applied to the question of allocating income to branches and other permanent establishments. This session will examine this issue, the impact of technology development, and the resulting policy changes that the OECD project on transfer pricing rules should address.

Mr. Sample, Moderator; Ms. Brown, Mr. Mukherjee, Mr. Neighbour, Mr. Randall, Mr. Sprague, Mr. Srivastava |
| 6:30 p.m. | Reception and Dinner with Keynote Address

Dr. R. Glenn Hubbard, Chairman, Council of Economic Advisers, Executive Office of The President |

Friday, February 8, 2002

8:00 a.m. - 10:00 a.m.

Issues Unique to Intellectual Property

While recent methodological developments have principally focused on other issues, it was primarily the concern over intellectual property-related issues that motivated the U.S. Treasury to embark on a policy of increased transfer pricing enforcement activity following the 1986 Tax Reform Act. This session will examine the current state of transfer pricing for intellectual property and the prospects for mitigating potential controversy in the future.

Mr. Andrus, Moderator; Dr. Ballentine, Mr. van Dam, Mr. Cunningham, Mr. Hannes, Mr. Levenstam, Mr. Mogle, Mr. Musher, Dr. Newlon, Mr. O'Toole

10:15 a.m. - 11:45 a.m.

Adequacy of International Dispute Resolution Mechanisms

To an increasing extent, transfer pricing disputes are resolved through country-to-country negotiation in the competent authority process. The increasing number of such disputes is taxing the administrative resources of national tax administrations. This session will consider whether existing institutions are capable of dealing with the increased flow of disputes, and what additional steps could be taken to ensure that transfer pricing disputes are fully resolved promptly and consistently.

Mr. Barrett, Moderator; Ms. Dunahoo, Mr. Lowell, Professor Park, Mr. Schwartz, Mr. Thomas, Mr. Whaley, Mr. Zed

11:45 a.m. - 1:30 p.m.

Luncheon with Keynote Address

1:30 p.m. - 3:15 p.m.

Removing the Obstacles to the Development of An Efficient International Tax System—Future

This session will discuss the future of international transfer pricing, the report of the Commission of European Communities regarding a consolidated corporate tax base, and the obstacles to increased efficiencies that can be brought to international taxation.

Dr. Merrill, Moderator; Ms. Angus, Mr. Aujean, Mr. Culbertson, Ms. Guarino, Mr. Luby, Mr. Neighbour, Dr. Stone

3:15 p.m.

Closing Remarks

Mr. Barrett, TCPI Planning Committee Member

General Information

Who Should Attend?

- The symposium is designed for corporate tax directors, government tax professionals, tax counsels, attorneys, managers, accountants, corporate controllers, treasurers, and CFOs with involvement in international cross-border transactions. The symposium will thoroughly examine all aspects of international transfer pricing - past, present and future. In doing so, it will provide a foundation for evaluating international transfer pricing principles in today's global economy. No prerequisites or advanced preparation are necessary for attendance at this symposium.

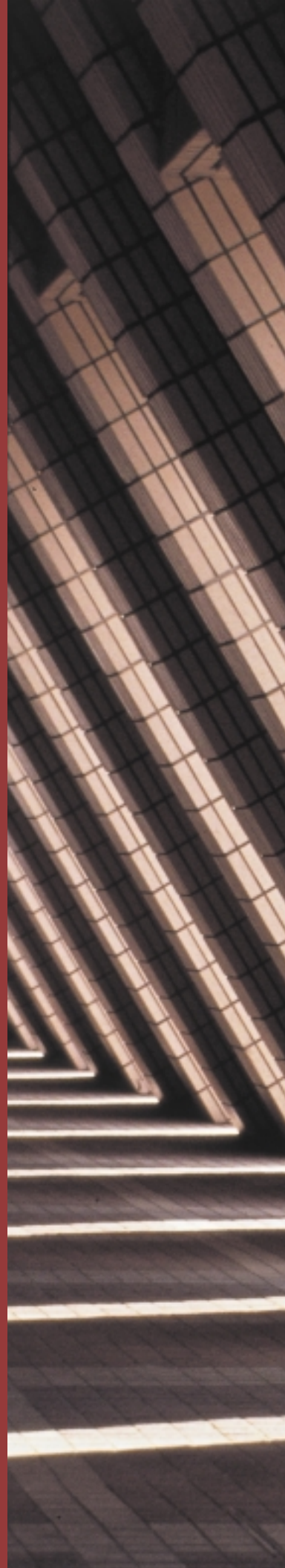
CLE and CPE Credit Are Available

- CLE Credit:

Accreditations will be requested from those states that require continuing legal education which registrants list on their application form. Each state has its own rules and regulations, including the definition of CLE.

- CPE Credit:

The Tax Council Policy Institute is registered with the National Association of State Boards of Accountancy (NASBA) as a sponsor of continuing professional education on the National Registry of CPE Sponsors. State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be addressed to the National Registry of CPE Sponsors, 150 Fourth Avenue North, Suite 700, Nashville, TN 37219-2417. NASBA phone number: (615) 880-4200. Web site: www.nasba.org



Program Location and Accommodations

- The symposium will be held at The Ritz-Carlton Hotel, 1150 22nd Street, NW, Washington, DC. Room reservations should be made directly with The Ritz-Carlton Hotel by calling (800) 241-3333 or (202) 835-0500. Room rates are \$265.00 per night under the group name "Tax Council Policy Institute, International Transfer Pricing Symposium." To obtain rooms at the group rate, please make your reservations as soon as possible and by no later than January 17, 2002. If you book a hotel reservation in this block, we will consider you to be registered for the symposium.

Registration

- The attendance fee for the symposium, including dinner and luncheon, are as follows:
 - If the registration form and payment are received *by December 31, 2001*, the fee is \$595.00.
 - If the registration form and payment are received *after December 31, 2001*, the fee is \$695.00.
- The attendance fee for government employees is \$245.00.
- The fee for symposium written materials for non-attendees (mailed after February 8, 2002) is \$245.00.

Cancellation and Refunds

- Fees are refundable, less a \$90.00 processing fee, if written notice is received by TCPI by January 1, 2002.
- There will be no refunds after January 1, 2002. However, a substitute for the original registrant will be accepted.

For Updates on the Symposium

- For updates on the symposium, please visit our web site:
www.pwcservices.com/tcpi

Comments - Past Symposia

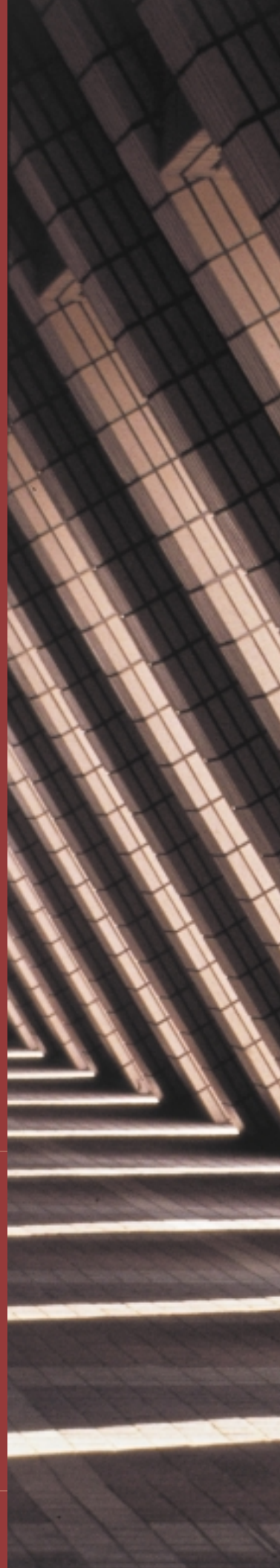
“ The topic, subtopics and presenters were fabulous. ”

“ Overall, this seminar provided a great overview and practical insight into to the real issues that are out there. The presenters provided invaluable insight into the practical solutions or arguments that might be used in dealing with the issues.”

“ This was one of the best conferences that I have ever attended. The sessions were all interesting and useful. Great speakers, wonderful facilities, great job overall. The Q&A format was also a great idea. ”

“ Great conference. It was one of the best if not the best one I have ever attended. Organization was well thought out. Great speakers, wonderful facilities, great job. The Q&A process and format was a great idea. ”

“ I really enjoyed the IRS procedures panel. It provided tremendous insight into the thinking of the IRS. I was mightily impressed by the overall quality of the symposium. It was one of the best I have attended. ”



The Future of International Transfer Pricing: Practical and Policy Opportunities

The Ritz-Carlton Hotel
1150 22nd Street, NW • Washington, DC
February 7-8, 2002

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Preferred Name on Badge: _____

Title: _____

Company/Organization: _____

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The conference fee includes a dinner and keynote address on Thursday, February 7 and lunch on Friday, February 8.

Do you plan to attend the dinner on Thursday, February 7? Yes _____ No _____

Enclosed is payment of (check ONE):

_____ \$595.00 (payment received by December 15, 2001)

_____ \$695.00 (payment received after December 15, 2001)

_____ \$245.00 Government employees

_____ \$245.00 Symposium written materials only (mailed after February 8, 2002)

Please make your check payable to **Tax Council Policy Institute** and mail your registration form and check to: Tax Council Policy Institute, 1301 K Street, NW, Suite 800W, Washington, DC 20005. For questions, please call (202) 414-1440.

Fees are refundable, less a \$90.00 processing fee, if written notice is received at TCPI by January 1, 2002. However, substitutes will be accepted after that date.

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For office use only:

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