The U.S. International Tax Regime
Confronting the Challenge of the Evolving Global Marketplace

Thursday, February 10, 2005

7:30 a.m. – 9:30 a.m.  Registration

9:30 a.m. – 9:45 a.m.  Welcome
Douglas Bates, Director, Federal Relations, Northwestern Mutual
Pamela F. Olson, Partner, Skadden Arps, Slate, Meagher & Flom LLP
Mark A. Weinberger, Americas Vice-Chair—Tax Services, Ernst & Young LLP

9:45 a.m. – 10:30 a.m.  Keynote Address
Paul Polman, Group President, Western Europe, Procter & Gamble
Robert H. Swan, Executive Vice President, Chief Financial Officer, EDS

10:30 a.m. – 11:40 a.m.  Session 1
Is it Time to Rethink U.S. International Tax Policy Goals?
Moderator: Timothy M. McDonald, Vice President, Finance and Accounting, Global Taxes, Procter & Gamble
Barbara M. Angus, International Tax Counsel, Department of the Treasury
David Brockway, Principal in Charge, Washington National Tax, KPMG LLP
C. Eugene Steuerle, Senior Fellow, The Urban Institute
David R. Tillinghast, Partner, Baker & McKenzie LLP

11:40 a.m. – 12:55 p.m.  Luncheon and Keynote Address
The Honorable John Snow, Secretary of the Treasury, Department of the Treasury
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1:10 p.m. – 2:35 p.m.
Session 2
U.S. International Tax Rules In Practice: Do They Achieve the Intended Goals?

Moderator: Marjorie A. Rollinson, Ernst & Young LLP
John Bush, Director of International Tax Planning, Citigroup Inc
Jeffrey A. Levenstam, Senior Director, Global Tax Planning and International Taxation, Cisco Systems
David P. Lewis, Executive Director, Global Tax, Eli Lilly and Company
Matthew M. McKenna, Senior Vice President of Finance, PepsiCo, Inc.
Thomas S. Neubig, Ph.D., National Director, Quantitative Economics and Statistics, Ernst & Young LLP
Roger D. Wheeler, Chief Tax Officer, General Motors Corporation
Paul Wolff, Vice President, Office of Tax Affairs, DaimlerChrysler Corporation

2:35 p.m. – 3:00 p.m.
Keynote Address
The Honorable Donald L. Evans, Secretary of Commerce, Department of Commerce

3:10 p.m. – 4:35 p.m.
Session 3
Current Tax Policy: Is It Anti-Competitive?

Moderator: LaBrenda Garrett-Nelson, Washington Council Ernst & Young, Ernst & Young LLP
The Honorable Kathleen B. Cooper, Under Secretary for Economic Affairs, Department of Commerce
Colleen Sayther Cunningham, President and CEO, Financial Executives International
David Hernandez, Vice President, Taxes, EDS
Matthew J. Slaughter, Tuck School of Business, Dartmouth College
Charles G. Stinner, Director, International Taxation, Air Products and Chemicals, Inc.
Martin A. Sullivan, Ph.D., Economist for Tax Analysts
4:35 p.m. – 6:00 p.m.  
Session 4  

Moderator: Michael J. Graetz, Justus S. Hotchkiss Professor of Law, Yale Law School  
Robin D. Beran, Director, Corporate Tax & Assistant Treasurer, Caterpillar Inc.  
Rocco V. Femia, Miller & Chevalier, Chartered  
Joseph H. Guttentag, Former Deputy Assistant Secretary for International Tax Affairs, Department of the Treasury  
Chia Tern Huey Min, Chief Tax Policy Officer, Ministry of Finance, Singapore Development Authority  
Gary Clyde Hufbauer, Reginald Jones Senior Fellow, Institute for International Economics  
Nanci S. Palmintere, Vice President, Finance and Enterprise Services; Director, Tax, Licensing & Customs; Intel Corporation  

6:00 p.m.  
Reception, Dinner and Keynote Address  
The Honorable William Thomas, Chairman, Committee on Ways and Means, United States House of Representatives
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Friday, February 11, 2005

7:00 a.m. – Continental Breakfast
8:00 a.m.

8:00 a.m. – Keynote Address
8:45 a.m.
R. Glenn Hubbard, Ph.D., Dean and Russell L. Carson Professor of Finance and Economics, Columbia Business School

8:45 a.m. – Session 5
10:15 a.m.
Where Are We Going?
A Look at Some Possible Alternatives

Moderator: Mr. Paul W. Oosterhuis, Partner, Skadden Arps, Slate, Meagher & Flom LLP

Reuven Avi-Yonah, Irwin I. Cohn Professor of Law, University of Michigan Law School

Mihir Desai, Graduate School of Business Administration, Harvard University

Kevin Hassett, Ph.D., Resident Scholar, American Enterprise Institute

Peter R. Merrill, Ph.D., Principal, Director of Economic Consulting, PricewaterhouseCoopers LLP

Will Morris, Tax Counsel International, General Electric Company

Phillip D. Morrison, Principal, Deloitte & Touche LLP

Kenneth Petrini, Vice President, Taxes, Air Products and Chemicals, Inc.
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10:30 a.m. – Noon
Session 6
Where Are We Going?
Political and Other Potential Barriers to Change
Moderator: Pamela F. Olson, Partner, Skadden Arps, Slate, Meagher & Flom LLP
John Buckley, Democratic Chief Tax Counsel, House Committee on Ways and Means
Andrew B. Lyon, Ph.D., Principal, PricewaterhouseCoopers LLP
Edgar McClellan, Republican Tax Counsel, Senate Committee on Finance
Greg Nickerson, Republican Staff Director/Staff Counsel, House Committee on Ways and Means
Harvey S. Rosen, Ph.D., Council of Economic Advisors
James R. White, Tax Policy and Administration Director, Government Accountability Office

Noon – 12:30 p.m.
Session 7
Looking Ahead
The Honorable Grant D. Aldonas, Under Secretary for International Trade, Department of Commerce
Mark A. Weinberger, Americas Vice-Chair—Tax Services, Ernst & Young LLP

12:30 p.m.
Closing Remarks
Doug Bates, Director, Federal Relations, Northwestern Mutual