
BUSINESS PROGRAM**WEDNESDAY – FEBRUARY 11, 2004****8:00 – 10:00 a.m. Registration** (*outside Grand Ballroom*)**10:00 - 10:15 a.m. Welcoming Remarks and Recognition of Symposium Mission** (*Grand Ballroom*)

- Douglas Bates, Director, Federal Relations, Northwestern Mutual Life
- Richard E. Andersen, Partner, Arnold & Porter
- Lindy L. Paull, Partner, PricewaterhouseCoopers LLP

10:15 – 10:45 a.m. The Evolution of the Corporate Tax Practice – How Did We Get Here? (*Grand Ballroom*)

- Larry Langdon, Partner, Mayer, Brown, Rowe & Maw

This address will focus on the evolution of tax policy and tax administration surrounding the role of corporate tax planning. The key judicial, administrative, and legislative developments leading up to the Sarbanes-Oxley Act, reportable transaction disclosure regulations, and proposed tax shelter and post-Enron legislation will be reviewed. This address will provide a broad overview of the challenges and tough issues facing corporate tax executives in the current environment.

10:45 – 12:15 p.m. The Corporate Tax Department – Managing in the Sarbanes-Oxley Era (*Grand Ballroom*)**Speaker:** Bill Gradison, Commissioner – Public Company Accounting Oversight Board**Panel:**

- Michael Boyle, Corporate VP, Finance, Microsoft Corporation (Panel Chair)
- Rick Berry, Partner, PricewaterhouseCoopers LLP
- Geoffrey F. Aronow, Partner, Arnold & Porter
- Larry Quimby, Partner, PricewaterhouseCoopers LLP
- James Whitson, Chief Tax Officer, Delphi Corporation

This session will examine the policy behind and the practical ramifications of the required increase in executive management focus on tax accounts. The panel will address the tax department's role in connection with the Section 302 quarterly certifications; Section 404 documentation of and attestation on internal controls; and the potential impact on the department's relationship with the audit committee and senior management.

Program Managers:

12:30 – 1:45 p.m. Luncheon & Keynote Address (*Grand Ballroom*)

- Paul S. Atkins, Commissioner, U.S. Securities and Exchange Commission

1:45 – 3:45 p.m. Expanding Disclosure Demands – The Impact on Tax Accruals (*Grand Ballroom*)

Speaker: Donald Nicolaisen, Chief Accountant, U.S. Securities and Exchange Commission

Panel:

- Robin Beran, Director, Corporate Tax, Caterpillar Inc. (Panel Chair)
- Richard E. Baltz, Partner, Arnold & Porter
- Kenneth Petrini, Vice President, Taxes, Air Products & Chemicals, Inc.
- Richard Jones, Partner, Ernst & Young
- Rita Benassi, Partner, Deloitte & Touche

This panel will explore trends experienced in financial restatements, SEC comment letters and enforcement actions, as well as emerging issues involving disclosure and transparency with respect to tax accruals. The panelists will debate the level of documentation and company approval that is required for tax contingency reserves, APB 23 assertions, and internal controls. The Critical Accounting Policies, FAS 5, Regulations S-X, and MD&A disclosure requirements will be addressed.

3:45 – 4:00 p.m. Break

4:00 – 6:00 p.m. Attorney-Client Privilege and Transparency – Can they Co-exist? (*Grand Ballroom*)

Speaker: The Honorable Thomas B. Wells, Chief Judge, US Tax Court

Panel:

- Ken Kempson, Senior Tax Counsel, General Electric Company (Panel Chair)
- Chip Harter, Partner, PricewaterhouseCoopers LLP
- James P. Joseph, Partner, Arnold & Porter
- Robert L. Moore, II, Member, Miller & Chevalier

This session will present a review of the evolution of the attorney-client and tax advisor privileges, as well as observations on the current state of affairs. The panelists will provide insight into positions on legal privilege from various perspectives, allowing participants to consider these issues from the point of view of the Internal Revenue Service, law firms, independent auditors and in-house counsel.

Program Managers:

TCPI Tax Council Policy Institute

The Renaissance Washington DC Hotel
February 11-12, 2004
Washington, DC

**“The Corporate Tax Practice:
Responding to the New Challenges
of a Changing Landscape”**

6:00 – 10:00 p.m. Reception, Dinner and Keynote Address (*Renaissance Ballroom Foyer and Ballroom*)

Speaker: Honorable Michael G. Oxley, (R-OH), Chairman, House Committee on Financial Services

Introduction: Honorable William Archer, Former Chairman, House Committee on Ways & Means

THURSDAY, FEBRUARY 12, 2004

7:00 – 8:00 a.m. Breakfast (*Congressional Hall A*)

8:00 – 8:15 a.m. Keynote Address

- Honorable Charles Grassley (R-IA), Chairman, Senate Committee on Finance

8:15 – 10:00 a.m. Working with the IRS – A New and Dynamic Relationship (*Grand Ballroom*)

Panel:

- Del Threadgill, Vice President & Director of Taxes, J.C. Penney Company, Inc. (Panel Chair)
- Timothy Thronson, Partner, PricewaterhouseCoopers LLP
- Nicholas DeNovio, Senior Counsel to the Chief Counsel, Internal Revenue Service
- Jonathan Zelnick, Senior Counsel to the Chief Counsel, Internal Revenue Service
- Frank Ng, Deputy Commissioner, LMSB, Internal Revenue Service
- David Lewis, Executive Director of Corporate Taxation, Eli Lilly & Company
- Oscar Jones, Exxon Mobil Corporation

This session will be devoted to developing a better understanding of the Internal Revenue Service priorities and related enforcement initiatives. The panel will address the stresses being placed on relationships with the IRS as a result of changing priorities, corporate tax shelters and emerging initiatives. Panelists will provide insight into what corporate executives can expect of the IRS in this new and dynamic environment and will explore ways to improve taxpayer-IRS relationships.

10:00 – 10:15 a.m. Break

Program Managers:

10:15 – 12:15 p.m. Global Effects of U.S. Reform – Dealing in Foreign Jurisdictions (*Grand Ballroom*)

Panel:

- Roger Wheeler, Chief Tax Officer, General Motors Corporation (Panel Chair)
- Carol Dunahoo, Partner, Baker & McKenzie
- Matthew McKenna, Senior Vice President of Finance, PepsiCo, Inc.
- Nanci Palmintere, Vice President Tax, Licensing & Customs, Intel Corporation
- Brian Arnold, Consultant, Goodmans LP (Toronto)
- Nishith Desai, Member, Nishith Desai Associates (India)
- Friedhelm Jacob, Partner, Hengeler Mueller (Germany)

The global reach of Sarbanes-Oxley and the tax shelter disclosure regulations, together with a growing treaty network and increased cooperation among competent authorities make it essential for corporate tax departments to adopt an integrated worldwide approach to tax planning, both from a substantive point of view and from the perspective of defending structures and transactions from attack under widely differing theories. This panel will bring a global perspective to the challenges facing the tax functions within U.S. and non-U.S. multinationals.

12:30 – 1:45 p.m. Luncheon and Keynote Address (*Grand Ballroom*)

- Mark W. Everson, Commissioner, Internal Revenue Service

1:45 – 3:15 p.m. The Future Corporate Tax Practice – Where Do We Go From Here? (*Grand Ballroom*)

Panel:

- Joseph Luby, Assistant General Tax Counsel, Exxon Mobil Corporation (Panel Chair)
- Lindy L. Paul, Partner, PricewaterhouseCoopers LLP
- Joseph Pari, Partner, Dewey Ballantine
- Elizabeth Hullinger, Senior Vice President & Director of Taxes, The Rouse Company
- Thomas Cornell, Corporate Tax Director, Mars, Incorporated
- Norma J. Lauder, Senior Vice President & Director of Taxes, Bank One

The "avalanche of transparency" discussed in the previous sessions has resulted in a significant increase in the demands of and pressure on the corporate tax department. In this session, panel members will focus on tax planning in this new environment and will explore ways in which corporations can effectively manage tax risk in the future.

3:15 – 3:30 p.m. Concluding Remarks (*Grand Ballroom*)

- Douglas Bates, Director, Federal Relations, Northwestern Mutual Life

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