



# The National Foreign Trade Council

## Tax Committee Fall 2014 Meeting



*October 30 & 31, 2013*

**The Microsoft Innovation and Policy Center  
901 K Street, NW  
Washington, DC 20006**

### **Agenda**

#### **October 30th**

**9:00-9:30 Coffee and Registration**

**9:30- 9:45 Opening Remarks**

*Paul Nolan, NFTC Tax Committee Chair*

**9:45-10:45 OECD—Base Erosion and Profit Shifting (BEPS) Project --Transfer Pricing, and the Taxation of Intangibles,**

- *Norm Richter, Baxter*
- *Michael McDonald, Treasury Department*
- *David Ernick, PricewaterhouseCoopers*
- *Rocco Femia, Miller & Chevalier*

**10:45-11:00 Break**

**11:00-Noon Practical implications of Country-by-Country Reporting**

- *Paul Nolan, McCormick Spices*
- *Brian Jenn, Treasury Department*
- *Tadd Fowler, Procter & Gamble*
- *Sam Maruca, Covington & Burling*
- *Robin Beran, Caterpillar*

**Noon-1:15 Lunch**

*David Lenter, Legislative Counsel, Joint Committee on Taxation*

**1:30—2:30 OECD—Base Erosion and Profit Shifting (BEPS) Project, Hybrid Arrangements, Tax Treaties and the Digital Economy**

- *Barbara Angus, Ernst & Young*
- *Gary Sprague, Baker & McKenzie*
- *Arlene Fitzpatrick, former Attorney-Advisor, Office of International Tax Counsel, U.S. Department of Treasury*
- *Gretchen Sierra, Deloitte*

**2:30—2:45 Break**

**2:45--4:00 Tax Treaties and the MAP Process—Problem Areas**

- *Peter Barnes, Caplin & Drysdale*
- *David Varley – Assistant Deputy Commissioner (International) (Acting), Internal Revenue Service*
- *Howard Berger, Senior Legal Counsel, Internal Revenue Service, LB&I*
- *Nicole Welch, Treaty Assistance & Interpretation Team, Internal Revenue Service, LB&I*

**4:00-4:15 Break**

**4:15-5:30 Treasury Regulations and Compliance Issues**

- *Lewis Greenwald, Mayer Brown*
- *Brenda Zent, Attorney-Advisory, Office of International Tax Counsel, U.S. Department of Treasury*
- *Chris DeVito, Johnson & Johnson*
- *Sean Foley, KPMG*

**5:30-6:15 Reception**

**6:15--8:00 Dinner— Election Update**

*Jennifer Duffy, Cook Political Report*

## **October 31st**

**8:15-9:00 Registration and Continental Breakfast**

**Day 2 Opening Remarks**

*Norm Richter, NFTC Tax Committee First Vice-Chair*

**9:00-10:00 A View From the Leadership**

- *Tom Roesser Microsoft*
- *Cathy Koch, Senior Advisor, Senate Majority Leader Reid*

**10:00-11:30 Legislative Update and Outlook**

- *Nick Giordano, Washington Council Ernst & Young LLP*
- *Jim Lyons, Tax Counsel, Republican Staff, Committee on Finance, U.S. Senate*
- *Todd Metcalf, Chief Tax Counsel, Democratic Staff, Committee on Finance, U.S. Senate*
- *David Olander Chief Tax Counsel, Republican Staff, Committee on Ways and Means, U.S. House of Representatives*
- *Aruna Kalyanam, Tax Counsel, Democrat Staff, Committee on Ways and Means, U.S. House of Representatives*