



# The National Foreign Trade Council



## Tax Committee Fall 2013 Meeting

October 30 & 31, 2013

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

### Agenda

#### October 30th

9:15-9:45 Coffee and Registration

9:45- 10:00 Opening Remarks

*Tom Roesser, NFTC Tax Committee Chair*

10:00-11:45 Transfer Pricing and the Taxation of Intangibles

- *Norm Richter, Baxter*
- *Chris Bello, Branch 6 Chief, Internal Revenue Service*
- *David Ernick, PricewaterhouseCoopers*
- *Rocco Femia, Miller & Chevalier*

11:45-Noon Break

Noon-1:15 Lunch

*Danielle Rolfes, International Tax Counsel, U.S. Treasury*

1:30—2:45 OECD—Base Erosion and Profit Shifting (BEPS) Project

- *Manal Corwin, KPMG*
- *Michael Plowgian, KPMG, formerly of the OECD BEPS Project*
- *Barbara Angus, Ernst & Young*
- *Tim McDonald, Procter & Gamble*

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

- *Peter Barnes, Caplin and Drysdale & Duke University Law School*
- *Michael Danilack, Deputy Commissioner (International), Large Business and International Division, Internal Revenue Service*
- *Diana Wollman, Director, International Strategy, Large Business and International Division, Internal Revenue Service*
- *Richard McAlanon, Director of Advance Pricing and Mutual Agreement, LB&I, Internal Revenue Service*
- *David Varley – Senior Manager of our Treaty Assistance & Interpretation Team*

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

**4:15-5:30 Tax Treaties—The Way Forward**

- *Harrison Cohen, Deloitte*
- *Chris Landberg, ,Advisor on International Economics and Trade, Senate Foreign Relations Committee*
- *Andy Olson, Senior Advisor for International Economics and Trade, Senate Foreign Relations Committee Minority Staff*
- *Arlene Fitzpatrick, Attorney-Advisor, Office of International Tax Counsel, U.S. Department of Treasury*

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

**6:15--8:00 Dinner—Tax Reform and Entitlement Reform**

*Former Senator Jon Kyl*

**October 31st**

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

**Day 2 Opening Remarks**

*Paul Nolan, NFTC Tax Committee First Vice-Chair*

**9:00-10:30 Legislative Update and Outlook**

- *Nick Giordano, Washington Council Ernst & Young LLP*
- *Mark Prater, Chief Tax Counsel, Republican Staff, Committee on Finance, U.S. Senate*
- *Ron Dabrowski, 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 Kalyam, Tax Counsel, Democrat Staff, Committee on Ways and Means, U.S. House of Representatives*