



39th ANNUAL CONFERENCE OF THE U.S.A. BRANCH OF THE
INTERNATIONAL FISCAL ASSOCIATION
INTERCONTINENTAL BUCKHEAD HOTEL, ATLANTA, GEORGIA
FEBRUARY 24-25, 2011



Conference Sponsors



Deloitte.



DUFF & PHELPS

BINGHAM

CRA The Ballentine
Barbera Group

ALSTON + BIRD LLP



COVINGTON
COVINGTON & BURLING LLP

EQUITY TRUST



The Coca-Cola Company



**39th ANNUAL CONFERENCE OF THE U.S.A. BRANCH OF THE
INTERNATIONAL FISCAL ASSOCIATION
INTERCONTINENTAL BUCKHEAD HOTEL, ATLANTA, GEORGIA
FEBRUARY 24-25, 2011**

PROGRAM SUMMARY

Thursday, February 24, 2011

- Welcome and Introductions
- Panel 1 – A Day in the Life of a Corporate Tax Director: Preparing for Recovery
- Panel 2 – Foreign Tax Credit Cupcakes: Splitters, Resourcing, and Covered Asset Acquisitions
- Lunch – Speaker: Manal S. Corwin, International Tax Counsel, Department of the Treasury
- Panel 3 – International Tax Planning for Intangibles
- Panel 4 – Using Partnerships in International Tax Planning
- Panel 5 – Limitation of Benefits: Best Practices – and Worst Practice
- Evening Reception & Dinner at the Georgia Aquarium

Friday, February 25, 2011

- Sponsored Breakfast Meetings
- Panel 6 – International M&A and Structuring
- Panel 7 – Practical Transfer Pricing Strategy
- Lunch
 - USA Branch General Meeting
 - 2010 IFA USA Branch Writing Prize Presentation
 - Congress Reports: National Reporters for 2011 IFA Congress to be held in Paris France
 - Luncheon Speaker: Michael Danilack, LB&I Deputy Commissioner (International), Internal Revenue Service
- Panel 8 – Take Your Head Out of the Sand: Preparing the Multinational Corporation for FATCA Compliance
- International Developments—Annual Review



39th ANNUAL CONFERENCE OF THE U.S.A. BRANCH OF THE
INTERNATIONAL FISCAL ASSOCIATION
INTERCONTINENTAL BUCKHEAD HOTEL, ATLANTA, GEORGIA
FEBRUARY 24-25, 2011

AGENDA

THURSDAY, FEBRUARY 24, 2011

- 7:30 a.m. **Registration & Morning Refreshments**
Morning continental breakfast is sponsored by Duff & Phelps.
- 8:30 – 8:45 a.m. **Welcome Remarks**
Steven J. Cohen, President IFA U.S.A. Branch
Scott M. Dayan, Chair of the IFA USA Branch 2011 Annual Conference
- 8:45 - 10:00 a.m. **Panel 1: A Day in the Life of a Corporate Tax Director: Preparing for Recovery**
This panel will discuss current topics affecting corporate tax leaders in industry.
Moderator: **Peter Look**, Motorola Mobility, Inc.
Panelists: Panelists to be named
- 10:00 – 10:30 a.m. **Refreshment Break**
Morning refreshment break is sponsored by The Coca-Cola Company.
- 10:30 – 12:00 noon **Panel 2: Foreign Tax Credit Cupcakes: Splitters, Resourcing, and Covered Asset Acquisitions**
This panel will discuss current issues and planning with regard to utilization of foreign tax credits.
Moderators: **Michael A. DiFronzo**, PricewaterhouseCoopers LLP
 Paul M. Schmidt, Baker & Hostetler LLP
Panelists: **Robert H.C. Wilkerson**, KPMG LLP
 Manal S. Corwin, International Tax Counsel, Department of the Treasury
 Julie M. Bradlow, Goodrich Corporation
- 12:00 – 1:30 p.m. **Lunch** Welcome from Central IFA: **Manuel E. Tron**, President Central IFA
 Luncheon Speaker: **Manal S. Corwin**, International Tax Counsel,
 Department of the Treasury
Today's lunch is sponsored by KPMG.
- 1:30 – 2:45 p.m. **Panel 3: International Tax Planning for Intangibles**
This panel will address what items are within the current definition of intangibles in light of proposed legislative and regulatory changes and how these changes may interact with the new OECD Intangibles Project and Business Structuring.
Moderators: **Alan W. Granwell**, DLA Piper LLP (US)
 Thomas M. Zollo, KPMG LLP
Panelists: **Ronald A. Dabrowski**, Deputy Associate Chief Counsel (International),
 Internal Revenue Service
 Kevin Levingston, Staff Member, Joint Committee on Taxation
 David Ernick, Associate International Tax Counsel, Department of the
 Treasury
- 2:45 – 3:15 p.m. **Refreshment Break**
Afternoon refreshment break is sponsored by The Coca-Cola Company.



**39th ANNUAL CONFERENCE OF THE U.S.A. BRANCH OF THE
INTERNATIONAL FISCAL ASSOCIATION
INTERCONTINENTAL BUCKHEAD HOTEL, ATLANTA, GEORGIA
FEBRUARY 24-25, 2011**

Thursday, February 24 continued

3:15 – 4:30 p.m.

Panel 4: Using Partnerships in International Tax Planning

This panel will address the issues and opportunities found in using partnerships in global tax planning from an international tax perspective. This session will discuss common issues found in using partnerships in many important countries as well as emerging opportunities confronting the international tax planner for both joint ventures and intercompany structures that are becoming more common in today's global marketplace.

Moderator: **Todd E. Behrend**, Ryan LLP

Panelists: **David Levere**, Ernst & Young LLP

Jeffrey M. Rubin, Deloitte LLP

Daniel W. Luchsinger, Covington & Burling LLP

4:30 – 5:45 p.m.

Panel 5: Limitation of Benefits: Best Practices – and Worst Practices

The United States pioneered the focus on limitation of benefits for treaties, to prevent treaty abuse. But now other countries have jumped aboard the issue, often with burdensome (and unworkable) rules. This panel will examine recent developments in the area of limitation of benefits, with a goal to identify practical and sensible methods to ensure that treaty benefits are granted to appropriate parties.

Moderator: **Peter A. Barnes**, General Electric Company

Panelists: **Douglas W. O'Donnell**, Director, Competent Authority and International Coordination, LB&I, Internal Revenue Service (tentative)

Jerome B. Libin, Sutherland, Asbill & Brennan LLP

Lodewijk Berger, Loyens & Loeff

5:45 – 6:45 p.m.

Young IFA Network (YIN) Reception

YIN event is sponsored by Deloitte.

6:45 – 10:00 p.m.

Evening Reception & Dinner at the Georgia Aquarium

Meet in the lobby at 6:15 to catch the bus.

Tonight's evening event is sponsored by Alston & Bird, Covington & Burling, Equity Trust, Ryan, and The Coca-Cola Company.



39th ANNUAL CONFERENCE OF THE U.S.A. BRANCH OF THE
INTERNATIONAL FISCAL ASSOCIATION
INTERCONTINENTAL BUCKHEAD HOTEL, ATLANTA, GEORGIA
FEBRUARY 24-25, 2011

FRIDAY, FEBRUARY 25, 2011

8:00 – 9:00 a.m.

Hot Topics Hot Breakfast!

This morning's breakfasts are sponsored by: BNA, CRA The Ballentine & Barbera Group, Duff & Phelps, and KPMG.

All conference participants are welcome to attend one of the four breakfast sessions offered on Friday morning. The session of each sponsor will feature a speaker on a hot topic, and will include a full hot breakfast. Speakers and topics for each session will be identified in the coming weeks leading up to the Conference.

9:15 – 10:30 a.m.

Panel 6: International M&A and Structuring

This panel will review several M&A related topics of interest, including what remains of inversions, planning tools to avoid "sandwich" problems (including the use of Section 304), problems in exiting foreign operations with dual consolidated losses and a few thought provoking PLRs. The panel will also discuss post-acquisition restructuring and reorganizations to ensure ongoing tax efficiency.

Moderator: **Sam Kaywood**, Alston & Bird LLP

Panelists: **William S. Dixon**, Citigroup, Inc.

Brainard L. ("Skip") Patton, Counselor at Law

Lowell D. Yoder, McDermott, Will & Emery LLP

Kimberly Tan Majure, Miller & Chevalier, Chartered

10:30 – 11:00 a.m.

Refreshment Break

Morning refreshment break is sponsored by Duff & Phelps, and The Coca-Cola Company.

11:00 – 12:15 p.m.

Panel 7: Practical Transfer Pricing Strategy

This panel will discuss practical approaches to problems encountered by multinational corporations with their transfer pricing strategy and implementation.

Moderator: **Scott M. Dayan**, Baker & Hostetler LLP

Panelists: **Henry J. Birnkrant**, Alston & Bird LLP

Bettie N. Ricca, Deputy Associate Chief Counsel (International), Internal Revenue Service

Steven P. Hannes, McDermott Will & Emery LLP

Panel 7 is sponsored by Bureau van Dijk.



**39th ANNUAL CONFERENCE OF THE U.S.A. BRANCH OF THE
INTERNATIONAL FISCAL ASSOCIATION
INTERCONTINENTAL BUCKHEAD HOTEL, ATLANTA, GEORGIA
FEBRUARY 24-25, 2011**

Friday, February 25 continued

12:15 – 2:00 p.m.

Lunch

USA Branch General Meeting

Steven J. Cohen, President IFA USA Branch, Presiding

2010 IFA USA Branch Writing Prize Presentation

Steven J. Cohen, President IFA USA Branch

Congress Reports: National Reporters for 2011 IFA Congress to be held in Paris France

Subject I Cross-border Business Restructuring

Thomas M. Zollo, KPMG LLP

Subject II Key Practical Issues to Eliminate Double Taxation of Business Income

Dirk J.J. Suringa, Covington & Burling LLP

Luncheon Speaker: Michael Danilack, LB&I Deputy Commissioner (International),
Internal Revenue Service

Today's lunch is sponsored by Bingham.

2:15 – 3:30 p.m.

**Panel 8: Take Your Head Out of the Sand: Preparing the Multinational Corporation for
FATCA Compliance**

This panel will discuss the expected approach of guidance on the application of FATCA to non-financial institutions and what companies need to be doing to prepare.

Moderator: **Joan C. Arnold**, Pepper Hamilton LLP

Panelists: **Michael Danilack**, LB&I Deputy Commissioner (International), Internal
Revenue Service

Other panelists to be named

3:30 – 4:30 p.m.

International Developments—Annual Review

Speaker: **James P. Fuller**, Fenwick & West LLP

4:30 p.m.

End of conference



**39th ANNUAL CONFERENCE OF THE U.S.A. BRANCH OF THE
INTERNATIONAL FISCAL ASSOCIATION
INTERCONTINENTAL BUCKHEAD HOTEL, ATLANTA, GEORGIA
FEBRUARY 24-25, 2011**

VENUE AND ACCOMMODATIONS

InterContinental Buckhead Hotel

The InterContinental Buckhead sets new standards of quality with international flair and southern hospitality. A Peachtree Road address puts you close to Buckhead's thriving business and shopping districts and provides easy access to attractions such as the Georgia Aquarium, the High Museum of Art, the New World of Coca-Cola and the CNN Studio Tour.

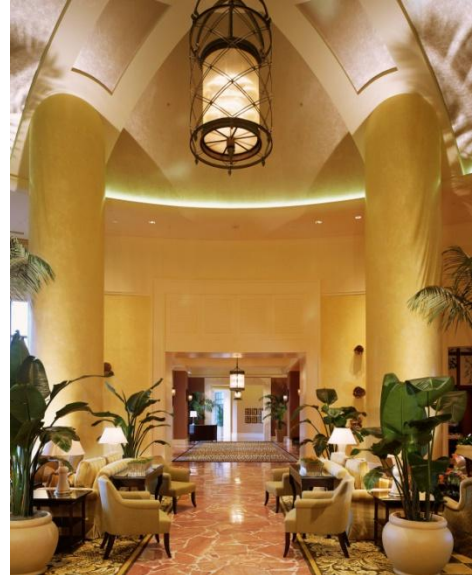
A block of guestrooms has been reserved at the InterContinental Buckhead Hotel. Please make your reservation right away!

- All participants are required to make their own accommodation arrangements directly with the hotel.
- Rooms will be filled on a first-come/first-serve basis.
- Unbooked rooms (if any) will be released for general sale on January 23, 2011, and the group rate may not be available after this date.

IFA Group Rate: \$239.00 standard room

Hotel Reservations: 404-946-9191

Please request the group rate for IFA



To book online go to: <http://www.ichotelsgroup.com/intercontinental/en/gb/dates-preferences/ATLBH?groupCode=GI8>
(there is a link to this site on the Conference Accommodations page on the IFA USA website: www.ifausa.org)



**39th ANNUAL CONFERENCE OF THE U.S.A. BRANCH OF THE
INTERNATIONAL FISCAL ASSOCIATION
ATLANTA, GEORGIA, FEBRUARY 24-25, 2011**

REGISTRATION FORM

Name: _____
 Organization: _____
 Address: _____
 City, State, Zip Code: _____
 Phone: _____ Email: _____
 Accompanying Person's name: _____

Conference Registration Fees – Check the box that applies to your registration				
REGISTRATION CATEGORY	IFA MEMBER³		NON-MEMBER	
	PAYMENT BY JANUARY 31, 2011	PAYMENT AFTER JANUARY 31, 2011	PAYMENT BY JANUARY 31, 2011	PAYMENT AFTER JANUARY 31, 2011
Accounting Firm or Law Firm Participant ¹	<input type="checkbox"/> \$795	<input type="checkbox"/> \$895	<input type="checkbox"/> \$995	<input type="checkbox"/> \$1095
Industry Participant ¹	<input type="checkbox"/> \$575	<input type="checkbox"/> \$675	<input type="checkbox"/> \$775	<input type="checkbox"/> \$875
Accompanying Persons Events:				
<input type="checkbox"/> \$185 for the Thursday CNN and Swan House Tour				
<input type="checkbox"/> \$225 for the Friday Botanical Gardens and Cooking Demonstration				
<input type="checkbox"/> \$125 for the Thursday Evening Dinner at the Georgia Aquarium				
Fees (Tax ID: 23-7068849)				
Registration Fee: ¹	\$ _____ (A)			
Government/Academic Discount ² (A x 50%)	\$ _____ (B)			
Accompanying Persons' Events:	\$ _____ (C)			
Total Payable (A – B + C):	\$ _____ (D)			
<small>¹ Includes access to technical sessions, Thursday night banquet, Thursday and Friday lunches and refreshment breaks, Friday breakfast session. ² Discount applies to full-time government and academic attendees. ³ The "member" rate may also be claimed for a new IFA membership for 2011 if registration is received accompanied by a completed IFA membership application form with additional \$225 payment for membership dues. Application forms available at: www.ifausa.org.</small>				

Payment of Amount (D)			
<input type="checkbox"/> Payment made by check (payable to IFA USA)	<input type="checkbox"/> Visa	<input type="checkbox"/> MasterCard	<input type="checkbox"/> American Express
Credit Card Number: _____		Expiry Date: _____	
Signature: _____			
<i>Your credit card statement will indicate that payment was made to "Events & Management Plus Inc."</i>			

Scholarships are available in the event of financial hardship. An individual wishing to obtain a scholarship should apply in writing at least 2 weeks in advance of the program date, explaining the circumstances of such person's financial hardship. The amount of the scholarship generally depends on income as follows: No income - Full Scholarship; Income up to \$15,000 - 75% discount; Income \$15,000-30,000 - 50% discount; Income above \$30,000 - no discount

Please help us with our meal planning:

At this time do you plan to attend the Thursday night dinner? Yes No Don't know

List any special dietary restrictions: _____

Return completed registration form with your remittance to:

IFA USA Branch
 2604 Elmwood Avenue, #347, Rochester, NY 14618-2295

Tel: 866-298-9464; Fax: 866-303-0626
info@ifausa.org

Speakers, content and panel order are subject to change without notice, and registrations may be limited. This meeting is subject to cancellation due to insufficient registration or other reasons, in which case refunds will be made free of processing fees. All other refund requests are subject to a \$50 processing fee and must be received in writing at the above address on or before **February 3, 2011**. No refunds will be given with respect to requests received after that date. All refunds are limited to the amount of registration fees previously paid less applicable processing fees. Substitutions are welcome at any time (including by walk-in registration) and copies of this registration form may be made for additional registrants. A fax or telephone registration received at the above numbers will hold the registrant's place for five business days, but will be complete and eligible for reduced rates only on the date on which a completed registration form, accompanied by payment in full, is subsequently received at the above address.