



62nd
ANNUAL
Conference

Gaylord Palms
Kissimmee, Florida



TAX EXECUTIVES INSTITUTE, INC.

October 21-24, 2007

Meritorious Service Awards

Recognizing that the success of Tax Executives Institute in advancing its educational, networking, and advocacy goals depends on the volunteer efforts of its members, TEI's Board of Directors created two meritorious service awards - one for Chapters and the other for Institute committees. Awards are given not only for work on particular projects, but also for sustained contributions. Listed below are the 2006-2007 recipients of these awards.



COMMITTEE

International Tax.....	Dorothy C. Chao
IRS Administrative Affairs.....	Mark C. Silbiger
Task Force on Structure & Governance	David M. Penney

CHAPTER

Carolinas.....	Richard J. Orlemanski
Chicago.....	Janice L. Luchessi
Detroit	Loren Opper
Houston	Oscar E. Jones
Los Angeles	Thomas A. Bayless
Minnesota	Richard W. Brust
New York.....	Alan Getz
Oklahoma	Anthony W. Rackley
Orange County.....	Gayle S. Jennings
Santa Clara Valley.....	Larry R. Langdon
St. Louis.....	John J. McNamara, Jr.
Virginia	Paul M. Desjardins
Wisconsin	Cynthia A. Rooks

General Information

ELIGIBILITY TO ATTEND

Registration is limited to members of TEI and other in-house tax professionals. (Individuals engaged in private law, accounting, or other consulting practice are ineligible to attend.) TEI has reduced the registration fee by \$200 (U.S.) for members who are attending their first TEI conference (Annual or Midyear). Individuals who have applied for membership are eligible for the first-timer discount. TEI is also offering an early registration discount to members and nonmembers whose registrations and payments are received by TEI by 4:00 p.m. ET on September 28, 2007.

REGISTRATION FEES (IN U.S. DOLLARS)

TEI Member by 9/28	\$700
TEI Member after 9/28.....	\$750
First-Timer (Members Only) by 9/28.....	\$500
First-Timer (Members Only) after 9/28.....	\$550
Nonmember by 9/28	\$800
Nonmember after 9/28.....	\$850
Associate Member/Member in Transition	\$350
Spouse.....	\$300

REGISTRATION PROCEDURE

Please register online at www.tei.org or send the completed registration form to TEI with your registration fee. Checks should be made payable to Tax Executives Institute, Inc. All payments must be in U.S. dollars. A registration form will not be processed unless accompanied by payment, and **no registrations will be accepted over the phone**. Because of TEI's lock-box procedures, registrations should not be sent to TEI's street address.

By Web: Go to www.tei.org. Click on "Continuing Education."

By Mail & USPS Express Mail: Send registration form with check or credit card information. Mailing address for registrations: TEI, P.O. Box 9407, Uniondale, NY 11555-9407.

By Other Express Mail: Citi@ 1 Reckson Plaza, Wholesale Lockbox Lower Level, Attn: J. Brady/N. Richards, Uniondale, NY 11555. Mark inside envelope "P.O. Box 9407-Tax Executives Institute."

By Fax: 202.638.5607. Credit card registrants only. VISA, MasterCard, American Express, Diners Club, and Discover only. To ensure confidentiality, please fax between 9 a.m. and 4 p.m. ET.

Fee covers the reception on Sunday, October 21; continental breakfast and luncheon on Monday, October 22; continental breakfast, luncheon, reception, and banquet on Tuesday, October 23; continental breakfast and luncheon on Wednesday, October 24; refreshment breaks; and all conference materials. After your registration has been processed, you will receive a confirmation via email.

General Information

HOTEL INFORMATION

TEI's 62nd Annual Conference will be held at the Gaylord Palms in Kissimmee, Florida. A block of rooms is being held for conference registrants, who are responsible for making their own hotel reservations. Upon registering for the conference with TEI, you will receive an email confirmation which will include a weblink to our block of rooms at the hotel. **Reservations may only be made by using this link.** To ensure that conference registrants can secure rooms within the room block, telephone reservations will not be accepted. A one-night charge will be made to your credit card to secure your reservation.

The room rates are **\$219 single/double**, plus a daily resort fee of \$10. All rates are subject to prevailing taxes. The TEI block of rooms will be released for sale to the public on **Saturday, September 29, 2007**. Requests for accommodations after that date, or sooner if the block sells out, cannot be ensured. Registrants are urged to make their reservation immediately upon receipt of the web link.

Gaylord Palms's address is: 6000 W. Osceola Parkway, Kissimmee, FL 34746. Phone: 407.586.0000.

CANCELLATION AND SUBSTITUTION POLICY

Refunds will be made for cancellations received in writing by 4:00 p.m. ET on October 12, and will be subject to an administrative service charge of \$75 (U.S.). No refunds will be made for cancellations received after that date or for no-shows. Refund of credit card registrations less the administrative charge will be made to the credit card account. In the event of cancellation of the conference, TEI's liability is limited to the return of the registration fee. Members unable to attend may purchase the conference materials for \$350 (U.S.). There will be a \$50 charge for substitutions (plus any fee differential).

FIRST-TIME REGISTRANTS

TEI has reduced the registration fee by \$200 for members who are attending their first TEI conference (Annual or Midyear). This is the equivalent of one year's dues, making the conference an even better value for new members. If you are a member attending your first conference, please check the appropriate box on the registration form and submit your payment of \$500 by September 28, 2007, or \$550 after that date. (This offer applies only to TEI members and pending members.)

MEMBERS IN TRANSITION

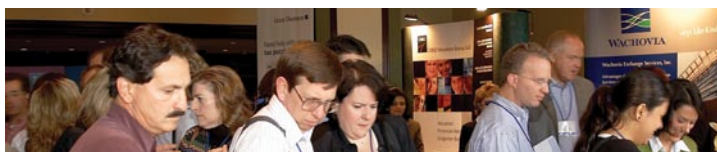
TEI has lowered the conference fee for members in transition. Unemployed individuals who are members in good standing may register for the conference by paying only \$350. Members wishing to take advantage of the reduced fee should mark the appropriate box on the registration form. They will be contacted to affirm both their desire to obtain a full-time position in industry and they are

General Information

not holding nonqualifying employment, as well as their adherence to TEI's duty of nonsolicitation.

CONFERENCE PARTICIPATION

You must register for the entire conference to attend any educational session or take part in any conference activity, including keynote addresses. Admission to luncheons, receptions, and the banquet will be by ticket only. Conference name badges will be required for admission to all educational sessions. No partial or split registration will be permitted.



Registrants are encouraged to visit exhibit booths staffed by TEI's conference sponsors, whose financial support enables the Institute to pursue its educational, networking, and advocacy goals without raising program fees or dues. Registrants should know that by entering drawings held by the sponsors, they are consenting to being contacted by the firms. In addition, TEI grants a one-time license to conference sponsors to contact registrants following the conference. Registrants wishing to have their names removed from the list provided to sponsors should write the word "remove" on the back of their business card and drop it off at the TEI Registration Desk. Questions about TEI's sponsorship program should be directed to asktei@tei.org. Sponsors are *not* permitted to attend any technical sessions.

SPOUSES

The spouse fee covers the reception on Sunday; a continental breakfast on Monday; a visit to Winter Park for touring the Morse Museum of American Art, and luncheon on Tuesday; the reception and banquet on Tuesday; and Wednesday luncheon. A spouse hospitality suite will be open on Sunday where professional tour guides, as well as members of the Florida Chapter, will assist in planning visits to area attractions. Monday has been left free after the continental breakfast for guests to enjoy activities of their own choosing.

CONFERENCE ATTIRE

Business or business casual attire may be worn during the day and on Sunday evening. Business attire is appropriate on Tuesday evening.

MEAL TICKETS

Registrants may purchase tickets for guests to luncheons, receptions, and the banquet at the TEI Registration Desk. Guest tickets may not be purchased for sponsors or practitioners.

General Information

SMOKING POLICY

Smoking is not permitted at any conference event.

MEDIA & MESSAGES

Sessions involving government officials and the Monday keynote address and plenary session will be open to the media. Telephone calls, messages, and conference announcements will be posted on the message board at the TEI Registration Desk. The phone number for messages is 407.586.0000 (ask for the TEI Registration Desk). Hotel guests may receive fax messages at 407.586.1999.

RECORDING MACHINES & CELLULAR PHONES

The use of tape and other recording devices is not permitted in any meeting rooms, except by accredited members of the media. To avoid disturbing others, please switch off mobile phones, email devices, and pagers upon entering the meeting room.

BANQUET TICKET EXCHANGE

The Tuesday banquet ticket included in your on-site registration packet must be exchanged for admission tickets at the ticket exchange desk adjacent to the TEI Registration Desk. A flyer explaining the ticket exchange and reserved table policy will be included in your registration packet.

SHIPPING OF CONFERENCE MATERIALS

Arrangements have been made with a full-service shipping company to ship registrants' conference materials to their offices at the conclusion of the conference. This service is at the individual's expense, and will include a boxing and handling charge. Registrants who do not wish to use this service should make shipping arrangements with the hotel business center or leave space in their luggage for transporting materials home.

CPE CREDIT INFORMATION

Tax Executives Institute is registered with the National Association of State Boards of Accountancy as a sponsor of "group live" continuing professional education on the National Registry of CPE Sponsors (registry number 103086). State boards of accountancy have final authority on the acceptance of individual courses. Complaints regarding sponsors may be addressed to National Registry of CPE Sponsors, 150 Fourth Avenue North, Suite 700, Nashville, TN 37219-2417. Website: www.nasba.org. For more information regarding administrative policies such as complaint and refund, call TEI at 202.638.5601.



General Information

Date: Annual Conference, October 21-24, 2007

Delivery Method: Group Live

Program Level: Overview

Field of Study: Taxes

Learning Objectives: To provide updates on legislative, regulatory, and judicial developments relating to federal, state & local, international, and Canadian taxation, as well as to analyze the effect of financial reporting developments on the effective operation of corporate tax departments.

Prerequisite: None.

Advanced Preparation: No advance preparation required.

CPE Credit 18.5 (based on a 50-minute hour)

CLE Credit 15.5 (based on a 60-minute hour)

Accounting Credit 2.5

Tax Executives Institute and TEI Education Fund accord to participants of any race, color, creed, sex, or national ethnic origin all the rights, privileges, programs, and activities generally accorded or made available to participants at its programs, courses, and other activities.

ACKNOWLEDGMENTS

Tax Executives Institute and TEI Education Fund acknowledges the ongoing support of **Thomson RIA**, TEI's exclusive affinity partner for tax research. The Institute also thanks **McKee Nelson LLP** for providing the tote bags for use by participants.

Conference Sponsors

Tax Executives Institute acknowledges the support of the following sponsors of the 62nd Annual Conference.

PLATINUM

ADP

Baker & McKenzie LLP

Deloitte & Touche LLP

DLA Piper US LLP

Ernst & Young LLP

Grant Thornton LLP

Hudson Financial Solutions

KPMG LLP

Mayer Brown LLP

McKee Nelson LLP

Sutherland Asbill & Brennan LLP

Thomson RIA

Vertex Inc.

GOLD

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DuCharme, McMillen & Associates, Inc.

Fenwick & West LLP

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Planitax, Inc.

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Tax Analysts

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Conference Sponsors

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Miller & Chevalier Chartered

Miller, Canfield, Paddock and Stone, P.L.C.

Pepper Hamilton LLP

Skadden, Arps, Slate, Meagher & Flom LLP

Thompson Hine LLP

White & Case LLP

Winston & Strawn LLP

BRONZE

Anybill, Inc.

BNA/Tax Management

CBIZ Valuation Group, Inc.

Ceteris, Inc.

Longview Solutions

McDermott Will & Emery LLP

Morrison & Foerster LLP

Sabrix, Inc.

Wachovia Exchange Services, Inc.

Sunday

October 21, 2007

- 8:30 am - 11:30 am **Executive Committee Meeting**Captiva 1
- 10:00 am - 8:00 pm **Registration**.....Sun Lobby
- 11:30 am - 1:00 pm **Executive Committee, Committee Chairs,
and Past Presidents Luncheon**Captiva 2
- Noon - 1:00 pm **Membership Committee**Captiva 1
- 1:00 pm - 4:00 pm **Board of Directors Meeting**Sanibel
- 4:00 pm - 6:00 pm **Committee Meetings**
- **Corporate Tax Management**.....Captiva 1
 - **Federal Tax**..... Miami 1
 - **International Tax**..... Miami 3
 - **IRS Administrative Affairs** Miami 2
 - **State & Local Tax** Daytona 2
- 6:30 pm - 7:45 pm **Welcome Reception**..... Piazza

(ALL SESSIONS BEFORE 6:00 PM BY INVITATION ONLY; MEMBERS WISHING TO ATTEND COMMITTEE MEETINGS SHOULD SEND AN EMAIL MESSAGE TO MEETINGS@TEI.ORG.)

Monday

October 22, 2007

- 7:00 am - 5:00 pm **Registration**.....Sun Lobby
- 7:00 am - 8:00 am **Continental Breakfast** Sun Lobby & Foyer
- 8:00 am - 9:15 am **Welcome and
Keynote Address** Sun Ballroom A

Presiding: Robert J. McDonough
Polaroid Corporation
Waltham, Massachusetts
TEI International President

The Effect of Global Trends on Business

Remarks by: Marvin Zonis
Professor Emeritus
Graduate School of Business
University of Chicago
Chicago, Illinois

9:15 am - 10:15 am **Plenary Session:
Financial Reporting Issues**..... Sun Ballroom A

Moderator: Terilea J. Wielenga
Allergan, Inc.
Irvine, California
Chair, TEI Financial Reporting Committee

The New Tax World

Saul M. Rosen
Citigroup, Inc.
New York, New York

Stuart E. Seigel
Seigel & Associates, LLC
New York, New York

10:15 am - 10:30 am **Refreshment Break**..... Sun Lobby & Foyer

CONCURRENT SESSIONS

10:30 am - 11:45 am **Federal Tax** Sun Ballroom A

Moderator: Carita R. Twinem
Briggs & Stratton Corporation
Milwaukee, Wisconsin
Chair, TEI Federal Tax Committee

Lessons Learned from Section 199, Including Optimizing § 1.861-8 Allocations

C. Ellen MacNeil
Deloitte Tax LLP
Washington, D.C.

Michael J. Shehab
Deloitte Tax LLP
Detroit, Michigan

10:30 am - 11:45 am **International Tax/IRS
Administrative Affairs** Sun Ballroom D

Moderators: Christopher T. Riley
Archer Daniels Midland Co.
Decatur, Illinois
Chair, TEI IRS Administrative Affairs Committee

Brian C. Ugai
Starbucks Coffee Company
Seattle, Washington
Chair, TEI International Tax Committee

**IRS International Initiatives
(Form 5471 Revision, Tier I and II Issues,
Structural Changes)**

Rocco V. Femia
Miller & Chevalier Chartered
Washington, D.C.

Frank Y. Ng
Commissioner,
Large and Mid-Size Business Division
Internal Revenue Service
Washington, D.C.

10:30 am - 11:45 **State & Local Tax**.....Sun Ballroom C

Moderator: Linda H. Dickens
Texas Instruments, Inc.
Dallas, Texas
Vice Chair, TEI State & Local Tax Committee

Update on State Tax Controversies

Kendall L. Houghton
Sutherland Asbill & Brennan LLP
Washington, D.C.

Marilyn A. Wethekam
Horwood Marcus & Berk Chartered
Chicago, Illinois

Noon - 1:45 pm **Luncheon Program**..... Florida Exhibit Hall E

Presiding: Robert J. McDonough
Polaroid Corporation
Waltham, Massachusetts
TEI International President

Remarks by: Linda E. Stiff
Acting Commissioner of Internal Revenue
Washington, D.C.

2:00 pm - 5:00 pm **Industry Sessions**

**SEE PAGES 35-36 FOR INDUSTRY
SESSIONS LISTINGS.**

3:15 pm - 3:45 pm **Refreshment Break**..... Sun Lobby & Foyer

3:30 pm - 5:00 pm **Tax Reform Task Force**..... St. George 104

7:00 am - 5:00 pm **Registration**.....Sun Lobby

7:00 am - 8:00 am **Continental Breakfast**Sun Lobby & Foyer

8:00 am - 9:00 am **Keynote Address**Sun Ballroom A

Presiding: Robert J. McDonough
Polaroid Corporation
Waltham, Massachusetts
TEI International President

Remarks by: The Honorable Donald L. Korb
Chief Counsel
Internal Revenue Service
Washington, D.C.

9:00 am - 10:15 am **Plenary Session:
Corporate Tax Management**...Sun Ballroom A

Moderator: Michael J. McGoldrick
Sunoco, Inc.
Philadelphia, Pennsylvania
Chair, TEI Corporate Tax Management Committee

New Corporate Tax Department Metrics, Re-Engineering Processes, and Other Issues

James D. Keene
Deloitte Tax LLP
Parsippany, New Jersey

Richard G. Larsen
Ernst & Young LLP
Washington, D.C.

10:15 am - 10:30 am **Refreshment Break**.....Sun Lobby & Foyer

CONCURRENT SESSIONS

10:30 am - 11:45 am **Financial Reporting**.....Sun Ballroom A

Moderator: Janet M. Wilson
Halliburton Company
Houston, Texas

Developing Trends in FIN 48 Disclosures

P. Michael Baldasaro
Ernst & Young LLP
New York, New York

10:30 am - 11:45 am **Canadian Income Tax**.....Sun Ballroom C

Moderator: David M. Penney
General Motors of Canada Limited
Oshawa, Ontario
Chair, TEI Canadian Income Tax Committee

**Acquisitions of, and Repatriations from,
Canadian Corporations, Including the Effect of
the U.S. – Canada Protocol**

Trent H. Henry
Ernst & Young LLP
Toronto, Ontario

Steven M. Surdell
Ernst & Young LLP
Chicago, Illinois

10:30 am - 11:45 am **State & Local Tax**..... Sun Ballroom D

Moderator: Victor Ledesma
Kimberly-Clark Corporation
Neenah, Wisconsin
Chair, TEI State & Local Tax Committee

**Restraints on State Nexus and Applications
of Expense Disallowance Rules after MBNA,
Lanco, and VFJ**

Timothy H. Gillis
KPMG LLP
Washington, D.C.

Donald M. Griswold
McDermott Will & Emery LLP
Washington, D.C.

Noon - 1:45 pm **Luncheon Program**..... Florida Exhibit Hall E

Presiding: Robert J. McDonough
Polaroid Corporation
Waltham, Massachusetts
TEI International President

Remarks by: Karen G. Gilbreath-Sowell
Deputy Assistant Secretary (Tax Policy)
U.S. Department of the Treasury
Washington, D.C.

CONCURRENT SESSIONS

2:00 pm - 3:15 pm **IRS Administrative Affairs**Sun Ballroom C

Moderator: Michael J. Bernard
Microsoft Corporation
Redmond, Washington
*Vice Chair, TEI IRS Administrative Affairs
Committee*

Managing Foreign Audits

Paul M. Schmidt
Baker & Hostetler LLP
Washington, D.C.

Alan W. Granwell
DLA Piper US LLP
Washington, D.C.

2:00 pm - 3:15 pm **Federal Tax** Sun Ballroom D

Moderator: Robert J. Birch
Wellmark, Inc.
Des Moines, Iowa
*Chair, TEI Federal Tax Subcommittee on
Employee Benefits and Payroll Taxes*

Severance Pay, Golden Parachutes, and Section 409A

Elizabeth N. Buchbinder
Ernst & Young LLP
Washington, D.C.

Elizabeth E. Drigotas
Deloitte Tax LLP
Washington, D.C.

2:00 pm - 3:15 pm **Corporate Tax Management** ... Sun Ballroom A

Moderator: Michael J. McGoldrick
Sunoco, Inc.
Philadelphia, Pennsylvania
Chair, TEI Corporate Tax Management Committee

Negotiation Techniques

Ruth Shlossman
Watershed Associates, Inc.
Washington, D.C.

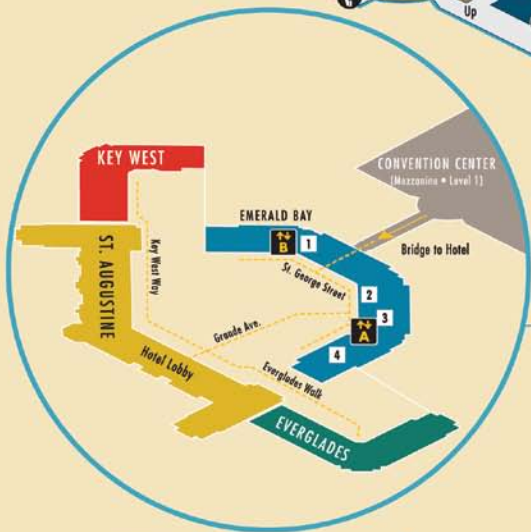
3:15 pm - 3:45 pm **Refreshment Break** Sun Lobby & Foyer

CONCURRENT SESSIONS

3:45 pm - 5:00 pm **International Tax** Sun Ballroom C

Moderator: Jocelyn P. Krabbenschmidt
Amazon.com, Inc.
Seattle, Washington
Vice Chair, TEI International Tax Committee

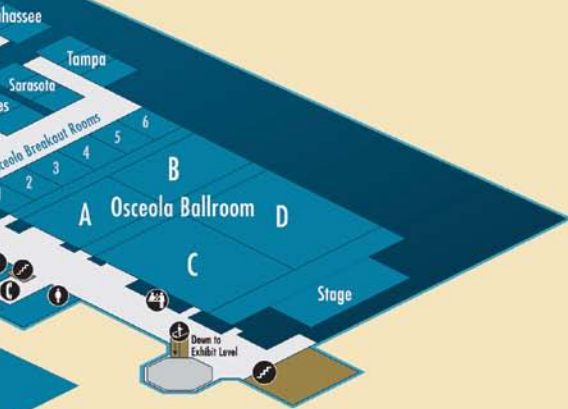
BALLROOM LEVEL (Level 2)



- KEY**
-  elevator
 -  escalator
 -  stairs
 -  restrooms
 -  information
 -  phones

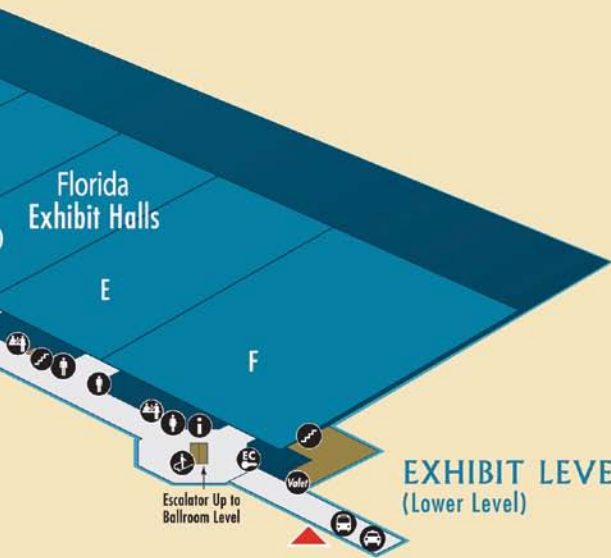


GAYLORD PALMS™



MEZZANINE LEVEL

(Level 1)



ADDITIONAL MEETING ROOMS IN HOTEL:

HEMINGWAY AND SANCHEZ BOARDROOMS:

Level 4 via Emerald Bay Elevators



3

EMERALD 1-8 MEETING ROOMS:

Lower Level via Emerald Bay Elevators



ORANGE BLOSSOM BALLROOM:

On St. George Street

4

102 - 108 ST. GEORGE STREET MEETING ROOMS:

On St. George Street

- bus
- taxi
- smoking area

- conference registration
- express checkout
- late night guest key card entrances

Foreign Audit Experiences: Far East, India, and Canada

Holly K. McClellan
Baker & McKenzie LLP
Palo Alto, California

David M. Penney
General Motors Canada Limited
Oshawa, Ontario

James P. Silvestri
Cognizant Technology Solutions Corporation
Teaneck, New Jersey

3:45 pm - 5:00 pm **Federal Tax**..... Sun Ballroom D

Moderator: Gary P. Hickman
Oldcastle, Inc.
Atlanta, Georgia
Vice Chair, TEI Federal Tax Committee

Mergers and Liquidations of Subsidiaries

James M. Lynch
Winston & Strawn LLP
Chicago, Illinois

3:45 pm - 5:00 pm **State & Local Tax**..... Sun Ballroom A

Moderator: Cathleen Stevens
Brunswick Corporation
Lake Forest, Illinois

Trends in State Taxation, Including Texas's Margins Tax, Michigan's SBT Replacement Tax, and New York's Budget Bill

Richard W. Genetelli
The Genetelli Consulting Group
New York, New York

Glenn C. McCoy
Ryan & Company
New York, New York

6:30 pm - 7:30 pm **CAP Companies** Sanibel 1-2
(by invitation only)

6:30 pm - 7:30 pm **Reception**..... Sun Ballroom C

7:30 pm - 10:30 pm **Banquet** Sun Ballroom A

Presiding: Robert J. McDonough
Polaroid Corporation
Waltham, Massachusetts
TEI International President

Presentations: **Honorary Membership**

Michael P. Boyle
Seattle Chapter
2005-2006 TEI International President

J.A. (Drew) Glennie
Calgary Chapter
2002-2003 TEI International President

Entertainment: **Rob Magnotti** | *Impressionist and Comedian*

Wednesday

October 24, 2007

- 7:30 am - 1:30 pm **Registration**.....Sun Lobby
- 7:30 am - 8:30 am **Continental Breakfast**Sun Lobby & Foyer
- 7:30 am - 1:30 pm **Conference**
- Material Shipping**..... Sun Foyer

CONCURRENT SESSIONS

8:30 am - 9:30 am **IRS Administrative Affairs** Sun Ballroom D

Moderator: Thomas J. Wcisel
McDonald's Corporation
Oak Brook, Illinois
Vice Chair, TEI IRS Administrative Affairs Committee

Hot Topics, Including Tax Accrual Workpapers, Tier 1 and 2 Issues, and Section 199 Audit Issues

Erin M. Collins
KPMG LLP
Los Angeles, California

Paul S. Manning
KPMG LLP
Washington, D.C.

8:30 am - 9:30 am **Federal Tax** Sun Ballroom A

Moderator: Carita R. Twinem
Briggs & Stratton Corporation
Milwaukee, Wisconsin
Chair, TEI Federal Tax Committee

Partnerships, Including Single-Member LLCs

Karen G. Lohnes
PricewaterhouseCoopers LLP
Washington, D.C.

8:30 am - 9:30 am **Canadian Commodity Tax**Sun Ballroom C

Moderator: Phil W. Riley
Dofasco Inc.
Hamilton, Ontario
Chair, TEI Canadian Commodity Tax Committee

Current Issues in Cross-Border Transactions

Steven K. D'Arcy
Bennett Jones LLP
Toronto, Ontario

9:30 am - 9:45 am **Refreshment Break**.....Sun Lobby & Foyer

CONCURRENT SESSIONS

9:45 am - 10:45 am **Federal Tax/IRS
Administrative Affairs**Sun Ballroom C

Moderators: Nancy C. Farahmand
J.C. Penney, Inc.
Dallas, Texas
Vice Chair, TEI Federal Tax Committee

Denise M. Lukowitz
Schneider National Inc.
Green Bay, Wisconsin
*Vice Chair, TEI IRS Administrative Affairs
Committee*

Hot Topics in Fringe Benefit Audits

Thomas M. Cryan, Jr.
Baker & McKenzie LLP
Washington, D.C.

9:45 am - 10:45 am **International Tax**Sun Ballroom A

Moderator: Daniel R. Goff
Xilinx, Inc.
San Jose, California
Vice Chair, TEI International Tax Committee

Hot Topics, Including Contract Manufacturing, and Updates on Foreign Base Company Sales Income and Transfer Pricing Issues

Michael W. Gosk
McDermott Will & Emery LLP
Palo Alto, California

Bruce R. Maggin
IBM Corporation
Armonk, New York

9:45 am - 10:45 am **State & Local Tax**..... Sun Ballroom D

Moderator: James H. Taylor
ING
Atlanta, Georgia

FIN 48: Selected State Issues

Jerrold S. Gattegno
Deloitte Tax LLP
New York, New York

Aaron M. Young
Alston & Bird LLP
New York, New York

10:45 am - 11:00 am **Refreshment Break**..... Sun Lobby & Foyer

CONCURRENT SESSIONS

11:00 am - Noon **IRS Administrative Affairs** Sun Ballroom A

Moderator: Richard J. Zablocki
General Motors Corporation
Detroit, Michigan
Vice Chair, TEI IRS Administrative Affairs Committee

Navigating Through Your Exam Team

John Petrella, Jr.
PricewaterhouseCoopers LLP
Boston, Massachusetts

Joseph W. Tierney
PricewaterhouseCoopers LLP
Boston, Massachusetts

11:00 am - Noon **Financial Reporting**..... Sun Ballroom D

Moderator: Terilea J. Wielenga
Allergan, Inc.
Irvine, California
Chair, TEI Financial Reporting Committee

FIN 48/FAS 109: Traps and Trends for Senior Executives

Gregory G. Palmer
McDermott Will & Emery LLP
Chicago, Illinois

Wednesday October 24, 2007

John F. Feeney
Grant Thornton LLP
New York, New York

11:00 am - Noon **International Tax**Sun Ballroom C

Moderator: Daniel J. Wenzel
S.C. Johnson & Sons, Inc.
Racine, Wisconsin
Vice Chair, TEI International Tax Committee

**Practical Implications of OECD Activities:
PE, Services, and Business Restructurings**

Patrick J. Ellingsworth
Royal Dutch/Shell Group
The Hague, The Netherlands

Diana L. Hickey
Baker & McKenzie LLP
San Francisco, California

Noon - 1:00 pm **Box Lunch (No Speaker)**Emerald Bay Plaza

Noon - 2:00 pm **Corporate Tax Management Workshops for
Large & Small Tax Departments**

**ROUNDTABLE DISCUSSIONS FOR MANAGEMENT ISSUES AFFECTING
TODAY'S SMALL TAX DEPARTMENTS (FEWER THAN 10 PEOPLE), AND
LARGER DEPARTMENTS (10 OR MORE PEOPLE), INCLUDING SARBANES-
OXLEY COMPLIANCE; OUTSOURCING; AND RECRUITMENT, RETENTION,
AND STAFFING.**

**REGISTRANTS WHO WISH TO ATTEND ONE OF THE WORKSHOPS MAY
PICK UP A BOX LUNCH IN EMERALD BAY PLAZA BEFORE PROCEEDING
TO THE WORKSHOP.**

Small Tax Department Miami 1
(less than 10)

Lynn B. Jordan
Performance Food Group Company
Richmond, Virginia

Large Tax Department..... Miami 3
(more than 10)

Michael J. McGoldrick
Sunoco, Inc.
Philadelphia, Pennsylvania

Noon - 2:00 pm **Continuing Education Committee**

Industry Sessions

Aerospace & Government Contracting..... Gainsville 2
C. Vincent Quella III
SAIC

Automotive Suppliers/Machinery & Allied Products..... Sun 6
Session will be self-moderated.

ChemicalsMiami 1
Richard J. Orlemanski
Lord Corporation

Electronics Captiva
Session will be self-moderated.

Financial Institutions.....Miami 3
Louis J. Mestier
Guaranty Bank

Food & Beverage Sun D
Dennis A. Carr
The Coca-Cola Company

Forest Products..... Sun 4
Sheri T. Dunn
Weyerhaeuser Company

Health Care Sanibel 1
Session will be self-moderated.

InsuranceMiami 2
Michael M. Hietpas
MGIC Investment Corporation

Media Sun 5
William J. Berry
Gannett Co., Inc.

Mining..... Sun 3
Session will be self-moderated.

Petroleum Sun 2
Session will be self-moderated.

Pharmaceuticals..... Sanibel 2-3
Session will be self-moderated.

Primary Metals & Other Basic Manufacturing Gainsville 1
Session will be self-moderated.

Industry Sessions

Restaurant, Hotel & Franchise Operations Sun 6
Session will be self-moderated.

Retail Trade Sun C
John P. Orr, Jr.
Finlay Fine Jewelry Corporation

Telecommunications Daytona 2
David D. Gillman
Telephone & Data Systems, Inc.

Transportation Sun 1
David C. Price
Norfolk Southern Corporation

Utilities Tampa 1
Stephen D. McGregor
Southern Union Company

All Others - Manufacturing Sun B
Mark C. Silbiger
The Lubrizol Corporation

Robert M. Ahonen
The Babcock & Wilcox Company

All Others - Non-Manufacturing Sun A
Mark J. Fadden
The ServiceMaster Company



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