

**2:45pm – 3:00pm Coffee Break**

**3:00pm – 5:30pm Discount Rate Challenge**

**John Magee**, Bingham McCutchen (Chair)  
**Tony Barbera**, Charles River Associates  
**Roger Grabowski**, Duff & Phelps  
**Michelle Levac**, Canada Revenue Agency  
**Andrew Parsons**, Internal Revenue Service

**Proposal Teams:**

**Vinay Kapoor and Prita Subramanian** (KPMG)  
**Susan Fickling-Munge and Dave Ptashne**  
(Duff & Phelps)  
**Phillippe Penelle** (Deloitte)  
**Tim Reichert** (Economics Partners)

**5:30pm – 6:30pm Networking Reception**

**6:30pm Small Group Dinners** (area restaurants)  
*Pre-registration required. Groups are posted in the Atrium. Meet in the Atrium immediately following the networking reception. The groups will walk together to area restaurants.*

**THURSDAY, AUGUST 1**

**7:45am – 8:15am Registration and Continental Breakfast**

**Discussion Panels**

**8:30am – 10:00am Valuing Business Opportunity: Definition, Regulatory Guidance, Case Law, and Arm's Length Pricing under Assumption of Compensability**

**Craig Sharon**, EY  
**Ken Wood**, Internal Revenue Service  
**Mark Bronson**, Duff & Phelps  
**Russ O'Haver**, Northeastern University  
**Barbara Rollinson**, Horst Frisch

**10:00am – 10:30am Networking Break**

**10:30am – 12:00pm Super-Normal Profits, Intangibles, and Tax Policy: The Role of Economics**

**John Wills**, Economics Partners  
**Irv Plotkin**, PwC  
**Michael Cragg**, The Brattle Group  
**Bill Morgan**, Internal Revenue Service  
**Robert Weissler**, Internal Revenue Service

**12:00pm – 1:30pm Lunch & Keynote Address**

**Marlies de Ruiter**, Head of Tax Treaty, Transfer Pricing and Financial Transactions Division, Centre for Tax Policy and Administration, OECD

**2:00pm - 4:00pm OECD Special Session BEPS Action Plan**

**Marlies de Ruiter**, Head of Tax Treaty, Transfer Pricing and Financial Transactions Division, Centre for Tax Policy and Administration, OECD  
**Michelle Levac**, Canada Revenue Agency  
**Michael McDonald**, US Department of the Treasury

**1:30pm Exhibit Booth Breakdown**

**Upcoming NABE Conferences**

**55th NABE Annual Meeting**  
September 7-10, 2013 | San Francisco, CA

**Economics Career Fair**  
October 18, 2013 | Washington, DC

**30th NABE Economic Policy Conference**  
February 23-25, 2014 | Arlington, VA

**4th Annual Transfer Pricing Symposium**  
July 22-24, 2014 | Washington, DC

Symposium PowerPoint presentations are available online at:

<http://nabe.com/TPS2013/sessions>

WiFi is available during the Transfer Pricing Symposium. Use the information below to access wireless internet:

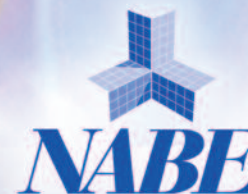
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# 2013 NABE TRANSFER PRICING SYMPOSIUM

SHERATON CRYSTAL CITY  
JULY 30–AUGUST 1, 2013  
ARLINGTON, VIRGINIA



*National Association for Business Economics*

# NABE Transfer Pricing Symposium

SHERATON CRYSTAL CITY | JULY 30- AUGUST 1, 2013 | ARLINGTON, VIRGINIA

Dear Colleague,

Welcome to NABE's third annual Transfer Pricing Symposium!

Please join me in thanking the chairs of NABE's Transfer Pricing Symposium, **Karen Kirwan** of EY and **Jill Weise** of Duff & Phelps and their outstanding committee of Jessica Joy, Carlos Mallo, Vladimir Starkov, Prita Subramanian and Renee Wong for their work in organizing this superb program. We also acknowledge the generous support of the Symposium sponsors, exhibitors, and advertisers.

If you have not done so already, please consider joining NABE and volunteering to help lead NABE's Transfer Pricing Roundtable. In addition to hosting this Symposium, the Roundtable conducts frequent webinars and teleconferences on economic topics in transfer pricing, which I am certain you will find rewarding.

To help us plan future events, please be sure to return the appraisal form at the program's conclusion on Thursday afternoon. We very much appreciate your feedback.

Thank you for attending.

**Ken Simonson**

2012-2013 NABE President

Chief Economist, Associated General Contractors of America

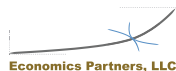
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Caplin & Drysdale  
ATTORNEYS

CRA Charles River  
Associates

KPMG

pwc

## EXHIBITORS

Deloitte  
Economic Partners, LLC  
KtMine

Duff & Phelps  
EY

## TUESDAY, JULY 30

12:00pm – 1:00pm *Exhibit Booth Setup*

12:00pm *Registration*

*Workshops for the Transfer Pricing Economist*

1:00pm – 1:15pm *Opening Remarks*

**Karen Kirwan**, EY

**Jill Weise**, Duff & Phelps

1:15pm – 2:15pm *Exploring the Definitions of Various Intangibles (Goodwill, Going Concern, etc.) with a View to Identifying Compensable Transfers*

**Lewis Greenwald**, Mayer Brown

**Tracy Gomes**, McDermott Will & Emery

**Tim Reichert**, Economics Partners

2:15pm – 3:15pm *What's Really Been Done, and Why? Economic Substance, Business Purpose, and Transfer Pricing*

**Rocco Femia**, Miller & Chevalier

**Vinay Kapoor**, KPMG

**Gene Tien**, Baker & McKenzie

3:15pm – 3:30pm *Coffee Break*

3:30pm – 4:30pm *Base Erosion and Profit Shifting vs. The Arm's Length Standard*

**Marlies de Ruiter**, OECD

**Michael Patton**, DLA Piper

**Garry Stone**, PwC

4:30pm – 5:30pm *Is Fair Value Arm's Length? Reconciling Financial Reporting and Transfer Pricing Standards*

**Clark Chandler**, KPMG

**Philippe Penelle**, Deloitte

**Mike Heimert**, Duff & Phelps

5:30 – 6:30pm *Cocktail Reception*

## WEDNESDAY, JULY 31

7:30am – 8:15am *Registration and Continental Breakfast*

*Discussion Panels*

8:30am – 8:45am *Welcome and Introduction*

**Karen Kirwan**, EY

**Jill Weise**, Duff & Phelps

8:45am – 10:00am *Location Savings: What They Are, Who Benefits from Them, and How to Avoid Pitfalls*

**Michael Lennard**, United Nations Department of Economic and Social Affairs

**Michael McDonald**, US Department of the Treasury

**Shanto Ghosh**, Deloitte

**Brian Cody**, KPMG

**Rebecca Coke**, EY

10:00am – 10:30am *Networking Break*

10:30am – 11:45am *Special Considerations Related to IP in the Pharmaceutical Industry*

**John Hickey**, Johnson & Johnson

**Molly Minnear**, KPMG

**Joe Murphy**, PwC

**Kim Rogers**, Internal Revenue Service

**Steven C. Wrape**, EY

11:45am – 1:15pm *Luncheon and Keynote Address*

**Michael Lennard**, Chief, International Tax Cooperation Section Financing for Development Office. United Nations Department of Economic and Social Affairs

1:30pm – 2:45pm *Intangible Property in the Financial Services Industry*

**Sherif Assef**, Duff & Phelps

**Chris Faiferlick**, EY

**John Hughes**, Internal Revenue Service

**Hsin Hung**, TD Securities

**Rob Plunkett**, Deloitte

**Kathryn O'Brien**, PwC

