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 Ruijter, 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 Ruiters, 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
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

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

Rocco Femina, 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 Ruitter, 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. Wrappe, 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 Assel, Duff & Phelps
Chris Faiferlick, EY
John Hughes, Internal Revenue Service
Hsin Hung, TD Securities
Rob Plunkett, Deloitte
Kathryn O’Brien, PwC