Proposal Teams:
Brian C. Becker, Precision Economics
Sean Foley (KPMG) and
Lewis Greenwald (Sullivan and Worcester)
Mike Heimert and Nelly Korsun, Ceteris
Thomas E. Meyer, Horst Frisch
Kathryn O'Brien, GE
Gene Tien and Holly Glenn, Baker McKenzie

5:30pm – 6:45pm Networking Reception
7:00pm 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 2
7:30am – 8:00am Registration and Continental Breakfast
8:15am – 10:00am The Realistic Alternatives Framework: Does Fiction Inform Fact?
- continued
Katherine Amos, Senior Director-Transfer Pricing, Tyco International
Mark Bronson, Ceteris
Robert Kirschenbaum, Bingham McCutchen
Michael McDonald, US Treasury and a US Representative to Working Party 6 of the OECD
Robert Miall, Ernst & Young
Mike Patton, DLA Piper
Tim Reichert, Economics Partners

12:15pm – 1:45pm Lunch & Keynote Address
Richard McAlonan, Director, Advance Pricing and Mutual Agreement Program, Internal Revenue Service

2:00pm – 4:00pm Open Forum: OECD Draft Revision of the Special Considerations for Intangibles in Chapter VI of the OECD Transfer Pricing Guidelines
Joe Andrus, Head of the Transfer Pricing Unit, Tax Treaty, Transfer Pricing and Financial Transactions Division, OECD
Michelle Levac, Canada Revenue Agency
Michael McDonald, US Treasury and a US Representative to Working Party 6 of the OECD

12:15pm Exhibit Booth breakdown

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

Log In: sheraton Password: welcome

Symposium PowerPoint presentations are available online at:
http://nabe.com/transfer2012/sessions.html
Dear Colleague,

Welcome to the NABE’s second annual Transfer Pricing Symposium!

Please join me in thanking the chairs of NABE’s Transfer Pricing Symposium, Karen Kirwan of Ernst & Young and Jill Weise of Ceteris, and their outstanding committee of Cesar Borja, Amy Friedheim, Prita Subramanian, Kate Sullivan, and Gene Tien 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.

Gene Huang
2011-2012 NABE President
Vice President and Chief Economist, FedEx

Tuesday, July 31
11:00am – 12:00pm Exhibit booth setup
12:00pm Registration Open
Workshops for the Transfer Pricing Economist
1:00pm – 1:15pm Workshops Opening Remarks
Karen Kirwan, Ernst & Young
Jill Weise, Ceteris
1:15pm – 2:15pm Workshop: Subpart F and PE Considerations in Transfer Pricing
Rocco Femina, Miller & Chevalier
John Magee, Bingham McCutchen
2:15pm – 3:15pm Workshop: US GAAP v. IFRS: Implications for Transfer Pricing Practitioners
Kristine Riisberg, Deloitte Tax
James Wisniewski, Ernst & Young
3:15pm – 3:30pm Coffee Break
3:30pm – 4:30pm Workshop: TP Audit Procedures and Adjustments - Mechanics
Natalie Hoyer Keller, Kirkland & Ellis
Kevin Kenworthy, Miller & Chevalier
4:30pm – 5:30pm Workshop: Mechanics of Discount Rate Estimations
Stephen Blough, KPMG
Joe Murphy, PwC
5:30pm – 6:30pm Cocktail Reception

Wednesday, August 1
Discussion Panels
7:30am – 8:15am Registration and Continental Breakfast
8:30am – 8:45am Welcome & Introduction
Karen Kirwan, Ernst & Young
Jill Weise, Ceteris
8:45am – 10:15am Intercompany Financing and Risk Transfers
Sherif Assaf, Ceteris
Chris Faiferlick, Ernst & Young

John Hickey, Senior Tax Manager, Johnson & Johnson
John Hughes, IRS APMA
Kathryn O’Brien, Global Transfer Pricing Leader, General Electric
Rob Plunkett, Deloitte Tax
John Wills, Economics Partners

10:15am – 10:45am Networking Break
10:45am – 12:00pm Interaction Between Services and Intangibles—Oil and Gas Example
Joe Andolino, Senior Vice President, Tax, Halliburton
Kelly Hales, Ernst & Young
Mike Heimert, Ceteris
Richard Hussein, Baker Botts
Ken Wood, IRS APMA
12:00pm – 1:30pm Luncheon & Keynote Address
Joe Andrus, Head of the Transfer Pricing Unit, Tax Treaty, Transfer Pricing and Financial Transactions Division, OECD
1:45pm – 3:00pm Intercompany Debt or Equity?
Brian Cody, KPMG
Richard Rozek, NERA
Filiz Serbes, Branch Chief, IRS Associate Chief Counsel Office (Corporate)
Sanford Stark, Bingham McCutchen
Carol Tan, Special Counsel, IRS Associate Chief Counsel Office (International)
3:00pm – 3:15pm Coffee Break
3:15pm – 5:30pm Safe Harbor Challenge Review Panel:
Patricia G. Lewis, Caplin & Drysdale—moderator
Joe Andrus, Head of the Transfer Pricing Unit, Tax Treaty, Transfer Pricing and Financial Transactions Division, OECD
Greg Ballentine, Charles River Associates
Michelle Levac, Canada Revenue Agency
R. William Morgan, Internal Revenue Service