

An educational foundation affiliated with the United States Council for International Business

# BNA Tax Management Transfer Pricing Report

# Business Restructurings and Transfer Pricing Developments in China, Europe and India

New York, New York



# Program Description

## Co-Chairs

**A.W. Granwell**

*Member*

Ivins, Phillips & Barker,  
Chartered  
Washington, DC

**Rita McWilliams**

*Managing Editor*

BNA Tax Management  
Transfer Pricing Report  
Washington, DC

**Lynda K. Walker**

*Vice President and*

*International Tax Counsel*

USCIB

Washington, DC

Transfer pricing is the number one MNC tax compliance issue. This program, which is tailored for tax executives and tax professionals in the transfer pricing area, will review:

1. The latest transfer pricing developments in China, the EU and India, and
2. Business restructurings.

Panelists include senior government officials from China, India, the Organization for Economic Cooperation and Development, and the United States as well as senior company tax executives and eminent private sector practitioners from law firms and professional service firms.

The region-specific panels will review the latest transfer pricing initiatives, the reasons for the initiatives, and practical strategies for dealing with these developments. Senior government officials from China and India will discuss current changes in substantive rules, contemporaneous documentation, penalties and audit positions. The European panel will highlight the most significant transfer pricing changes in the EU and educate participants about how to deal with these changes.

Each panel will be an hour and a half in duration and will be composed of government officials, industry representatives and private practitioners. Ample time has been provided for audience participation.

Venue, Catering and  
Reception Sponsor



Platinum Sponsors

**Deloitte.**



Gold Sponsor

**Greenberg  
Traurig**

Silver Sponsor

**LOYENS L LOEFF**

## Government Speakers:

**Steven A. Musher**

*Associate Chief Counsel (International)*  
Internal Revenue Service

**Caroline Silberstein**

*Head of Transfer Pricing Unit*  
OECD

**Akhilesh Raniani** (invited)

*Commissioner of Income Tax Department*  
Department of Revenue  
Ministry of Finance, India

**Huang Xiao**

*Anti-Avoidance Division International*  
Taxation Department  
State Administration of Taxation,  
People's Republic of China

## Private Sector Speakers:

**Valerie Amerkhal**

*Director, Transfer Pricing*  
Economic Consulting Services, LLC  
Washington, DC

**Brian E. Andreoli**

*Partner*  
DLA Piper US, LLP  
New York, NY

**Peter Barnes**

*Tax Counsel- International*  
General Electric  
Fairfield, CT

**Richard A. Clark**

*Principal*  
Deloitte Tax LLP  
Washington, DC

**Michel Collet**

*Partner*  
CMS Bureau Francis Lefebvre  
New York, NY

**Komal Dhali**

*Partner*  
Global Transfer Pricing Services  
KPMG  
New York, NY

# Schedule

- 8:00 am** Registration and Buffet Breakfast
- 8:45** Introductory Remarks: Conference Chairs
- 9:00** **Business Restructurings**
- **Introductory remarks by Caroline Silberztein, Head of Transfer Pricing, OECD**
  - When a company should restructure, the benefits and risks of the strategy, and what the future holds for this type of planning
  - Panelists: A.W. Granwell (moderator), Valerie Amerkhail, Brian E. Andreoli, Richard A. Clark, Tadd Fowler and Caroline Silberztein
- 10:30** Refreshment Break
- 11:00** **Current EU Transfer Pricing Developments**
- Current regulatory and audit developments
  - Review of EU Transfer Pricing Forum developments
  - Planning strategies
  - Panelists: Carmine Rotondaro (moderator), Michel Collet, Carolyn D. Fanaroff, Caroline Silberztein, and Harmen van Dam
- 12:30 pm** Working Lunch
- **Keynote Address: Steven A. Musher, Associate Chief Counsel (International), Internal Revenue Service**
- 1:30** **Current Indian Transfer Pricing Developments**
- **Introductory remarks by Akhilesh Raniani, Commissioner of Income Tax Department, Department of Revenue Ministry of Finance, India**
  - Current regulatory and audit developments
  - Planning strategies
  - Panelists: Peter Barnes (moderator), Komal Dhall, Shanto Ghosh, Shyamal Mukherjee, and Akhilesh Raniani
- 3:00** Refreshment Break
- 3:30** **Current Chinese Transfer Pricing Developments**
- **Introductory remarks by Huang Xiao, Anti-Avoidance Division International Taxation Department, State Administration of Taxation, People's Republic of China**
  - Current regulatory and audit developments
  - Planning strategies
  - Panelists: Steven Tseng (moderator), Peter Barnes, A.W. Granwell, Huang Xiao, and Qinghua Xu
- 5:00** Program Reception

Educational Course Credits: CPE and CLE applied for. Accreditation will be sought and determined in those jurisdictions requested by registrants at the conference. This course is designed for the intermediate to advanced level practitioner.

**Carolyn D. Fanaroff**  
*Of Counsel*  
Greenberg Traurig LLP  
Washington, DC

**Tadd Fowler**  
*Director of Global Taxes*  
Procter & Gamble  
Cincinnati, OH

**Shanto Ghosh, Ph.D.**  
*Principal Economist*  
Deloitte Haskins & Sells  
Mumbai, India

**Shyamal Mukherjee**  
*Partner*  
PricewaterhouseCoopers  
New Delhi, India

**Carmine Rotondaro**  
*Tax and Real Estate Director*  
Gucci Group NV  
Amsterdam, Netherlands

**Steven Tseng**  
*Partner in Charge*  
Global Transfer Pricing Services  
(China & Hong Kong SAR)  
KPMG  
Shanghai, China

**Harmen van Dam**  
*Partner*  
Loyens & Loeff NV  
Rotterdam, Netherlands

**Qinghua Xu**  
*Director of China Advisory Services*  
Continental Western European Area  
Ernst & Young  
Paris, France

# Registration Form

The United States Council Foundation, Inc.  
and  
BNA Tax Management Transfer Pricing Report

## Business Restructurings and Transfer Pricing Developments in China, Europe, and India

December 4, 2006  
The Museum of Biblical Art, New York, New York

### Registration Fees

- ☐ Early Bird Registration (by Nov. 1): \$650.00\*      ☐ Regular Registration: \$750.00\*  
☐ USCIB Member: Receive \$150.00 discount off either price      ☐ Conference Materials Only: \$100.00

**Fee includes CLE/CPE Application**

Name

Position/Title

Company

Address

State, Zip

Postcode, Country

Phone

Fax

E-mail

\* For government, academic and student rates, call (212) 703-5062.

### Payment Methods

- ☐ Please debit my credit card      ☐ Please find check enclosed (Please make check or money  
☐ Mastercard    ☐ Visa    ☐ AMEX      order payable to "United States Council Foundation, Inc.")

Cardholder's Name (exactly as it appears on the card)

Card No.

Expiration Date

Signature

**Cancellation Policy:** If you cannot attend, you must cancel your registration in writing no later than Friday, November 17th, to receive a full refund less a 10% administrative charge. We cannot accept verbal cancellations. Cancellations received after November 17 are liable for the full conference fee. You may send a substitute in your place for no additional charge.

## Four Easy Ways to Register

1. Fax: +(212) 575-0327, Attn: Debbie Siu
2. E-mail: [dsiu@uscib.org](mailto:dsiu@uscib.org)
3. Complete and return to:  
Ms. Debbie Siu  
United States Council for International Business  
1212 Avenue of the Americas  
New York, NY 10036
4. Visit: [www.uscibtax.org](http://www.uscibtax.org)

### Hotel Information:

A block of rooms is being reserved at the Sheraton New York Hotel & Towers on a first-come first-serve basis. This is high tourist season for New York, so please be sure to book your room as soon as possible.

**Sheraton New York Hotel & Towers:** 811 Seventh Ave, New York, NY 10019

### For hotel reservations, please contact:

Leslie Dockeray: (212) 335-4558 (212) 884-8453 (fax)  
email: [floater.ny8@dlapiper.com](mailto:floater.ny8@dlapiper.com)