



WASHINGTON UPDATE

A UNITED STATES COUNCIL FOR INTERNATIONAL BUSINESS PUBLICATION

Highlighting Key Activities, August – September 2016

During the months of August and September, 2016, USCIB Staff met with Robert Holleyman, Deputy USTR, Angela Ellard, House Ways and Means, and Michael Tracton and Julie Zoller, U.S. Department of State; produced a series of comment letters on OECD BEPs discussion papers; discussed WTO priorities with key officials in Geneva; submitted extensive comments on China's compliance with its WTO commitments; participated in the Third APEC Senior Officials Meetings (SOM 3); and much more. Below are summaries of these and other highlights from the activities of USCIB in Washington, D.C. over the last two months. If you have any questions or comments, or want more information on a specific topic, please contact any of the staff members listed at the end of this brief.

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- ***USCIB Trade Committee Meets with Angela Ellard, House Ways and Means Committee, and Michael Tracton, U.S. Department of State:*** At the September 20, 2016, meeting of the USCIB Trade and Investment Committee, Angela Ellard, Chief Trade Counsel for the House ways and Means Committee provided an outline of the current state of play regarding the Trans-Pacific Partnership (TPP) and on potential timelines as the legislative year draws to a close. She also discussed the Trans-Atlantic Trade and Investment Partnership (TTIP), Trade in Services Agreement (TiSA), Customs Reauthorization, Miscellaneous Tariff Bill (MTB), and trade relations with the UK and China. Michael Tracton, Director of the Office of Investment Affairs, U.S. Department of State, provided a timely update on the status of the U.S.-China Bilateral Investment Treaty (U.S.-China BIT) negotiations, following the latest round of negotiations the week of September 19, 2016.
- ***Rachel Bae, OECD, Briefs USCIB Staff on OECD Digital Trade Work:*** On Thursday, September 15, 2016, USCIB staff met with Rachel Bae, Senior Counsellor, OECD Trade and Agriculture Directorate, who will be leading the OECD's work on digital trade. She discussed how the OECD is approaching its cross-cutting work on digital trade and how it will respond to requests to provide analysis by the upcoming G20 in Germany. Initially they will work on formulating a digital trade "taxonomy". To better position USCIB for discussions with OECD and several other international organizations working on digital trade issues (including the WTO, APEC, UNCTAD, and the WCO), USCIB plans to form a cross-committee Digital Trade Working Group. The working group will provide input directly as appropriate and through ICC and BIAC. More information will be sent to members about the first meeting of this group in early October.
- ***ICC Trade Commission Takes Action on Trade Policy Statements:*** Rob Mulligan, USCIB Senior Vice President for Policy and Government Affairs, represented members at the September 26, 2016 meeting of the ICC Trade and Investment Commission in Geneva. A final version of the cross-border data paper developed by the commission was provided at the meeting and officially released during the WTO Public Forum later in the week. The commission members also discussed final changes to its paper urging action on the TTIP negotiations, discussed the upcoming report on post-Nairobi business priorities, agreed to develop a joint paper with the ICC Environment Commission on trade and climate change, and reviewed a draft statement on rules of origin in preferential trade agreements. While in Geneva, Rob also met with WTO staff Keith Rockwell and David Shark, as well as USTR Deputy Chief of Mission in Geneva, Chris Wilson, about expectations for WTO work in the run-up to the next Ministerial in 2017.
- ***USTR Briefs USCIB Members on G20 Leaders' Summit Outcomes:*** On September 8, 2016, USCIB hosted a briefing following the G20 Leaders' Summit, which took place September 4-5 in Hangzhou, China. Audrey Winter, Deputy Assistant United States Trade Representative (USTR) for China provided a readout of the summit, which included the U.S.-China Bilateral Investment Treaty (BIT) negotiations, excess capacity issues regarding steel and aluminum, State-Owned Enterprise (SOE) policy, bankruptcy, technology innovation, and secure and controllable issues relating to banking, cybersecurity, and insurance. This was followed by an update from Bill McElnea,

Director for Environment and Natural Resources at USTR, on the Environmental Goods Agreement (EGA) negotiations in Geneva. The most recent round of negotiations was the week of September 19, with the next one coming up the week of October 17, 2016, and a Ministerial to conclude the agreement scheduled for December 3 & 4, 2016.

- ***Donnelly Highlights Role of Investment in Development:*** USCIB Vice President Shaun Donnelly was a panelist at an August 2, 2016 program at the OECD's Washington Center rolling out the 2016 Annual Report from the OECD's Development Assistance Committee (DAC). This year's DAC report highlights the contribution of investment, especially private investment and foreign direct investment (FDI), to economic growth development in developing and emerging economies. Donnelly had earlier contributed a sidebar commentary "[Pro-Investment Policies Really Matter!](#)" to the DAC report. In his remarks at the rollout session, Donnelly offered a private sector perspective and emphasized the importance of good, pro-investment, pro-growth economic policies for developing nations. Private FDI flows swamp official development assistance (ODA) flows to most developing countries and FDI goes where it finds good policies and market opportunities.
- ***Peter Robinson Blogs on the Importance of a Strong Investment Chapter in TTIP:*** Following up on his July joint OpEd with the Secretary General of ICC Germany, Oliver Wieck, USCIB President/CEO Peter Robinson authored a blog post keying off that Op Ed. On August 12, 2016 Peter's Blog Item '[Let's Get the Investment Chapter Right in TTIP](#)' ran on the America's Trade Policy blog of the Washington International Trade Association (WITA). The blog item was also subsequently posted on the Investment Policy Central blog. OPC is a pro-investment web USCIB shares with other leading pro-investment U.S. trade associations.
- ***Donnelly Speaks Out for Open Trade and Investment Policies:*** Shaun Donnelly was back on the speaking circuit in September. On September 21, 2016 as part of the US-Korea Dialogue at the Woodrow Wilson Center, Shaun joined Jeff Schott from the Peterson Institute and former senior US Treasury Official Meg Lundsager and Korean experts on a panel on "Trade Blocs in the Asia-Pacific Region: TPP, RCEP an US-Korean Economic Cooperation." The next day, Shaun moderated a panel with leading U.S. and regional experts on "Doing Business in the Middle East" at Georgetown's Institute of International Economic Law. On August 30, 2016 Shaun met informally with a visiting Japanese Foreign Ministry delegation to discuss regional trade agreements - TPP, TTIP, and the china-led Regional Comprehensive Economic Partnership (RCEP.)
- ***Business and NGOs Talking Rule of Law in Emerging Markets:*** On September 20, 2016, Shaun Donnelly joined a small group of business (including a handful of leading USCIB member companies) and NGO reps in an informal brainstorming session on shared and overlapping business and NGO objectives and priorities regarding rule of law in developing and emerging countries. The session was co-hosted by UPS and Freedom House. Participants identified some promising areas for information sharing, cooperation, and possible joint programming. Rule of law is clearly a critical and very challenging area for both business and NGOs.

- **USCIB Supports Launch of EU-U.S. Privacy Shield Self-Certification Process:** On August 8, 2016, the U.S. Department of Commerce officially began accepting self-certifications of U.S.-based organizations to ensure the privacy of transatlantic transfers of personal data under the [EU-U.S. Privacy Shield](#) framework. The Privacy Shield framework requires that participating U.S. companies and organizations have in place appropriate independent recourse mechanisms (IRMs) for dispute resolution. Companies may utilize a private sector dispute resolution program for that purpose or choose the EU Data Protection Authorities (EU DPAs) to serve as their IRM. Companies that choose to utilize the DPAs for dispute resolution must pay an annual \$50 fee to cover the operating costs of the DPA panel.
- **USCIB Hosts Deputy USTR Holleyman for Briefing on New USTR Digital Trade Working Group:** On September 30, 2016, Deputy U.S. Trade Representative Robert Holleyman addressed a special multi-association meeting jointly convened by USCIB and the U.S. Chamber of Commerce to brief the business community on USTR's newly launched Digital Trade Working Group. Holleyman will lead the group, which will be composed of USTR staff with expertise in e-commerce, telecommunications, services, intellectual property, innovation, and industrial competitiveness. Key USTR staff with relevant expertise reviewed the fall agenda and outlined their plans to identify and address barriers to digital trade in their respective areas.
- **USCIB Plays Leading Role in Developing Comments on IANA Stewardship Transition:** On August 30, 2016, USCIB played a leading role in developing comments for the ICANN Business Constituency concerning key elements to implement the framework enabling transition of the IANA (domain name system) stewardship functions from the U.S. Department of Commerce's National Telecommunication and Information Administration (NTIA) to the global multistakeholder community. Specifically, USCIB examined the proposed Articles of Incorporation for the Post-Transition IANA (PTI) entity, which will perform all of the IANA functions currently covered by the NTIA contract, as well as the draft PTI bylaws, PTI governance and standards of conduct documents, and a draft agreement between the PTI and the Domain Name System ("naming") community in ICANN. For the past two years, USCIB actively contributed to the development of the IANA Stewardship Transition and related Enhancing ICANN Accountability proposals and is on record supporting a timely transition.
- **State Department Briefs USCIB on Goals and Objectives for WTSA-16:** On September 21, 2016, Julie Zoller, Senior Deputy Coordinator, Communications and Information Policy Directorate, U.S. Department of State, briefed USCIB members on the U.S. government's goals and objectives for the World Telecommunication Standardization Assembly 2016 (WTSA-16), which will convene October 25-November 3, 2016 in Tunisia. The WTSA-16 will determine the structure and work program for the United Nations' International Telecommunication Union Telecommunication Standardization Sector (ITU-T) for the next four years. Zoller explored the U.S. government's focus on improving the quality of the ITU-T's work, limiting the scope and remit of the ITU-T to technical telecommunication standards, opposing efforts to expand the scope of the ITU-T's work to include Internet governance policy, and addressing shortcomings in the ITU-T's consensus-based process. Ambassador David Gross,

Partner, Wiley Rein, discussed how these challenges fit into recent multi-year efforts by some ITU members to expand the ITU's remit and even alter its role to be more operational in nature. He proposed that these are key questions that the U.S. government and USCIB members should be prepared to address at WTSA-16.

- ***USCIB Urges U.S. Government to Fight Efforts to Expand the ITU's Remit to Include Internet Governance:*** As follow up to USCIB's meeting on September 21, 2016 with Julie Zoller concerning the upcoming WTSA-16, USCIB issued a [statement](#) on September 27, 2016. The statement urges the U.S. government to advocate against resolutions that would expand the scope of the International Telecommunication Union's (ITU) work and effectively open the door to "inappropriate and counterproductive ITU work well beyond its current remit, including matters relating to Internet governance and policy." USCIB maintained that industry's ability to address Internet governance-related issues is most effectively addressed in existing multistakeholder policy-making and standards-setting bodies. USCIB urged the U.S. government to use the WTSA-16 to focus on clarifying and underscoring the value of the ITU's Telecommunication Standardization Sector as an entity focused on developing important technical and voluntary telecommunication standards.

Tax – Advancing Tax Policies that Promote U.S. Competitiveness

- ***USCIB Submits Series of Letters to the OECD on BEPS Discussion Drafts:*** USCIB's Tax Committee devoted significant resources to drafting a series of comment letters on OECD BEPS discussion drafts. Links to each of these letters are provided below. Two of those letters should be highlighted: the comment letter on attribution of profits to permanent establishments and the comment letter on profit splits. Bill Sample, Chair of the USCIB Tax Committee, will be presenting on these issues on behalf of USCIB at the public consultations to be held at the OECD on October 11th and 12th. The profit attribution comment letter argued strongly for the application of the Authorized OECD Approach (AOA) in determining profits attributable to a PE. Agreement to use the AOA should tend to minimize double taxation and disputes because a common standard would apply. On profit splits, USCIB recognized the need for a transactional two-sided method, but argued that the two-sided method should not become the default method nor should it be interpreted in such a way as to support formulary apportionment.
 - August 9 - [USCIB Comment Letter on the OECD Discussion Draft on BEPS Action 4 on Elements of the Design and Operation of the Group Ratio Rule](#)
 - August 15 - [USCIB Comment Letter on the OECD Discussion Draft on the amendments to Chapter IX of the Transfer Pricing Guidelines](#)
 - September 2 - [USCIB Comment Letters on the OECD Discussion Drafts on BEPS Action 7 on Additional Guidance on the Attribution of Profits to Permanent Establishments](#)
 - September 2 - [USCIB Comment Letter on the OECD Discussion Draft on BEPS Actions 8-10 on Revised Guidance on Profits Splits](#)
 - September 7 - [USCIB Comment Letter on OECD's Discussion Draft on BEPS Action 4 on Approaches to Address BEPS Involving Interest in the Banking and Insurance Sectors](#)

- September 16 – [USCIB Comment Letter on OECD’s Discussion Draft on BEPS Action 2 Branch Mismatch Structures](#)
- **Carol Doran Klein Represents USCIB at OECD VAT/GST TAG Meetings:** Carol Doran Klein, Vice President and International Tax Counsel for USCIB, attended OECD meetings on VAT in late September. At the meetings, the OECD noted that they are undertaking a new study on total business taxes on capital owners that could potentially be very helpful with the discussion on “fair share” by showing the corporate contribution is not merely corporate income tax, but also other tax burdens. As part of the study, the OECD is looking for input on the cost of collecting and remitting VAT. If you would like to contribute information, please contact Carol Doran Klein (cdklein@uscib.org).
- **USCIB Meets with OECD’s David Bradbury and Giorgia Maffini on the OECD Digital Economy Task Force:** While in Paris for the VAT meetings, Carol Doran Klein met with OECD’s David Bradbury, Head of the OECD’s Tax Policy and Statistics Division, and Giorgia Maffini of that office on the upcoming work of the OECD’s Digital Economy Task Force, which they are leading going forward. The task force, which has been inactive since the Action 1 Final Report was issued last year, will be meeting in early October to decide the scope of the work for the upcoming period until the end of 2020. The OECD noted that following the release of the Action 1 Final Report there remain areas where key questions are unanswered in the direct tax space and those will likely be part of the task force’s scope of work going forward. They further noted that it would be extremely helpful to get feedback from companies on their experiences dealing with unilateral tax measures that countries have implemented. Please contact Carol Doran Klein (cdklein@uscib.org) if you have information you would like to provide to the OECD in this regard.

Customs and Trade Facilitation – Reducing Barriers and Costs from Customs and Border Control Practices

- **Embassy Outreach to Discuss TFA Continues:** Megan Giblin, USCIB Director for Customs and Trade Facilitation, along with small groups of USCIB members, met with a number of embassies during the months of August and September to press for ratification of the WTO Trade Facilitation Agreement (TFA). These included the embassies of Bahrain, Chile, Costa Rica, the Dominican Republic, Israel, and Morocco. Ratification and implementation of the WTO TFA continues to be a top priority for the USCIB Customs and Trade Facilitation Committee, and as of the end of September, 2016, 94 countries have ratified the TFA of the 109 needed for it to enter into force.
- **USCIB Customs Valuation Task Force Members Meet with CBP and USTR:** Members of the USCIB Customs Valuation Task Force met with Christina Kopitopoulos, USTR, on Wednesday, August 3, 2016. Kopitopoulos discussed the scheduled work of the WTO Valuation Committee for this fall. On Tuesday, September 20, 2016, members met with Elif Eroglu from U.S. Customs and Border Protection’s (CBP) Office of Regulations and Rulings and U.S. Delegate to the World Customs Organization Technical Committee on Customs Valuation (TCCV). She reviewed cases and matters for discussion at the upcoming October meeting of the WCO TCCV.

Corporate Responsibility – Developing Standards and Principles, Increasing Awareness of Positive Business Impact

- **9th Annual Engaging Business Forum at The Coca-Cola Company:** USCIB, together with the U.S. Chamber of Commerce and the International Organization of Employers, convened the 9th Annual Engaging Business Forum hosted by The Coca-Cola Company Headquarters in Atlanta, GA. The Forum, which focused on the UN Guiding Principles for Business and Human Rights, had over 150 attendees, including representatives from multinational corporations, U.S. government, and civil society. Topics of discussion included the UN Guiding Principles, issues of government responsibility to protect human rights, the identification of salient human right issues and reporting, and grievance mechanisms. The Forum included high-level speakers such as John Ruggie, Berthold Beitz Professor in Human Rights and an Affiliated Professor in International Legal Studies at Harvard Law School and author of the UN Guiding Principles; Ambassador Andrew Jackson Young, Jr., 14th United States Ambassador to the United Nations, 55th Mayor of Atlanta, Georgia, and Member of the U.S. House of Representatives; Chris Lu, Deputy Secretary, U.S. Department of Labor; Cherie Blair, CBE, QC -- Chair, Omnia Strategy LLP, and many more.

China – Supporting Policies and Relationships that Enhance U.S.-China Business

- **USCIB Submits Comments to USTR on China's Compliance with WTO Commitments:** USCIB submitted comments to the annual request from the Office of the United States Trade Representative (USTR) concerning China's compliance with its WTO commitments. [The submission](#), which is based on member input, includes cross-sectoral business issues like the Anti-Monopoly Law (AML), Certification, Licensing and Testing Barriers, Customs and Trade Facilitation, Intellectual Property Rights, IT Security Measures, Market Access, National Treatment and Non-Discrimination, Regulatory Environment, Standards, State-Owned Enterprises, and Taxation. It also includes sectoral issues like Agricultural Biotechnology, Audiovisual, Chemicals, Express Delivery Services, Software, and Telecommunications. Eva Hampl, Director, Investment, Trade and Financial Services testified on behalf of USCIB at a corresponding hearing convened by the interagency Trade Policy Staff Committee (TPSC), which is chaired by USTR, on October 5, 2016.

APEC – Enhancing U.S. Business Cooperation with the Asia-Pacific Region

- **Medina and Giblin Attend Third APEC Senior Officials Meetings:** Helen Medina, USCIB Vice President of Product Policy and Innovation, and Megan Giblin, USCIB Director of Customs and Trade Facilitation, attended the third APEC Senior Officials Meeting (SOM 3) in Lima, Peru, August 15-28, 2016. Medina participated in the APEC Chemical Dialogue (CD), where she supported participating USCIB members including: the American Chemistry Council, American Petroleum Institute, The Boeing Company, General Electric, and the Nickel Institute. The CD serves as a forum for regulatory officials and industry representatives to find solutions to challenges facing the chemical industry in the Asia-Pacific region. Medina also attended the 2nd Digital Trade Policy Dialogue, which continued its year-long exploration of the opportunities and challenges

of digital trade, tackling topics such as the possible scope of future digital trade work in APEC, elements of an enabling environment for digital trade, useful practices for advancing digital trade, challenges economies face as they navigate the changing digital trade environment and how recent trade agreements have sought to address digital trade challenges.

Giblin participated in the APEC Business – Customs Dialogue (ABCD), Subcommittee on Customs Procedures meetings, the APEC Alliance for Supply Chain Connectivity (A2C2) meetings, and events related to the implementation of the WTO Trade Facilitation. Giblin continued advocacy work related to WTO TFA ratification as well as engagement on implementation efforts, establishing and fostering relationships with Customs officials from APEC economies as well as members of industry, and identifying linkages to the work underway within the USCIB Customs and Trade Facilitation Committee. Additionally, USCIB member Christopher Howell (Crowell & Moring LLP) participated in the Electronic Commerce Steering Group (ECSG) and the Data Privacy Subgroup (DPS) on behalf of USCIB.

Competition – *Creating Global Legal Practices for an Open and Competitive Business Environment*

- **ICC/USCIB Competition Committee Meets in New York:** On September 21, 2016, USCIB co-hosted a joint meeting of the ICC Commission on Competition and the USCIB Competition Committee. The meeting was held at Kaye Scholer LLP in New York, and was co-led by Paul Lugard, Partner at Baker Botts in Brussels, and chair of the ICC Competition Commission and John Taladay, Partner at Baker Botts in D.C., and chair of the USCIB Competition Committee. Guest speaker Frederic Jenny, Professor of Economics and Director of International Relations, ESSEC; Co-Director, European Center for Law and Economics; and Chair of the OECD Competition Committee, led a discussion on global issues concerning competition, and also addressed Brexit. Following the discussion, the Committee Meeting agenda included discussions of various work of the ICC Competition Commission, including on compliance and advocacy, merger control regimes, due process, the International Competition Network (ICN), cartels and leniency, and arbitration, mediation, and antitrust follow-on actions. The Committee also received an update on key developments in competition law in China from Mr. Zhan Hao, AnJie Law Firm, speaking on behalf of the ICC China Commission on Competition.

Membership

- **Membership Meetings:** The Washington, D.C. membership department and policy staff met with representatives from member companies Eli Lilly, The Gap, Koch Industries, and UPS to develop our understanding of their policy priorities for the next year and beyond, and to see how USCIB can better serve their policy needs.

Upcoming Events:

OECD Public Consultation on Transfer Pricing Matters, Paris, France – October 11-12

UN Committee of Experts on International Cooperation in Tax Matters Meeting, Geneva, Switzerland – October 11-14

USCIB Customs Committee Meeting, Washington, D.C. – October 18

OECD SOE Workshop and Roundtable, Paris France – October 19

USCIB Corporate Responsibility and Labor & Employment Committee Meetings, Washington D.C. – October 19-20

USCIB Environment Committee Meeting, Washington, D.C. – October 19

OECD Investment Committee Meeting, Paris, France – October 21

ICC Digital Economy Commission (ICC-DEC) Meeting, Paris, France – October 24-25

2nd Meeting of UN Intergovernmental Working Group (IWG) on a binding treaty on Business and Human Rights, Geneva – October 24-26

World Telecommunication Standardization Assembly (WTSA-16), Yasmine Hammamet, Tunisia, October 25 – November 3

BIAC Finance Task Force Meeting & OECD Financial Roundtable, Paris, France – October 26-27

BIAC Tax Committee Meeting, October 27 – Paris, France

ICC Corporate Responsibility and Anti-Corruption Commission Meeting, Paris, France – October 28

BIAC Trade Committee Meeting, November 3-4 – Paris, France

ICANN 57, Hyderabad, India – November 3-9

2016 UN Forum on Business and Human Rights, Geneva – November 14-16

Meetings of the OECD Committee on Digital Economy Policy (CDEP) and its Working Parties, Paris, France – November 14-18

Internet Governance Forum (IGF), Guadalajara, Mexico – December 5-9

USCIB Policy and Program Staff

Rob Mulligan

Senior Vice President, Policy and Government Affairs
202-682-7375 or rmulligan@uscib.org

Erin Breitenbucher

Senior Policy and Program Associate and Office
Manager, Washington
202-682-7465 or ebreitenbucher@uscib.org

Shaun Donnelly

Vice President, Investment and Financial Services
202-682-1221 or sdonnelly@uscib.org

Megan Giblin

Director, Customs and Trade Facilitation
202-371-9235 or mgiblin@uscib.org

Ronnie Goldberg

Senior Counsel
212-703-5057 or rgoldberg@uscib.org

Eva Hampl

Director, Investment, Trade and Financial Services
202-682-0051 or ehampl@uscib.org

Alison Hoiem

Senior Director, Member Services
202-682-1291 or ahoiem@uscib.org

Jonathan Huneke

Vice President, Communications and Public Affairs
212-703-5043 or jhuneke@uscib.org

Norine Kennedy

Vice President, Strategic International Engagement,
Energy and Environment
212-703-5052 or nkennedy@uscib.org

Elizabeth Kim

Policy and Program Assistant, New York
212-703-5095 or ekim@uscib.org

Carol Doran Klein

Vice President and International Tax Counsel
202-682-7376 or cdklein@uscib.org

Helen Medina

Vice President, Product Policy and Innovation
212-703-5047 or hmedina@uscib.org

Ariel Meyerstein

Vice President, Labor Affairs, Corporate
Responsibility & Corporate Governance
212-703-5056 or ameyerstein@uscib.org

Chris Olsen

Policy and Program Assistant, Washington
202-617-3156 or colsen@uscib.org

Barbara Wanner

Vice President, ICT Policy
202-617-3155 or bwanner@uscib.org

Kira Yevtukhova

Policy and Program Associate, Washington
212-703-5082 or kyevtukhova@uscib.org