

Internal Revenue Service, LB&I, Communications, Technology and Media/Tax Executives Institute - New York Chapter Conference

Thursday, May 17, 2012

Location: Internal Revenue Service
290 Broadway, 30th Floor, New York, N.Y.

8:15 – 9:00	Registration and continental breakfast
9:00 – 9:15	<u>Opening Statements and Welcome</u> <ul style="list-style-type: none">- Pat Chaback - Industry Director CTM- Ray Gwydir - Tax Executives Institute, New York Chapter President- Timothy McCormally – Tax Executives Institute, Executive Director
9:15 – 10:45	<u>Recent Developments in IRS/LB&I</u> <ul style="list-style-type: none">• Issue Practice Groups (IPG)• Examination Process, Quality Examination Process (QEP)• Industry Issue Resolution (IIR)• Uncertain Tax Positions (UTP)• Compliance Assurance Process (CAP) - Paul DeNard - LB&I - Deputy Commissioner (Operations)- Pat Chaback - Industry Director, CTM- Lavena B. Williams – Director, Field Operations (East)- Dave Horton - Director, Field Specialists- Ray Gwydir and Lisa Cappell - TEI Moderators
10:45 – 11:00	Break

11:00- 12:15	<p><u>International Current Developments</u></p> <ul style="list-style-type: none"> • Transfer Pricing (especially Intellectual Property) • APMA –APA/Competent Authority • FATCA for non-financial institutions <ul style="list-style-type: none"> - Sam Maruca – Director, Transfer Pricing Operations - Ted Setzer - International Territory Manager - Paul Heller and Barry Agranoff – TEI Moderators
12:15– 1:15	<p>Lunch</p>
1:25 – 2:45	<p><u>Breakout Sessions (Main Room 30th Floor & 2 Rooms on the 3rd Floor)</u></p> <p><u>Publishing/Broadcasting</u></p> <ul style="list-style-type: none"> • Section 199 – Benefits & Burdens – Industry Directive • IRC 1441 - Payments to Foreign Authors/Entities • Broadcast Contract Amortization • IRC 162(f)– FCC Penalties for Forfeitures/Voluntary Contributions <ul style="list-style-type: none"> - Tom Wharton and Linda A. Klang– TEI Moderators <p><u>Movies/TV/Music</u></p> <ul style="list-style-type: none"> • IRC 1441 - Payments to Foreign Musicians/Entities • Legislative Changes to Sections 181 and 199 • Capitalization and Allocation of Sales-Based Royalties • IRC 167(g) Income Forecast Method of Amortization <ul style="list-style-type: none"> - Iris Schneider – TEI Moderator <p><u>Technology/Communications</u></p> <ul style="list-style-type: none"> • Wireless Telecommunication Assets –Industry Directive/Rev Proc 2011-22, 27 & 28 • Section 199 • Advanced Payments and Deferred Revenue • Web Site Development Costs & Domain Names <ul style="list-style-type: none"> - Bruce Maggin – TEI Moderator

2:45 – 3:10	Break
3:10– 4:30	<p><u>General Session – Current Technical Developments</u></p> <ul style="list-style-type: none"> • R&E Credit Section 41 & 174 • <i>Ex parte</i> Appeals <ul style="list-style-type: none"> - Dave Horton - Director, Field Specialists - Paul Coates - Technical Advisor - Section 174 (tentative) - Joe Durak – Appeals Team Manager - Steve Rogozinski and Lori Matulewicz – TEI Moderators
4:30– 4:45	<p><u>Closing</u></p> <ul style="list-style-type: none"> - Pat Chaback - Industry Director – CTM - Ray Gwydir - Tax Executives Institute, New York Chapter President

Registration Fee for this all day program is \$50. Since this meeting will take place at an IRS facility, you **must** register in advance **NO LATER THAN May 10, 2012** so we can provide a list of attendees to Security in the building. Seating is limited - availability based on receipt of your registration.

PLEASE keep in mind that that the security in this building is equivalent to airport security—**please leave enough time** to go through security...there will be a continental breakfast and an opportunity to network upstairs once you are through security. For more information or if you have specific questions that you would like to be considered by the panelists during the conference please contact any of the TEI committee members listed below:

Tom Wharton	thomas.wharton@pearson.com	212-641-2424
Barry Agranoff	barry.agranoff@pearson.com	212-641-2422
Lisa Cappel	lcappel@estee.com	631-847-6343
Ray Gwydir	rgwydir@estee.com	631-847-6333
Linda Klang	Linda.klang@lehmanholdings.com	201-526-1484
Iris Schneider	Iris.schneider@us.sony.com	212-833-6764

**Internal Revenue Service, LB&I, Communications, Technology and Media/Tax
Executives Institute - New York Chapter Conference
May 17, 2012**

Registration: \$50 per person

**Please send your check made payable to Tax Executives Institute *by May 10th* to
Joshua Wind, Tax Department, 7th floor
Pearson Inc., 1330 Avenue of the Americas, New York, NY 10019**

New York State Continuing Education CPE (6.5) credits will be granted for this meeting

To register for this program, please e:mail the registration form to Josh Wind at joshua.wind@pearson.com

Fax – (212) 641-2557

Telephone – (212) 641-2457

**Registration Form – IRS CTM/Tax Executives Institute NY Chapter Conference
May 17, 2012**

**For planning purposes, please select one of the three breakout sessions:
Publishing/Broadcasting, Movies/TV/Music, or Technology/Communications**

Name	Breakout session	Company Affiliation: _____
_____	_____	Telephone Number: _____
_____	_____	Email Address: _____
_____	_____	
_____	_____	
_____	_____	

IRS and other government employees interested in attending should contact ellis.rosenblatt@irs.gov or call 212-719-6150