



UNITED STATES COUNCIL FOR  
INTERNATIONAL BUSINESS



BIAC THE VOICE OF  
BUSINESS AT THE OECD

## BEPS WORKSHOP

September 8/9, 2014

1801 K Street NW, Suite 12000  
Washington, DC 20006

### Objectives

- To distill key recent messages from the OECD on 2014 BEPS Actions ahead of the G20 Finance Ministers' meeting.
- To discuss business involvement in implementation of 2014 BEPS Actions.
- To assess the business consultation process for 2014 BEPS actions and identify improvements for 2015.
- To discuss the scope of key 2015 BEPS Action and ensuring business input on the same.
- To consider key 2015 action items from the perspective of US businesses and US Treasury to present to the G20/OECD.
- To determine next steps to enable proactive input to 2015 priority items and a sustained engagement plan.

### Day 1: Monday, September 8

Time	Session	Session Leader
10:00 – 10:30	<i>Coffee available</i>	
10:30 – 10:45	Welcome & Introductions	Will Morris, Carol Doran Klein
10:45 – 11:15	2014 BEPS Actions: Current standing	Will Morris
11:15 – 12:00	Setting the scene: US perspectives on 2014 Actions, the BEPS process so far and other government positions	Danielle Rolfes Henry Louie Quyen Huynh Douglas Poms John Merrick
12:00 – 12:30	Plenary session: Business review of 2014 Action Items a) Treaty abuse b) Hybrid mismatches	Mary Bennett Will Morris
12:30 – 13:00	<i>Lunch break</i>	
13:00 – 13:30	Plenary session continued... c) CBCR d) Digital	Carol Doran Klein Jocelyn Krabbenschmidt
13:30 – 14:00	Government perspective on 2015 Actions and next steps for the BEPS process, including trade related issues.	Danielle Rolfes
14:00 – 15:00	Break out groups, 2015 Action Items: [maybe extend these sessions – end the day at 6pm perhaps] a) Action 4: Interest deductibility b) Action 7: PE status c) Action 8: Intangibles & special measures d) Action 9: Risk & capital	Tim Tueff Simon Beaumont Tracy Neighbors Saul Rosen
15:00 – 15:15	<i>Coffee break</i>	
15:15 – 16:30	Continuation of break-out groups	
16:30 – 17:45	Plenary session: Break-out groups to report back	
17:45 – 18:00	Day 1 wrap and review agenda for Day 2	Will Morris
18:00 – 19:00	<i>Free time</i>	
19:00	Dinner: Kellari Taverna (1700 K St NW)	



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## Day 2: Tuesday, September 9

Time	Session	Session Leader
08:30 – 09:00	<i>Coffee and pastries available</i>	
09:00 – 09:45	Observations from Day 1: <ul style="list-style-type: none"><li>• Greatest priorities and concerns</li><li>• Greatest risks for the US</li></ul>	Introduction by Will Morris followed by table group discussions
09:45 – 11:15	Identifying and dealing with major challenges and issues (e.g. cash box)	Table group discussions
11:15 – 11:30	<i>Coffee break</i>	
11:30 – 12:00	Future engagement and next steps <ul style="list-style-type: none"><li>• Treasury, IRS and business reps working together to balance integrity concerns, complexity and risks to US investment and revenue</li><li>• Modifications to business engagement at OECD</li><li>• Prospect of further business workshops</li><li>• How and whether the US should “lead”?</li></ul>	Will Morris, All
12:00 – 12:40	Communication of workshop messages beyond Treasury <ul style="list-style-type: none"><li>• Engaging with the wider business community.</li><li>• Engaging on the Hill.</li><li>• Businesses’ voice in the process.</li><li>• Delivering an appropriate and proportionate response.</li></ul>	BRT (Business Roundtable)
12:40 – 13:00	Agreeing actions & workshop close	Will Morris, Carol Doran Klein
13:00	<i>Close – lunch available</i>	