



24th Annual

**High Technology
Tax Institute**

NOVEMBER 17 & 18, 2008

**Crowne Plaza Cabana Palo Alto
4290 El Camino Real
Palo Alto, CA**

Sponsored by

**Tax Executives Institute &
San Jose State University
College of Business**

24th Annual High Technology Tax Institute

Monday November 17

Morning

7:30 - 8:15 REGISTRATION & CONTINENTAL BREAKFAST

Sponsored by *Fenwick & West LLP*

8:15 - 8:30 Welcome

Sandra Hahn, Tax Director - *Intuit*, TEI Santa Clara Valley Chapter President
Neil Traubenberg, Senior Vice-President, *Tax Executives Institute*
David Steele, Dean, *San José State University, College of Business*
Annette Nellen, Tax Professor, *San José State University*

8:30 - 10:10 International High Technology U.S. Tax Current Developments

Jim Fuller, Partner - *Fenwick & West LLP*

10:10 - 10:30 BREAK

10:30 - Noon Contract Manufacturing and the Branch Rule

Michael A. DiFronzo, IRS Deputy Associate Chief Counsel (International – Technical) - *Office of the Chief Counsel*
Bob Giusti, Partner - *Ernst & Young LLP*
John Peterson, Partner – *Baker & McKenzie*

Monday November 17

Afternoon

Noon - 1:45 LUNCH & SPEAKER

Karen Gilbreath Sowell, Deputy Assistant Secretary for Tax Policy - *United States Department of The Treasury*
Luncheon sponsored by *Deloitte*

1:45 - 3:00 BREAKOUT A

Permanent Establishment

Gary Sprague, Partner – *Baker & McKenzie*
Ron Saake, International Tax Partner - *Deloitte*

BREAKOUT B

Hidden and Possible Future State Tax Liabilities

Rocky Cummings – Partner, *BDO Seidman, LLP*
Ferdinand Hogroian – Director, *PricewaterhouseCoopers LLP*

3:00 - 3:15 BREAK

Sponsored by *Ernst & Young LLP*

3:15 - 4:15 Research Credit Ongoing Challenges

Jim Eberle, Managing Director National Practice Leader, Federal – *Alvarez & Marsal Taxand*
Michael Goldbas, Principal, R&D Tax Services – *Deloitte*

4:15 - 5:15 BREAKOUT C

Doing Business in China

Jon Eichelberger, Partner – *Baker & McKenzie*
Jeff Olin, National Managing Partner-International Tax – *Grant Thornton*
Stephen P. Sedler, Senior Vice President of Taxes & International Trade Administration – *Seagate Technology*

BREAKOUT D

Tax Reform – High Tech Friend or Foe?

Bill Barrett, Vice President, Tax & Trade – *Applied Materials*
Annette Nellen, Professor – *San José State University*

5:15 - 7:30 HOSTED SOCIAL HOUR

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24th Annual High Technology Tax Institute

Tuesday November 18

Morning

7:30 - 8:00 REGISTRATION & CONTINENTAL BREAKFAST

Sponsored by *Planitax, Inc.*

8:00 - 9:30 BREAKOUT E

Federal Tax Controversy

Maria Hwang, Director Field Operations, Communications, Technology & Media Industry – *Internal Revenue Service*
Larry R. Langdon, Partner – *Mayer Brown LLP*; former Commissioner LMSB, IRS
Barbara Leonard, Area Counsel, Communications, Technology & Media – *Internal Revenue Service*
Barry B. Shott, LMSB Deputy Commissioner (Int'l) – *Internal Revenue Service*

BREAKOUT F

New Software Business Models and Their Tax Issues

Jeff Levenstam, Principal, International Tax Services – *Ernst & Young LLP*
Paul Sallomi, U.S. Tax Industry Leader- Technology – *Deloitte*
Rusty Thomas, Tax Sector Leader, Electronics and Software – *KPMG LLP*

9:30 - 9:50 BREAK

9:50 - 11:00 BREAKOUT G

Foreign Affairs

Peter D. Skewes-Cox, Partner - *PricewaterhouseCoopers LLP*
Kent Wisner, Principal, International Corporate Services Group and M&A Group – *KPMG LLP*

BREAKOUT H

FAS 141R

Andrew Cordonnier, Partner-National Tax – *Grant Thornton*
Greg Huffaker, Senior Director M&A – *Oracle*
Michael Reichert, Global Managing Tax Partner – High Technology – *Deloitte Tax LLP*

11:00 - 12:15 Federal Domestic Tax Update

Ivan Humphreys, Partner – *Wilson Sonsini Goodrich & Rosati*
Buff Miller, Partner – *Cooley Godward Kronish LLP*
Annette Nellen, Professor – *San José State University*

Tuesday November 18

Afternoon

12:15 - 1:45 LUNCH & SPEAKER

Barry B. Shott, LMSB Deputy Commissioner (International) – *Internal Revenue Service*

1:45 - 3:15 IFRS & GAAP Convergence

Eric L. Johnson, Tax Accounting and Compliance Director - *Intel*
Wendy Perez, Tax Partner - *Ernst & Young LLP*
Neil Trautenberg, VP Corporate Tax – *Sun Microsystems*; Senior Vice-President - *TEI*

3:15 - 3:30 BREAK

Sponsored by *Wilson Sonsini Goodrich & Rosati*

3:30 - 5:15 High Tech Accounting

David Forst, Partner - *Fenwick & West LLP*
Dean Kamahale, Principle – *KPMG LLP*
Scott Jaconetty, Tax Partner – *BDO Seidman, LLP*

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Tuition fee includes all sessions, materials, lunches and refreshment breaks.

TUITION FEES	Attendee	TEI Member/Guest of TEI Member
	(before October 31st).....\$700	(before October 31st)..... \$650
	After\$725	After \$700

CPE/MCLE CREDITS The High Technology Tax Institute has been approved for Continuing Professional Education accreditation by the California State Board of Accountancy. The conference qualifies for 16 hours of CPE credit. San Jose State University's College of Business, certifies that an application is pending for approval of this activity for MCLE credit by the State Board of California.

HOTEL ACCOMMODATIONS

Crowne Plaza Cabaña Palo Alto
4290 El Camino Real, Palo Alto, California 94306
Hotel Room Rate: \$169/night, Reservations: (650) 857-0787

Contact the hotel by October 27, 2008 and identify yourself as a High Technology Tax Institute participant to qualify for the special rate.

REFUND POLICY

The Institute will refund registration fees contingent on receipt of a written request postmarked by October 31, 2008. A \$50 processing fee will be retained by the Institute. No refund requests postmarked after October 31, 2008 will be accepted. Please note that non-attendance of the institute will not qualify as a cancellation of registration. Written notification must be submitted by the date mentioned above.



ON-LINE REGISTRATION IS NOW AVAILABLE
<http://www.tax-institute.com>
OR COMPLETE FORM AND:

FAX Registration form to Julie Ryan /SJSU (408) 924-3463
(forward your check after faxing your registration) and/or

MAIL Registration form/tuition fee to: High Technology Tax Institute - SJSU
Accounting & Finance Department, Attn: Julie Ryan
One Washington Square, BT 850, San Jose, CA 95192-0066

Questions **Call Lori Wilkin or Julie Ryan (408) 924-3460**

Name _____ Title/Department _____
Company _____ Address _____
City _____ State _____ Zip _____
Day Phone _____ Email _____

How would you like your name to appear on your badge? _____

(Company names will be used for transferable badges)

My check is enclosed for the amount of \$ _____

Please circle breakout session preferences (select 4)

Are you a TEI member or guest of a TEI member? YES NO

Breakout A or B • Breakout C or D

Breakout E or F • Breakout G or H

If a guest, name of sponsoring TEI member: _____

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