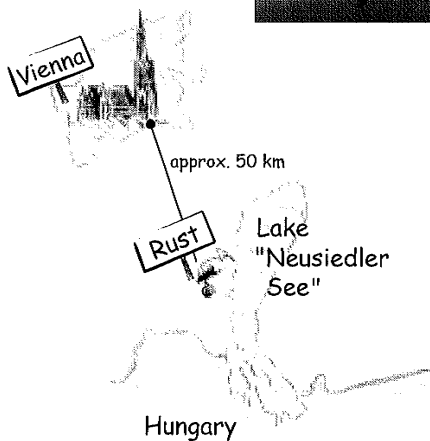
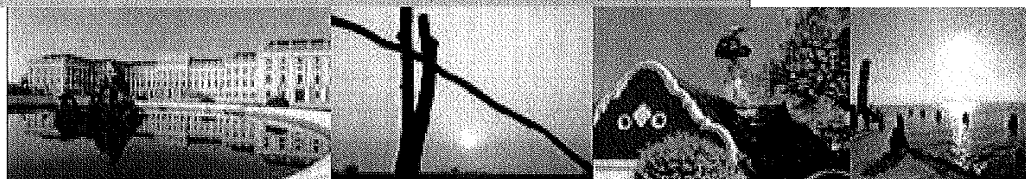




06 – 10 July 2008, Rust
Burgenland, Austria

7th International Tax Law

SUMMER CONFERENCE



"Recent Developments in Tax Treaty Practice – the Case Study Conference"

Chairman Prof. Dr. Michael Lang

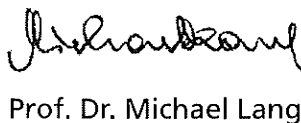


WELCOME

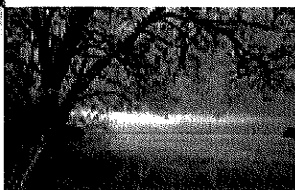
Dear colleagues,

In July 2001 we organized the 1st International Tax Law Summer Conference in Austria. Since this Conference and the 2nd, the 3rd, the 4th, the 5th and the 6th International Tax Law Conferences in 2002, 2003, 2005, 2006 and 2007 were a big success,

we felt encouraged to organize another conference in 2008: 22 experts from all around the world will inform you about the new developments in international tax and discuss cross-border case-studies. Working in a wonderful countryside nearby the famous Austrian lake "Neusiedlersee" and combining interesting discussions with colleagues from all around the world with a great leisure time: This and more you can experience at the International Tax Law Summer Conference from 06–10 July 2008 in Rust, the smallest township in Austria.


Prof. Dr. Michael Lang

Rust is a charming town by the lake "Neusiedlersee", one of the biggest lakes in Europe. One hour away from Vienna and close to the Hungarian border it is ideal for making great trips in your leisure time. Rust is famous for its wonderful countryside, which is also a nature reserve, where numerous birds have their home. Rust is also called "the town of storks" and is very famous for its exquisite wines. It is surrounded on three sides by lovely green vineyards and its lake also offers a lot of possibilities for sport and pleasure.



LECTURERS & PANELISTS

Chairman

Prof. Dr. Michael LANG

Head of the Institute for Austrian and International Tax Law, Vienna University of Economics and Business Administration, Austria

Patricia BROWN

Senior Advisor, Financial Transactions, Centre for Tax Policy and Administration, OECD; Formerly Deputy International Tax Counsel (Treaty Affairs), U.S. Treasury Department

Andrew DAWSON

Head of the Tax Treaty Team, Revenue & Customs Department, United Kingdom; Member of the UN Committee of Experts on International Cooperation in Tax Matters

Robert H. GREEN

Robert H. Green is a partner with the Washington, DC law firm of Caplin & Drysdale specializing in international tax controversies and transfer pricing. His extensive experience includes tensure as Director-International for the Internal Revenue Service, where he served as the US Competent Authority. Previously, he worked for Procter & Gamble Company as Director, International Taxes and as Director/Taxes-Europe based in Germany.

Dr. Heinz JIROUSEK

Head of the Division of International Tax Law, Ministry of Finance in Vienna, Austria; Former Vice-Chairman of WP8 of the Committee on Fiscal Affairs

Benedetta A. KISSEL

Deputy International Tax Counsel (Strategic Programs), Department of the Treasury, USA

Prof. Dr. Heinz-Klaus KROPPE, LL.M.

Partner at Deloitte Düsseldorf, Germany. Tax Leader Germany and Head of Deloitte's European Transfer Pricing Practice. Professor for International Tax Law at the Ruhr-University in Bochum. Member of EU Joint Transfer Pricing Forum.

Prof. Dr. Helmut LOUKOTA

Prof. Dr. Helmut Loukota, lecturer at the Institute for Austrian and International Tax Law at the Vienna University of Economics and Business Administration, consultant for International Tax Law at the Federal Ministry of Finance in Vienna

Prof. avv. Guglielmo MAISTO

Professor for Tax Law at the Catholic University of Piacenza; Partner at Maisto e Associati, Milan; Italy

T.P. OSTWAL

Member of the Business and advisory committee of OECD, Paris; Chairman of International Fiscal Association – India Branch; Professor at the University of Mumbai from 1976-1991

Prof. Dr. Pasquale PISTONE

EURYI-ESF Professor at the Institute for Austrian and International Tax Law, Vienna University of

Economics and Business Administration and Associate Professor at the University of Salerno, Italy

Member of the editorial board of Intertax

Prof. Dr. Albert J. RÄDLER

Senior Tax Partner at Linklaters in Munich, from 1982-1998; Professor of International Business Taxation, International Taxation Institute, University Hamburg, Germany, 1991/2 member of the Ruding Committee, Brussels

Prof. Roy ROHATGI

Retired as Partner in Arthur Andersen. Visiting Professor and international consultant in strategic management and international taxation. Conference director of the leading conference on international taxation in Mumbai (Bombay) in India.

Prof. David ROSENBLOOM

co-Chairman and Member of Caplin & Drysdale, Chartered (Law firm), James S. Eustice Visiting Professor of Taxation and Director of the International Tax Program, New York University School of Law, USA

Jacques SASSEVILLE

Head of Tax Treaty Unit, OECD Centre for Tax Policy and Administration

Prof. Dr. Josef SCHUCH

Professor at the Institute for Austrian and International Tax Law, Vienna University of Economics and Business Administration; Partner at Deloitte, Austria

Caroline SILBERZTEIN

Head of the Transfer Pricing Unit of the OECD Centre for Tax Policy and Administration

Prof. Dr. Claus STARINGER

Professor at the Institute for Austrian and International Tax Law, Vienna University of Economics and Business Administration; Principal Consultant with Freshfields, Vienna; Austria

Dr. Alfred STORCK

Senior Corporate Officer, Head of Group Functions Taxes and Finance at ABB Ltd, Zurich, Switzerland

Frans VANISTENDAEL

Since 1985 Partner at Tournicourt & Vanistendael, until 2007 Professor at the University of Leuven, from 2007 Academic Director at IBFD in Amsterdam

Michael WICHMANN

Deputy Head, Tax Treaty Policy Division, Federal Ministry of Finance, Berlin, Germany

Ulrich WOLFF LL.M.

Former Head of Department of International Tax Law, Federal Ministry of Finance, Berlin, Germany; Now with PricewaterhouseCoopers AG, Germany

PROGRAM

Main topic: "Recent Developments in Tax Treaty Practice – the Case Study Conference"

with Workshops

Sunday, 6 July 2008

From 5.30 p.m.

Opening: *Michael Lang*

Lecture: "Experiencing Music and Culture in Austria"

Nicole Stark, MAS

From 6.30 p.m. on

Welcome Reception



Monday, 7 July 2008

9.00 – 9.40 a.m.

"The Influence of European Tax Law on Third Countries"

Frans Vanistendael

9.40 – 10.00 a.m.

Discussion

10.30 a.m. – 1.00 p.m.

Case Studies: "Tax treaties – What happens when States disagree? – Qualification and Classification Conflicts in Tax Treaty Law"

Panel Discussion: *Andrew Dawson, Heinz Jirousek, Benedetta Kissel, Michael Lang, Michael Wichmann*

2.45 – 5.30 p.m.

Optional Workshop I:

"OECD – Recent Developments" Jacques Sasseville

Tuesday, 8 July 2008

9.00 – 9.40 a.m.

"Recent Developments in US Tax Treaty Practice" Benedetta Kissel

9.40 – 10.00 a.m.

Discussion

10.30 a.m. – 1.00 p.m.

Case Studies: "Legitimate versus Illegal Tax Planning – Where are the borders?"

Panel Discussion: *Patricia Brown, Andrew Dawson, Helmut Loukota, Pasquale Pistone, Ulrich Wolff*

2.45 – 5.30 p.m.

Optional Workshop II:

"Recent ECJ Decisions in Direct Taxation"
Pasquale Pistone / Michael Lang



Wednesday, 9 July 2008

9.00 – 9.40 a.m.

"US Tax Law: Recent Developments" David Rosenbloom

9.40 – 10.00 a.m.

Discussion

10.30 a.m. – 1.00 p.m.

"Withholding Taxes - The Application of Tax Treaty Reductions in Practice"

Panel Discussion: Patricia Brown, Guglielmo Maisto, David Rosenbloom, Jacques Sasseville, Josef Schuch

2.45 – 5.30 p.m.

Optional Workshop III:

"International Tax Developments in India" Roy Rohatgi, T P Ostwal

Thursday, July 10, 2008

9.00 – 9.40 a.m.

"Recent EU Tax Developments" Albert Rädler / Josef Schuch

9.40 – 10.00 a.m.

Discussion

10.30 a.m. – 13.00 p.m.

Case Studies: "Tax Issues and Planning related to Business Restructuring"

Panel Discussion: Robert Green, Heinz-Klaus Kroppen, Caroline Silberztein, Claus Staringer, Alfred Storck, Michael Wichmann

SOCIAL PROGRAM

We will offer you and your accompanying person the following events for your evening entertainment:

Lecture: "Experiencing Music and Culture in Austria" This event will take place after the Opening!

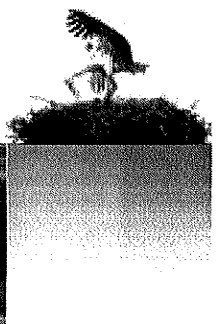
Welcome Reception: An informal get-together will take place after the Opening as well. All participants are invited, and a buffet and beverages will be available.

Seefestspiele Mörbisch – the greatest operetta festival of the world presents: "White Horse Inn" by Ralph Benatzky.

This unique festival takes place each summer on one of the biggest open-air stages of Europe. We got tickets for the night before the premier!

Farewell evening: All participants are welcome to join for an Austrian evening (Heuriger), where traditional Austrian cuisine and fine Austrian wines will be served.

Further details and the chance to register for these events will be given after we receive your registration for the Conference. A contribution to the cost of these functions will be charged.



GENERAL INFORMATION

Organisers:

- International Fiscal Association (IFA), Austrian Branch
- Institute for Austrian and International Tax Law, Vienna University of Economics and Business Administration
- Research Institute for European and International Tax Law, Vienna
- Akademie der Wirtschaftstrehänder GmbH, Vienna

Official Conference Language:

The official language of the Conference is English.

Congress Dates:

The International Tax Law Summer Conference will be held in Rust, Austria from 06–10 July 2008.

Conference Venue:

Seehotel Rust

Am Seekanal 2-4

A-7071 Rust

Tel: +43-2685-3810

Fax: +43-2685-381-419

www.seehotelrust.at

Registration:

Please send the enclosed registration form to the Akademie der Wirtschaftstrehänder. An official receipt/confirmation of booking will be issued to all participants.

Participation and closing date:

The number of places is limited; therefore, we ask you to send your registration as soon as possible. The closing date is 30th May 2008.

Information:

Akademie der Wirtschaftstrehänder GmbH

Schönbrunner Straße 222-228/PF 63
A-1121 Vienna

Contact person:

Ms. Marion Gertner

Tel: +43-1-815 08 50-25

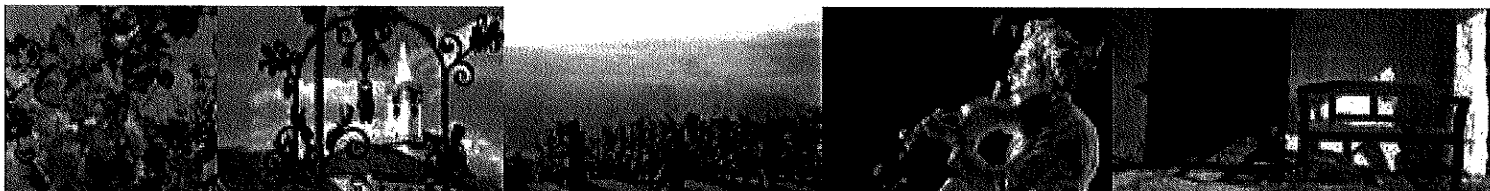
Fax: +43-1-817 14 37

Email: m.gertner@wt-akademie.at

www.wt-akademie.at

Cancellation:

Notification of cancellation of registration must be sent in writing to the official conference office at the Akademie der Wirtschaftstrehänder GmbH. In case of cancellation before 13th June 2008, the registration fee will be refunded.



7th International Tax Law Summer Conference
06-10 July 2008, Rust, Austria

REGISTRATION FORM

Please send or fax the registration form to the conference organisation office:

AKADEMIE DER WIRTSCHAFTSTREUHÄNDER GMBH
Schönbrunner Straße 222-228/1/6/3, A-1121 Vienna, Austria
Telephone: +43-1-815 08 50-25 Fax: +43-1-817 14 37

www.wt-akademie.at
Contact Person: Ms. Marion Gertner
E-Mail: m.gertner@wt-akademie.at

Please complete using block capitals or typewriter.

I. Participant Mrs Mr

Surname: First name:

Company:

Please send correspondence and invoice to: my company address my private address

Street:

Postal code, city: Country:

Telephone: Fax:

E-mail:

II. Accompanying Person Mrs Mr

Surname: First name:

III. Participation fee

2000,- EUR (excluding 20% VAT) for the conference itself (Monday-Thursday 09.00 a.m. – 01.00 p.m.)

The participation fee includes the welcome reception and all lunches after the conference, as well as all conference materials and refreshments. Additional payment is required for the hotel reservation and the social program.

Optional Workshops:

If you want to participate in a Workshop (Monday-Wednesday afternoon), please register here:

Workshop I: "OECD - Recent Developments"

Workshop II: "Recent ECJ Decisions in Direct Taxation"

Workshop III: "International Tax Developments in India"

The fee for one Workshop is 140,- EUR, if you register for all three it is only 350,- EUR altogether!

Take advantage of our special discount of 10% for early registration!

Participants who register by 30 April 2008 will qualify for the reduced fee of **1800,- EUR**.

After receipt of your registration, we will send you an invoice for the conference fee. Payment can only be made by bank transfer to the following account in Austria. Please instruct your bank that you also pay for the fees of the Austrian banks.

Bank: **Bank Austria Creditanstalt**, account number: 09494626600, sort code: 12000
IBAN: AT641100009494626600, BIC: BKAUATWW

I hereby accept the General Conditions of the AKADEMIE DER WIRTSCHAFTSTREUHÄNDER GMBH mentioned in the invitation program. I agree that for the purpose of congress organisation only my personal data will be recorded electronically. My name will be entered in the Congress list of participants. I have read and accept the participation and cancellation terms in the invitation program. Please keep a copy of this form for your own records.

Date

Signature

Please turn over!

HOTEL RESERVATION

7th International Tax Law Summer Conference, 06-10 July 2008, Rust, Austria

Please send this form, preferably by fax, to the Seehotel Rust. You will receive a confirmation of your booking from the hotel.

<input type="checkbox"/> Mrs	<input type="checkbox"/> Mr	
Surname: First name:		
Company:		
Please send correspondence to: <input type="checkbox"/> my company/organisation address <input type="checkbox"/> my private address		
Street:		
Postal Code, City: Country:		
Telephone: Fax:		
E-mail:		
Arrival:		
Departure:		
<input type="checkbox"/> Single Room	<input type="checkbox"/> Double Room	
<input type="checkbox"/> B&B (Bed & Breakfast)	<input type="checkbox"/> Half board (Lunch is included for the participant!)	<input type="checkbox"/> Full board

Seehotel Rust ****

Am Seekanal 2-4, A-7071 Rust

Telephone: +43-2685-3810

Fax: +43-2685-381419

E-mail: reservierung@seehotelrust.at, Homepage: www.seehotelrust.at

Single Room:

B&B	82,- EUR
Half board	86,- EUR
Full board	89,- EUR

Double Room:

B&B	73,- EUR p.pers.
Half board	77,- EUR p.pers.
Full board	80,- EUR p.pers.

I hereby confirm the above reservation:

Date

Signature

Fax: +43-2685-381419
Seehotel Rust

Please turn over!