

12TH ANNUAL NABE

TRANSFER PRICING SYMPOSIUM

JULY 19-21, 2022

FOUR SEASONS HOTEL | WASHINGTON, DC



The NABE Transfer Pricing Debate

Introduction of the Topics

- Topic 1: Should the question of whether the 482 Periodic Adjustment rules vs the OECD HTVI rules apply to a litigated controversy involving the pricing of a controlled transfer of IP be expected to have a material impact on the outcome.
- Topic 2: Should the question of whether the 482 or the OECD TPG language related to "control" of IP apply to a litigated controversy involving a controlled license of IP, be expected to have a material impact on the outcome.

Panelists

Topic 1



Russ Young
Baker McKenzie

Pro Team



Loren Ponds
Miller & Chevalier
Chartered
Con Team

Topic 2



Kartikeya Singh
PwC

Pro Team



Steve Wrappe
Grant Thornton
Con Team

Moderators



Richard Slowinski
Alston & Bird



Michael McDonald
Ernst & Young



Sarah Stauner
Kroll

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Topic 2: Should the question of whether the 482 or the OECD TPG language related to "control" of IP apply to a litigated controversy involving a controlled license of IP, be expected to have a material impact on the outcome.