

## Part IV - Items of General Interest

Internal Revenue Service announces the Twenty-First Institute on Current Issues in International Taxation, jointly sponsored by the Internal Revenue Service and The George Washington University Law School.

### Announcement 2008-94

The Internal Revenue Service announces the Twenty-First Annual Institute on Current Issues in International Taxation, jointly sponsored by the Internal Revenue Service and The George Washington University Law School, to be held on December 8 and 9, 2008, at the J.W. Marriott Hotel in Washington, DC. Registration is currently underway for the Institute, which is intended for international tax professionals.

The program will present a unique opportunity for top IRS and Treasury officials and tax experts, an OECD representative, foreign government tax authorities, and leading private sector specialists, to address breaking issues and present key perspectives on new developments. The first day will feature a discussion by U.S. and foreign tax authorities of competent authority current trends and new frontiers.

The first day will also feature sessions on the following:

- Foreign Audits and the Competent Authority Process
- Transfer Pricing Update—Regulatory and Administrative Developments
- The Modernization of Subpart F—Accommodating Business Structures While Preventing Avoidance Transactions
- Foreign Tax Credit Update
- Cross-Border M&A

The second day will focus on the following topics:

- When Does *And* Mean *Or*?: Current Issues in Treaty Interpretation
- Full Disclosure: How Taxpayers and Tax Administrators Are Coping with the New Transparency
- Inbound/Outbound Developments

On the first day, Douglas H. Shulman, Commissioner of the Internal Revenue Service, will deliver the luncheon address. On the second day, Edward D. Kleinbard, Chief of Staff of the Joint Committee on Taxation, will deliver an opening address, and Michael F. Mundaca, Deputy Assistant Secretary for International Tax Affairs of the Treasury, will deliver the luncheon address. The second day will also include an “Ask the IRS” panel featuring senior officials from the Service.

Those interested in attending or obtaining more information should contact The George Washington University Law School, at <http://www.law.gwu.edu/ciit>.