

December 02, 2019

Tax Policy and Statistics Division  
Centre for Tax Policy and Administration  
Organisation for Economic Co-operation and Development

Re: Public Consultation Document – *Global Anti-Base Erosion Proposal (“GloBE”) – Pillar Two*

Dear Sir or Madam,

The Association of International Certified Professional Accountants (“Association”) appreciates the opportunity to provide comments on your public consultation document *Global Anti-Base Erosion Proposal (“GloBE”) – Pillar Two* (“Pillar Two Proposal”).

The Association previously submitted [initial thoughts](#) in May on the public consultation document on *Addressing the Tax Challenges of the Digitalisation of the Economy*, [additional and more detailed comments](#) on your *Programme of Work to Develop a Consensus Solution to the Tax Challenges Arising from the Digitalisation of the Economy*, as well as [comments on the public consultation document Secretariat Proposal for a “Unified Approach” under Pillar One](#).

We respectfully submit our general comments on the overall approach as well as input on policy, technical and administrability issues raised. Paragraphs referenced below are paragraphs in the Pillar Two Proposal.

### **General Comments**

The Association appreciates the efforts of the OECD in developing the Pillar Two Proposal. We note that although the Pillar Two Proposal contains four components (an income inclusion rule, an undertaxed payments rule, a switchover rule, and a subject to tax rule), only the income inclusion rule is discussed in-depth in the Pillar Two Proposal, and specific comments or feedback about the other three components are not requested. The Association believes these other three components (an undertaxed payments rule, a switchover rule, and a subject to tax rule) should also be subjected to public discussion and debate. Thus, we respectfully request that the OECD issue a public consultation on those components in the near future to more fully explain these proposals and provide opportunities for submitting comments.

The comments below, therefore, are generally limited to the income inclusion rule as discussed in the Pillar Two Proposal, noting that certain technical and design issues will depend upon policy decisions that have yet to be agreed among the members of the Inclusive Framework regarding both Pillar One and Pillar Two.

The Association believes that in crafting the components contained in the Pillar Two Proposals that the following [guiding principles of good tax policy](#) should be considered:

1. **Equity and fairness:** Similarly situated taxpayers should be taxed similarly.
2. **Certainty:** The tax rules should clearly specify how the amount of payment is determined, when payment of the tax should occur, and how payment is made.
3. **Effective tax administration:** Costs to collect a tax should be kept to a minimum for both the government and taxpayers.
4. **Simplicity:** Simple tax laws are necessary so that taxpayers understand the rules and can correctly comply with them.

Lastly, the following comments assume that the GloBE tax would be payable only at the ultimate parent company level, not at each tier of subsidiaries within a global corporate structure.

## **Tax Base Determination**

### *Use of adjusted financial accounts*

The Pillar Two Proposal suggests using financial accounts as a starting point for determining an appropriate income base, stating that the use of financial accounts would simplify and reduce the compliance costs of the Pillar Two Proposal. The Association believes that global audited consolidated financial accounts, adjusted by permanent and temporary book-tax differences, is an appropriate income tax base as it is the base used for “regular” (or normal) corporate tax rate purposes.

Since the stated goal and intent of the income inclusion rule is to ensure that taxpayers pay at least a minimum amount of tax on global income, the Association believes that the tax base applied for both the “regular” (or normal) corporate tax rate, and minimum tax purposes should be the same. In other words, in order to test whether a multinational enterprise (“MNE”) is paying a minimum level of tax, the minimum tax rate should be applied against the same tax base as the regular income tax.

An income inclusion amount should only be included in income if the applied minimum tax rate is less than the regular tax rate. If there is any base difference between the minimum tax base and regular income tax base, the GloBE tax is not simply ensuring that taxpayers are paying a minimum amount of tax on their global income, but instead is introducing a global alternative minimum tax based on different rules and policy objectives.

### *Application of a consistent de minimis amount*

To determine if the GloBE minimum tax is less than regular income tax, taxpayers must first calculate their regular income tax on a global basis. Such calculation is not performed today as taxpayers currently calculate their income tax on a per-entity or jurisdictional basis rather than a global basis. Pillar One also requires taxpayers to calculate their income on a global basis, but only for taxpayers at or above a €750 million revenue threshold. For consistency and

simplification purposes, the income inclusion rule (under Pillar Two) should also only apply to taxpayers that meet the €750 million revenue threshold. If the income inclusion rule applies to taxpayers that do not otherwise determine their tax base on a global basis, the Pillar Two Proposal would impose a substantial compliance burden against smaller taxpayers.

As such, the starting point for determining the GloBE tax base should be the global audited consolidated financial accounts of taxpayers with revenue at or over €750 million, adjusted by permanent and temporary book-tax differences as applied to determine the tax base under Pillar One.

In addition, applying the Pillar Two Proposal only to companies that meet the €750 million in global revenue threshold would limit the proposal to companies that are required to prepare global audited financial statements and would allow tax administrators to focus their resources on taxpayers that have the ability to generate material base-erosion transactions.

#### *Allowing certain credits against GloBE*

After the GloBE minimum tax rate is applied to the global taxable income base, certain credits (such as foreign tax credits, research and development credits, and possibly others) should be allowed against both regular tax and the GloBE minimum tax. If foreign tax credits are not allowed against the GloBE minimum tax, double taxation could arise. Additionally, if research and development credits are not allowed against the GloBE minimum tax, the GloBE tax would reduce the incentive to invest in research and could violate national sovereignty and policy to encourage innovation by countries that adopt Pillar Two.

#### *Impact of using different accounting standards*

With regard to the impact of using different accounting standards, such as GAAP or IFRS, both GAAP and IFRS accounting standards are generally designed to fairly represent the financial position and earnings of an enterprise in any given year. The use of different standards for different companies within a consolidated group should not materially misstate the income generated for the year as most differences of income and expense recognition between the accounting standards are generally only timing differences. We do recognize, however, that longer term differences might exist in purchase accounting and other limited applications. Finally, we believe the application of GAAP or IFRS within the same industry, but by different taxpayers, should not materially cause a competitive disadvantage from a tax perspective that would not already exist under financial reporting purposes for the same reason.

Therefore, if financial accounts are used as the starting point for determining the tax base, the use of the parent company's accounting standards (whether GAAP or IFRS) should be considered appropriate for all subsidiaries. If a situation arises where the subsidiary reports its statutory accounts under local country standards that are different from the parent company's standards, the local entity should be able to apply the local standards, as long as these standards are consistently applied.

*Tax base for purposes of an undertaxed payments rule*

On the question of the tax base for purposes of an undertaxed payments rule, applying lessons learned from the U.S. base erosion and anti-abuse tax (“BEAT”), the following are recommended:

- Undertaxed payments should be considered on a transactional basis, not on the same income tax base as the income inclusion rule.
- Netting of transactions, where costs from many jurisdictions are accumulated in a single jurisdiction before being charged back out, should only be subject to tax for net amounts paid out, not the gross amount of payments made.
- The undertaxed payments rule should not apply in the case where the undertaxed payment is also included in the income inclusion rule. To apply tax to an undertaxed payment which is also included in the income inclusion rule would cause that undertaxed payment to be taxed twice. In other words, as an ordering rule, the income inclusion rule should apply first, and the undertaxed payments rule should apply only if the undertaxed payment is not taken into account under the income inclusion rule.

**Adjustments for Permanent Differences**

The material permanent differences between financial accounting income and taxable income may differ based upon the tax laws in different jurisdictions. However, some of the most common differences are:

- fines and penalties;
- dividends subject to a participation exemption;
- interest on government debt;
- any non-deductible portion of entertainment;
- income recognition under the equity method of US GAAP (investment in minority entities);
- different characterization of debt versus equity in hybrid instruments;
- write-off of goodwill or the impairment of intangible assets in a jurisdiction that does not allow a deduction for intangible amortization; and
- stock and asset basis adjustments caused by purchase accounting.

If a GloBE tax would apply income inclusion based upon income that is under-taxed (i.e., taxed at a rate below some minimum tax rate), the income inclusion rule should be applied under the same rules as the regular income tax. If the minimum tax rate is applied upon different tax principles than the regular tax rate, the income inclusion rule would in effect be a second tax system rather than a test of whether a taxpayer’s income is taxed at a minimum tax level. Such a second tax system would add complexity and controversy rather than perform an anti-abuse role.

Therefore, as the stated purpose of the income inclusion rule is to ensure that a minimum amount of tax is imposed, the income inclusion rule should apply using the tax rules of the parent company

jurisdiction. Such an approach would leave countries free to adopt policies consistent with their needs and sovereignty but still ensure a minimum level of taxation is applied on that income. For example, permanent items (such as, dividends excluded from taxation under a participation exemption or interest received from government-issued debt) should not by themselves trigger an income inclusion, as such items are not base eroding or abusive to a tax base. Other permanent differences (such as, the different characterization of debt versus equity on hybrid instruments) have already been addressed under the BEPS project. The treatment of hybrid instruments should follow the BEPS guidance.

For these reasons, the Association believes that the results of the financial accounts should be adjusted by the permanent book-tax differences that would apply for regular tax purposes by the local, applicable jurisdictional rules.

### **Adjustments for Temporary Differences**

The Pillar Two Proposal considers whether the income inclusion rule should be tested on a current taxation basis (i.e., not taking into account the impact of deferred taxes) and suggests an elaborate system to track and provide for the carry-forward of excess taxes and losses. The Association has concerns with this approach.

Under this proposed system, a taxpayer would be tested on a cash basis. The tested tax rate would equal the amount of current tax paid divided by financial statement income. This approach is highly problematic.

Example 1: Consider the case of a financially troubled taxpayer (such as a startup) in a 25% tax-rate jurisdiction. In Year 1, the taxpayer generates a loss of \$200 and carries forward that loss to a subsequent year. Thus, the taxpayer would have \$0 regular tax and, as it also has \$0 income, no GloBE tax would be due in Year 1. In Year 2, the company earns \$300, but due to the \$200 carryforward, the company has a regular income tax base of \$100 and would pay tax of \$25. On a cash tax basis in Year 2, the taxpayer has \$25 of tax with book income of \$300, a cash tax rate of about 8%. If the 8% is less than the GloBE minimum tax rate, the taxpayer would be subject to the income inclusion rule even though the taxpayer is subject to tax at a 25% tax rate and has not engaged in any base erosion transactions or abusive behaviors.

Example 2: Consider where a high-taxed country, in response to an economic slow-down, enacts highly accelerated depreciation or capital allowances in order to encourage investment in capital equipment. If an enterprise takes advantage of the country's policy incentives, the high depreciation deductions or capital allowances would reduce the amount of current year taxes paid, potentially causing the enterprise to be caught by the income inclusion rule. Thus, on a cash basis, the country's investment policy could be defeated and again the GloBE tax would target a company that is not acting abusively. Instead, enterprises with the ability to invest would be discouraged to expand spending during an economic slow-down, which would defeat public policy and potentially prolong the economic slowdown.

As the Pillar Two Proposal discusses with regard to deferred tax accounting,<sup>1</sup> the better approach is to take temporary differences into account when determining the GloBE tax base. By application, in Example 1, the enterprise that generated the Year 1 loss could treat the loss as a temporary difference. In Year 2, the enterprise would recognize \$25 of current tax paid (as above) and \$50 of deferred tax expense (i.e., loss carryforward of \$200 x 25%) for total tax expense of \$75. (The tax expense of \$75 divided by book income of \$300 equals the 25% statutory tax rate.) Thus, in this case, the GloBE tax would appropriately not apply in Year 2.

Similarly, in Example 2, by applying the deferred tax concept, companies would not be punished for expanding capital spending during an economic slowdown and could take advantage of incentives provided by their governments to reduce the impact of the economic slowdown. In both examples, applying the deferred tax rules would tax the company on an economic basis rather than on a current year basis. Applying the income inclusion rule on an economic approach more accurately reflects the activities of the enterprise and reduces the risk of inappropriately applying the minimum tax of the income inclusion rule. Note, however, that adjustments may need to be made for certain deferred tax items, including equity accounting items, uncertain tax positions, tax rate changes, valuation allowances,<sup>2</sup> and business combinations.

As noted in the Pillar Two Proposal,<sup>3</sup> under both GAAP and IFRS, deferred tax assets or temporary differences are tracked on a per entity basis and cannot be netted against the income, loss, or other attributes of other related members of the MNE group. Further, companies with audited financial accounts are required to track deferred items on an entity-by-entity basis. Utilization of the deferred tax approach, as opposed to other approaches, would reduce compliance burdens on MNEs.

In practice, parent companies track deferred tax items of subsidiaries that in sum are material to their financial statements, while the deferred tax items of dormant and near dormant entities may not be perfectly tracked due to immateriality. As the GloBE would be based on audited financial accounts, it is assumed that the level of materiality applied by the auditors of the financial accounts is an acceptable level of materiality for all purposes of the GloBE proposal, and therefore items deemed immaterial for the financial statements should be immaterial for purposes of the GloBE.

The Pillar Two Proposal<sup>4</sup> notes a concern with applying the deferred tax approach. The approach is based, in part, on expected future tax liability and thus involves judgment on the part of the company preparing the financial statements. The concern raised is that deferred tax accounting may not adequately address loss situations in low-tax jurisdictions. As an example, a deferred tax asset arising from an operating loss may be less than the minimum tax rate that could potentially expose the MNE to tax under the inclusion rule where there is no underlying economic income.

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<sup>1</sup> Pillar Two Proposal, page 14, paragraph 40.

<sup>2</sup> A valuation allowance is a reserve recorded when less than 100% of a deferred tax asset is expected to be used in the future.

<sup>3</sup> Pillar Two Proposal, page 14, paragraph 43.

<sup>4</sup> Pillar Two Proposal, page 16, paragraph 51.

This concern actually includes two separate issues: (1) whether deferred tax accounting rules adequately address loss situations in low-tax jurisdictions, and (2) whether income under an inclusion rule may apply where there is no underlying economic income.

Under the first issue (whether deferred tax accounting rules adequately address loss situations in low-tax jurisdictions), note that the same deferred tax rules apply regardless of whether the tax rate is high or low. Thus, the deferred tax approach should focus the application of the GloBE tax to companies operating in low-taxed jurisdictions, regardless of the application of loss carryforwards, and would not be problematic.

Under the second issue (whether income under an inclusion rule may apply where there is no underlying economic income), we believe this concern is also misplaced. The use of the deferral method more properly aligns income and the related tax from economic activity than is the case where a cash basis tax approach is applied. Therefore, the use of the deferral method actually reduces the risk of manipulating the effective tax rate.

Finally, the Pillar Two Proposal<sup>5</sup> suggests a possible effective tax rate based on a multi-year averaging computation in applying the GloBE tax. While a multi-year averaging approach to measure the effective tax rate could provide more stability by “smoothing out” the effect of one-off items, its adoption could add substantial and unnecessary complexity and controversy. This complexity and controversy would be minimized if a worldwide consolidated blending approach is applied but would be magnified under a jurisdictional or entity blending approach.

## **Blending**

The Pillar Two Proposal notes that the income inclusion amount must consider the extent to which a taxpayer can mix low-tax and high-tax income within the same entity or across different entities within the same group, a concept the Pillar Two Proposal refers to as “blending.”

The Pillar Two Proposal suggests three approaches:

- Worldwide blending, that is, testing the worldwide blended rate against a minimum tax level. The U.S. applies a form of worldwide blending in its global intangible low-taxed income (GILTI) tax.
- Jurisdictional blending, that is, requiring foreign income to be apportioned between different taxing jurisdictions. One approach is to combine the income and tax of all members of a MNE group that are a tax resident in the same jurisdiction (including branches established in that jurisdiction) for purposes of the minimum rate test.
- Entity blending, that is, testing each entity separately.

The Pillar Two Proposal requests an assessment of the general compliance costs and economic effects of a GloBE proposal that is based on each of these three proposals.

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<sup>5</sup> Pillar Two Proposal, page 15, paragraph 44.

### *General compliance costs*

In general, worldwide blending would be the simplest and least compliance-burdensome approach as the information necessary to comply with the worldwide blending is already collected at the parent company level under both GAAP and IFRS.

Jurisdictional blending and entity blending would be the most complex and burdensome approaches for both compliance and controversy purposes. The complexity and burden are caused by multiple calculations not currently required that would be required to be performed by each entity and at every jurisdiction.

Jurisdictional blending would entail the highest level of complexity. To perform jurisdictional blending, taxpayers would need to (i) calculate the income and related tax for each entity, branch and partner income from each jurisdiction, (ii) combine the income and tax for the entities, branches, and partner income for each jurisdiction, then (iii) take into account intercompany eliminations. These calculations could be very complex when there are dozens of entities and branches in the jurisdictions. Although some countries allow corporate consolidations or corporate grouping (such as the U.K.'s loss sharing rules), not every country allows for consolidation or combination of entities. GAAP and IFRS do not require parent companies to track or maintain such combination of entities and branches when preparing financial accounts, and adding this functionality could be a significant compliance burden for many enterprises.

Entity blending should generally be an easier compliance burden than jurisdictional blending as deferred taxes are currently tracked at the entity level, but the sheer number of legal entities and branches in a large MNE (frequently reaching into the thousands) would cause a more significant compliance burden than a simple combination at the worldwide blending level.

### *Economic effects*

From an economic perspective, worldwide blending neutralizes the tax impact of investment decisions. Investment location decisions should be made neutral of tax considerations and blending the income and tax from all global subsidiaries would minimize the tax influence in such decisions, especially if the deferred tax approach is applied.

The global impact of blending at a jurisdictional or entity level would be more sensitive during periods where there are larger book / tax differences, unless the deferred tax approach is applied.

### *Effect of blending on volatility*

The worldwide blending approach would be most effective (relative to the jurisdictional or entity approach) at managing volatility caused by large temporary differences between book and tax. This is because the larger income base would neutralize differences caused by large temporary items, such as losses, financial results of MNEs with diversified operations across different industries and jurisdictions, etc.



*Use of consolidated financial accounting information*

The use of consolidated financial information at the ultimate parent company location for purposes of the GloBE tax would result in the lowest compliance burden when compared to (i) separating the income and taxes of domestic and foreign operations, (ii) separating the income and taxes to a jurisdictional level, or (iii) breaking down income and taxes to an entity level.

As noted in the Pillar Two Proposal,<sup>6</sup> requiring MNEs to prepare un-consolidated financial accounting information for each member of the group, where this was not already prepared or available, would have substantial compliance cost implications. Heightened controversy risks would also exist.

Testing the income and tax of a global consolidated MNE by using consolidated financial accounts based on the accounting standards at the parent company level, adjusted for permanent items in each jurisdiction as determined under local law for regular income tax, and applying the deferred tax method would be the least costly compliance approach. This information is generally already required to be provided under GAAP and IFRS.

*Allocating income between branch and head office*

The Pillar Two Proposal<sup>7</sup> notes difficulties in allocating income between a branch and its head office. This difficulty is highlighted by transactions between the branch and its head office, as these transactions are generally eliminated at the head office level although taken into account for accounting and tax purposes at the branch level.

A solution to allocate income in all circumstances between a branch and its head office is highly difficult. In many cases, such allocation is based on facts and circumstances, such as the direction of the sale or purchase transactions occurring between the two parties. Difficult questions can also arise as to where the eliminated income should be reported. Such issues are not resolved even for entities that are required to report income and tax under Country-by-Country (“CbC”) reporting. The CbC report requires a branch to report income but does not contain rules on how to allocate eliminated income between a home office and the branch. Further, the CbC rules require that tax paid by a branch is reported in the branch’s jurisdiction, but the income and the tax paid by the home office from income earned by the branch is reported in the home office jurisdiction. The bifurcation of the income and associated tax amounts may result in information being reported on the CbC report in different jurisdictions. Thus, the CbC reporting does not provide a solution to the allocation issue and the preparation of the CbC report would not necessarily reduce the complexity of the issue or cost of compliance around the issue.

However, as noted in the Pillar Two Proposal,<sup>8</sup> applying a worldwide approach would be less onerous in this context than a jurisdictional or entity blending approach. Under the worldwide

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<sup>6</sup> Pillar Two Proposal, page 19, paragraph 62.

<sup>7</sup> Pillar Two Proposal, page 19, paragraph 63.

<sup>8</sup> Pillar Two, page 20, paragraph 64.

approach, such allocation would only be required in a domestic-to-foreign context. It would not be required between foreign-to-foreign jurisdictions.

#### *Allocating income of a tax transparent entity*

Apportioning the income of a tax transparent entity, such as a partnership, is also a complex issue. For example, income could be earned by the partnership in one jurisdiction but, due to the flow-through nature of the partnership, such income may be taxed in a second jurisdiction with a higher or lower tax rate than the jurisdiction where the income is earned.

A reasonable approach to match income and the associated tax may be to apportion the income (or loss) of a tax transparent entity according to the partnership agreement. Under such approach, both the income and tax are reported and matched together in the jurisdiction where tax is paid. However, complexities remain for income generated on transactions between a partnership and its partners. These partnership complexities are not easy to resolve nor susceptible to the development of a standard rule applicable in all circumstances. Such transactions should be analyzed based on specific facts and circumstances.

As noted in the Pillar Two Proposal,<sup>9</sup> the specific blending rule applied is important in matching such income and associated tax. Again, the worldwide blending approach is less onerous than a jurisdictional or entity approach. Under the worldwide blending approach, income apportionment is only required in a domestic to foreign context and not in a foreign to foreign context. In contrast, a detailed analysis of income apportionment would be required regardless of jurisdiction under either a jurisdictional or entity blending approach.

#### *Crediting taxes that arise in another jurisdiction*

An additional complexity arises with income and tax mismatches when withholding taxes are imposed on distributions, deemed distributions, and eliminated payments in the context of both branch and head office jurisdictions and partnerships.

The Pillar Two Proposal<sup>10</sup> proposes a credit-transfer mechanism whereby tax is deemed paid by the entity or jurisdiction where the income is attributed. Although this approach may simplify the jurisdictional assignment of taxes, it appears open to manipulation depending upon the approach used to attribute the income to each jurisdiction.

As noted in the Pillar Two Proposal,<sup>11</sup> this concern is less of an issue under worldwide blending, as any tax imposed by a foreign jurisdiction would be matched against foreign income regardless of the foreign jurisdiction in which the income arises. Under jurisdictional or entity blending, the income must be allocated to a source jurisdiction and the taxes attributable to that income must be

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<sup>9</sup> Pillar Two, page 20, paragraph 67.

<sup>10</sup> Pillar Two, page 21, paragraph 70.

<sup>11</sup> Pillar Two, page 21, paragraph 68.

aligned with that income, which would be a difficult and complex issue for both compliance and controversy purposes.

#### *Treatment of dividends and other distributions*

Dividends and similar distributions should be excluded from the definition of income for purposes of the GloBE tax on the assumption that:

- (i) The underlying earnings of the distributing entity would already have been subject to tax at the minimum rate, and
- (ii) Dividends are frequently exempted from taxation by a participation exemption. Including dividends in taxable income without any associated taxes (other than possible withholding tax) may cause an entity in a high-taxed jurisdiction to be determined to be taxed below the minimum tax and inappropriately become subject to the GloBE tax.

If the financial statements upon which GloBE is calculated includes dividends, such dividends should be removed from the financial statements, along with any associated withholding taxes. This treatment should provide the same result under the worldwide, jurisdiction or entity blending approaches.

With regard to the request for other issues relating to the worldwide, jurisdictional and entity blending, it appears that the worldwide blending approach is (1) the least complex and least compliance-burdensome, (2) the most economically-neutral, and (3) least susceptible to volatility. It is also most capable of simplifying the issues surrounding (1) consolidated financial accounts, (2) the allocation of income between a branch and its head office, (3) the allocation of partnership income, and (4) cross-crediting of taxes. Therefore, it appears that the worldwide blending approach would substantially reduce costs for both tax administrators and taxpayers as well as reduce controversy.

#### **Conclusion**

The Association believes that, in order to focus the resources of tax administrators to taxpayers that have the potential ability to generate material base-erosion or base avoidance transactions, the GloBE tax should only apply to large MNEs. We recommend applying the same revenue threshold of Pillar One (i.e., companies in a global group that generate at least €750 million of global revenue annually).

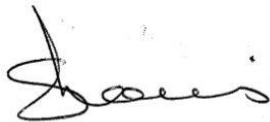
The GloBE minimum tax should be determined based upon the same tax base as used for regular income tax, and therefore, the ultimate parent company should adjust its global consolidated financial statement for the permanent and temporary differences that apply for regular income tax purposes.

Worldwide blending should be the blending approach applied as it reduces complexity, compliance costs, and controversy when compared to jurisdictional and entity blending.

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The Association of International Certified Professional Accountants is the most influential body of professional accountants, combining the strengths of the American Institute of CPAs (AICPA) and The Chartered Institute of Management Accountants (CIMA) to power opportunity, trust and prosperity for people, businesses and economies worldwide. It represents 650,000 members and students in public and management accounting and advocates for the public interest and business sustainability on current and emerging issues. With broad reach, rigor and resources, the Association advances the reputation, employability and quality of CPAs, CGMAs and accounting and finance professionals globally.

We appreciate your consideration of our thoughts and welcome the opportunity to discuss them further. Please feel free to contact Samantha Louis, Association Vice President – Global Advocacy at [samantha.louis@aicpa-cima.com](mailto:samantha.louis@aicpa-cima.com), or +44 (0) 203 814 2205; or Edward Karl, Association Vice President – Taxation at [edward.karl@aicpa-cima.com](mailto:edward.karl@aicpa-cima.com), or +1 202 434 9228.



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