

# CONTENTS

<b>John A. Couch</b> <i>International Tax Partner, Bracewell &amp; Giuliani LLP</i> TREATY STRATEGIES: TAXABLE PRESENCE UNDER DOUBLE TAX TREATIES	7
<b>Sean M. King</b> <i>Partner, Williams Mullen</i> SUCCESSFUL TAX PLANNING STRATEGIES FOR CROSS-BORDER TRANSACTIONS	75
<b>Richard E. Andersen</b> <i>Partner, Arnold &amp; Porter LLP</i> THE FUNDAMENTALS OF INTERNATIONAL TAX LAW	93
<b>David L. Forst</b> <i>Partner, Fenwick &amp; West LLP</i> ADVISING CLIENTS IN CROSS-BORDER TRANSACTIONS	105
<b>Gary J. Gartner</b> <i>Tax Partner, Kaye Scholer LLP</i> MAXIMIZING THE CLIENT'S TAX EFFICIENCY	111
<b>Lawrence M. Hill</b> <i>Partner and Chair, Tax Controversy and Litigation Group</i> Dewey & LeBoeuf LLP THE INCREASINGLY VITAL ROLE OF INTERNATIONAL TAX LAW	123
<b>Appendices</b>	157

# Appendices

Appendix A: Independent Agency Agreement	158
Appendix B: Inter-Company Services Agreement	181
Appendix C: Foreign Country Questionnaire	194
Appendix D: Model U.S. Tax Treaty	229