

AMERICAN TAXATION ASSOCIATION

The Tax Section of the American Accounting Association

2007

Mid-Year Meeting and JATA Conference



February 23 - 24, 2007

Sponsored by
The KPMG Foundation

Tentative Program

Friday, February 23, 2007

7:30 a.m.	Registration Opens	Conference Center Lobby
7:30 -8:30 a.m.	Continental Breakfast	Conference Center Foyer
7:30 a.m.-6:30 p.m.	Publisher Exhibits	Conference Center Lobby

CPE Sessions

8:15 -9:45 a.m. **FAS 109**
Corte Real DEF This session will be led by Brian Simpson from the Dallas office of KPMG.

10:15-11:45 a.m. **Uncertain Tax Positions**
Corte Real DEF This session will be led by Rebecca Godkin, Tax Managing Director with KPMG. Ms. Godkin spends 100% of her time with FAS109, 123R and FIN48. She is currently on a rotation to the KPMG Department of Professional Practice where she reviews the adequacy of the audit documentation supporting the tax provision. She also teaches the principles of FAS109 at KPMG's annual staff and manager training.

Noon-1:15 p.m. **Lunch**
La Condesa New faculty will be introduced by Jennifer Kahle (University of South Florida), Chair of the New Faculty Concerns Committee.

Concurrent Session

1:30 – 3:30 p.m. **Legal Research**
Corte Real DEF Moderator: Bill Duncan (Arizona State University-West)

Twenty-Plus Questions About Schedule M-3

John O. Everett (Virginia Commonwealth), Cherie Hennig (Florida International University), and William A. Raabe (The Ohio State University)

The Tax Implications of Redating Stock Option Grant Dates and Exercise Dates

Sonja Pippin, Jeffrey Wong, and Richard Mason (all at the University of Nevada, Reno)

Criminal Prosecution of Tax Return Preparers

Nancy B. Nichols (James Madison University)

Comments on Proposed Regulation Sec. 1.263(a)

W. Eugene Seago (Virginia Tech University)

Journal of the American Taxation Association
Twelfth Annual Research Conference

10:00 a.m.-Noon

Corte Real ABC

Paper: **Investor Response to a Reduction in the Dividend Tax Rate: Evidence from the Jobs & Growth Tax Relief Reconciliation Act of 2003**

Authors: Teresa Lightner, Michaela Morrow, Robert Ricketts and Mark Riley (Texas Tech University)

Discussant: William Moser (University of Missouri)

Paper: **Taxes and Asset Prices: The Case of Thoroughbreds**

Author: Kim Key (Auburn University)

Discussant: Stacie LaPlante (University of Georgia)

Noon-1:15 p.m. **Lunch**

La Condesa New faculty will be introduced by Jennifer Kahle (University of South Florida), Chair of the New Faculty Concerns Committee.

1:30 – 3:30 p.m.

Corte Real ABC

Paper: **Incremental Value Relevance of Unrecognized Deferred Taxes: Evidence from the United Kingdom**

Authors: Stephen Lynn (City University of Hong Kong), Chandra Seethamraju (Washington University in St. Louis) and Ananth Seetharaman (Saint Louis University)

Discussant: David Weber (University of Connecticut)

Paper: **Examining Investor Expectations Concerning Tax Savings on the Repatriations of Foreign Earnings under the American Jobs Creation Act of 2004**

Author: Mitchell Oler (University of Utah), Terry Shevlin and Ryan Wilson (University of Washington)

Discussant: Susan Albring (University of South Florida)

Friday, February 23, 2007

Concurrent Sessions

3:30 – 4:00 p.m. **Refreshment Break**

Foyer

4:00 – 5:30 p.m. **Who's Doing What These Days? The Changing Roles and Responsibilities of Tax and Audit Professionals**

Corte Real

Moderator: Shelley Rhoades-Catanach (Villanova University)

Audit and tax partners from KPMG will discuss the array of tax, financial reporting, and audit knowledge and skills required of today's accounting professionals in light of recent regulatory and standard developments and the changing relationship between the audit and tax professional.

5:30 - 6:45 p.m. **Committee Meetings**

Mezzanine Level

7:00-8:00 p.m. **Reception Sponsored by KPMG**

Terrace Garden

Saturday, February 24, 2007

7:30-8:30 a.m. **Continental Breakfast**

Foyer

7:30-8:30 a.m. **New Faculty Breakfast**

El Mirador

7:30 a.m.-5:00 p.m. **Publisher Exhibits**

Lobby

Concurrent Sessions

8:30-10:00 a.m. **(1) Life in the Tax Department During and After SOX Implementation: Tales from the Front**

Corte Real ABC

Moderator: Raquel Alexander (University of Kansas)

The tax department personnel and tax advisor of a publicly-traded company will bring to life the internal workings of today's tax department, including compliance with and life after SOX. They will discuss in detail the challenges faced in SOX compliance including the specific tax risks identified; missing or undocumented controls; and documenting and accounting for uncertain tax positions.

Saturday, February 24, 2007

Concurrent Sessions (cont.)

8:30-10:00 a.m. **(2) ATA/Deloitte Teaching Award**

Corte Real DEF Moderator: Allen Ford (University of Kansas)

This session will highlight the most recent winner of the ATA/Deloitte Teaching Award, *Engaging Students in the Politics of Tax Policy: The Tax Equity Survey Project*, by Bryan C. Cloyd and Connie D. Weaver.

10:00-10:30 a.m. **Refreshment Break**

Foyer

10:30 a.m.-Noon **(1) Tax Accounting Research**

Corte Real ABC Moderator: David Guenther (University of Oregon)

One of the unique perspectives that accountants bring to tax research is the intersection of tax with other functional areas of accounting. This session will examine research incorporating the intersection of tax with financial reporting and auditing. Tax reporting for both financial statement and compliance purposes will be considered. Michelle Hanlon (University of Michigan), Lil Mills (University of Texas) and George Plesko (University of Connecticut) will review and interpret prior work as well as discuss potential directions for future research.

10:30 a.m.-Noon **(2) Integrating Tax throughout the Curriculum**

Corte Real DEF Moderator: Kathy Sinning (Western Michigan University)

Kevin Misiewicz (Notre Dame), Jim Seida (Notre Dame) and Jane Baldwin (Baylor) will discuss how they integrate tax and other accounting topics in traditional tax and financial reporting classes at both the undergraduate and graduate levels. The design of less-traditional classes intended to incorporate multiple functional areas also will be discussed.

Saturday, February 24, 2007

Noon-1:30 p.m. **Lunch**

El Mirador

Speaker: Ms. Margaret Curry

Ms. Curry is currently Director of Tax for Dell, Inc. of Round Rock, TX, the No. 1 provider of computer systems in the world. Her areas of responsibility include federal, state, and local tax, controversy management, legislation, and compensation and benefits. Prior to joining Dell in 2005, Ms. Curry was Senior Tax Counsel for GMAC International Operations based in High Wycombe, England and, previously, Senior Tax Attorney and Tax Litigation Specialist for the IRS District Counsel Office in Detroit.

Concurrent Sessions (con't)

1:30-3:00 p.m. **(1) Repatriation and Valuation of Tax Holidays:**

Corte Real ABC **Research Triangulation**

Moderator: Jon Davis (University of Wisconsin)

This session will highlight the importance of triangulating research findings. Linda Krull (University of Texas), Richard Sansing (Dartmouth College) and David Harris (Syracuse University) will present and discuss research addressing a common issue using different methodologies.

1:30-3:00 p.m. **(2) Incorporating FAS 109 into the Tax Curriculum**

Corte Real DEF Moderator: Cyndi Vines (University of Kentucky)

As the financial reporting of taxes takes on increased importance, tax educators are faced with the responsibility of ensuring adequate coverage of the topic in the curriculum. Possibilities range from including FAS 109 as a distinct substantive topic in an introductory tax class to designing an expanded module in an advanced class to creating entire courses that use FAS 109 to integrate ideas from several functional areas. Gary McGill (University of Florida), Ed Outslay (Michigan State University), and John Phillips (University of Connecticut) will demonstrate different approaches they have used to incorporate FAS 109 into their classes.

Saturday, February 24, 2007

3:00-3:30 p.m. **Refreshment Break**

Foyer

3:30-5:00 p.m. **(1) Research by New Tax Faculty and PhD Students**
Corte Real ABC Moderator: Teresa Lightner (Texas Tech University)

The Formation of Tax Clienteles by Mutual Funds Following the 2003 Tax Relief Act

Authors: Spenser Usrey (University of Alabama, with Edward Schnee and Gary Taylor)
Discussant: William Moser (University of Missouri)

Is Aggressive Financial and Tax Reporting Related to the Organization and Orientation of the Corporate Tax Function?

Authors: Stephanie Sikes (University of Texas at Austin, with John Robinson and Connie Weaver)
Discussant: Sonja Rego (University of Iowa)

The Justification Gap: Exploring the Interactive Effects of Context and Accountability in Accounting Decisions

Authors: Sean Andre (University of Wisconsin-Madison, with Jon Davis)
Discussant: John Barrick (Brigham Young University)

3:30-5:00 p.m. **(2) Tax Cases in the Classroom: Where, When and How?**
Corte Real DEF Moderator: Tracy Noga (Bentley College)

In this session Bill Raabe (Ohio State University), Sally Jones (University of Virginia), and Zite Hutton (Western Washington University) will discuss when and how to effectively use cases in the classroom (at various levels), where to find cases, and how to develop your own cases.

END OF PROGRAM

Meeting Registration Information

You may register for the meeting online at the ATA website (<http://aaahq.org/ata/index.htm>) or by submitting the Registration Form in this booklet. The meeting registration fee includes a name badge (required for admittance to all events), all meals specified in the program, and a list of registrants. A \$50 late registration fee will be charged for any registrations received after January 22, 2007. To help us ensure the proper room size and food requirements, it is very important that you complete the enclosed form indicating the sessions and meals you expect to attend.

Conference Hotel Information

The conference will be held at the Hilton Palacio del Rio hotel. For more information about the hotel, visit the hotel website at <http://www.palaciodelrio.hilton.com>.

Making a Reservation: Hotel reservations may be made by phone, directly with the hotel (1-210-222-1400) or through Hilton reservations (1-800-HILTONS [445-8667]). Be sure to mention that you are with the American Taxation Association to get our special rate of \$167 (plus tax) for either a single or double room. Alternatively, reservations can be made online at the above web address. Enter your requested reservation dates and click on "Go." On the next page, choose your room preferences and enter "ATA" as the Group/Convention Code in the Special Accounts section before clicking on "Continue." The special ATA rate should be displayed. After choosing your room type, you will be asked to provide your personal information including your method of payment. Note that a first night's deposit, refundable up to 72 hours before check-in, will be required. After clicking on "Book Now," you will receive your confirmation information.

A minimum number of guest rooms had to be guaranteed to get this rate (i.e., the ATA must pay for unused rooms). To help us meet the room block requirement, please stay at the Palacio del Rio. The block of rooms will be held until January 22, 2007. Note we cannot guarantee that any additional rooms will be available in the hotel once our block of rooms is sold out, even if the block is sold out before the cut off date. You should make your reservations as early as possible to help ensure your accommodations.

Checking In/Out: Check-in time is 3:00 p.m. and check-out time is 11:00 a.m. Although your room may be ready before the normal check-in time, this cannot be guaranteed. If you arrive early and your room is not available, the hotel will provide storage for your luggage. Our special rate will be honored by the hotel (subject to availability) from February 18 through February 27, 2007.

Airport to Hotel Information

SATRANS offers shuttle service between the airport and the Palacio del Rio for approximately \$14 one-way or \$24 round-trip. Shuttle tickets are sold curbside, just outside the airport baggage claim area. Cab fares are approximately \$24 each way. The hotel is located 8 miles from the airport, approximately a 20 minute drive.

What to See and Do in San Antonio

Now the eighth largest city in the United States, San Antonio has retained its sense of history and tradition, while carefully blending in cosmopolitan progress. The city has always been a crossroads and a meeting place. Sounds and flavors of Native Americans, Old Mexico, Germans, the Wild West and the Deep South mingle and merge. Close to twenty million visitors a year delight in the discovery of San Antonio's charms. Besides its rich history and Old World charm, the Alamo city is home to some of the most popular and unique attractions in the Lone Star State. The hotel is directly on the world famous Riverwalk with cruises boarding right outside the hotel door. Visitors can spend countless hours frequenting the shops, restaurants and nightclubs that line the river's banks or walk to neighboring La Villita, the original village of San Antonio. The Alamo, the site of one of the most notorious battles in history, is a short stroll away. In addition to the Tower of the Americas, offering visitors an extraordinarily inspiring view of San Antonio from its 605 foot high observation decks and revolving restaurant, Hemisphere Park houses the Mexican Cultural Institute, the Institute of Texan Cultures, numerous shops, and a relaxing water park. One of the largest zoos in the nation, the San Antonio Zoo houses over 3,500 animals, making it a must see for kids and adults alike. Four Spanish frontier missions, part of a colonization system that stretched across the Spanish Southwest in the 17th, 18th, 19th centuries, are preserved in the San Antonio Missions National Historical Park. Finally, San Antonio offers several unique dining options, ensuring a memorable trip. For more information about visiting San Antonio, visit <http://www.sanantoniocvb.com/>.

Continuing Professional Education

We plan to comply with requirements necessary for you to receive CPE for attending the sessions at this meeting.

The third annual KPMG/ATA Tax Doctoral Consortium will be held on Thursday, February 22, 2007 before the ATA midyear meeting in San Antonio.

The goal of the consortium is to help prospective new tax faculty make the right choices in the early stages of their careers so that they become successful scholars. Getting advice from and establishing relationships with experienced faculty during one's doctoral program can make a crucial difference in that person's academic career. The program is designed to meet the needs of doctoral students with an interest in tax that are in the middle stages of their doctoral program, as well as attract students to tax early in their doctoral programs. The expected student-faculty ratio of 30:8 will provide an opportunity for doctoral students to meet and learn from successful tax faculty in both small group sessions and on an individual basis.

Faculty participants at the 2007 KPMG/ATA Tax Doctoral Consortium will include Raquel Alexander, Amy Dunbar, Ken Klassen, Anne Magro, Ed Maydew, Susan Porter, John Robinson, and Richard Sansing. The full program will be posted on the ATA website when it becomes available.

KPMG is providing funding for student hotel costs for Thursday, February 22, and all consortium meals. **The application deadline is Friday, December 15, 2006.** Please let doctoral students at your institution know about the 2007 KPMG/ATA Tax Doctoral Consortium. We welcome doctoral students who are undecided about taxation as a focus of their research. Please direct questions regarding the application process to Raquel Alexander at raquela@ku.edu.

**Call for Papers
2007 JATA Conference**

The 13th *Journal of the American Taxation Association* Conference will be held in conjunction with the ATA's Midyear Meeting in San Antonio, TX on February 23-24, 2007. Original papers addressing interesting and relevant tax issues will be considered for the conference. Submissions to the conference will be treated as submissions to *JATA*, and should not be under review with any other journal. All research methodologies (including, but not limited to, archival/empirical, analytical, behavioral, experimental, and field studies) will be considered. Contingent on suitable revisions in accordance with *JATA*'s normal review procedures, papers selected for the conference, along with discussants' comments, will be published in a regular issue of the journal. Continuing the tradition begun in 2005, an award will be made to the best conference paper as selected by the conference committee.

Conference papers will be made available to conference participants in advance of the midyear meeting through the ATA web site. Papers not accepted for the conference will be treated as regular submissions to *JATA*. Authors will be notified of the conference selection decision by December 1, 2006.

Manuscripts should be prepared in conformance with *JATA*'s published preparation and style guidelines and submitted electronically in Microsoft Word or Adobe PDF format. To preserve anonymity, the cover page should be submitted as a separate Word or PDF file. If the research utilizes experimental instruments, questionnaires, cases, etc., this material should also be submitted in a separate file. With the exception of the cover page, the identity of the author(s) should be deleted from the files. Files should be transmitted as email attachments to Professor Bryan Cloyd at JATA@vt.edu. Please indicate in the email that the paper is submitted to the Conference. To be considered, papers must be received no later than **October 1, 2006**. Contact Professor Cloyd by email or phone (540.231.3181) if file compatibility or electronic submission presents a problem.

The submission fee of \$75 in U.S. funds may be paid by credit card or check. To charge the fee, access the *JATA* site at the AAA web site (<https://aaahq.org/AAAFORMS/journals/jatasubmit.cfm>).

Questions about the submission process may be directed to Professor Bryan Cloyd at the address below.

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**Call for Papers
New Faculty and Doctoral Student Research Session**

The 19th annual American Taxation Association (ATA) Midyear Meeting will feature a session devoted exclusively to research by new faculty and doctoral students. This session provides new faculty and PhD students an excellent opportunity to gain exposure by presenting their research in a conference setting and to receive constructive feedback on their work. Selected papers will be made available in advance of the midyear meeting through the ATA web site. We invite authors to submit research papers and research-in-process papers. Research-in-process must be sufficiently developed to allow informed feedback (e.g., well developed background and theory, clearly stated hypotheses, and planned statistical analysis).

Dual submission of manuscripts to the *JATA* Conference and the New Faculty/Doctoral Research Session is allowed. Should a paper be accepted for both sessions, the author will be asked to choose either the *JATA* Conference or the New Faculty/Doctoral Research Session.

Eligibility: In order for a paper to qualify for the New Faculty and Doctoral Student Research Session, at least one author must have started their first tenure-track faculty position during the 2003-04 academic-year or later or be a doctoral student. Doctoral students are invited to submit papers based on their dissertation or other working papers.

Papers already accepted for publication prior to the selection announcement date are ineligible; submission of papers close to publication acceptance is discouraged.

Doctoral Student Support: The ATA will partially support doctoral students who have papers accepted for this session; the registration fee will be waived and one night's lodging at the hotel will be provided.

Deadline: Submissions must be received by **November 1, 2006**. Papers selected for the New Faculty/ Doctoral Research Session will be announced by December 15, 2006.

Submission: Questions and submissions should be made electronically to Jon Davis at jdavis@bus.wisc.edu. Please include "New Faculty/Doctoral Research" in the subject line of the email. Submitted manuscripts should be either MS Word or Adobe Acrobat files attached to an email. Since a blind review process will be used to evaluate manuscripts, send the title page in a separate file from the manuscript file and delete any identifying information from the manuscript file. A statement indicating the manuscript's status should accompany the submission; the statement should also note if the manuscript is being simultaneously submitted to the *JATA* Conference.

**Call for Papers
Legal Research Session**

You are invited to submit for consideration applied tax policy and legal tax research manuscripts for presentation at the 2007 ATA Midyear meeting. Submitted manuscripts will also be considered for publication in *The ATA Journal of Legal Tax Research*. All manuscripts will be blind reviewed and must follow the style guidelines of *The ATA Journal of Legal Tax Research*.

We encourage submission of research that:

- Proposes improvements in U.S., state and local, or foreign tax systems and unique solutions to tax or fiscal problems
- Discusses improvements in tax policy, tax compliance or tax complexity
- Identifies, describes or illuminates important current tax issues
- Critically analyzes recent or proposed legislative or regulatory changes
- Provides critical discussions for strategically structuring transactions, considering tax and non-tax ramifications
- Critically analyzes similarities and differences between tax accounting and financial accounting issues.

Authors may submit different papers to different Midyear sessions (e.g., JATA Conference, Legal Session, etc.). Multiple submissions must be disclosed with the submission. Papers that have been previously published or have been accepted for publication are not eligible. The deadline for submissions of legal research manuscripts is **November 1, 2006**. Three copies should be submitted to:

William Duncan
Chair, Legal Research Committee
School of Global Leadership & Management
PO Box 37100
Phoenix, AZ 85069-7100
602.543.6112

Alternatively, ONE COPY can be submitted via e-mail to:
william.duncan@asu.edu.

All manuscripts will automatically be considered for publication in *The ATA Journal of Legal Tax Research*. If journal acceptance is the primary goal, the paper should be no longer than 20-25 double spaced pages.

2007 ATA Mid-Year Meeting Program Committee

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