

# AMERICAN TAXATION ASSOCIATION

The Tax Section of the American Accounting Association

## 2008 Mid-Year Meeting and JATA Conference



February 22 - 23, 2008

Sponsored by  
The KPMG Foundation

Sessions that offer CPE credit have the Field of Study and Credit Hours (CH) in red. Program levels offered during the meeting may include basic, intermediate, advanced, overview, and update. Program levels are also indicated in red.

## Tentative Program

### Friday, February 22, 2008

Please check <http://aaahq.org/ata/index.htm> for updates to the program.

- 7:30 a.m.                    **Registration Opens**  
7:30 -8:30 a.m.          **Continental Breakfast**  
7:30 a.m.-6:30 p.m.    **Publisher Exhibits**

### CPE Sessions

- 8:15 -9:45 a.m.    **CPE Session FIN 48: The First Year in Practice Tax, 1.5 CH—Update**  
This session will be led by professionals from KPMG.  
10:15-11:45 a.m. **CPE Session Transfer Pricing Update Tax, 1.5 CH—Update**  
This session will be led by professionals from KPMG.  
Noon-1:15 p.m.    **Lunch**  
New faculty will be introduced by Jennifer Kahle (University of South Florida), Chair of the New Faculty Concerns Committee.

### JATA Conference

- 10:00 a.m.-Noon **JATA Conference Part I Tax, 2 CH—Advanced**  
*Moderator:* Bryan Cloyd (Virginia Tech University)  
“**Bilateral Implicit Taxes and Anti-Competitive Banking Regulation**”  
David G. Harris (Syracuse University) and Emre Kilic (University of Houston)  
*Discussant:* David Guenther (University of Oregon)  
“**Tax-Based Dividend Clienteles: Evidence from Tax Law Changes**”  
William Moser and Andy Puckett (University of Missouri)  
*Discussant:* Jennifer Blouin (University of Pennsylvania)  
  
Noon-1:15 p.m.    **Lunch**  
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. **JATA Conference Part II Tax, 2 CH—Advanced**  
“**The Influence of Differences in Taxable Income and Book Income on the Bond Credit Market**”  
Aaron Crabtree (University of Nebraska-Lincoln) and John J. Maher (Virginia Tech)  
*Discussant:* Ryan J. Wilson (University of Iowa)  
“**Inferring U.S. Tax Liability from Financial Statement Information**”  
Petro Lisowsky (Boston University)  
*Discussant:* Mary Margaret Frank (University of Virginia)

Friday, February 22, 2008

Concurrent Sessions

1:30 – 3:30 p.m. **Legal Research Tax, 2 CH—Advanced**

*Moderator:* Robert Gardner (BYU)

**When Worlds Collide: Applying the Nonobvious and Novel**

**Requirements of Patent Law to Tax Strategy Patents**

Roby B. Sawyers (NC State University), David L. Baumer (NC State University), and Wade M. Chumney (Belmont University)

**Taxing and Regulating College and University Endowment Income: The Literature's Perspective**

Mark Cowan (Boise State)

**Tax Shelter Dilemma: The Impact of Reportable Transactions**

Cherie Hennig (Florida International University), Donald Samuelson (Colorado State University), and Blaise Sonnier (Florida International University)

**Wall Street versus Private Equity Firms: The Taxation of Carried Interest**

Nancy B. Nichols (James Madison University) and William VanDenburgh (James Madison University)

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

4:00 – 5:30 p.m. **Reflections and New Directions: A Town Meeting with Recent Sommerfeld Award Winners**

**Tax, 1.5 CH—Overview**

*Moderator:* Amy Dunbar (University of Connecticut)

Fifteen years ago, the ATA established the Ray Sommerfeld Outstanding Tax Educator Award to recognize, honor, and reward outstanding contributions by a faculty member teaching taxation at an academic institution.

To commemorate the fifteenth anniversary of the award's establishment, this session (conducted in a town meeting format) will allow audience members to ask questions to a panel of the six most recent Sommerfeld winners who will provide their reflections and opinions on where they think the tax profession is headed, the state of the tax academy, and advice on becoming a successful tax researcher/a successful tax teacher. Panelists will include John Everett, Anna Fowler, Sylvia Madeo, Ed Outsley, Doug Shackelford, and Terry Shevlin.

Friday, February 22, 2008

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

The following committees have indicated that they will be meeting during this time (locations will be included in the final program):

Annual Meeting Program Committee

Awards Committee

Graduate Assessment and Accreditation Issues Committee

2009 Mid-Year Meeting Committee

New Faculty Concerns Committee

Publications Committee

Tax Policy Oversight Committee

Teaching Resources

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

Saturday, February 23, 2008

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

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

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

Concurrent Sessions

8:30-10:00 a.m. **(1) Current Topics in Tax Research**

**Tax, 1.5 CH—Advanced**

*Moderator:* Ken Klassen (University of Georgia)

In this session, Sonja Olhoft-Rego (University of Iowa), David Randolph (University of Dayton), and Ryan Wilson (University of Iowa) will present the research listed below. Tom Omer (Texas A&M University) will discuss the papers and comment on the future of tax motivated research.

The presented papers:

**Earnings Management Strategies: To Conform or Not to Conform**

Authors: Brad Badertscher, John Phillips, Morton Pincus, and Sonja Olhoft-Rego

**Documenting Tax and Non-tax Tradeoffs**

Authors: Jim Seida and David Randolph

**Economic Consequences of Increasing the Conformity in Accounting for Uncertain Tax Benefits**

Authors: Peter Frischmann, Terry Shevlin, and Ryan Wilson

Saturday, February 23, 2008

Concurrent Sessions

8:30-10:00 a.m. **(2) Four Tax Cases, including the 2007 ATA/Deloitte Teaching Award Innovation Award Winning Cases Tax, 1.5 CH—Advanced**  
*Moderator:* Raquel Alexander (University of Kansas)

Mary Margaret Frank (University of Virginia), winner of the 2007 ATA/Deloitte Teaching Innovation Award, will present winning submission, “How to Put More Strategy in Your ‘Taxes and Business Strategy’ Course: A Case Method Approach.” In addition, Steven Gill (San Diego State University) will also present the case “Ethics and Tax Incentives.”

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

10:30 a.m.-Noon **(1) Research Opportunities with the Tax Gap Tax, 1.5 CH—Advanced**  
*Moderator:* Lil Mills (University of Texas at Austin)

The tax gap has recently been estimated to be over \$300 billion annually. Given its magnitude, both Congress and the IRS has shown great interest in better understanding the tax gap and its causes. This session will examine potential research opportunities into the tax gap and its causes. The panel will include Marsha Blumenthal (University of St. Thomas), Mike Dolan (KPMG and former acting commissioner of the IRS), and Mike Mazur (IRS).

10:30 a.m.-Noon **(2) Incorporating Active Learning in Tax Classes Tax, 1.5 CH—Advanced**  
*Moderator:* Carol Fischer (St. Bonaventure University)

Over the last decade, many educators have encouraged a move away from passive learning to more active learning. Research in learning suggests that active learning can play a key role in improving critical thinking and problem solving. The panelists in this session will share exercises they have incorporated into their tax classes to encourage active learning. Presenters include Zite Hutton (Western Washington University), Brigitte Muehlmann (Suffolk University), Anne Jones and Julia Camp (University of Massachusetts-Boston) and Dennis Schmidt (Montana State University).

Saturday, February 23, 2008

Noon-1:30 p.m. **Lunch Tax, 1 CH—Overview**  
*Speaker:* Mr. Reagan Farr

Mr. Farr is the Commissioner of the Tennessee Department of Revenue.

Concurrent Sessions (con’t)

1:30-3:00 p.m. **(1) Beyond the Federal Income Tax Tax, 1.5 CH—Advanced**  
*Moderator:* Tracy Noga (Bentley College)

While a great deal of research is focused on the federal income tax, this session will highlight areas outside the federal income tax that may be productive research areas. Panelists will include Bill Fox (University of Tennessee), Elizabeth Plummer (Texas Christian University), and Bob Yetman (University of California at Davis). They will describe the opportunities and interesting research questions that exist in state taxes, property taxes, and exempt organizations. Sanjay Gupta (Michigan State University) will provide an overall perspective on opportunities in these research areas.

1:30-3:00 p.m. **(2) Assurance of Learning and Assessment Personal Development, 1.5 CH—Advanced**  
*Moderator:* Teresa Stephenson, University of Wyoming

Andy Cuccia (University of Oklahoma), Valerie Milliron (California State University, Chico), and Shelley Rhoades-Catanach (Villanova University) will discuss best practices in assessing accounting programs as well as undergraduate and graduate tax courses. Effective strategies ranging from establishing learning goals and objectives to developing assessment measures and making program and course changes based on the results will be presented. Anne Christensen (Montana State University) will also briefly summarize the results of the ATA Assurance of Learning Survey.

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

Saturday, February 23, 2008

**Concurrent Sessions (con't)**

3:30-5:00 p.m. **(1) Research by New Tax Faculty and PhD Students**  
**Tax, 1.5 CH—Advanced**  
*Moderator:* David Hulse (University of Kentucky)

**The Effect of the Domestic Manufacturing Deduction on Corporate Payout Behavior**

Authors: Casey Schwab, University of Texas at Austin (with Jennifer Blouin and Linda Krull)  
Discussant: Michael Kinney (Texas A&M University)

**Do Firms Eat their Tax Cookies before FIN 48 Reveals the Cookie Jar?**

Authors: Stephanie Sikes, the University of Texas at Austin (with Jennifer Blouin, Cristi Gleason, and Lillian Mills)  
Discussant: John Phillips (University of Connecticut)

**FIN 48 and Tax Compliance**

Authors: Leslie Robinson, Dartmouth (with Lillian Mills and Richard Sansing)  
Discussant: Suzanne Paquette (University of Laval)

3:30-5:00 p.m. **(2) Topic Overload in the Introductory Tax Class**  
**Tax, 1.5 CH—Advanced**  
*Moderator:* Brian Spilker (Brigham Young University)

This session, sponsored by the Teaching Resources Committee, will focus on the challenge of covering more material without more time. Panelists include Ben Ayers (University of Georgia), Christine Bauman (University of Northern Iowa), Shelley Rhoades-Catanach (Villanova University) and Ron Worsham (Brigham Young University). The panelists will share strategies for dealing with this issue and discuss how to decide which topics warrant in-depth coverage. They will share advice on topics such as: What topics do they cover? At what level do they cover them? Is there an ideal or are we just trying to get the students exposed to taxation? What are the trade-offs between providing in-depth coverage of selected topics versus limited coverage of a wider range of topics?

**END OF PROGRAM**

**Meeting Registration Information**

The registration fee for the conference is \$175. You may register for the meeting online at the ATA website (<http://aaahq.org/ata/index.htm>). 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 21, 2008. 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 Peabody Memphis. For more information about the hotel, visit the hotel website at <http://www.peabodymemphis.com>.

**Making a Reservation:** Hotel reservations may be made online at the above web address. Click on “Make a Room Reservation” to get the webpage with the reservation requests. In the Group Reservation block on the left, enter the Group Number 284353 and click Submit. You will then be presented with a reservation page where you can select the details of your reservation. The special ATA rate will be displayed with your room options. After choosing your room type, you will be asked to complete a new guest registration and reservation process that will include providing personal information and your method of payment. After providing this information and clicking “Make Reservation,” you will receive your confirmation information. Alternatively, reservations may be made by phone, directly with the hotel (1-901-529-4000 or 1-800-PEABODY). Be sure to mention that you are with the American Taxation Association to get our special rate of \$169 (plus tax) for either a single or double room.

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 Peabody Memphis. The block of rooms will be held until January 21, 2008. 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 4:00 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 25, 2008.

## **Airport to Hotel Information**

TennCo Express Airport Shuttle offers shuttle service between the airport and the Peabody Hotel for approximately \$15 one-way or \$20 round-trip. Shuttle tickets are sold curbside, just outside the airport baggage claim area. Cab fares are approximately \$30 each way. The hotel is approximately a 15 minute drive from the airport.

## **What to See and Do in Memphis**

Memphis is the largest city in Tennessee and a major cultural center for the Southeastern United States with a metropolitan population of over one million. Memphis has an illustrious history as a crossroads for American musical genres, from blues and gospel to jazz and rock 'n roll. The city is recognized as the home of Elvis Presley and as the birthplace of the blues. Graceland is the second most visited house in the country - behind the White House in Washington, D.C.

The Peabody Hotel is conveniently located downtown, just blocks from Memphis attractions like the Beale Street Entertainment District, the Memphis Rock 'n Soul Museum, Gibson Guitar Factory and Fed-Ex Forum, home of the NBA Memphis Grizzlies. The Peabody Hotel itself is one of Memphis' most popular attractions. The hotel opened its doors in 1925 and is listed on the National Register of Historic Places. The famous Peabody Ducks march to and from the Grand Lobby twice daily in a time-honored tradition dating back to the 1930s. Only minutes away from the hotel are more Memphis tourist attractions such as the STAX Museum of American Soul Music, Memphis Zoo, Graceland, and Sun Studio, the recording studio where legends such as Johnny Cash, Jerry Lee Lewis, Carl Perkins and Elvis Presley first recorded their music. Easily accessible by trolley is the National Civil Rights Museum, and the South Main Street arts and boutique district, where creative and unique art and fashions can be found.

For more information on travel to Memphis, visit the Memphis Convention & Visitors Bureau website at [www.memphistravel.com](http://www.memphistravel.com).

## **Continuing Professional Education**

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

## **2008 ATA Mid-Year Meeting Program Committee**

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