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September 6, 2012

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Re: Report on Representative Camp's International Tax Reform Discussion Draft

Gentlemen:

I am pleased to submit the attached report of the Tax Section of the New York State Bar Association on Representative Camp's International Tax Reform Discussion Draft (the "Discussion Draft"). We understand the difficulties inherent in formulating any kind of comprehensive international tax reform plan and we appreciate the opportunity to provide comments on the plan described in the Discussion Draft.

The scope of the report is limited to a discussion and analysis of certain issues and considerations we believe will be important to the effective implementation of the plan described in the Discussion Draft. It does not discuss or express any view on the fundamental policy choices it reflects. Nor does the report comment more generally on the relative advantages or

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disadvantages of different international taxing regimes, including the current one.

We appreciate your consideration of our comments.

Respectfully submitted,



Andrew W. Needham
Chair

Enclosures

cc: Thomas A. Barthold
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