

Additional Issues Requiring Action by the Committee

1. Review CA and MA examples of sourcing marketing intangibles in the receipts factor to respond to Bruce Johnson's request for such examples.
2. Prepare recommendation(s) to Executive Committee to resolve the tension between the treatment of hedging transactions and the treasury function in the definition of receipts in Draft Art. IV.1 (g) and in the throw out provision of Draft Art. IV.17 (a)(4)(ii)(C).
3. Recommend technical correction to Executive Committee to add the word "or" between "tangible" and "intangible" in Draft Art. IV.1 (a)(i)(B).
4. Decide whether to recommend replacing "and" with "or" in Draft Art. IV.1 (a)(i)(A), such that the transactional and functional tests for business (apportionable) income would be expressed in the disjunctive rather than in the conjunctive.