TeleStrategies® 16TH ANNUAL

COMMUNICATIONS TAXATION 2015

MAY 13-15, 2015 • ORLANDO, FL

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About TeleStrategies' Communications Taxation Conference:

TeleStrategies' 16th Annual Communications Taxation Conference brings together the nation's top tax professionals to address the challenging and amazingly complex domain of communications taxation.

The program provides comprehensive coverage of all aspects of telecom tax, including:

- Key tax trends, rulings and case studies
- Transaction taxes, mapping, rating, tax on tax
- USF, pre-paid, E-911 and other key Federal/local fees and surcharges
- Next-generation taxes: cloud, web conferencing, M2M, content/apps, SDN, subsidized transport
- Audit defense strategy, audit preparation and tax recovery
- Exemption management
- USAC audits, 499A fillings
- Sourcing, nexus, jurisdiction regulations
- Industry-specific (wireline, wireless, content aggregators, ISPs, cable) updates
- Emerging regulatory, policy and local legislation bellwethers
- Sales and excise tax
- Billing integration, interfaces, quality assurance, internal controls
- And more!

Whether you are new to communications taxes, or an industry veteran, you will learn how to lower your tax bill, streamline tax operations, pro actively prepare for audits, better defend your company's audit position, leverage case studies/precedent to lower your tax liabilities, and, most importantly, network with your peers to learn from other's experiences.

Please don't hesitate to contact me for any reason about the program.

Sincerely,
Dr. Matthew Lucas, Program Chair

POST-CONFERENCE ACTIVITIES

FRIDAY, MAY 15, 2015

2nd Annual Golf Tournament

Free to attendees, all-inclusive
12:30 – 5:30 PM
Sponsored by Compliance Solutions and CoreLogic

Backstage Safari at Disney's Animal Kingdom

Free to attendees, all-inclusive
12:45 - 4:30 PM
Sponsored by Compliance Solutions

Agenda

THURSDAY MAY 14

7:15 AM EXHIBITS AND REGISTRATION OPEN
CONTINENTAL BREAKFAST
SPONSORED BY IDI BILLING SOLUTIONS

8:00 AM WELCOME TO COMMUNICATIONS TAXATION 2015

Conference Opening Remarks

Dr. Matthew Lucas, *Vice President, TeleStrategies*

8:15 - 9:30 AM EXECUTIVE KEYNOTE PANEL

Operating in the Age of Innovation PANEL

This executive keynote panel will look at the key consumer/end-user trends driving the next generation of communications. The presenters will draw on PwC's global research to consider market trends and forecasts relating to mobile spectrum shortage, small cell rise, B2B innovation/cloud B2B services, M2M investment rise, software defined networking increase, demand for mobility, rising adoption of cloud services, divergence and more. Join the panelists as they consider these trends, their impact on the future of telecom businesses and the implications to your tax department.

Brian Goldstein, *US Communications State and Local Tax Leader, PwC*
Principal, *Strategy &, Global Media and Entertainment, PwC (Invited)*
Industry Executives *(Invited)*

9:30 - 10:00 AM NETWORKING AND EXHIBITS

10:00 - 11:00 AM CONFERENCE SESSIONS BLOCK 1

Communications M&A: Lessons & Strategies

PRESENTATION

As communications companies consider or execute transactions, a wide variety of tax and regulatory matters often arise. These matters appear in due diligence, and can often make or break a deal. For example, what can you do if the seller has a large unpaid balance to one of the regulatory funds? How do you handle a failure to register and pay taxes or fees in the past? How do the "over the top" models popular in Silicon Valley fare when confronted with regulatory analysis? In this session, you will hear from those who have been in the trenches about what to expect and how to handle tricky questions, whether you are on the buy or sale side of the transaction. Case studies will be presented, and regulatory approval strategies will be discussed.

Steve Augustino, *Partner, Kelley Drye & Warren LLP*
Mark Lammert, *President & CEO, Compliance Solutions, Inc.*

Bitcoin: What Happens if my Company Decides to Accept it? ROUNDTABLE

More than 84,000 businesses, including telecommunications companies such as Dish, currently accept virtual currency — and that number is growing rapidly as virtual currency becomes a mainstream form of payment. Businesses are attracted by the reduced transaction cost, faster transaction speeds and other positive attributes But there are also risks in its use. The IRS and State taxing authority have provided limited guidance on how to account for and apply sales and use tax on transactions that make use of virtual currency. Not surprisingly, this guidance is already contradictory. Are you ready to give advice to the CEO and CFO of your company on whether your company should accept and/or make use of virtual currency? Are you able to provide your tax department guidance on how to apply sales and use tax when they are paid in virtual currency? This presentation will prepare you for the inevitable virtual currency questions.

Joel Waterfield, *State and Local Tax Director, Grant Thornton LLP*
David Mielke, *Global Deal Sr. Analyst, Global Tax, Hewlett-Packard*

Follow the Money: USF Contribution Audits

ROUNDTABLE

There is tremendous pressure on the federal Universal Service fund to generate increasing amounts of money for the USF programs, yet the contribution base keeps shrinking. To top it off, the FCC's Enforcement Bureau has adopted a much tougher stance with respect to all things USF-related. This session will address what you can to do avoid an audit of your USF contributions, as well as how to prepare for and survive one if your company is selected. The session will address practical tips as well as recent trends in USF contribution audits.

Danielle Frappier, *Partner, Davis Wright Tremaine*
Carl R. Geppert, *Partner, Telecommunications Industry Leader, KPMG LLP*

11:00 - 11:15 AM NETWORKING AND EXHIBITS

11:15 - 12:15 PM CONFERENCE SESSIONS BLOCK 2

Taxation & Regulatory Treatment of Web Conferencing Services: What a Tangled Web We Weave PRESENTATION

In the aftermath of the InterCall audit - and the subsequent adverse decision by the US Court of Appeals against The Conference Group and Webex - there is much confusion regarding tax/fee application for web conferencing service. Further muddying the waters are the traditional conferencing providers - currently subject to FUSF and other regulatory fees - urging the FCC to level the playing field by subjecting integrated web-based conferencing/collaboration services to similar treatment. This session will look at the current state of web conferencing taxes/fees; the basis for the FCC's jurisdiction over "adjunct" components of web and cloud services; the additional layer of complexity resulting from various companies determining its individual regulatory policy based upon the nature of their service offerings and risk tolerance; and finally, the presenters will look at State DOR developments and their impact on web conferencing.

David J. Rubenstein, *CPA, Corporate Professional Services Senior Manager, Telecommunications & Utility Tax, Wolters Kluwer*
Michael P. Donahue, *Partner, Marashilian & Donahue, LLC, The CommLaw Group*

Tax on Tax - A Tax Compliance Mission Impossible

ROUNDTABLE

Tax on Tax is a complicated and intertwined set of laws. This breakout session will look at why we have this calculation, how to correctly calculate and collect the tax, and thoughts on what might make it more workable. Discussion topics will include:

- How did this happen? - The history of these creative taxing scenarios
- What do the laws say and are they clear?
- How do you calculate the correct tax?
- Can providers and vendors be sure they are collecting the correct tax?
- Can it really be calculated correctly if it is passed on to the consumer?
- Do new laws provide effective dates that allow for significant time from passage to collect them?
- Is there hope for the future? Can providers and vendors influence the laws to make accurate calculation and compliance a reality?

Dale Varga, *Senior Tax Research Analyst, Vertex Inc.*
Mike Basch, *Principal Tax Research Analyst, Vertex Inc.*

Ask a Lawyer! No questions are off-limits during this unique opportunity to get straight answers regarding the complex and confounding regulatory and telecom tax issues ROUNDTABLE

Are you struggling to understand conflicting, unclear or uncertain FCC rules & regulations? Worried about a potential USAC Audit, FCC Enforcement Action or state Telecom Tax Audit? Questioning how your services should be treated from a tax/regulatory perspective? This is your chance to have your questions and concerns answered by the co-chairs of the Communication Taxes & Fees practice group at Marashlian & Donahue, LLC, The CommLaw Group. Bring your questions with you. Or, if you would like a specific question answered with a specific response, please submit your issues in advance at: www.telestrategies.com/ask-a-lawyer.htm, or email to: mlucas@telestrategies.com (Upon request you may remit questions confidentially, with no attribution to your company; simply indicate your preference when submitting).

Jonathan S. Marashlian, *Managing Partner, Marashlian & Donahue, LLC, The CommLaw Group*
Allison D. Rule, *Partner, Marashlian & Donahue, LLC, The CommLaw Group*

12:15 - 1:30 PM EXHIBITS OPEN
LUNCH SPONSORED BY EZTAX

1:30 - 2:30 PM CONFERENCE SESSIONS BLOCK 3

Industry Best Practices for Tax & Surcharge Presentation on the Invoice, Bundled Charge Issues, Customer Data Protection and Privacy Compliance PANEL

Indirect tax professionals faced with managing the challenges of compliance and audits often have little time left to oversee the actual presentment of taxes and surcharges on customer bills. However, ignoring what you collect and how it came to be there is a path that can only make matters worse. Just what exactly are you allowed to put on the customer's bill in the first place? How can you unbundle charges for the purpose of revenue reporting and/or taxation? This session will look at these issues plus the FCC's truth-in-billing rules, including the rules governing USF pass-through charges, customer proprietary network information (CPNI) requirements, and the FCC's new "proprietary information" obligations. The panel will discuss how to comply with these overlapping requirements, avoid CPNI fines (which are as high as $10M!), and how to mitigate risks from class-action law suits and state enforcement based on billing practices.

Toby Bargar, *Senior Tax Consultant, EZtax, Inc.*
Rick Heller, *Director, SALT Telecommunications & Cloud Services, Deloitte Tax LLP*
Brita Strandberg, *Partner, Harris, Wiltshire & Grannis LLP*

What's Next in Taxation? PANEL

The world is innovating at an astonishing rate. The good news is that whether "it" is the next watch, medical device, car, app, thermostat or bitcoin – you can be assured that a robust communications network is necessary to make "it" work. This panel session will help you make sense of the new innovations, technologies and gadgets that are impacting telco markets and business models … and explain what it all means for today's tax department and into the future.

Matthew Lucas, *Vice President, TeleStrategies*
Joe Greco, *Vice President, Transaction, Property and Regulatory, Verizon*
Jim Nason, *Tax Managing Partner, Telecommunications, Deloitte Tax LLP*

Telecom 201: Creating a World Class Transaction Tax Department - Increased Simplicity & Understanding (Part 1 of 2) TRAINING

This two-part presentation is for new and experienced telecom tax professionals, giving a walk-through of the "lifecycle" of a telecom tax department -- specifically covering the principle areas of transaction taxes. Part One of this session will focus on the first two key areas within a tax department: (1) sales and billing systems, purchases and automation, and (2) general ledger set up. The presenters will consider issues such as billing system mapping/coding, tax on tax, tax automation and discuss best practices in each area. The speakers will save plenty of time for Q&A.

Courtney Cherry, *Director of Tax Policy & Research, TTR, Inc.*
Robert Banagay, *Partner, Transaction Tax Consulting Group, LLC*
Diane Seidule, *Partner, Transaction Tax Consulting Group, LLC*
Laura Smith, *Manager, Transaction Tax Consulting Group, LLC*

2:30 - 2:45 PM NETWORKING AND EXHIBITS

2:45 - 3:45 PM CONFERENCE SESSIONS BLOCK 4

Audit Defense Strategy PANEL

Carriers spend an inordinate amount of time and money defending prior positions in the face of auditors armed with 20-20 hindsight. Meanwhile, the same jurisdictions are facing budget crises never before seen, thereby making audit recovery their first priority. This session presents views from seasoned veterans regarding current audit issues and industry trends, as well as pragmatic perspectives on audit defense best practices and success strategies.

Kathy Saxton, *Multistate Tax Service, Deloitte Tax LLP*
Toni Stimmler, *Senior Manager, Audit & Appeals, Level 3 Communications*
Audra Mitchell, *State Tax Counsel, Sprint Nextel (invited)*
Cindy Gonzales, *Assistant General Counsel, State and Local Tax, Verizon (invited)*

Costly Mistakes On The 499A ROUNDTABLE

USAC's Form 499A is the base form for approximately 18% in federal fees and surcharges on your GROSS revenue. It is also used by many states for various reasons related to state taxation. Seemingly simple mistakes can have very costly and far-reaching consequences. And you have only one year to file an amendment, or these mistakes become irreversible. VoIP providers, prepaid calling card companies, private line service providers, MVNOs, international wholesale providers and others need to be VERY careful when completing this form. Everything from the boxes you check to where you put your revenue translates into real dollars that affect the bottom line. Thomas Lynch represents scores of telecom service providers and has helped many of them fix their filing mistakes and reduce their tax burden. This roundtable will highlight some of the more common mistakes and provide you an opportunity to discuss with Mr. Lynch and other conference participants your issues and experiences with the 499A.

Thomas M. Lynch, *Esq., Partner, Thomas Lynch & Associates*

Telecom 201: Creating a World Class Transaction Tax Department - Increased Simplicity & Understanding (Part 2 of 2) TRAINING

Continuing with the "lifecycle walk-through" of a telecom transaction tax department, Part Two of the session focuses on (3) compliance and (4) audits. In this session, the presenters will consider issues such as tax compliance, bad debts, tax recovery, audit defense and discuss best practices in each area. This is an excellent opportunity for new and experienced telecom tax professionals to walk away with the ability to easily communicate what gets done within their group and possibly identify areas of improvement. There will be a Q&A at the end.

Courtney Cherry, *Director of Tax Policy & Research, TTR, Inc.*
Robert Banagay, *Partner, Transaction Tax Consulting Group, LLC*
Diane Seidule, *Partner, Transaction Tax Consulting Group, LLC*
Laura Smith, *Manager, Transaction Tax Consulting Group, LLC*

3:45 - 4:00 PM NETWORKING AND EXHIBITS

4:00 - 5:00 PM CONFERENCE SESSIONS BLOCK 5

A Look Ahead – Forecasting Trends in State Tax Litigation for Communications Companies PANEL

This panel will preview a number of cases that are making their way through the appeals process and discuss how those cases create issues and opportunities for communications companies. The panelists are directly involved in many of the pending matters that impact TeleStrategies attendees and will discuss steps that are being taken today to prepare for both favorable and unfavorable outcomes over the next twelve months.

Eric Tresh, *Partner, Sutherland Asbill & Brennan*
Maria Biava, *Associate General Counsel, State and Local Tax, Verizon*

Corporate Income Tax Issues for Telecom Entities TRAINING

This session addresses the top-level federal and state income tax considerations specific to the telecom industry. The speakers will first look at certain states that have specific telecom company statutes and/or recent tax decisions to ensure that the correct returns are being filed and reporting is in accordance with these statutes; secondly, provide a top-level understanding of the differences between federal and state tax bases and describe documentation that you need to ensure compliance with state

DOR audits; assess trends in apportionment methods at the state levels to assist you in keeping up with the state tax changes; and, finally, will provide an open forum for attendees' experience in dealing with these issues in audits. This session is suitable both as an industry primer, as well as an update for veterans.

***Steven Davis**, Partner, Lammert & Davis CPA*

5:00 PM EVENING NETWORKING RECEPTION SPONSORED BY COMPLIANCE SOLUTIONS, INC.

FRIDAY MAY 15, 2015

7:15 AM EXHIBITS AND REGISTRATION OPEN CONTINENTAL BREAKFAST SPONSORED BY IDI BILLING SOLUTIONS

8:15 - 9:00 AM CONFERENCE SESSIONS BLOCK 6

To Reserve or Not to Reserve. That is the Question. PANEL

Do your indirect tax accruals make you nervous? Worried that you haven't taken into consideration the various nexus expansion laws? How do you decide how much to reserve? Please join PwC as we discuss these issues and some of the challenges being faced by others in your industry.

***Jennifer Jensen**, Director, PwC*
***David Prebut**, Director, PwC*
***John Barnes**, Director of Transaction Tax, T-Mobile*

A New Sheriff in Town: The New World of FCC Enforcement ROUNDTABLE

It is no secret that failure to pay USF or other regulatory fees can lead to serious consequences. Under the current FCC Chairman, consumer-oriented enforcement has taken on a new focus and scope. With the arrival of a new Enforcement Bureau Chief from the ranks of the state Attorneys General offices, many practices and assumptions are changing. This session will provide an overview of the hot topics in enforcement, the rise of "civil forfeitures" and developments in compliance plans and remedies. Be prepared or pay the price.

***Steve Augustino**, Partner, Kelley Drye & Warren LLP*

Allocation Angst and Bundle Bedlam ROUNDTABLE

This interactive roundtable will focus on the taxation of bundled services - including current challenges, methodology, billing system aspects, documentation and audit defense. The discussion will consider specific state requirements, potential audit issues, and any other questions that attendees may wish to discuss. The session will be designed to engage participants in an active discussion, sharing of war stories, and discussion of successes and best practices so that all participants can leave with a better understanding of the topic.

***John Brind'Amour**, Manager Tax Planning and Research, IDI Billing Solutions*
***Amanda Gebicki**, Partner, Grant McCarthy Group, LLC*

VoIP Tax Pitfalls ROUNDTABLE

The barriers to entry for many VoIP businesses are negligible compared to traditional telecom services. As such, VoIP service providers can get started almost overnight. However, managing the tax and regulatory compliance risk is a critical component – and many businesses jump into the industry with limited knowledge as to what's required of them. This session will highlight the major issues that must be addressed while establishing a new VoIP business. Specific topics that will be covered include:

- Do I need a tax and fee calculation engine?
- How do I map my products and services into the calculation engine?
- Should I let the wholesaler (upstream carrier) charge, collect, and remit the applicable taxes and fees?
- How do I provide exemption certificates to my wholesaler/carrier?
- What are the tax rules regarding the service and can I apply them consistently across all states?
- Do I need to be concerned about regulatory issues?
- How can I get the proper taxes and fees on the invoice?

***Robert Dumas**, Founder and Managing Partner, TaxConnex LLC*
***Jeff Meigs**, Partner and Consulting Practice Leader, TaxConnex LLC*

9:00 - 9:15 - NETWORKING AND EXHIBITS

9:15 - 10:00 AM CONFERENCE SESSIONS BLOCK 7

Riding the Tax Refund Roller Coaster – Processes, Procedures, Policies and Positions PANEL

State and local governments can be unique in their review approach, methodology, and requirements for issuing transactional tax refunds. This session will consider some of the hurdles and roadblocks claimants often face along the sometimes long and difficult road to refund approval. We will discuss our experiences submitting large refund claims across multiple jurisdictions, and cover topics such as best practices, working with the auditor, navigating government bureaucracies, and other general strategies. We will also discuss issues such as 'paying to play' by first reimbursing customers, statute of limitations issues, data and documentation requirements, actuals vs. estimates, appeals, and trust tax nuances.

***Jamie Brenner**, Partner, State and Local Tax (SALT) Indirect Tax, PwC*
***Jim Erwin**, Transaction Tax Director, Zayo Group*
Industry Guests (invited)

Sales and Excise Tax: Defense of Digital and 'Cloud' Products and Services from State Taxation ROUNDTABLE

In this ever-changing field of taxation, state departments of revenue continue to aggressively pursue the taxation of various digital products and other services under the guise of taxes imposed on software and/or telecommunications services. This session will address the key issues and arguments digital product and telecommunication service providers should be aware of to defend against the various ways states and localities seek to subject them to both new and existing (e.g. telecommunications) sales and excise taxes, and provide advice regarding strategies for providers to possibly avoid or minimize the improper taxation of these products and services. The presenters will also analyze recent case law developments impacting the taxability of such products and services; evaluate the latest developments in physical and attributional nexus; as well as consider the diverse sourcing rules adopted by the states, including the SSUTA rules.

***R. Gregory Roberts**, Partner, Morrison & Foerster LLP*
***Rebecca M. Ulich**, Associate, Morrison & Foerster LLP*

Prepaid Explosion and Regulatory Hurries ROUNDTABLE

When you ask the world what is prepaid, you get so many different answers. When you ask Regulatory and Tax bodies, what is prepaid, you most often get completely different responses from each one. How is a market that is moving quickly toward prepaid transactions keeping up with what the tax officials think? And, more importantly, how are the tax officials keeping up with what the market is doing? This session will discuss key prepaid issues, including: prepaid cards, contracts, vouchers, and agency agreements that make prepaid the next big regulatory mystery.

***Joe Solana**, President, GSAssociates, LLC*
Industry Guests (invited)

"When am I Exempt?" - Sales Tax Exemption for Services ROUNDTABLE

Managing the various federal and state exemptions applicable to the tax types billed by telecommunications services today is an enormous challenge. This session will consider each of the taxes on a state and federal level; provide a detailed analysis of the applicable exemptions; and present the various methods that an organization can utilize to ensure tax exemptions are kept current. The presenters will also give best practices and experience for organizing applicable documentation using a centralized and paperless environment that can be read and accessed 24/7.

Kevin McCarthy, *Associate, ISSI/TEAMS*
Larry Powers, *Chief Strategy Officer, ISSI/TEAMS*

10:00 - 10:15 - NETWORKING AND EXHIBITS

10:15 - 11:00 AM CONFERENCE SESSIONS BLOCK 8

Crossroads: Where Technology, Connectivity and Taxation Meet PANEL

As connectivity is integrated into all aspects of our lives, the merging of connectivity services (e.g., conferencing, data transmission, VoIP, wireless and satellite services) into internet enabled hardware and software, a.k.a. the Internet of Things, creates an array of new questions for tax professionals and taxing authorities. These questions range from the fundamental characterization of the connected product/service and its sourcing to more complex questions around business exemptions, data limitations, prepaid versus postpaid, and centralized collections. This session will explore the myriad of tax issues that come about where technology, connectivity and taxation meet.

Pete Falli, *Director, Telecom Taxes, Microsoft Corporation*
Grady Cunningham, *Partner, State and Local Tax, KPMG LLP*
Reid S. Okimoto, *National Tax Leader, Emerging Technology, State and Local Tax, KPMG LLP*
Steve King, *Senior Manager, State and Local Tax, KPMG LLP*

NOLs: Revive Them, Increase Them, Extend Them ROUNDTABLE

Many states aggressively try to limit taxpayers' ability to use their net operating losses. This session addresses what to do when it's time to utilize your NOLs and the states try to limit your ability to do so. This session will include detailed information about issues, positions, and pending controversies involving: California's NOL suspension; Illinois' NOL suspension and NOL cap; Massachusetts' NOL carryovers and short tax years; New Jersey's NOL suspension; and Pennsylvania's NOL cap.

Kenneth Levine, *Associate, Reed Smith LLP*

Taxation of Collaboration Services ROUNDTABLE

The traditional conference business is adding options like video conferencing, web conferencing and messaging that allow for more extensive collaboration. This breakout will look at the different tax implications these services could have based on how the services are provided. For example, should offering a web conferencing solution with a voice component that connects to the PSTN be taxed differently than a web conferencing solution with a solely IP to IP based voice service? Or, how are the enhanced features these collaborative services making their taxation more vague? Finally, the speaker will look at the issue of sourcing these services - especially with their ability to be provided on multiple platforms.

Jason Darland, *Esq., EZTax, Inc.*

Classifying Broadband Services as Telecommunications Services: A Potential Tidal Wave of Change to USF Contributions and Compliance ROUNDTABLE

The FCC may have set the stage for major changes to its USF contribution rules by classifying high speed Internet access service ("broadband service") as a "telecommunications service," even though the it may well be declining to assess USF on broadband services revenues in its net neutrality order. Several factors strongly suggest that USF contribution rules will be modified in the near future: The Federal State-Joint Board must submit its Recommendations on USF contribution reform during the 2nd Quarter of 2015; the FCC has expanded the USF revenue requirement to support an aggressive E-Rate Modernization Program; USF expenditures will increasingly shift to supporting broadband service; and industry experts widely acknowledge the pool of assessable revenues needs to be expanded inasmuch as the Contribution Factor is regularly exceeding 15%. This session will address possible changes to the USF contribution rules and provide perspectives on when these changes could take effect.

C. Douglas Jarrett, *Partner, Keller and Heckman LLP*
Gregory E. Kunkle, *Partner, Keller and Heckman LLP*

11:00 - 11:15 - NETWORKING AND EXHIBITS

11:15 - 12:00 PM CONFERENCE SESSIONS BLOCK 9

Real-Time Taxation, Real Impacts on Telecom PANEL

There is an increasing expectation for real-time transactions among consumers – be that online shopping, apps, entertainment, information and virtually anything the market will sustain. Real-time, however, is not just for retail anymore. Increasingly telecom customers expect real-time quotes (with applicable taxes) for devices/accessories, service plans, and on-demand connectivity such as In-vehicle platform service offerings, M2M, or downloads from a medical device, sensor or logistics network. Traditionally pre-paid had the obvious impact for real-time rating. This session will look at the emerging scenarios coming to market that will require real-time taxing, the challenges therein, and the impact on legacy, batch-oriented tax engines.

Tiffany DeBerry, *Business Systems Analyst – Taxation, AuroraView, LLC.*
Timothy Dubois, *Vice President of Technology, Electronic Tax Systems, Inc.*
Robert Gibbs, *President, Electronic Tax Systems, Inc.*

Telecom Tax in the Age of "Softwareization" ROUNDTABLE

Software-defined network (SDN) technology is set to revolutionize not only how telecommunications are delivered, but also the types and nature of services providers can offer. One key implication is that the lines between telecom and internet services are blurring – leaving tax and regulatory considerations in the air. This session will consider the impact and ramifications SDN will have on the taxability of traditional and emerging telecom services as well as equipment/infrastructure considerations.

Dustin Davis, *Director, Ryan LLC*
Matthew Boch, *Partner, McDermott Will & Emery*

Policy Perspective – What's happening on the Policy Front that is Likely to Impact Taxes/Fees in the Coming Year ROUNDTABLE

There are a wave of significant policy changes under consideration by the FCC that will likely have dramatic impact on telecom tax and regulatory compliance departments. This session will look at the key policy debates, directions and possibly outcomes. Topics covered include NG911 ecosystem - operational policy framework and standards; evolving state positions/differences in E911 tax and fee impositions; "Net Neutrality" Under Title II - likely new State, Local and Federal Fees; Title II reclassification/ exemption possibilities and other policy impacts on "all-IP" service platforms.

Thomas H. Jankowski, *Director - Global Public Policy, AT&T Services, Inc.*

Everything You Always Wanted to Know About Voluntary Disclosure Agreements ROUNDTABLE

Telecommunications companies are faced with an increasing array of state and local taxes, including sales taxes, transaction taxes, and gross receipts taxes. To complicate matters, many telecommunication companies are not even aware that they are subject to these various taxes, which potentially subjects the companies to a hefty assessment for tax, penalties and interest. Companies can mitigate this exposure risk by contacting a state or local taxing jurisdiction through a voluntary disclosure of unpaid tax. But executing a voluntary disclosure agreement is not as simple as it might seem. This session will explore the intricacies of a voluntary disclosure, including collecting and certifying the data that is part of the disclosure and the roles played by various company personnel.

Jonathan Perl, *Counsel, Locus Telecommunications, Inc.*
David Hughes, *Partner, Horwood Marcus & Berk Chartered*

PRE-CONFERENCE TUTORIALS

TUTORIAL 1: WEDNESDAY, MAY 13, 2015

9:00 AM - 4:30 PM (FULL DAY, 6.5 HOURS CPE)

Understanding Communications Taxation

***Jim Nason**, Tax Managing Partner, Telecommunications, Deloitte Tax LLP*
With the Deloitte Tax Telecommunications Team

A mainstay of the TeleStrategies' Communications Taxation event, this intense introductory seminar continues to be refreshed and updated to cover not only the basics of our current tax system for communications service providers, but a deeper dive into key tax considerations associated with "cutting edge" services and applications. This is a must for people new to the communications space or those that want a refresher of Communications Tax 101+. The first part of the program continues to be focused on the core aspects of telecom taxation with the afternoon taking on the more challenging issues facing today's communications tax professional.

I. Overview of Communications Taxation

- Taxation of basic local, long distance, wireless, and video services
- General taxes including gross receipts, sales, and telecommunications-specific taxes

II. Sourcing and Apportioning Transaction Taxes

- Understanding the Goldberg rule when it applies and when it doesn't
- State's position and formulas on interstate services

III. Wireless Taxation including Prepaid

- Sourcing of wireless services and the challenges
- Tax issues specific to wireless service providers as well as the applicability of various taxes and surcharges

IV. Exempt Customers, Sales for Resale and Taxation

- Understanding gross receipt taxes and telecommunications sale for resale exclusions and exempt customers
- Key differences among the states regarding resale taxation

V. Internet and Emerging Services Taxation

- Taxation of Internet access and new/emerging services
- Differences in taxation of telephone, data, TV and other related services
- Taxation of transport vs. content services vs. digital media

VI. Bundled Services Taxation

- What services are being bundled, how are they taxed and what are the challenges to existing tax models?
- What approaches are the states using to tax these bundles? Is there an answer to: what constitutes "books and records"?

VII. Current Trends and Developments in the Taxation of Telecommunications

- What are the big issues taking center stage in administrative decisions and the courts?
- What is on the mind of tax policymakers in state and local jurisdictions?

VIII. Telecommunications Services: An Operational Tutorial

- Become more conversant with how telecommunications services are delivered.
- What a telecommunications professional needs to know to "talk the talk"!

IX. Regulation, Fees, Surcharges and Other Charges (When a Tax is Not a Tax)

- Basic understanding of regulatory issues, concerns and changes facing the communications company
- Overview of regulatory mandates and related fees (911, USF, and more)

X. Transaction Tax System/Process Fundamentals

- Hear what you need to know in implementing/upgrading an automated transaction tax solution
- Common pitfalls and opportunities

TUTORIAL 2: WEDNESDAY, MAY 13, 2015

1:00 - 5:00 PM (HALF DAY, 4.5 HOURS CPE)

Taxation Issues for Communications Companies

PwC Tax Telecommunications Team

1:00 - 2:45

Federal Universal Service Fund (FUSF)

This session will introduce you to FUSF and explore updates. We will also take a deep dive into FUSF accessibility, compliance and return mechanics, the audit process, recent FCC orders, and significant pitfalls and traps. In addition, we will be covering Universal Service Administrative Company (USAC) audits and significant risk areas.

***Arti Deliaj**, Director, PwC*

2:45 - 3:00 - BREAK

3:00 - 4:40

Top Ten Audit Issues by Telecommunications Tax Departments

Experience an interactive discussion on issues such as outdated billing systems that belong on display in the Smithsonian, complexities of statutory/regulatory/judicial changes and aggressive auditors and much more! We will offer solutions to how these issues can be addressed on a daily basis.

***David Prebut**, Director, PwC*
***Dawn Scott**, Director, PwC*

4:40 - 5:00 - FINAL Q&A

POST-CONFERENCE ACTIVITIES

FRIDAY, MAY 15, 2015

Second Annual Golf Tournament

Sponsored by Compliance Solutions and CoreLogic
Free to attendees, all-inclusive

We will make this a fun event for the terrible and the best golfers and will assemble the teams so that everyone will have a chance at winning. Reservations required. Indicate your participation during online registration, or contact Wes Johnson at wes@csilongwood.com by March 15th.

12:00 - 12:30 PM BUS TRANSPORTATION FROM DISNEY'S GRAND FLORIDIAN

1:00 PM GOLF SHOTGUN START AT DISNEY'S PALM COURSE

5:30 PM AWARDS DINNER AT PALM'S COURSE FOR GOLFERS

Greens fees, driving range, putting contest, rental clubs and shoes provided. Attendees are welcome to bring their own clubs and shoes.

Backstage Safari at Disney's Animal Kingdom

Sponsored by Compliance Solutions.
Free to attendees, all-inclusive

Take a journey to find out what happens behind-the-scenes at Disney's Animal Kingdom! During this in-depth program, you'll get an insider's look at conservation, animal nutrition and medicine, animal care and behavioral studies.

12:45 PM BUS TRANSPORTATION FROM DISNEY'S GRAND FLORIDIAN

1:00 PM THREE-HOUR TOUR BEGINS AT DISNEY'S ANIMAL KINGDOM

4:30 PM BUS RETURNS TO DISNEY'S GRAND FLORIDIAN

Registration Information *Register by April 8th and save $200*

	Before 4/8/2015	After 4/8/2015
Tutorial and Conference	$1,295	$1,495
Conference Only	$995	$1,195
Tutorial Only	$495	$695

Buy One, Get One Free Service Provider Offer: To be eligible for the special rate, you, and the person you are registering, must be approved full-time employees of a wireless or wireline phone company, cable MSO, ISP or VoIP provider. Pay for one and the second person can attend for free.

Registration

Online: www.telestrategies.com • Phone: 703-734-7050

Conference Location: Conference and Exhibits will be held at Disney's Grand Floridian Resort & Spa. Please contact Walt Disney World™ Reservations directly at (407) 939-4686 to reserve a room online. TeleStrategies Communications Taxation Group Rate is $209 per night. Make your reservation by April 20 to receive the discounted rate. Book early, as our reservation block usually fills up.

Attendees: Attendance at this conference is open to tax professionals employed by communications service providers, tax software and research vendors and those companies advising communications service providers (consultants, attorneys, and accountants). We respectfully request that employees and contractors to state and local governments and contract auditors NOT attend.

CPE Credits

TeleStrategies Inc. is registered with the National Association of State Boards of accountancy (NASBA) as a sponsor of continuing professional education on the National Registry of CPE Sponsors. State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be addressed to the National Registry of CPE Sponsors, 150 Fourth Avenue North, Suite700, Nashville, TN 37219-2417. Web site: www.nasba.org

Credits available: 17*
Method of presentation: Group-Live
Advance preparation: None

Program level: Basic
Prerequisites: None

For more information regarding administrative policies such as complaint resolution, please call TeleStrategies at 703-734-7050.

** The two-day conference offers 10.5 hours of CPE. Deloitte pre-conference offers 6.5 hours of CPE. PwC pre-conference offers 4.5 hours of CPE. Attendees must sign in and sign out to receive CPE credit.*

CLE Credits

TeleStrategies, Inc. received CLE approval in 2014 in Georgia, Kansas, Missouri, Nebraska, Pennsylvania, Tennessee, Texas, Virginia and Washington State CLE is available in 17 other states using reciprocity agreements with these existing approvals. If you would like CLE credits in a state not listed, please send an email to jtownsend@telestrategies.com.

About the Lead Sponsor

Compliance Solutions provides complete end to end tax & regulatory services to the telecom industry from telecom tax rating to telecom transaction & corporate income tax preparation to FCC/State regulatory compliance to audit support services. Compliance Solutions provides the most comprehensive tax solutions for the best overall value such as transaction tax preparation & filing services, tax exemption management services for wholesale carriers, consulting services for tax mapping projects and a wide range of tax rating services. Compliance Solutions' corporate income tax services are turnkey solutions for the simple to the very complex entity structure. Founded in 2002, the Compliance Solutions' team brings value to clients through years of experience in telecom & taxation, outstanding services and customer support to hundreds of clients, and by providing best of class solutions to challenging tax & regulatory issues. For more information about Compliance Solutions, please visit www.csilongwood.com.

About the Associate Sponsors

As business, accounting, and tax advisors to many of the world's leading communications companies, PwC has an insider's view of trends and developments driving the industry. We have aligned our practice around the issues and challenges that are of utmost importance to our communications clients. Learn more at www.pwc.com/communications

TTR is a website used to quickly find telecommunications tax and regulatory answers. TTR provides detailed sales and use tax answers for all telco industry equipment purchases. TTR also provides detailed answers with supporting research on how to accurately apply tax and all regulatory charges to customer bills; including tax on tax rules. TTR now has telecommunications tax and regulatory rates at a rooftop level of accuracy. Visit www.ttrus.com

Wolters Kluwer offers best-in-class products that automate telecommunications taxation for Telecom, Cable, VOIP & many other types of providers. Our flagship product in the telecommunications market is SureTax® Telecom, a sophisticated Transaction Tax Calculation Engine that combines comprehensive CCH tax content with the power of a cloud-based solution.

In the highly regulated telecom industry, any change in strategy may have significant tax and compliance implications. Our tax professionals provide the practical skills and real-world knowledge to help your company achieve competitive advantage. Contact us -- we advise on potential state and federal credits and plan for international growth.