

Tax Notes Quotes David Rosenbloom on Taiwan Tax Agreement

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Tax Notes

Two Senate committees remain at odds over which will take the lead on a treaty like tax agreement with Taiwan, in a dispute with roots in committee jurisdictions and disagreement over the best method for addressing the issue.

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Wyden and Finance Committee ranking member Mike Crapo, R-Idaho — as well as the heads of the Ways and Means Committee — might be relying on the language of an agreement with Taiwan not explicitly being a treaty as an opportunity for their committees to write and lead their own bill, said H. David Rosenbloom of Caplin & Drysdale.

“They’re probably stepping in simply because it’s legislation and not a treaty, and therefore it doesn’t touch the magic word that gets it into Foreign Relations,” Rosenbloom said.

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Both Rosenbloom and Avi-Yonah said that in an ideal world, the Finance Committee would have the purview over tax treaties and agreements because of their tax expertise — despite the foreign relations aspects involved — but they predicted that the long-standing jurisdictional lines aren’t likely to move.

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And bipartisan agreement on the need to address China’s increased economic influence puts more weight on the foreign relations implications of a tax agreement with Taiwan than would exist when working on a typical tax treaty, Rosenbloom said.

For the full article, please visit *Tax Notes*’ website (subscription required).

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