

# 68th ANNUAL CONFERENCE ON TAXATION

Sponsored By

# NATIONAL TAX ASSOCIATION TAX INSTITUTE OF AMERICA

Regency Hyatt House HOUSTON, TEXAS NOVEMBER 2-5, 1975

# SIXTY-EIGHTH ANNUAL CONFERENCE ON TAXATION

Sponsored by the

# NATIONAL TAX ASSOCIATION — TAX INSTITUTE OF AMERICA

Hyatt Regency Hotel
Houston, Texas
NOVEMBER 2-5, 1975

## **GENERAL INVITATION**

The conference sessions are open, and the public is cordially invited to take part in the discussion following the formal papers to the extent that available time permits and in accordance with the conference rules. All sessions will be informal.

Anyone may take part in the discussion of resolutions submitted for conference action, but the voting is confined to members of the National Tax

Association-Tax Institute of America.

A \$20.00 registration fee will be charged for members of the National Tax Association-Tax Institute of America, and a \$40.00 registration fee for nonmembers attending the conference. Wives and children will be registered without charge.

## **MESSAGE CENTER**

Arrangements have been made with the Hyatt Regency Hotel to provide a message center to receive messages and incoming telephone calls. The telephone number of the hotel is:

(713) 224-2222

## LADIES' HOSPITALITY ROOM

The Ladies' Hospitality Room will be located in the Dogwood Room which is on the third floor of the Hyatt Regency. It will be open Sunday from 10:00 A.M. to 4:00 P.M. and daily from 9:00 A.M. to 4:00 P.M.

# SUNDAY, NOVEMBER 2, 1975

10:00 A.M. to REGISTRATION 6:00 P.M.

Cypress & Foyer

6:00 P.M. to RECEPTION 7:30 P.M.

**Imperial East** 

# MONDAY, NOVEMBER 3, 1975

7:30 A.M. to BREAKFAST FOR CONFERENCE PARTICIPANTS

Cottonwood A

8:00 A.M. to 5:00 P.M. REGISTRATION

Cypress & Foyer

9:30 A.M. to 10:15 A.M. OPENING SESSION
Arthur M. Hayes, President,

Arboretum 1-5

NTA-TIA, presiding Invocation

Welcome to Houston, Texas

Gary B. Webb, Assessor-Collector of Houston, representing the Mayor

Response

Laurence N. Woodworth, Vice President, NTA-TIA

**Presidential Address** 

Arthur M. Hayes, President, NTA-TIA

Organization of the Conference Arthur D. Lynn, Jr., Secretary, NTA-TIA

10:30 A.M. to 12:30 P.M.

FIRST GENERAL CONFERENCE SESSION

Arboretum 1-5

TAX POLICY AND EXPENDITURES OF THE U.S. GOVERNMENT AS WE APPROACH THE THIRD CENTURY OF AMERICAN FEDERALISM

H. Clyde Reeves, Consultant, Council of State Governments, Lexington, Kentucky, presiding

**Tax Policy** 

The Honorable AI Ullman, Chairman of the Committee on Ways and Means, U. S. House of Representatives, Washington, D. C.

Expenditure

Dr. Alice Rivlin, Director of the Congressional Budget Office, Washington, D. C.

Historical Overview and Implications for the Future

Dr. Laszlo Ecker-Racz, Arlington, Virginia

12:45 P.M. to 2:15 P.M. CONFERENCE LUNCHEON Imperial East
Laurence N. Woodworth, Vice President,
NTA-TIA, presiding

Address

Reagan Brown, Special Assistant to Honorable Dolph Briscoe, Governor of Texas 2:30 P.M. to 5:00 P.M. COMMITTEE MEETINGS

Federal Taxation and Finance Ponderosa
Intergovernmental Fiscal Relations Mesquite
Interstate Allocation and Apportionment of
Business Income Redbud
Local Non-Property Taxation Pecan
Property Taxation Sandalwood A
Public Utility Taxation Sandalwood A

Public Utility Taxation Sandalwood B
State Income and Business Taxation
State Sales and Use Taxation
Willow
Taxation of Financial Institutions
Ebony
Taxation of Public Utilities —

Transportation Holly
Education in Public Finance Raintree
Committee on Committees Cedar

# TUESDAY, NOVEMBER 4, 1975

9:00 A.M. to REGISTRATION 4:00 P.M.

Cypress & Foyer

9:00 A.M. to 10:30 A.M. FIRST CONCURRENT CONFERENCE
SESSION Imperial East

# STATE SALES AND USE TAXATION

Chandler A. Hewell, Director, Sales and Use Tax Unit, Georgia Department of Revenue, Atlanta, Georgia, presiding

What's New In Manufacturing Exemptions?
Stuart W. Connock, Deputy State Tax Commissioner, Virginia Department of Taxation, Richmond, Virginia, presiding

Machinery Used in the Recycling of Tangible Personal Property

Linda S. Paine, Sr. Tax Attorney, Tenneco, Inc., Houston, Texas

Key Words in the Production Exemption — A Suggested Definitional Approach to Uniformity John A. Deasy, Jr., Sr. Tax Attorney, State and Local Taxes, Westinghouse Electric Corporation, Pittsburgh, Pennsylvania

Computer Service and Data Processing
Edward M. Dudley, Supervisor, State and
Local Taxes, American Telephone and Telegraph Company, New York, New York, presiding

Terminology

Carl Vorlander, Executive Director, National Association of State Information Systems, Lexington, Kentucky

**Laws and Regulations** 

Edward M. Dudley, Supervisor, State and Local Taxes, American Telephone and Telegraph Company, New York, New York

**Court Cases** 

O. Lloyd Darter, Jr., Tax Attorney, Western Electric Company, New York, New York

The Politics of Revenue Forecasting
A. James Heins, Professor of Economics,
University of Illinois at Urbana-Champaign,
Urbana, Illinois

9:00 A.M. to 10:30 A.M. SECOND CONCURRENT CONFERENCE SESSION Arboretum 1, 2, 3

#### CAPITAL FORMATION AND FEDERAL TAX POLICY — THE INVESTMENT CREDIT CONCEPT

John Nolan, Esquire, Miller and Chevalier, Washington, D. C., presiding

Efficacy of the Investment Credit for Fiscal Purposes

Robert M. Coen, Professor, Department of Economics, Northwestern University, Evanston, Illinois

Structural Considerations — Existing Investment Credit

John Mendenhall, Esquire, Williams, Connolly and Califano, Washington, D. C.

The Proper Function of the Credit — at Full Employment

Emil M. Sunley, Jr., Associate Director, Office of Tax Analysis, U. S. Treasury Department, Washington, D. C.

Variable Rate Credit and an Alternative Plan Gerard M. Brannon, Professor of Economics, Georgetown University, Washington, D. C.

10:45 A.M. to 12:15 P.M. SECOND GENERAL CONFERENCE SESSION Imperial East

STATE-LOCAL POLICY AND EXPENDITURES AS WE APPROACH THE THIRD CENTURY OF AMERICAN FEDERALISM

Billy D. Cook, Director of Research, Department of Finance, District of Columbia, Washington, D. C., presiding

Choosing Government Size: Fiscal Due Process Harley Hinrichs, Public Finance Scholar in Residence, Advisory Commission on Intergovernmental Relations, Washington, D. C.

Potentials for Legislative Expenditure Monitoring, Evaluation and Control: State-Local

John F. Kasonic, President, Kasonic, Chappelle and Associates, Inc., Seattle, Washington

State-Local Expenditure Growth: The Causes of and Alternative Possibilities for Control

Bernard L. Weinstein, Assistant Professor of Political Economy, University of Texas at Dallas, Richardson, Texas

Indexing as a Possible Method for the Control and Planning of State Budgets

Arthur Bayer, Associate Professor of Economics, Memphis State University, Memphis, Tennessee

12:30 P.M. to NASA TOUR INCLUDING BOX LUNCH 4:00 P.M.

2:30 P.M. to 5:00 P.M. SPECIAL TECHNICAL PAPERS

SESSION Arboretum 1, 2, 3
James A. Papke, Professor of Economics,
Purdue University, Lafayette, Indiana, presiding

An Alternative for Supplementary Social Security Financing

Joseph M. Bonin, Professor of Economics, Loyola University, New Orleans, Louisiana and

John B. Legler, Associate Professor of Banking and Finance, University of Georgia, Athens, Georgia

Social Accounting and Taxation: The Tax Effects of Corporate Social Responsibility Decisions

D. Larry Crumbley, Professor of Accounting, Texas A&M University, College Station, Texas and

Marc J. Epstein, Associate Professor, California State University, Los Angeles, California

The Environment as a Source of Revenue
Hugh Macaulay, Professor of Economics,
Clemson University, Clemson, South Carolina

Ethics in Public Finance: The Excess Burden on Resources and Performance

Randall S. Stout, Professor of Economics, Pennsylvania State University, University Park, Pennsylvania

The Consequences of Non-Clearing Public Service Prices

R. Charles Vars, Jr., Associate Professor of Economics, Oregon State University, Corvallis, Oregon

Improving the Design and Interpretation of Tax Burden Studies

Kenneth L. Wertz, Assistant Professor of Economics, University of North Carolina, Chapel Hill, North Carolina

6:30 P.M. RODEO AND BARBECUE

# WEDNESDAY, NOVEMBER 5, 1975

9:00 A.M. to REGISTRATION 4:00 P.M.

Cypress & Foyer

9:00 A.M. to 10:00 A.M.

ANNUAL MEETING OF THE NATIONAL TAX
ASSOCIATION-TAX INSTITUTE OF
AMERICA Imperial East
Arthur M. Hayes, President, presiding

Treasurer's Report
Nominating Committee Report
Election of Honorary Members
Presentation of NTA-TIA Outstanding Doctoral
Dissertation Awards
Reports of Standing & Study Committees

10:00 A.M. to 10:15 A.M. THIRD GENERAL CONFERENCE SESSION

**Imperial East** 

REPORT OF THE CONFERENCE RESOLUTIONS COMMITTEE

Arthur M. Hayes, President, presiding

10:30 A.M. to

THIRD CONCURRENT CONFERENCE SESSION Imperial East

PROPERTY TAXATION

Leslie Carbert, Tax Economist, Pacific Gas & Electric Company, San Francisco, California, presiding

Use of State Ratio Findings in the Local Equalization Process

Ronald B. Welch, formerly Assistant Executive Secretary, Property Taxes, California State Board of Equalization, Sacramento, California

Non-Revenue Uses of the Property Tax

Robert D. Matthews, Special Assistant, Council of State Governments, Lexington, Kentucky

Statewide Property Tax and School Finance
John O. Behrens, Governments Division,
U. S. Bureau of the Census, Washington,
D. C.

Property Taxation, Progressivity and Education Vouchers

Harold E. McClelland, Claremont Men's College, Claremont, California and

Jerry St. Dennis, Claremont Men's College. Claremont, California

10:30 A.M. to

FOURTH CONCURRENT CONFERENCE SESSION Sandalwood A & B

IMPORTANT DEVELOPMENTS IN FEDERAL AND STATE BANK TAXATION

John F. Rolph, III, Tax Counsel, American Bankers Association, Washington, D. C., presiding

**Important Federal Developments** 

James G. O'Brien, Vice President, Bankers Trust Company, New York, New York

State Taxation of Out-of-State Banks

Murray Drabkin, Partner, Kaler, Worsley, Daniel and Hollman, Washington, D. C.

John Shannon, Assistant Director, Advisory Commission on Intergovernmental Relations, Washington, D. C.

10:30 A.M. to 12:15 P.M.

FIFTH CONCURRENT CONFERENCE SESSION Cottonwood A & B

INVITED PAPERS: NTA-TIA OUTSTANDING DOCTORAL DISSERTATION AWARDS

James A. Papke, Professor of Economics,

James A. Papke, Professor of Economics, Purdue University, Lafayette, Indiana, presiding The Incidence of Profits Taxes

John B. Burbidge, Assistant Professor of Economics, McMaster University, Hamilton, Ontario, Canada

The Property Taxpayers' Revolt and Education Financing: The Evidence from 1960 and 1970 Millage Referenda

John L. Neufeld, Assistant Professor of Economics, University of North Carolina, Greensboro, North Carolina

Intrametropolitan Residential Location and the Local Public Sector

Andrew M. Reschovsky, Assistant Professor of Economics, Rutgers University, New Brunswick, New Jersey

Discussants:

John S. Akin, University of North Carolina, Chapel Hill, North Carolina (On leave as Brookings Institution Fellow with H.E.W.)

Kenneth R. Biederman, Georgetown University, Washington, D. C. (On leave with U. S. Senate Budget Committee)

Stephen G. Kuzina, Department of Economics, Kenyon College, Gambier, Ohio

## 1:45 P.M. to 5:00 P.M.

SIXTH CONCURRENT CONFERENCE SESSION Aboretum 4, 5

PUBLIC UTILITY AND TRANSPORTATION COMPANIES

Impacts of Federal and State Regulations on Utility Investment

Robert L. Purnell, Chairman, Michigan State Tax Commission, Lansing, Michigan, presiding

Pensy's Problems

William Lahner, Tax Manager, The Penn Central Transportation Company, Philadelphia, Pennsylvania

Con Rail - A Solution

Thomas J. Graves, U. S. Railway Association, Washington, D. C.

**Impacts of Abandonments** 

William R. Black, Professor, Indiana University and Director of Rail Planning, Public Service Commission of Indiana, Indianapolis, Indiana

**Telephone Companies** 

Peter Rosoff, Director, Required Earnings Study, Treasury Department, American Telephone and Telegraph Company, New York, New York

Financing vs. Construction

John Johnson, General Accountant and Principal Accounting Officer, Detroit Edison Co., Detroit, Michigan

**Pipeline Companies** 

J. E. Bixby, Vice President & Chief Financial Officer, Texas Eastern Transmission Corporation, Houston, Texas 1:45 P.M. to 3:15 P.M.

SEVENTH CONCURRENT CONFERENCE SESSION Cottonwood A & B

TAXATION OF MULTINATIONAL FIRMS: EMERGENT POLICY PERSPECTIVE AND **PROBLEMS** 

Nathan N. Gordon, Deputy to the Assistant Secretary (International Tax Policy), U. S. Treasury Department, Washington, D. C. and

B. Kenneth Sanden, Partner, Price Waterhouse & Co., New York, New York

3:30 P.M. to 5:00 P.M.

FIGHTH CONCURRENT CONFERENCE SESSION Arboretum 1, 2, 3

THE SOCIAL, ECONOMIC AND POLITICAL

IMPACT OF STATE LOTTERIES
Robert Allphin, Director, Illinois Department of Revenue, Springfield, Illinois, presiding

**Lotteries in General** 

Ralph F. Batch, Superintendent of the Illinois Lottery, Springfield, Illinois

Legal Aspects of Lotteries

George T. Rummel, Deputy Director, Illinois Department of Revenue, Springfield, Illinois

The Failure of the Delaware Lottery Marvin R. Brams, Economist and Associate Professor of Urban Affairs, University of Delaware, Newark, Delaware

The Success of the Pennsylvania Lottery Lynn R. Nelson, Executive Director, Bureau of the State Lottery, State of Pennsylvania, Harrisburg, Pennsylvania

RECEPTION 6:30 P.M. to 7:30 P.M.

**Imperial East** 

7:30 P.M.

**ANNUAL CONFERENCE** RANQUET

**Imperial East** 

Arthur M. Hayes, President, presiding **Entertainment** 

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# **PROGRAM**

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