Program

of the

FORTIETH ANNUAL CONFERENCE ON TAXATION

Roney Plaza Hotel Miami Beach, Florida

November 17-20, 1947



SPONSORED BY THE

National Tax Association

MONDAY, NOVEMBER 17 AND TUESDAY, NOVEMBER 18

Subject: "What Should Be Done About the Corporate Income Tax?"

MONDAY, NOVEMBER 17

9:30 A. M.—First Session: "Background of the Corporate Income Tax and Analysis of the Present System"

Moderator:

James W. Martin University of Kentucky Lexington, Kentucky

Speakers:

Louis Shere Division of Tax Research Treasury Department, Washington, D. C.

Topic: "Statistics of Corporate Taxation"

(With emphasis upon the relation of the corporate yield to the total yield under the present system and under various modifications that might be adopted)

Robert S. Ford University of Michigan Ann Arbor, Michigan

Topic: "Economic Aspects of the Present Corporate Income Tax"

(With emphasis upon the incidence of the corporate tax, the effect of the tax on methods of financing and other economic effects)

Arthur H. Kent Kent & Brookes San Francisco, California

Topic: "Legal Machinery of the Present Corporate Income Tax System"

(With emphasis upon the tax treatment of cash and stock dividends, taxable and non-taxable reorganizations, capital gains and losses, Section 102 and other legal features of the present tax)

12:30 P. M.—Luncheon Session

Presiding:

J. Newton Lummus, Jr. Tax Assessor of Dade County Miami, Florida

Speakers: To be announced.

2:00 P. M.—Second Session: "The Proper Place, if any, of a Corporate Income Tax, as such, in the Tax System"

(The discussion at this session will be directed toward the single question as to whether there should be a tax on corporations other than a tax in the nature of a withholding device. Expressed in other words, the issue will be whether the corporate entity as such is a proper source of taxation.)

Moderator:

Malcolm Bryan Trust Company of Georgia Atlanta, Georgia

Panel of Speakers:

Harold M. Groves University of Wisconsin Madison, Wisconsin

Louis Schreiber
E. I. du Pont de Nemours & Company, Inc.
Wilmington, Delaware

Richard A. Musgrave Swarthmore College Swarthmore, Pennsylvania

TUESDAY, NOVEMBER 18

9:30 A. M. — Third Session: "Alternative Methods of Taxing Corporate Earnings At the Personal Level"

(The discussion at this session will be directed to the possible techniques of carrying out an integration of the corporate tax with the personal income tax, assuming that this policy should be found desirable.)

Moderator:

Alfred G. Buehler University of Pennsylvania Philadelphia, Pennsylvania

Panel of Speakers:

Richard Goode University of Chicago Chicago, Illinois

John L. Connolly Minnesota Mining and Manufacturing Company St. Paul. Minnesota

George E. Lent University of North Carolina Chapel Hill, North Carolina

2:00 P. M.—Fourth Session: "Would Complete Integration of Corporate and Personal Taxes Injure Business?"

(The discussion at this session will be based on the assumption that practicable means can be devised for taxing corporate earnings at the personal level, and will be directed to the question of whether such a policy would retard prosperity.)

Moderator:

Harley L. Lutz Princeton University Princeton, New Jersey

Panel of Speakers:

Ellsworth C. Alvord

Chairman, Committee on Federal Finances U. S. Chamber of Commerce Washington, D. C.

William Vickrey
Columbia University
New York, New York

J. Keith Butters Harvard Graduate School of Business Administration Boston, Massachusetts

WEDNESDAY, NOVEMBER 19

9:30 A. M. and 2:00 P. M .- Fifth and Sixth Sessions:

"The Impact of State and Local Taxes on Business"

(The discussion this day will be developed by having representatives from several different types of business organizations present the particular features of State and local taxes which they think need the most immediate study and attention. The problems raised will be then discussed from the standpoint of the state and local tax administrators.)

Moderators:

William C. Warren (fifth session)
Columbia University Law School
New York, New York
William A. Sutherland (sixth session)
Attorney-at-Law
Washington, D. C. and Atlanta, Georgia

Panel of Speakers:

Representing Business:

Wilbur K. Bush Chicago, Burlington & Quincy Railroad Company Chicago, Illinois

C. C. Long
St. Louis-San Francisco Railway Company
Oklahoma City, Oklahoma
George D. Brabson

Ohio Oil Company Findlay, Ohio Joseph S. Martel McKesson & Robbins, Inc.

New York, New York

Arthur R. Kaiser Sears, Roebuck & Company Chicago, Illinois

W. L. Hearne United States Steel Corporation New York, New York

Representing Tax Officials:

Following the papers by the representatives of business, or perhaps interspersed with them, will be remarks in response given by outstanding state and local tax officials. These will include C. Emory Glander, Ohio Tax Commissioner, Alger B. Chapman, President of the New York State Tax Commission, and several other outstanding state and local tax administrators who will be designated after the exact nature of the issues to be raised by the business representatives has been ascertained.

7:30 P. M.—Banquet Session (Informal)

Presiding:

Seth T. Cole.
Attorney-at-Law
Albany and New York, New York

Speaker

James W. Martin, President National Tax Association

Subject: "Tax Administration and Tax Equity"

9:30 A. M. and 2:00 P. M.—Seventh and Eighth Sessions

Discussion of Report of Joint Committee of National Tax Association, National Association of Tax Administrators, and American Bar Association on Coordination of Federal, State and Local Taxes, Henry F. Long, Boston, Massachusetts, Chairman.

Presiding:

George W. Mitchell (seventh session) Federal Reserve Bank Chicago, Illinois

James W. Martin, President (eighth session) National Tax Association

(The majority and minority views on the report will be presented by various members of the committee, including Henry F. Long, Massachusetts Commissioner of Corporations and Taxation; Robert C. Brown, University of Pittsburgh Law School; Seth T. Cole, Attorney-at-Law; and Dixwell L. Pierce, California State Board of Equalization. Following this analysis, the issues involved will be opened to general discussion.)

Report of Committees:

Committee on Multiple and Overlapping Personal Income Taxes, Mortimer M. Kassell, Chairman

Committee on Bank Taxation, Henry F. Long, Chairman

Annual Business Meeting of National Tax Association

(Including report of Membership Committee, G. Howard Spaeth, Chairman; and Committee of 15, Seth T. Cole, Chairman)

12:30 P. M.-Luncheon Session

Presiding:

Otho A. Cook
Commissioner of Revenues
State of Arkansas

Speaker:

The Honorable Herbert R. O'Conor United States Senator from Maryland

Subject: "Intergovernmental Fiscal Relations"

COMMITTEE ON LOCAL ARRANGEMENTS

J. N. LUMMUS, JR., Chairman VINCENT B. BURKE JOHN H. CHEATHAM, JR., BRUCE DAVIS HONORABLE C. M. GAY VAN C. KUSSROW HONORABLE J. EDWIN LARSON OSCAR F. MILLER JAMES M. OWENS, JR., ROY WILLIAMS HONORABLE BRYAN WILLIS

OFFICERS

JAMES W. MARTIN, University of Kentucky, President GEORGE W. MITCHELL, Federal Reserve Bank of Chicago, Vice President

RONALD B. WELCH, State Board of Equalization, California, Secretary

ROBERT J. EBY, New Rochelle, New York, Treasurer

EXECUTIVE COMMITTEE

The above officers ex-officio, the three ex-presidents who have last held office and nine elected members.

Ex-Presidents

WALTER G. QUERY, South Carolina Tax Commission ROY G. BLAKEY, University of Minnesota DIXWELL L. PIERCE, State Board of Equalization, California

Elected Members

R. C. BECKETT, Illinois Central System, Chicago
ROY BLOUGH, University of Chicago
O. C. CASH, Stanolind Oil & Gas Co., Tulsa
EDWIN M. GILL, Commissioner of Revenue, North Carolina,
C. EMORY GLANDER, Tax Commissioner, Ohio
CARL SHOUP, Columbia University
G. HOWARD SPAETH, Commissioner of Taxation, Minnesota

G. HOWARD SPAETH, Commissioner of Taxation, Minnesota WILLIAM A. SUTHERLAND, Attorney, Atlanta and Washington WALTER W. WALSH, Tax Commissioner, Connecticut

Honorary Members

A. KENNETH EATON, Department of Finance, Dominion of Canada

STUART GARSON, Premier, Province of Manitoba

PROGRAM COMMITTEE, 1947

WILLIAM A. SUTHERLAND, Sutherland, Tuttle & Brennan, Washington, D. C., Chairman

B. E. BAKER, Southern Bell Telephone Company, Atlanta, Ga.

R. C. BROWN, University of Pittsburgh, Pittsburgh, Pennsylvania WILBUR K. BUSH, C. B. & Q. Railroad Company, Chicago, Illinois

WELLES GRAY, Pennsylvania Economy League, Harrisburg, Pennsylvania

1. M. LABOVITZ, U. S. Bureau of the Budget, Washington, D. C.

J. N. LUMMUS, JR., Tax Assessor of Dade County, Miami, Florida

DAVID STEVENS, Commissioner of Public Health & Welfare Augusta, Maine

STANLEY SURREY, University of California, Berkeley, California RONALD B. WELCH, State Board of Equalization, Sacramento, California

BRYAN WILLIS, State Auditor, Tallahassee, Florida