NTA Forum

Perspectives, Ideas and News from the National Tax Association November, 1989

From the Editor

Excessive complexity in the tax laws is a plague that concerns every NTA member, whether taxpayer representative, tax practitioner, administrator, policy maker, or academic student of taxation. The problem is evident at all levels of government—federal, state, and local—and seems to infect every part of the tax system.

Like the weather, however, complaints about excessive complexity are more common than suggestions of what to do about it.

In this, the second issue of the *NTA FORUM*, long-time NTA member Hugh Calkins goes a step beyond complaining and offers a specific proposal for improving "administrability" of the federal income tax. He recommends that the private sector—tax practitioners and taxpayer representatives—take the initiative by proposing alternative, simpler, rule-of thumb methods for resolving issues that, for many taxpayers, can require time and effort totally out of proportion to the amount of tax involved.

It is to be hoped that his proposal will at least stimulate further thought and discussion of this important problem. The Editor invites members' comments and reactions to Calkins' proposal. If not this, then what?

Expressions of opinion in the *NTA FORUM* of course must not be construed as positions taken by the Association.

NTA's diverse membership includes tax professionals of all kinds and from every camp. This diversity provides ground for fruitful discussion, not only of the issues raised by Calkins but of other tax ideas and viewpoints as well. The editor invites submissions of material that will be of interest and value to a wide range of NTA members, especially our practitioner and governmental colleagues.

Should federal tax reform be back on the agenda?

This question was addressed by four distinguished tax authorities at the opening general session of the NTA Annual Conference last month in Atlanta. The panel was chaired by NTA President Dan Holland, of MIT.

Richard A. Musgrave, now at the University of California, Santa Cruz, argued that "with the capital gains cut still under debate, the immediate problem is one of preventing deform rather than expediting reform."

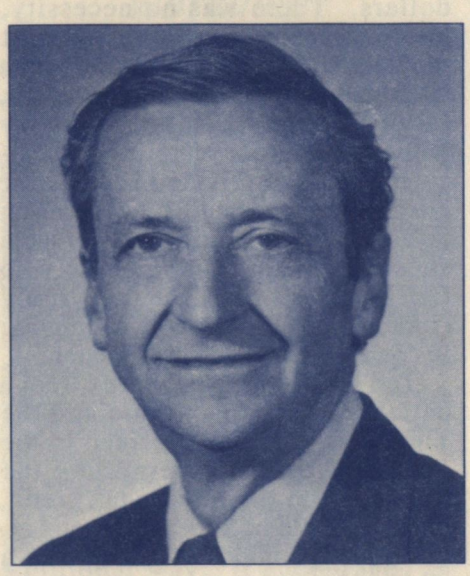
To reintroduce favored treatment of capital gains would be "disastrous" to the cause of tax reform, he said. It would "wreck the '86 scheme of loophole closing." Moreover, as an incentive to investment, "blanket exclusion of capital gains would be altogether inferior to other alternatives such as reinstatement of an investment credit."

In contrast with the 80's, when tax reform either cut taxes or maintained "revenue neutrality", future tax reforms will necessarily occur in a context of revenue increases. Should reform emphasize a broad based consumption tax, or attempt to further reform the income tax? Musgrave favors the latter. A serious defect is that a consumption tax cannot be made progressive in the middle to upper income ranges. It would be "a little better" in its effects on saving but far less effective than would be a decrease in the exorbitant rate of public dissaving. On balance, Musgrave concluded, "we had better stick with the income tax and try to improve it."

F. Eugene Wells, Director of Taxes for Proctor and Gamble, answered the

(continued on page 7)

Toward improving administrability of the Federal Income Tax



by Hugh Calkins
Partner, Jones, Day, Reavis and Pogue
Cleveland, Ohio

For more than a decade, the cause of federal income tax reform has stressed greater simplicity and easier compliance. Despite this emphasis, the Internal Revenue Code has grown steadily in length, now running to more than 7,000 pages. Every tax professional knows that its complexity has increased enormously and that TR-86 made matters worse.

Today the principal problem with the federal income tax is its inadministrability. There is serious doubt that taxpayers and tax practitioners

(continued on page 2)

NTA Forum

Number 2, November, 1989

Please send all correspondence to:
Frederick D. Stocker, Editor,
NTA Forum
National Tax Association
5310 East Main Street, Suite 104
Columbus, OH 43213
Phone (614) 864-1221

can really comply with the law, however conscientious their efforts and intentions. Increasingly one hears practitioners admit "... we just can't figure it out. And we know that IRS can't figure it out any better. We're going to take a stab at it. But for the first time in my life I'm signing a return that I have no confidence is correct."

There is serious doubt that taxpayers and tax practitioners can really comply with the law, however conscientious their efforts and intentions.

Two illustrations warn of what is to come if the inadministrability problem is not relieved. One is of Congressional making. Congress clearly was justified in correcting a situation in which favored tax treatment was available to health plans that covered only a handful of senior executives and principal owners, while leaving the rank and file to pay for their health costs with after-tax dollars. There was no necessity, however, for approaching that problem with an "effects" test, which is virtually impossible for businesses, large and small alike, to apply without inordinate reporting and calculations. The private sector, while clamoring for repeal, is volunteering no assistance in designing a workable substitute. The same people who failed the first time, the tax-writing committee staffs, are now attempting to come up with something better.

The second example arises from a collaboration of Congress and the Treasury. Congress decided in the 1986 Act that in determining the limitation on the foreign tax credit, interest should be allocated among affiliated corporations as if they were a single corporation, on the basis of asset values. The temporary regulations that Treasury recently promulgated provoked the following testimony to the Treasury by my partner Ray Wiacek:

"The 10T(e) complexity is wholly of your own making. Worse, it is complexity that makes compliance almost impossible. Large U.S. multinationals operate in dozens of countries, through scores of subsidiaries. Yet to comply, they are supposed to determine the average indebtedness of each of their foreign subsidiaries to unrelated parties, and separately to related parties, on a *monthly* basis. Let me repeat this—on a *monthly* basis. They are also supposed to distinguish operating from capital leases, analyze guarantees, trace debt through chains of related companies, and so on, on a monthly basis. If a company has a hundred foreign subsidiaries, you are asking them to make 2400 such calculations a year. To put it bluntly, many companies will do this halfheartedly at best, and some will not do it at all. I have had the tax managers from several very large companies tell me that they will comply in a manner which is "close enough for tax work."

This problem of inadministrability greatly increases the hours of effort required to prepare a tax return; it subjects practitioners and clients to the risk of penalties; and it contributes to a level of frustration that can transform honest taxpayers and practitioners into men and women who give up on the process and follow any shortcut that gets them temporarily out of the trenches. Growing doubt over the rationality of the system undermines willingness to comply and encourages an attitude that getting by is good enough.

SOURCES OF THE INADMINISTRABILITY PROBLEM

In my view there are three causes of the inadministrability of the federal income tax: The budgetary stringency that has characterized the federal budget since 1981 and will probably characterize it for decades to come; the continuing drive to close the compliance gap; and the workings of our political process.

Budgetary Stringency

Before 1981, the administration of our income tax benefitted handsomely from the so-called "fiscal dividend". That dividend arose from the application of a progressive rate structure to an inflationary economy. The fiscal dividend automatically provided more tax revenue each year. As a result, changes were made regularly to fine tune the system, even though they cost small amounts of revenue, since those small amounts could be absorbed in the annual revenue increment.

We have not seen the end of the use of information reporting as a means to improve tax compliance.

However satisfactory this arrangement may have been to those responsible for budget and tax policy, it was rightly considered to be unfair by citizens who faced each year a significant tax increase without Congressional vote. In my view, it became a powerful contributor to a growing citizen willingness to avoid tax. The fiscal dividend was largely eliminated by the Revenue Act of 1981, which introduced inflationary adjustments for tax brackets.

The 1981 Act also introduced a massive tax cut for business and individuals. Ever since, Congress has been preoccupied by an excessive deficit and insistent that all changes in the tax law be either neutral or productive of additional revenue. This insistence helps explain why the 1982, 1984, 1986 and 1988 Revenue Acts each exceeded 385 pages in length. A big enactment makes it easier to balance the gainers and losers.

Efforts to Close the Compliance Gap

The compliance gap is currently estimated at about $85 billion, of which about 30 percent is attributable to the failure of many independent contractors to report all their income.

The best way to improve compliance with an income tax law in a complex society is to reduce opportunities for noncompliance. Thus, the withholding of income tax on salary and wage income virtually assures the 95 percent compliance rate that we find for this category of income. Information reporting is proving to be remarkably successful in improving the proportion of interest, royalty, dividend and capital gain income that is reported on returns. Attention is currently focused on whether there is some way to extend reporting requirements to reach the scandalously high portion of independent contractor income that is not reported, without creating excessive administrative and compliance burdens.

While information reporting facilitates the job of the tax collector, it adds cost and irritation to the conduct of business and financial affairs. Back-up withholding sounds as if it were an appropriate enforcement device. The trouble is that, like it or not, private firms and individuals become the policemen who must administer the sanctions.

The private sector, while clamoring for repeal, is volunteering no assistance in designing a workable substitute.

We have not seen the end of the use of information reporting as a means to improve tax compliance. IRS is currently devoting attention, as it should, to the use of national boundaries, Swiss bank accounts, and off-shore corporations as techniques to avoid taxation. Sooner or later someone will invent a reporting technique that will help curb improper use of foreign corporations, and this will necessitate yet another set of forms for scrutiny by IRS.

The compliance problem contributes to inadministrability in one additional way: It encourages an atmosphere of distrust in the tax world. We have all seen it within the tax writing committee staffs, who traditionally act on the apparent assumption that all taxpayers will avoid tax to the maximum extent ingenuity permits, and consider themselves obligated in response to use all the ingenuity they possess to close every conceivable loophole.

doubt over the rationality of the system undermines willingness to comply and encourages an attitude that getting by is good enough.

Former Commissioner Gibbs referred to this attitude of distrust in remarking on IRS experience with tax shelters in the 1970's and 1980's:

"Quite frankly, we [the IRS] lowered our expectations of taxpayers and practitioners . . . We not only looked for aggressive tax positions, we expected to find them. Instead of being able to judge each case solely on its merits, the cumulative effect of what we were seeing began to take its toll. The result was a far less positive, more adversarial relationship between taxpayer and tax administrator."

Political Processes

The pressures of the budget deficit and the compliance gap are exacerbated by the way the political process produces half-a-loaf tax amendments, drafted by Congressional Committee staff. When tax cuts are out of the question, each interest group is arrayed against each other group. Each has contributed to the campaign coffers of several or many members of tax writing committees who are likely to support the group's position. Even assuming the highest integrity on the part of the members of the committees, differences among members are certain. To resolve the differences, the committee chairmen must push

compromises, since only in that way can each committee member deliver a portion of a loaf to his or her constituents. Compromises are inherently complex. They are particularly complex when they are designed by staff lawyers who are under pressure to collect every possible dollar of revenue and uninterested in simplifying approximations.

I believe that the frustrated army of tax practitioners throughout the country, to say nothing of the taxpayers who still prepare their own business or individual returns, can be an equally effective political force in support of administrability.

No relief is on the horizon from any of these three forces. Unless we become more relaxed than we should about using social security surpluses to finance current operations, or find a national leader willing to propose higher taxes, the federal government budget promises to be tight for decades. Progress in eliminating the compliance gap will be steady but slow; the gap will still be measured in tens of billions of dollars a decade from now. The restoration of a Wilbur Mills-style strong committee chairmanship form of operation in Congress is improbable.

Businesses and practitioners cannot make their taxation lives more palatable by pursuing simplification as such, or by railing against yet additional information gathering and disclosure requirements. We can make progress, if at all, by focusing on the management of complexity and of data-gathering, that is to say, by focusing on the administrability of a complex income tax system that imposes substantial administrative burdens. If it must be complex, how can the complexities be handled to result in minimum expenditure of unnecessary time?

A Proposal to Improve Administrability

A more administrable income tax law can be achieved if the private and public sectors work together to achieve it. I offer three specific suggestions for actions the private sector can take to promote administrability.

the private sector should become a major player in the regulation process.

(1) My principal suggestion is that the private sector should become a major player in the regulation process. I suggest that affected taxpayers organize a process so that, when a regulation has been published, the taxpayer community will prepare a substitute regulation and, in many instances, two substitute regulations.

we should work harder to educate key people in the public sector on the importance of administrability.

The first will have substantially all the detail of the IRS original, but will be designed to achieve as much administrability as the Congressional enactment will permit. Where, as in the Code provisions prohibiting discrimination in health plans, the Congressional enactment is inherently inadministrable, the taxpayer proposal will consist of substitute legislation. Sampling and industry average percentage adjustments and the like will be considered as shortcuts to precise information derived through elaborate data collection processes. Information collected for financial statement purposes, sometimes adjusted by percentage factors, will be preferred to new data gathering requirements.

The second form of regulation would be optional with the taxpayer and would be designed to be simple in application. It would be intended for taxpayers whose amounts at stake are sufficiently small that it is more economic to use a simple rule, which does not necessarily save the taxpayer the last tax dollar, than to devote the professional time required to apply the detailed rules designed for taxpayers with more at stake. It would be designed so that, in most instances, it would raise a little more revenue than the complex version.

My further premise is that the disease of inadministrability if so serious, and the likelihood that the public sector will cure it is so small, that the incentive to overcome conflicting interests is great.

As the choice between the two forms of regulation would be with the taxpayer, there would almost certainly be some revenue cost to the Treasury when sophisticated taxpayers found it advantageous to choose the simple rule. That revenue loss would be a small price to pay for providing simple rules for less sophisticated taxpayers to live by.

For example, consider the passive loss regulations. At present they are written so that a taxpayer with sufficient dollars at stake can plumb all 145 pages to their depth and, nearly always, find a definitive answer. These regulations are poorly designed for the much larger number of practitioners who must prepare a return economically for a taxpayer with only a few dollars at stake and who cannot afford to penetrate the subject more than superficially. Why cannot regulations and other guidance

publications be written to meet the distinct needs of these two groups?

I do not minimize the difficulty the private sector will have getting together on its substitute versions of a regulation. My premise is that administrability issues are generally different from tax burden issues. My further premise is that the disease of inadministrability is so serious, and the likelihood that the public sector will cure it is so small, that the incentive to overcome conflicting interests is great.

. . . tax writing committee staffs . . . traditionally act on the apparent assumption that all taxpayers will avoid tax to the maximum extent ingenuity permits, and consider themselves obligated in response to use all the ingenuity they possess to close every conceivable loophole.

It may be important to observe that it is in the interest of sophisticated taxpayers and the practitioners who serve them to prepare the simple rules for the less sophisticated taxpayers, because it is the availability of those simple rules that will insure the political effectiveness of the organized taxpayer and tax practitioner enterprise.

To prepare private sector regulations and substitute legislation, I suggest that private sector organizations use a procedure borrowed from the American Law Institute. Under that procedure an individual, perhaps a professor of taxation or a practitioner who is competent in the particular field in question, is engaged as Reporter. He or she is given one or possibly several groups of advisors. In the ALI format one group, generally not more than ten, meets quarterly. The other group, frequently twenty but sometimes as large as fifty, meets every six months or so.

Compromises are inherently complex. They are particularly complex when they are designed by staff lawyers who are under pressure to collect every possible dollar of revenue and uninterested in simplifying approximations.

The Treasury, IRS, and tax writing committee staffs could well be represented on one or both committees. Through the good offices of members of the tax writing committees, or using the private sector estimators who are now available, the revenue gain or loss from the private sector, more administrable, alternative would be estimated. There would be compromises, heavily influenced by the revenue estimates. The work product would be a blend of the Reporter's ideas and the judgments of the advisory committees. Final approval of a Private Sector Administrability Council, which might consists of the leadership of tax practitioner and business tax organizations, could be required.

The finished work product would be reported to the Treasury, the Internal Revenue Service, and where appropriate, the Congress.

(2) The private sector effort I have just described will work better if the private sector also adopts my second suggestion. It is that we should work harder to educate key people in the public sector on the importance of administrability. It is not enough that the Assistant Secretary for Tax Policy, the senior members of his small staff, the Commissioner of Internal Revenue, and the Chief Counsel, all appointed from the private sector, will have experienced the difficulty of administering the income tax law. It is not enough that the present Chief of Staff of the Joint Committee, unlike many of his predecessors, has a substantial private sector background.

This thin top layer of people with private sector experience is important but, numbering fewer than a dozen, they clearly are not sufficient. They cannot write the regulations and notices. They do not draft the statutes, the committee reports, or the Blue Book. It is necessary that the bright and well intentioned young men and women who perform those tasks be made more aware of the problems resulting from excessive complexity and inadministrability.

All of us have a tremendous stake in becoming partners in tax administration, in shoring up the credibility of our tax system, and in reducing the tensions between us.

Such education should not be delayed until a bill is pending. An effort should be undertaken at once to arrange for a hearing on administrability issues, so that attention can be called to the magnitude of the private sector effort required to comply with the Internal Revenue Code of 1986. The effort need not be carried on exclusively at hearings. Members of the tax-writing committees and Treasury staffs are ordinarily available to listen to taxpayers who have relevant information to impart. I know of one major corporation that met with such a group last fall to report on the extraordinary burdens which were imposed in the filing

(continued on page 6)

(continued from page 5)

season for the 1987 year on U.S. corporations with subsidiaries abroad.

(3) My final suggestion is that the private sector begin at once to identify one or several members of the Ways and Means Committee and of the Finance Committee who are sympathetic to administrability problems. That cause needs a champion. To champion this cause ought to be politically attractive. It is said that the insurance industry has achieved its generally preferred tax status over the years because of the army of insurance agents spread throughout the country who can exert political pressure when the interests of the industry are threatened. We all recall the effectiveness of the banking and thrift industries in defeating the proposal that withholding be extended to interest and dividends. I believe that the frustrated army of tax practitioners throughout the country, to say nothing of the taxpayers who still prepare their own business or individual returns, can be an equally effective political force in support of administrability.

In his Inaugural Address, President Bush said "This is the age of the offered hand." Former Commissioner Gibbs concluded an address to the American College of Tax Counsel by stating:

"All of us have a tremendous stake in becoming partners in tax administration, in shoring up the credibility of our tax system, and in reducing the tensions between us."

Under his leadership, the IRS went further in putting out its hand in search of cooperation than at any time in my memory.

The problem is to make the rhetoric of the President and the Commissioner a reality. Treasury and IRS will respond if the private sector pays attention to administrability and, without attempting to shift tax burdens, develops proposals that will make the income tax law one with which practitioners and business firms can comply without expenditure of unreasonable effort.

I am confident that if the more than 100 million taxpayers and 300,000 tax practitioners in this country organize in support of administrability, they will represent a political force to which Congress will respond.

NTA to offer members a literature search service

Not uncommonly when a novel tax proposal comes on the scene—a bill thrown in the legislative hopper, for example, or an idea dreamed up by an influential individual or organization—tax department staff members are set scurrying about to find out what, if anything, has ever been written on the subject.

No longer is the library the first and only place to look. Modern electronic technology has transformed the nature of such searches. Information retrieval specialists can now search more widely, more selectively, and at lower cost than the traditional system that relied on a graduate student, intern, or junior staff member.

As a special service to NTA members, the Association has made arrangements with BusinessWords Comprehensive, a Columbus firm specializing in data retrieval, to conduct thorough and speedy searches of the tax literature on any topic, on request, at a special NTA member rate.

Full details will be mailed in several weeks. In outline, to find out what has been written on a topic of interest, for example the taxation of sales of illegal drugs, one would phone in and describe the topic in such a way as to enable the literature search specialist to identify key words or combinations of words on which to focus the search.

The search would cover a wide variety of online data bases. The member would receive by mail or fax a list of items (journal articles, news stories, legislative actions, etc.) relating to the topic, together with a summary of the contents. Full text can then be obtained if desired.

The scope of the search can be delimited in any of a variety of ways, for example, data bases to be searched, number of years to go back, or time or amount to be spent on the search.

The member will be billed directly. A typical search might cost from $100 to $300. Our search on taxation of illegal drugs, for example, turned up 20 references going back to 1983 and cost a little over $100.

As an introduction to the system, BusinessWords will allow NTA members one limited search on any topic for just $35.

The Association plans neither to subsidize nor profit from this service. Major benefits to NTA members consist of facilitation of access and lower cost due to economies of scale.

While NTA assumes no responsibility and offers no guarantees, our explorations indicate that BusinessWords is reliable and competent. We believe that many members are likely to find the service useful.

Look for full details soon.

Federal Tax Reform

(continued from page 1)

question by noting that "tax reform has never been off the agenda." Since 1986 there has been constant tinkering with the tax system, always in the name of reform. The 1986 TRA "simplified business decision making, but it did not simplify the tax law."

The trouble with tax reform, Wells stated, is that it always loses revenue. Serious tax reform is unlikely to occur until the political climate becomes receptive to consideration of new revenue sources.

Wells listed seven specific areas where reform is needed:

(1) Rationalize rules and procedures for taxing foreign source income.

(2) The capital cost recovery system.

(3) Simplification, understandability, and "avoidance of constant change."

(4) Integration of the personal and corporate income taxes.

(5) Pension plans and the taxation of Social Security income.

(6) A uniform rule applicable to profit sharing plans.

(7) Giving the IRS adequate resources to do its job.

Rudy Penner, of the Urban Institute and formerly director of the Congressional Budget Office, agreed on the need to resist the drive for "tax unreform" and on the need for greater stability in tax laws.

(continued on page 7)

(continued from page 6)

He also thinks a broad based consumption tax unlikely and that "we are pretty much stuck with the present personal and corporate tax system."

There remain three significant base-broadening possibilities:

(1) Owner occupied housing, especially second homes above a certain amount.

(2) Untaxed fringe benefits such as pensions and health insurance.

(3) Social Security benefits.

For items (1) and (2) Penner thinks there are signs of growing political acceptability.

The danger with all efforts to raise additional revenue, Penner emphasized, is that they create demands for concessions that may "cause tax reform to unravel." But if done "slowly", he thinks it possible to continue to have both low rates and a broad tax base.

The final panelist, Greg Ballentine, of Peat Marwick, argued against more reform and more legislative activity. To do so encourages both political "activists" and "passivists" to seek tax concessions in furtherance of their respective policy goals.

The overriding need is for more revenue. The size of the deficit is a big concern. Structural reform is relatively unimportant.

He hopes Congress will keep its hands off the tax system until there develops a consensus for a major revenue increase. What would Ballentine like to see done then? "Raise rates."

New Members

The Association is pleased to welcome the following new members who have joined since July 1, 1989

NAME	STATE OR COUNTRY
David S. Allen	AZ
Tamein Anderson	NJ
Paul J. Beck	IL
Warren Bilotta	VA
E. Ray Canterbery	FL
Bradford Case	VA
Vineeta Chopra	India
Citibank NA (Denise Strain)	NY
Grant M. Clowery	IL
C. Bryan Cloyd	IN
Michael Compson	NC
Eugene F. Corrigan	CA
Ethniko Kentro Dimosias	Greece
Koentjoro Djojodikoesoemo	Indonesia
Kathryn Engebretson	PA
Facultad de Derecho	Spain
James P. Feehan	Canada
Kathy Fiederlein	IN
James G. Fitzgerald	CT
John D. Fox	MA
William M. Gentry	NJ
Harry L. Gutman	PA
Seth Hammer	PA
Rita M. Hilton	NY
Thomas D. Hopkins	NY
Wei-te Hsieh	CA
Sheng Cheng Hu	IN
Michael Hylan	NY
Indiana State University	IN
Ingram and Associates, Inc.	TN
Suvanit Karnjanavanit	Thailand
Anamaria Seanini Kazanis	GA
Richard F. Keevey	NJ
Bruce R. Kingma	OH
Michael W. Lawson	CT
Donna L. Letterio	NY
Suming Lin	AZ
Jeff Lonsdale	IL
Thomas F. Luce	PA
Victorino Mamalateo	Philippines
Thomas H. Marks	NY
Richard E. Maxwell	OH
Yabanzayo E. Mazeya	NY
Robert F. McCammon, Jr.	PA
Bruce Merenstein	PA
Walter S. Misiolek	AL
Simon B. Mozayeni	NY
Susan C. Nelson	DC
Jo Beth Mertens	GA
Northwestern Univ. Library	IL
Office of Auditor General	Canada
O. F. Perera	Sri Lanka
Mark Perrault	MA
Wilhelm Pfaehler	W. Germany
Alfred Pohe	Solomon Is.
Lidija Polutnik	GA
Mark W. Rider	GA
Diane Lim Rogers	PA
Francisco Ruge-Murcia	VA
Robert Scheoni	MI
Amy Ellen Schwartz	MA
Thomas M. Seldon	WI
William J. Sheldrake	IN
Mark Shroder	WI
Jonathan Skinner	VA
Young-Dahl Song	NC
The University of Calgary	Canada
Alicia L. Tomacruz	Philippines
University of Queensland	Australia
Lowell Walker	NY
David Weiner	VA
Ira Weiss	PA
Laura A. Wheeler	NY
W. Loren Williams	CA
Gerald Wise	TX

We invite you to join us in our work

APPLICATION FOR MEMBERSHIP

NATIONAL TAX ASSOCIATION
5310 East Main Street • Columbus, OH 43213

I wish to become a member of the National Tax Association.

My check for $_____ is enclosed for the payment of annual dues. I understand that $40.00 of my dues ($45.00 for foreign members) covers the subscription cost of the *National Tax Journal*, and that I will receive the *Proceedings of the Annual Conference* and all other publications of the Association at no additional cost.

Sustaining Member	$500.00 or more
Corporation or Government Agency	$300.00
Corporate employee or professional	$120.00
Government employee, academic, or library	$ 60.00
Full-time student or inactive retiree	$ 15.00

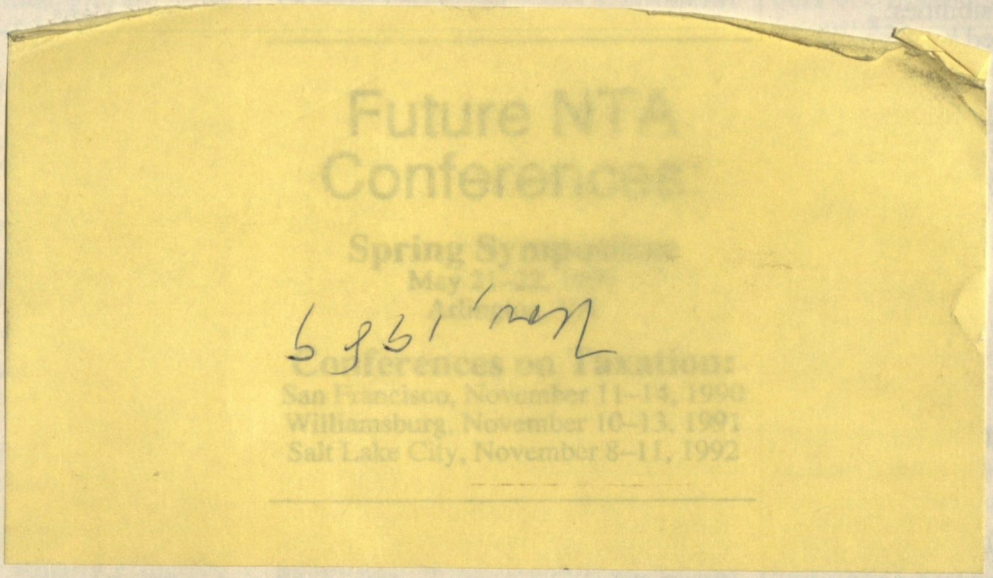
NAME_____
(PLEASE PRINT)

TITLE_____

AFFILIATION_____

STREET ADDRESS_____

CITY_____ STATE_____ ZIP_____



NTA Forum
National Tax Association
5310 East Main Street
Columbus, OH 43213
Form 3579 Requested