From:	peter.collins@au.pwc.com				
To:	<"cn=	ou=au/ou=tls/o=pwc@asiapac">			
Sent:	Wednesday, 05/08/2015 05:11 PM				
Subject:	Re: chat for 5 when you get a moment? eom				

No worries. Unless has a secret deal with **see MAAL** will start as planned. Treasury absolutely clear on this today. Worth a quick chat.

Re	eg	a	r	d	s	

Peter

Peter Collins

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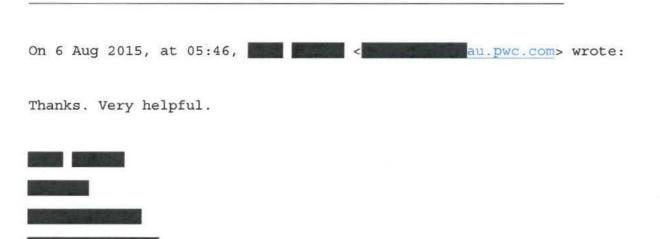


International Tax Services PwC Australia Office: Cell: peter.collins@au.pwc.com http://www.pwc.com.au http://www.linkedin.com/in/petercollinspwc

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On 5 Aug 2015, at 21:55, Peter Collins peter.collins@au.pwc.com>
.wrote:

There was some more consultation today on s177DA and BEPS more generally.

On 177DA, changes to the draft legislation proposed but likely to be around the fringes only; broad intent not influenced by the various submissions.

Main questions from clients relate to start date which seems locked in for 1 Jan 16 as originally proposed. Current plan is legislation through Parliament in October and we would expect to see the revised legislation in the meantime.

Peter Collins

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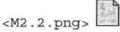
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Taxtalk: www.pwc.com.au/tax/taxtalk/

Worldwide Tax Summaries: taxsummaries.pwc.com

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The industries that might have problems include non-resident Tech/Digital, shipping, virtual retailers, insurers/reinsurers, funds managers, commodity traders, telcos and service providers generally. In addition, ANY inbound commissionaire structure might have a problem.

So the field is large, and time is short.

Do you think the TP practice could identify clients with inbound commissionaire structures where they would be receptive to a conversation on 177DA? Can you identify those clients for us?

Happy to discuss.

Thanks



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On 20 Aug 2015, at 1:05 am, and a second secon

Understand you're leading TP interface on US targeting effort on behalf of the broader team. I have enclosed Australian TP client data on our top 30 FY15 US clients below. I will set up a call with the set of the discuss client interface and relationship support assistance we can provide.

As one of the more recent coordination with you and the team on our side. In the interim if you have any questions pls let me know.

Best

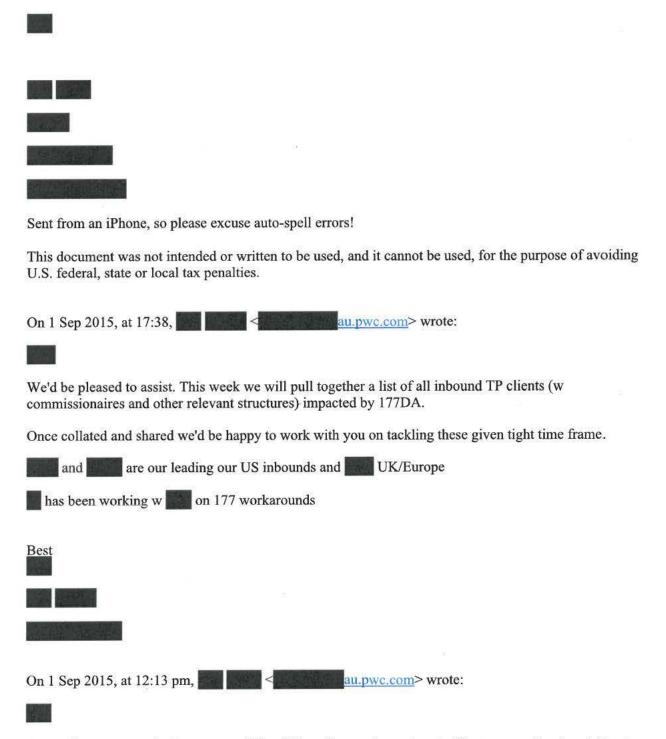


(See attached file: Aust TP US client relationship data.xlsx)

partners/directros will send any relevant backgr

From: AU/TLS/PwC To: AU/TLS/PwC@AsiaPac, AU/TL Thanks. Look forward to the list.

and I are working closely on DPT solutions. Very happily, **see** is this week sending out and signing up numerous SoWs to Bay targets and clients!



As you know, we are in the process of identifying clients where a head office conversation in relation to BEPS, CbyC, 177DA etc changes would be fruitful. The list is quite long.

In relation to s177DA, any fix needs to be implemented in 2015 for technical reasons and so this has the highest priority.