



The Contemporary Tax Journal

A publication of the SJSU MST program

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Letter from the Editor

Contemporary Tax Journal Spring 2014

*“The woods are lovely, dark and deep,
But I have promises to keep,
And miles to go before I sleep,
And miles to go before I sleep.”*

Stopping By The Woods On A Snowy Evening, 1923

By Robert Frost

I was in fifth grade when I first heard these lines. Then, as now, I had my own little interpretation of them. To me, miles to go before I sleep signify the numerous pastures I am yet to discover and wander into before my day comes to an end. Perhaps it was the innocence of a child picking up literal meaning from a poem, still, it has managed to stay with me. With the thought of learning and exploring new avenues everyday, I bring to you the Spring 2014 edition of “The Contemporary Tax Journal”. In this edition, we will cover non-conventional and upcoming areas in the world of tax.

We begin with an article interpreting the U.S. - Swiss treaty and allocation of endorsement compensation between royalty and personal income. The next segment covers session summaries from Tax Executives Institute Conference held in March 2013. The summaries include topics such as issues related to taxation of multijurisdictional income, international tax policy paths, one of the most relevant topics in Silicon Valley and bay area economics and its contribution to the US economy.

My personal favorite is the Tax Maven section of the journal that includes interviews with eminent tax professionals in the world of tax. What makes this section all the more unique is the fact that tax mavens are people who are connected to San Jose State University in one way or the other, such as being an alumni, speaker at our tax conferences or serving on the Tax Advisory Board. This issue brings to you the interview of two such people, Ms. Pam Olson and Mr. David Doerr. Moving on to the next section The Focus on

Tax policy features two analyses of tax rules using principles of good policy outlined by AICPA, being the latest additions to our library of tax proposals.

Finally, I would like to thank Professor Annette Nellen and Professor Bobbi Makani for their guidance, support and tireless efforts for bringing us all together. This year, we have two new members to the journal team; Professor Joel Busch is the member of the editorial board. Ms. Catherine Dougherty is our new Webmaster, and also the MST program coordinator. Thank you for your time and efforts. Last but not the least, I would like thank all my fellow MST students for their contribution towards the journal.

Stuti Seth

Student Editor