

Administration of Barack Obama, 2011

Message to the Senate Transmitting the Protocol Amending the Swiss Confederation-United States Taxation Convention

January 26, 2011

To the Senate of the United States:

I transmit herewith, for the advice and consent of the Senate to their ratification, the Protocol Amending the Convention between the United States of America and the Swiss Confederation for the Avoidance of Double Taxation with Respect to Taxes on Income, signed at Washington on October 2, 1996, signed on September 23, 2009, at Washington, as corrected by an exchange of notes effected November 16, 2010 (the "proposed Protocol") and a related agreement effected by an exchange of notes on September 23, 2009 (the "related Agreement"). I also transmit for the information of the Senate the report of the Department of State, which includes an Overview of the proposed Protocol and related Agreement.

The proposed Protocol and related Agreement provide for more robust exchange of information between tax authorities in the two countries to facilitate the administration of each country's tax laws. They generally follow the current U.S. Model Income Tax Convention and the Organization for Economic Cooperation and Development standards for exchange of tax information. The proposed Protocol and related Agreement also provide for mandatory arbitration of certain cases that the competent authorities of each country have been unable to resolve after a reasonable period of time.

I recommend that the Senate give early and favorable consideration to the proposed Protocol and related Agreement and give its advice and consent to their ratification.

BARACK OBAMA

The White House,
January 26, 2011.

Categories: Communications to Congress : Swiss Confederation-U.S. Taxation Convention, message transmitting protocol amending

Subjects: Switzerland : Taxation Convention, Swiss Confederation-U.S.

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