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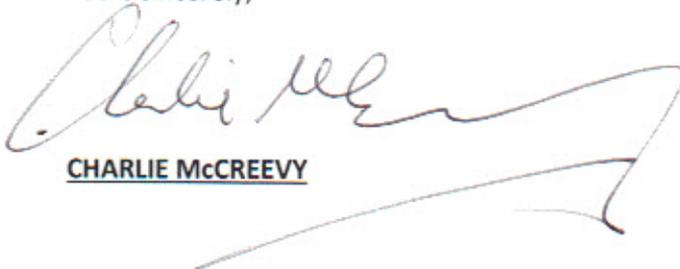
RE: Comments: International Tax Reform Working Group

Dear Sirs,

In my previous capacity as European Commissioner for Internal Markets and Services (2004 to 2010,) I attach a paper submitted by the EU which I supported while I was Commissioner in relation to a U.S. proposal to deny a tax deduction of reinsurance premium when ceded from a U.S. based company to a foreign reinsurer when the two companies have common ownership. Prior to my time as EU Commissioner, I was the Finance Minister of Ireland from 1997 to 2004.

As EU Commissioner, I viewed the proposal as a protectionist measure and a restraint of free trade when it was considered by the Senate Finance Committee in 2009 and supported the attached submission then. I see no change and continue to support the arguments opposing the proposal and wish to draw the attached paper to your attention as the arguments presented therein are still applicable today.

Yours sincerely,



CHARLIE McCREEVY