

*Parker Fielder Conference, October 27, 2011*  
*William J. Wilkins Prepared Remarks*

Thank you for inviting me, and special thanks to the University of Texas, the sponsors, and the conference organizers. I wanted to use my time today to describe some current topics in tax administration, with a special focus on issues affecting business taxpayers and their advisors.

These are certainly interesting times in tax administration. Much of our effort involves following through on recent legislative and administrative initiatives that are designed to improve tax administration through smarter use of information and through using points of leverage to communicate tax compliance messages. On the information front, recent legislation authorized new information collection from brokers on the basis of securities, and from credit card and other payment processors on business receipts. On the leverage front, the new Schedule UTP is leveraging financial accounting

processes to improve audit selection and issue selection for large corporations; return preparer registration and oversight is leveraging several hundred thousand preparers in order to try to improve the quality of tens of millions of tax returns; and there has been ongoing communication with the tax bar to leverage their ability to communicate with individuals who have compliance problems associated with offshore financial accounts.

Our roles in the Office of Chief Counsel include working with internal and external stakeholders to provide workable regulatory frameworks for these initiatives; to provide guidance that makes the tax law more administrable and easier to comply with, within the confines of enacted statutes; to participate in resolving conflicts between the IRS and particular taxpayers; and in particular to use both litigation and regulatory approaches to old and new forms of tax avoidance.

Also available as part of the eCourse

[Oil and Gas Tax, Part 2: Current Developments in Tax Administration with IRS Chief Counsel; Ethics and Professional Responsibility with IRS Director of OPR; plus the Latest Techniques and Trends to Resolve an LB&I Audit \(2011\)](#)

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