

## we wear jobs

April 15, 2015

The Honorable Chuck Schumer Senate Finance Committee International Tax Working Group 322 Hart Senate Office Building Washington, DC 20510

The Honorable John Thune Senate Finance Committee Business Income Tax Working Group 511 Dirksen Senate Office Building Washington, DC 20510

The Honorable Ben Cardin Senate Finance Committee Business Income Tax Working Group 509 Hart Senate Office Building Washington, DC 20510

The Honorable Rob Portman
Senate Finance Committee International Tax Working Group
448 Russell Senate Office Building
Washington, DC 20510

## RE: Request for Input to Senate Finance Committee Business Income Tax Working Group and International Tax Working Group

Dear Senator Schumer, Senator Thune, Senator Cardin, and Senator Portman:

We are writing in response to your request for comments on substantive ideas to reform the U.S. tax code. Several of our apparel and footwear member companies submitted comments which are summarized in the following points:

- The U.S. corporate tax rate must be reduced. A corporate tax rate of 25 percent or less would bring the United States to a rate closer to that of other developed economies, leveling the playing field.
- The U.S. should move closer to a territorial taxation system, whereby income is taxed in the jurisdictions it is earned.
- Repatriated overseas earnings should be taxed at a lower rate than the regular corporate tax rate. A U.S. tax on repatriated

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(703) 524-1864 (800) 520-2262 (703) 522-6741 fax www.wewear.org foreign earnings at a rate of 5 percent would allow flexibility for bringing corporate income earned overseas back. The current harsh tax penalty for repatriation should be lessened greatly.

- The Last-In, First-Out (LIFO) inventory method must be preserved. Requiring LIFO users to recapture taxable income under LIFO reserves will result in an extreme retroactive tax increase. A reduction in the tax rate would not compensate for the detrimental effects of LIFO repeal.
- Any comprehensive tax reform must include reform of passthrough companies, such as S corps and LLCs.

Thank you for attention to this important issue. Please feel free to direct any questions to David Lapidus of my staff at <a href="mailto:DLapidus@wewear.org">DLapidus@wewear.org</a>.

Sincerely,

Juanita D. Duggan President and CEO

Juanita D. Duggar

American Apparel & Footwear Association