DEDICATION

THOMAS C. ATKESON ........................................ v

ARTICLES

Simplification and Equity as Goals of Tax Policy ...................... Stanley S. Surrey & Gerard M. Brannon 915
Planning and Research: Its Evolution and Role in the Internal Revenue Service ........ Sheldon S. Cohen 922
The Reincorporation Problem in Subchapter C: A Question of Semantics? ................. R. P. Hertzog 928
The IRS Program to Up-Date Published Rulings .......................... Harold T. Swartz 951
Federal-State Cooperation in Tax Administration ...................... James R. Turner 958
Rental Real Estate Corporations and Section 341 (e)(3) of the Internal Revenue Code ...... William P. Oberndorfer, T. Howard Spainhour & Michael E. Overton 972
Tax Ruling Procedure Revisited ......... Norman A. Sugarman 1011
The Treatment of Income & Deductions in the Case of Controlled or Related Entities ...... William H. Westphal 1041
New Dimensions to the Thin Corporation .................................. Waller H. Horsley 1066
Problems of Private Claimants Under Miller Act Payment Bonds .......... Paul H. Gantt, Robert D. Wallick & James M. Proctor 1077

NOTES

Rules Defining the Use of Trade Terms in Patent Applications .................... 1104
A Proposal to Make Lex Domicilii the Required Choice of Law Under Article 28 of the Warsaw Convention. 1118

Commercial Decency and the Code—The Doctrine of Unconscionability Vindicated 1143

Current Decisions


Federal Taxation—Reorganization—Spin-Offs—Labor Difficulties as a Valid Business Purpose—Sidney L. Olson, 48 T.C. 855 (1967) 1190

Book Reviews

Honesty and Competition—False Advertising Law and Policy Under FTC Administration—William W. Gillies 1195

Preludes to Gideon—George D. Horning, Jr. 1199

Civilians Under Military Justice: The British Practice Since 1689, Especially in North America—Robert E. Quinn 1203

Psychoanalysis, Psychiatry and the Law—Russell P. Norman 1207

Books Noted 1213

Index 1219
ERRATA

Volume 8, Number 4. The rules referenced on pages 510, 511, and in Appendix B on pages 529-532 are the rules of the Atomic Energy Commission. The rules of the Atomic Energy Commission Board of Contract Appeals do not contain discovery provisions as such.