



United States Department of State

Washington, D.C. 20520

JUN 30 2009

Dear Ms. McLernon:

Thank you for your letter in support of the Protocol Amending the Convention Between the Government of the United States of America and the Government of the French Republic for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with Respect to Taxes on Income and Capital, signed at Paris on August 31, 1994. The Secretary has asked me to respond on her behalf. I very much appreciate your characterization of the bilateral business relationship between the United States and France and the beneficial effects of this relationship. As your letter points out, although this relationship has already resulted in significant gains for both countries, there remains the potential to strengthen it.

Treaties for the avoidance of double taxation are a useful tool for providing businesses with a stable and transparent operating environment. Thus, we are pleased to report that on May 21st Secretary Clinton signed the letter to the President recommending the transmission of the protocol to the Senate for its advice and consent to ratification.

Please do not hesitate to contact me with any additional questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "David Nelson", written in a cursive style.

David D. Nelson
Assistant Secretary, Acting
Bureau of Economic, Energy and
Business Affairs