

**No. 14647**

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**UNITED STATES OF AMERICA  
and  
INTERNATIONAL LABOUR ORGANISATION**

**Exchange of letters constituting an agreement relating to the  
reimbursement of income taxes. Geneva, 15 April and  
16 May 1975**

*Authentic text: English.*

*Registered by the United States of America on 11 March 1976.*

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**ÉTATS-UNIS D'AMÉRIQUE  
et  
ORGANISATION INTERNATIONALE  
DU TRAVAIL**

**Échange de lettres constituant un accord relatif au rem-  
boursement de l'impôt sur le revenu. Genève, 15 avril et  
16 mai 1975**

*Texte authentique : anglais.*

*Enregistré par les États-Unis d'Amérique le 11 mars 1976.*

EXCHANGE OF LETTERS CONSTITUTING AN AGREEMENT<sup>1</sup> BETWEEN THE UNITED STATES OF AMERICA AND THE INTERNATIONAL LABOUR ORGANISATION RELATING TO REIMBURSEMENT OF INCOME TAXES

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I

UNITED STATES MISSION TO INTERNATIONAL ORGANIZATIONS  
GENEVA, SWITZERLAND

April 15, 1975

Dear Mr. Blanchard:

I have been authorized to inform you that the United States Government can reimburse the International Labor Office for the sums utilized to reimburse personnel subject to payment of U.S. income tax in order to equalize the remuneration between such personnel and staff members of the ILO not subject to national taxes. To do this, I propose below a formal agreement establishing the procedure:

“The United States Government understands that the International Labor Office (ILO) will pay any tax reimbursements to U.S. citizens or others liable to pay U.S. income taxes who are staff members of the ILO through a special suspense account. The U.S. Government will be obligated to pay a tax equalization charge as part of its annual payment to the ILO to compensate this special suspense account. This charge will cover actual reimbursements made by the ILO to employees subject to U.S. income taxes. This Agreement does not cover ILO employees paid from voluntary funds.”

Your concurrence in the above paragraph by letter will constitute the agreement between the United States Government and the International Labor Office formalizing the tax reimbursement procedure which will enter into force retroactively as of January 1, 1975.

Sincerely yours,

[Signed]

FRANCIS L. DALE  
U.S. Permanent Representative to International Organizations

The Honorable Francis Blanchard  
Director General  
International Labor Office  
Geneva

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<sup>1</sup> Came into force on 16 May 1975 by the exchange of the said letters, with retroactive effect from 1 January 1975, in accordance with their provisions.

## II

INTERNATIONAL LABOUR OFFICE

BUREAU INTERNATIONAL DU TRAVAIL  
GENÈVE

The Director General

Le Directeur général

16 May 1975

Dear Mr. Dale,

Thank you for your letter of 15 April 1975 proposing a formal agreement by which the United States Government will compensate the International Labour Office for the sums utilized to reimburse U.S. income taxes incurred by its staff members paid under its regular budget. You proposed agreement to the following text, which would establish the procedure:

[See note 1]

I am happy to indicate my concurrence in the above text, on the understanding that it concerns all U.S. income taxes levied on ILO income, and my acceptance that this exchange of letters constitutes the agreement between the United States Government and the International Labour Office formalizing the tax reimbursement procedure which will enter into force retroactively as of 1 January 1975.

May I take this opportunity to thank you for the attention you and your Government have given to this matter.

Yours sincerely,

[Signed]

FRANCIS BLANCHARD  
Director-General

S.E. M. Francis L. Dale  
Ambassadeur  
Représentant permanent  
Mission permanente des Etats-Unis auprès de l'Office des Nations Unies  
et des autres organisations internationales à Genève  
Genève

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