WHEREAS, the Government of the United States of America acknowledges the need to coordinate the reporting obligations under FATCA with other U.S. tax reporting obligations of Canadian financial institutions to avoid duplicative reporting;

WHEREAS, an intergovernmental approach to FATCA implementation would facilitate compliance by Canadian financial institutions while protecting the ability of Canadians to access financial services;

WHEREAS, the Parties desire to conclude an agreement to improve international tax compliance and provide for the implementation of FATCA based on domestic reporting and reciprocal automatic exchange pursuant to the Convention and subject to the confidentiality and other protections provided for therein, including the provisions limiting the use of the information exchanged under the Convention;

NOW, THEREFORE, THE PARTIES HAVE AGREED AS FOLLOWS:

ARTICLE 1

Definitions

1.   For purposes of this agreement and any annexes thereto ("Agreement"), the following terms shall have the meanings set forth below:

a)   The term "**United States**" has the same meaning as in the Convention. Any reference to a "**State**" of the United States includes the District of Columbia.

b)   The term "**U.S. Territory**" means American Samoa, the Commonwealth of the Northern Mariana Islands, Guam, the Commonwealth of Puerto Rico, or the U.S. Virgin Islands.

c)   The term "**IRS**" means the U.S. Internal Revenue Service.

d)   The term "**Canada**" has the same meaning as in the Convention.

e)   The term "**Partner Jurisdiction**" means a jurisdiction that has in effect an agreement with the United States to facilitate the implementation of FATCA. The IRS shall publish a list identifying all Partner Jurisdictions.

f)   The term "**Competent Authority**" means:

   (1)   in the case of the United States, the Secretary of the Treasury or the Secretary's delegate; and

   (2)   in the case of Canada, the Minister of National Revenue or the Minister of National Revenue's authorized representative.