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Practical Guide to U.S. Transfer Pricing

Robert T. Cole

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Transfer pricing rules are an inescapable part of doing business internationally. This third edition of **Practical Guide to U.S. Transfer Pricing** is designed to help multinationals cope with the U.S. transfer pricing rules and procedures, taking into account the international norms established by the Organisation for Economic Co-operation and Development (the "OECD"). It is also designed for use by tax administrators, both those belonging to the U.S. Internal Revenue Service and those belonging to the tax administrations of other countries, and tax professionals in and out of government, corporate executives, and their non-tax advisors, both American and foreign.

The U.S. rules are presented along with ideas on how to apply them in a common-sense fashion in a multi-jurisdictional world.

Highlights of the new U.S. developments include coverage of the following:

- Analysis of the many changes in the rules for intangibles since the 1994 Regulations and the effect of VERITAS Software Corp. v. Commissioner on the Comparable Uncontrolled Transaction (CUT) method.

- A summary of the July 2010 revision of the OECD Transfer Pricing Guidelines and guidance for restructuring transactions.

- Cost sharing material has been updated in light of recent court decisions in Xilinx v. Commissioner and VERITAS Software Corp. v. Commissioner.

- Analysis of the more receptive approach of U.S. Immigration and Customs Enforcement to transfer pricing documentation and advance pricing agreements.

- The progress on mandatory arbitration, the new statistics, and the reorganization of the Competent Authority function.

- The many changes in IRS examination procedures.

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