

Transfer Pricing — With So Much at Stake, Are You Confident That You Are Fully Informed?

You can be with **Transfer Pricing Report** — the one resource that pulls it all together:

- **Goes beyond the news**, providing both U.S. and foreign practitioners' perspectives and insights, feature articles, and expert analysis on how corporations are handling complex transfer pricing challenges.
- **Details major developments in foreign countries** and includes translations of selected full text such as laws.
- **Carries exclusive interviews** with U.S. and foreign government officials (including key IRS officials) discussing changing compliance and audit issues.
- **Offers what leading practitioners are recommending** to protect against double taxation, substantive assessments, and heavy penalties.
- **Covers every transfer pricing and permanent establishment case** filed in courts to give readers insight into various governments' audit practices.
- **Follows the latest on advance pricing agreement (APA) programs** around the world.
- **Shows how leading companies have structured their pricing** to comply with various government compliance and audit policies.
- **Written by an experienced staff dedicated to transfer pricing issues.**

Additional Benefits of Transfer Pricing Report On The BNA Tax Web Library:

- Searchable so you can easily research any issue
- Archive now includes all issues of Transfer Pricing Report back to 1992
- On same platform as the highly respected BNA Tax Management Portfolios



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Major Topics Covered:

- U.S. Code Sec. 482 Regulations and IRS Audit Policies
- Foreign Country Transfer Pricing and Permanent Establishment Law, Regulations, and Practice
- Documentation Requirements
- Penalties
- Court Proceedings and Decisions
- OECD, EU (including helpful charts that give project status)
- Competent Authority
- Information Document Requests
- Third-Party Summonses
- Advance Pricing Agreements, Cost Sharing Agreements, and Use of Joint Ventures

A Sample of Recent Articles:

- Costco Case Signals Progress in U.S.-Canada Negotiations
- Initiative to Keep Audits Current Seen Causing Unintended Results
- European Forum Moving Toward Two-Part System for Documentation
- Companies Attempt to Ensure Pricing Process Meets SOX Requirement
- A Market-Based Approach for Tangible Property Transfer Pricing
- Guarantee Fees, Transfer Pricing, Foreign Dividends Under Code Sec. 965

For more information, call your
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