TaxNewsFlash

United States

No. 2017-387
September 18, 2017

United States: LB&I practice units about transfer pricing issues

The IRS Large Business and International (LB&I) division publicly released two “practice units” that concern topics having transfer pricing implications:

- Competent Authority Rev. Proc. 2015-40 guidance: U.S. initiated adjustment(s)
- High value services: Technical and marketing fees – inbound

The practice units are part of a series of IRS examiner “job aides” and training materials intended to describe for IRS agents leading practices for specific international and transfer pricing issues and transactions, and are available on the IRS practice unit **webpage** (release date of September 15, 2017).

Direct comments, including requests for subscriptions, to Washington National Tax. For more information, contact KPMG’s Federal Tax Legislative and Regulatory Services Group at + 1 202.533.4366, 1801 K Street NW, Washington, DC 20006-1301.