



TaxNewsFlash

Transfer Pricing

No. 2017-140
November 21, 2017

United States: IRS update to jurisdiction status table, country-by-country reporting

The IRS today announced recently signed competent authority arrangements (CAAs) have been added as new content concerning country-by-country (CbC) reporting.

The IRS's [jurisdiction status table](#) includes recently signed CAAs for the exchange of CbC reports. The IRS's table also includes:

- Operative dates of the CAAs
- Jurisdictions that are in negotiations for a CAA, have satisfied the U.S. bilateral data safeguards and infrastructure review, and have consented to be listed

According to the IRS, CbC reporting data will be exchanged pursuant to bilateral CAAs that rely on income tax treaties, Tax Information Exchange Agreements, or the Convention on Mutual Administrative Assistance in Tax Matters that permit automatic exchanges of information.

The information contained in TaxNewsFlash is not intended to be "written advice concerning one or more Federal tax matters" subject to the requirements of section 10.37(a)(2) of Treasury Department Circular 230, as the content of this document is issued for general informational purposes only, is intended to enhance the reader's knowledge on the matters addressed therein, and is not intended to be applied to any specific reader's particular set of facts. Although we endeavor to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. Applicability of the information to specific situations should be determined through consultation with your tax adviser.

KPMG International is a Swiss cooperative that serves as a coordinating entity for a network of independent member firms. KPMG International provides no audit or other client services. Such services are provided solely by member firms in their respective geographic areas. KPMG International and its member firms are legally distinct and separate entities. They are not and nothing contained herein shall be construed to place these entities in the relationship of parents, subsidiaries, agents, partners, or joint venturers. No member firm has any authority (actual, apparent, implied or otherwise) to obligate or bind KPMG International or any member firm in any manner whatsoever.

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.

To unsubscribe from TaxNewsFlash-Transfer Pricing, reply to [Washington National Tax](#).

[Privacy](#) | [Legal](#)