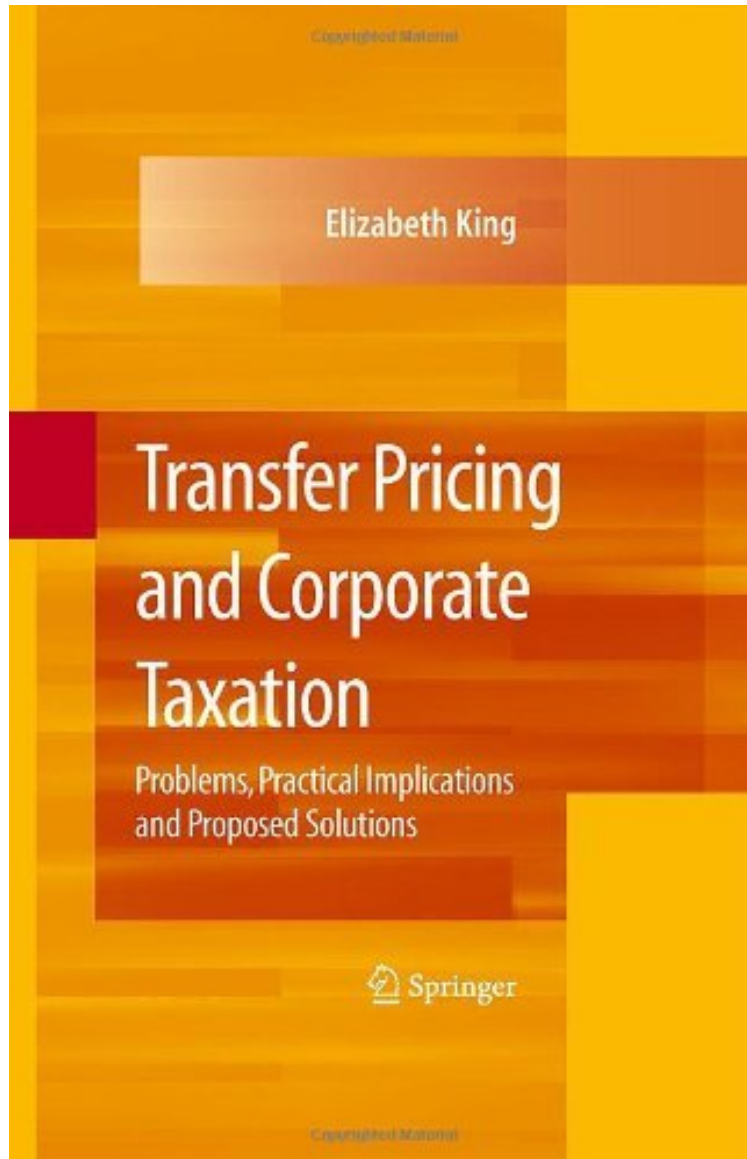


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Transfer Pricing and Corporate Taxation: Problems, Practical Implications and Proposed Solutions

Elizabeth King

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Elizabeth King : Transfer Pricing and Corporate Taxation: Problems, Practical Implications and Proposed Solutions before purchasing it in order to gauge whether or not it would be worth my time, and all praised Transfer Pricing and Corporate Taxation: Problems, Practical Implications and Proposed Solutions:

National tax authorities individually determine multinational firms' country-specific tax liabilities by applying one or more sanctioned transfer pricing methodologies. These methodologies are founded on basic assumptions about market structure and firm behavior that are rarely empirically valid. Moreover, for the most part, the transfer pricing methodologies now in vogue were developed before the Internet became a dominant factor in the world economy, and hedge and private equity funds transformed financial and commodities markets. For these reasons, multinational firms are unable to accurately anticipate their tax liabilities in individual countries, and remain at risk of double taxation. Uncertainties in corporate tax liability are extremely costly, both for individual corporations and from an economy-wide perspective. Firms pay exorbitant fees to have tax attorneys, accountants and economists prepare the documentation required by tax authorities to substantiate their intercompany pricing practices and defend their tax positions on audit. Corporate tax liabilities are also potentially much higher than they would be under a more transparent and predictable transfer pricing regime (due to the potential for double taxation and penalties), and investors' returns are reduced accordingly. The FASB's Interpretation No. 48, Accounting for Uncertainty in Income Taxes (released on July 13, 2006), has motivated multinational firms to increase their reserves substantially (in many cases at the insistence of their auditors), reducing the total funds available for productive investment. The current transfer pricing regimes are embodied in the OECD Guidelines, individual OECD member countries' interpretations thereof, the U. S.

From the reviews: "The book of Elizabeth King is written for the benefit of tax practitioners. The focus is on the various transfer pricing cases. The case studies reflect in particular the US views as for example the FIN 48 specifications. We recommend this book to tax advisors and inhouse tax specialists handling transfer pricing aspects in particular related to the US." (Steuern-buecher, September, 2012) From the Back Cover Transfer pricing is often identified as the most important tax issue that multinational corporations face. This publication is an extremely useful tool for practitioners and tax directors grappling with complex and contentious transfer pricing issues of various kinds. It contains a series of highly detailed case studies, which draw on the author's two decades as a government economist specializing in transfer pricing and valuation, a transfer pricing economist with Price Waterhouse, and, lastly, an independent consultant. These case studies elucidate the types of intercompany transactions that tax authorities often scrutinize, lay out how one should go about analyzing such transactions under the existing regulatory regime in considerable detail, and illustrate a number of proposed alternative approaches that could substantially reduce compliance costs and the frequency of transfer pricing disputes. Practitioners and tax directors will find the case studies extremely helpful in formulating defensible transfer pricing policies. The case studies may also be useful in assessing tax exposure attributable to intercompany pricing practices, as required under FASB Interpretation No. 48 (FIN 48). Tax policy analysts will find the evaluation and critique of existing methods and the development of alternative proposals thought-provoking and compelling. The book is divided into three parts: Part I contains a detailed review and critique of individual transfer pricing methods and the economic premises that underpin them. Part II contains a discussion of proposed alternative transfer pricing methods. Part III contains the aforementioned series of eight case studies, encompassing a broad range of transfer pricing issues. Global trading and certain types of Internet-based businesses, which the current transfer pricing regime does not adequately address, are among the issues covered. Each case study is analyzed under both the existing transfer pricing regime and one or more proposed methods.