

Internal Revenue Service
Department of the Treasury
United States of America

Transfer Pricing Seminar

for Foreign Tax Enforcement Officials

July 16 – 22, 2000

Chicago, Illinois

Important Notice:

Participants must be fluent in English. A copy of this brochure should be given to each nominee. More detailed instructions will be sent to participants at a later date.

Transfer Pricing Seminar

Seminar Overview

This five-day program is designed for auditors, managers and investigators responsible for auditing multinational companies.

Objectives

After completing the Transfer Pricing Seminar, you will be:

- Familiar with historical analysis of transfer pricing regulations (Section 482)
- Able to identify audit issues
- Familiar with issues related to:
 1. loans and advances
 2. services
 3. intangibles
 4. fraud issues
- Able to apply transfer pricing methods

Who Should Attend and Eligibility Requirements

Auditors, managers and investigators responsible for conducting audits of multinational corporations.

The minimum requirements are:

- Have auditor or investigator experience

- Be fluent in English with minimum scores as follows:

ALIGU (both listening and reading) 80

British Council Acceptable Level

TOEFL 525

- Have health/accident insurance applicable in the United States for the duration of the course (short-term medical insurance is available in the United States for approximately US \$100 per month)

Session

There is one session scheduled for the year 2000:

For Session Dates. . .
July 16 – 22, 2000

The Nominations Are Due. . .
June 12, 2000

Session Location

The course will be conducted in Chicago, Illinois.

Methodology

The course uses experiential methods concentrating on:

- Practical exercises
- Case studies

Materials

Students are provided with manuals, reference materials and case studies to use in the classroom and take home for future reference.

Participant Presentation

Participants are expected to make a ten-minute presentation during the first week of the course discussing the transfer pricing issues in their country.

Participant Evaluation

A written evaluation is prepared for the sponsoring agency.

About Our Instructors

The instructors are revenue agents drawn from the Internal Revenue Service.

Session Fee

Participant should bring a check for the course fee:

IRS Training Fee — US \$1,775

Fee includes: materials, administrative costs, award luncheon, and opening reception.

Hotel and Meal Expenses

Participants will need approximately US \$1,050 for hotel and meal expenses. This figure is based on the

1999 U.S. Government per diem rate of US \$150 per day, which is subject to change. All participants are required to stay at the selected hotel. Participants should indicate if they wish to share a room (if possible).

Financial Data

Participants should bring cash, check, or traveler checks to pay for the course. **Checks should be made payable to Internal Revenue Service.**

The participant can pay for the fees, or the participant's sponsoring agency or an international organization such as the United Nations or the United States Agency for International Development (USAID) may pay the fees.

Nomination Procedures

Submit your nomination or inquiries to:

Internal Revenue Service
Office of Overseas Operations
and Tax Administration
Advisory Services
OP:IN:OO:TAAS
950 L'Enfant Plaza South, SW
Washington, DC 20024

Phone: 202-874-1350

FAX: 202-874-1838

E-mail:

TAAS@m1.irs.gov (please note new e-mail address)

Or see the IRS website for more information:
www.IRS.GOV

Nomination Information

All nominations must include the following information:

- Contact person, including e-mail, phone and fax numbers
- Participant's name
- Present job title
- Date of birth
- Gender
- Passport number
- Participant's e-mail, phone and fax numbers, home and work addresses
- Description of duties and responsibilities
- Former work experience
- Educational background
- Extent of out-of-country travel
- Copies of ALIGU, TOEFL or British Council competency scores (see eligibility requirements)
- Smoking/non-smoking preference

In-Country Option

This program can be modified and conducted in your country if there are a sufficient number of participants. This would allow more people to be trained at a lower overall cost.

Transfer Pricing Seminar



Department of the Treasury
Internal Revenue Service

www.irs.gov

Publication 3439 (Rev. 8-1999)
Catalog Number 26473J

Internal Revenue Service
Office of Overseas Operations
and Tax Administration
Advisory Services

OP:IN:OO:TAAS

950 L'Enfant Plaza South, SW

Washington, DC 20024

USA

AIR MAIL/PAR AVION