



DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

MEMORANDUM FOR: Steven Musher
Associate Chief Counsel (International)

FROM: Matthew W. Frank, APA Program Director

DATE: April 10, 2008

SUBJECT: APA Quarterly Report for FY 2008,
Second Quarter Ending 03/31/08

The following are the APA Program's results for the second quarter of FY 2008 ("Q2").

APAs Completed

The APA Program completed 9 APA matters in Q2, consisting of 5 unilateral APAs and 4 bilateral APAs.

Negotiating-Position Papers

The APA Program completed 6 bilateral negotiating position papers in Q2.

Annual Reports

The APA Program completed its review of and closed 80 annual reports in Q2.

New Matters

The APA Program received 20 new APA matters in Q2, consisting of 12 bilateral matters and 8 unilateral APA matters.

APA Inventory

The APA Program has an ending inventory of 260 open matters.¹ This consists of 218 bilateral and 42 unilateral matters.²

Attached for your information is the APA issuance report and open inventory reports as of March 31, 2008. Please contact me at (202) 435-5222 if any additional information is required.

Respectfully submitted,

Matthew W. Frank
APA Program Director

Attachments

cc: LMSB Commissioner
Director, International
National Director of Appeals
LMSB Division Counsel

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1. This equals beginning Q2 inventory of 249 matters, plus 20 receipts, less 9 closures ($249 + 20 - 9 = 260$).
 2. The 260 open matters include 19 pending dollar filings (10 bilateral and 9 unilateral). Thus
 - The APA Program has an inventory of 241 active cases, i.e., 260 open matters less 19 pending dollar filings.
 - The 241 active cases consist of 208 bilateral cases (218 total bilateral matters less 10 pending bilateral dollar filings) and 33 unilateral cases (42 total unilateral matters less 9 pending unilateral dollar filings).
 - The APA Program has forwarded 114 of the 208 active bilateral matters to Competent Authority. Thus, the APA Program has a current working inventory of 127 cases, consisting of 94 bilateral (208 active bilateral cases less 114 forwarded to Competent Authority) and 33 active unilateral cases.