



OFFICE OF
CHIEF COUNSEL

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

MEMORANDUM FOR: Hal Hicks
Associate Chief Counsel (International)

FROM: Matthew W. Frank, APA Program Director

DATE: July 14, 2005

SUBJECT: APA Quarterly Report for FY 2005,
Third Quarter Ending 6/30/05

The following are the APA Program's results for the third quarter of FY 2005 ("Q3").

APAs Completed

The APA Program completed 21 APA matters in Q3, consisting of 11 bilateral APAs and 10 unilateral APAs.

Negotiating-Position Papers

The APA Program completed 18 bilateral negotiating position papers in Q3.

Annual Reports

The APA Program completed its review of and closed 28 annual reports in Q3.

New Matters

The APA Program received 21 new APA matters in Q3, including 14 bilateral and 7 unilateral APAs. There were 2 withdrawals during Q3.

APA Inventory

The APA Program has an ending inventory of 221 open matters.¹ This consists of 166 bilateral and 55 unilateral matters.²

Attached for your information is the APA issuance report and open inventory reports as of June 30, 2005. 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 223 matters, plus 21 receipts, less 21 closures and 2 withdrawals { $223 + 21 - 21 - 2 = 221$ }.
 2. The 221 open matters include 16 pending dollar filings (7 bilateral and 9 unilateral). Thus
 - The APA Program has an inventory of 205 active cases, i.e., 221 open matters less 16 pending dollar filings.
 - The 205 active cases consist of 159 bilateral cases (166 total bilateral matters less 7 pending bilateral dollar filings) and 46 unilateral cases (55 total unilateral matters less 9 pending unilateral dollar filings).
 - The APA Program has forwarded 75 of the 159 active bilateral matters to Competent Authority. Thus, the APA Program has a current working inventory of 130 cases, consisting of 84 bilateral (159 active bilateral cases less 75 forwarded to Competent Authority) and 46 active unilateral cases.