



News Release

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**PACIFIC ASSOCIATION OF TAX ADMINISTRATORS FINALIZES
TRANSFER PRICING DOCUMENTATION**

WASHINGTON - The Internal Revenue Service announced today that the Pacific Association of Tax Administrators (PATA) has finalized a Transfer Pricing Documentation Package.

PATA is an inter-governmental tax organization whose members include Australia, Canada, Japan, and the United States.

PATA members have agreed on principles under which taxpayers can prepare one set of documentation that will meet the transfer pricing documentation provisions of each PATA member country. This eliminates the need to prepare separate documentation for each country.

The PATA Documentation Package is intended to reduce taxpayer burden and provide certainty that a penalty will not be imposed. Use of this PATA Documentation Package is completely voluntary and, if the principles are satisfied, will protect the taxpayer from transfer pricing documentation penalties that might otherwise apply in each of the four jurisdictions.

Before finalizing this multilateral approach to transfer pricing documentation, PATA members received many comments on the proposed package. PATA members considered the comments received and edited the package to reflect comments, where feasible, and to provide clarification, where required.

The final version of the PATA Documentation Package is available on the IRS Web site at <http://www.irs.gov/businesses/international/index.html>

Questions should be referred to Carol A. Dunahoo - Director, International (LMSB), at 202 874-1900 or via e-mail to carol.a.dunahoo@irs.gov.

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