



OFFICE OF
CHIEF COUNSEL

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

MEMORANDUM FOR: Steven Musher
Associate Chief Counsel (International)

FROM: Craig A. Sharon, APA Program Director

DATE: October 28, 2010

SUBJECT: APA Quarterly Report for FY 2010,
Fourth Quarter Ending 9/30/10

The following are the APA Program's results for the fourth quarter of FY 2010 ("Q4").

APAs Completed

The APA Program completed 33 APA matters in Q4, consisting of 7 withdrawals, 7 unilateral APAs, and 19 bilateral APAs.

Negotiating-Position Papers

The APA Program completed 14 bilateral negotiating position papers in Q4.

Annual Reports

The APA Program completed its review of and closed 62 annual reports in Q4.

New Matters

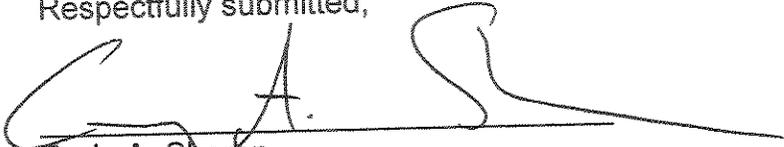
The APA Program received 59 new APA matters in Q4, consisting of 41 bilateral matters and 18 unilateral APA matters.

APA Inventory

The APA Program has an ending Q4 inventory of 404 open matters.¹ This consists of 316 bilateral and 88 unilateral matters.²

Attached for your information is the APA issuance report and open inventory reports as of September 30, 2010. Please contact me at (202) 435-5222 if any additional information is required.

Respectfully submitted,



Craig A. Sharon
APA Program Director

cc: LB&I Commissioner
LB&I Deputy Commissioner (International)
National Director of Appeals
Director, Competent Authority & International Coordination
Director, Transfer Pricing Practice
Division Counsel, LB&I

Attachments

1. This equals beginning Q4 inventory of 378 matters, plus 59 receipts, less 33 closures ($378 + 59 - 33 = 404$).
2. The 404 open matters include 49 pending dollar filings (35 bilateral and 14 unilateral). Thus,
 - The APA Program has an inventory of 355 active cases, i.e., 404 open matters less 49 pending dollar filings.
 - The 355 active cases consist of 281 bilateral cases (316 total bilateral matters less 35 pending bilateral dollar filings) and 74 unilateral cases (88 total unilateral matters less 14 pending unilateral dollar filings).
 - The APA Program has forwarded 109 of the 281 active bilateral matters to Competent Authority. Thus, the APA Program has a current working inventory of 246 cases, consisting of 172 bilateral (281 active bilateral cases less 109 forwarded to Competent Authority) and 74 active unilateral cases.