

LB&I International Practice Service Transaction Unit

Shelf		Business Inbound		
Volume	6	Income Shifting Inbound	UIL Code	9422
Part	6.9	Other Transfer Pricing Issues	Level 2 UIL	9422.09
Chapter	6.9.1	General Overview of Transfer Pricing Concepts	Level 3 UIL	N/A
Sub-Chapter	N/A	N/A		

Unit Name	Foreign Shareholder Activities and Duplicative Services
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Issue and Transaction Overview

Foreign Shareholder Activities and Duplicative Services

This unit examines the deductibility of certain foreign service expenses allocated from a foreign parent (FP) to a controlled US subsidiary (US Sub). The deduction of foreign service expenses may be limited by IRC 482 and Treas. Reg. 1.482-9*. If the deduction of foreign service expenses is limited by IRC 482, then the examiner will need to issue a Notice of Proposed Adjustment increasing US Subs taxable income.

A controlled service transaction is:

- Any activity performed by one member of a controlled group of taxpayers
- That results in a benefit to one or more other members of the controlled group.

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Issue and Transaction Overview (cont'd)

Foreign Shareholder Activities and Duplicative Services

Services that are duplicative of activities already performed by the recipient generally are not considered to provide a benefit to the recipient and charges may be disallowed unless some additional benefit to the recipient can be shown.

In addition, an activity is not considered to provide a benefit if the sole effect of that activity is either to protect the service provider's capital investment in the recipient or to facilitate compliance by the service provider with reporting, legal, or regulatory requirements applicable specifically to the renderer, or both. Charges for such Shareholder activities may also be disallowed.

This unit will analyze foreign service expenses that are allocated from FP to US Sub and determine whether the expenses are foreign shareholder activities and/or foreign duplicative services and thus not providing a benefit to US Sub. The unit will define the terms shareholder activities and duplicative services. The unit will provide audit resources and tools to help the examiner identify and audit the issue to determine whether the expenses deducted by US Sub are valid tax expenses of the US Sub.

Note that the 1.482-9 regulations also discuss indirect or remote benefits and passive association benefits as not providing a benefit to the recipient but these benefits are not part of this unit.

It is recommended the reader first review the following IPS Units before reviewing this unit: ISI/9422.09_02, *Three Requirements of IRC 482*, ISI/9422.09_06, *Arm's Length Standard*, and ISI/9422.09_05, *Services Cost Method (Inbound Services)*.

The next slide will provide a scenario with a set of basic facts and circumstances related to intercompany service transactions between FP and US Sub. The unit will then analyze the transactions under the shareholder activity and duplicative service regulations.

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Transaction and Fact Pattern

Foreign Shareholder Activities and Duplicative Services	
Diagram of Transaction	Facts
<p>The diagram illustrates the transaction flow between three entities: FP (Foreign Parent), US Sub (Foreign controlled), and Bank (Unrelated). FP is represented by a blue square, US Sub by a white square with a black border, and Bank by a white pentagon with a black border. A green arrow labeled 'Services' points from FP to US Sub. A green arrow labeled 'Payment' points from US Sub to FP. A purple arrow labeled 'Loan' points from Bank to US Sub.</p>	<ul style="list-style-type: none"> ▪ FP controls US Sub. ▪ FP has Accounting and Financing Departments that prepare all the required financial and periodic reports required by FP's home country. FP's home country requires periodic reports showing balance sheets, income statements and other material financial information on a worldwide basis using International Financial Reporting Standards (IFRS) for accounting purposes. ▪ US Sub has Accounting and Financing Departments that maintain US Sub's individual books and records. US Sub uses these departments to apply to third party banks for loans. The banks require US Sub to report financial information, including balance sheets, income statements and other material information, using U.S. Generally Accepted Account Principles (GAAP). US Sub forwards the results of the financial reports to FP along with the general ledger. ▪ FP converts the US Sub GAAP financials and ledger to IFRS so FP can combine the US Sub's financials into FP's consolidated global financials. FP bills US Sub for this service activity.

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Summary of Potential Issues

Foreign Shareholder Activities and Duplicative Services	
<u>Issue 1</u>	Whether FP can charge US Sub for purported services or are the purported services nondeductible foreign <u>shareholder activities</u> .
<u>Issue 2</u>	Whether FP can charge US Sub for purported services or are the purported services nondeductible foreign <u>duplicative activities</u> .

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All Issues, Step 1: Initial Factual Development

Foreign Shareholder Activities and Duplicative Services

A controlled service transaction is any activity performed by one member of a controlled group of taxpayers that results in a benefit to one or more other members of the controlled group.

Fact Element	Resources	6103 Protected Resources
<p>Did FP perform an activity for US Sub?</p> <p>An activity includes:</p> <ul style="list-style-type: none"> ▪the performance of functions, ▪assumptions of risks, ▪or use or the making available by a renderer of tangible or intangible property or other resources, capabilities, or knowledge. 	<ul style="list-style-type: none"> ▪ Issue the Mandatory Transfer Pricing Information Document Request (IDR) <p>Review these resources:</p> <ul style="list-style-type: none"> ▪ Treas. Reg. §1.482-9(l)(1) ▪ IRM 4.61.3 - Development of IRC 482 Issues. ▪ IRM 4.46.3-5 Exhibit - Transfer Pricing Compliance Processes ▪ Checklist – IRC § 482 (Transfer Pricing) ▪ Transfer Pricing Roadmap 	

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All Issues, Step 1: Initial Factual Development (cont'd)

Foreign Shareholder Activities and Duplicative Services

A controlled service transaction is any activity performed by one member of a controlled group of taxpayers that results in a benefit to one or more other members of the controlled group.

Fact Element	Resources	6103 Protected Resources
<ul style="list-style-type: none"> ▪ Is there a transfer pricing study for the intercompany transactions? ▪ What services does FP perform for US Sub? Did US Sub incur intercompany service transactions with FP? ▪ Are there any intercompany services other than those found in the original fact discovery that warrant further examination? 	<p><i>Request and review the following:</i></p> <ul style="list-style-type: none"> ▪ Intercompany Agreements ▪ Transfer Pricing Study ▪ Intercompany Invoices ▪ Taxpayer Presentation: A presentation from US Sub of the types of intercompany services with FP, how services are delivered, how costs are determined and charged, and the management structure of each entity. 	

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All Issues, Step 1: Initial Factual Development (cont'd)

Foreign Shareholder Activities and Duplicative Services

A controlled service transaction is any activity performed by one member of a controlled group of taxpayers that results in a benefit to one or more other members of the controlled group.

Fact Element	Resources	6103 Protected Resources
<ul style="list-style-type: none"> ▪ Do intercompany contracts or agreements list activities performed by FP for US Sub? ▪ Are all activities listed in these contracts or agreements? ▪ Did US Sub prepare a functional analysis? Does it cover foreign shareholder activities or duplicative services? ▪ Would interviews or questionnaires uncover other activities that are not listed in intercompany agreements or contracts? ▪ Do intercompany service invoices uncover items not found through other means? 	<ul style="list-style-type: none"> ▪ Treas. Reg. §1.482-9(l)(2) and (3) ▪ Intercompany agreements ▪ Intercompany invoices ▪ Taxpayer's functional analysis ▪ Taxpayer's interview notes ▪ Perform Interviews or questionnaires utilizing the Transfer Pricing Functional Analysis Questionnaire 	

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All Issues, Step 1: Initial Factual Development (cont'd)

Foreign Shareholder Activities and Duplicative Services

A controlled service transaction is any activity performed by one member of a controlled group of taxpayers that results in a benefit to one or more other members of the controlled group.

Fact Element	Resources	6103 Protected Resources
<ul style="list-style-type: none"> ▪ Did FP and US Sub use invoices? If not, are intercompany services flowed through the books using intercompany general journal entries? ▪ Do intercompany service allocations (journal entries) uncover additional activities? ▪ Does the general ledger contain common overhead accounts, like accounting and legal, and did they have allocable items from FP? 	<ul style="list-style-type: none"> ▪ Intercompany journal entries. You may need to request a sample if there are a vast amount of journal entries. ▪ General ledger may have allocable activities. 	

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All Issues, Step 1: Initial Factual Development (cont'd)

Foreign Shareholder Activities and Duplicative Services

A controlled service transaction is any activity performed by one member of a controlled group of taxpayers that results in a benefit to one or more other members of the controlled group.

Fact Element	Resources	6103 Protected Resources
<ul style="list-style-type: none"> ▪ Does Form 5472 indicate services are being provided to US Sub by FP? ▪ Did US Sub aggregate transactions on Form 5472 that would suggest foreign shareholder activities or duplicative services could be included within in other line items? ▪ Does a review of the Form 1120 detail schedules for operating expenses suggest foreign shareholder activities or duplicative services? ▪ Would a review of publicly filed information suggest foreign shareholder activities or duplicative services exist? 	<p>Form 5472:</p> <ul style="list-style-type: none"> ▪ Part II & III - 25 % foreign shareholder and related party information ▪ Parts IV, Line 18a, 20, 21, and 25 report amounts paid for services ▪ Part V - nonmonetary and less than full consideration transactions <ul style="list-style-type: none"> ▪ Form 1120, detail schedules for operating costs. ▪ Company website ▪ TIG (Tax Information Gateway) Reports; perform ratio analysis ▪ Capital IQ ▪ YK1 could provide information, if flow through entities are involved. 	

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All Issues, Step 1: Initial Factual Development (cont'd)

Foreign Shareholder Activities and Duplicative Services

A controlled service transaction is any activity performed by one member of a controlled group of taxpayers that results in a benefit to one or more other members of the controlled group.

Fact Element	Resources	6103 Protected Resources
<ul style="list-style-type: none"> Does the transfer pricing study or other documentation provided discuss if US Sub received a benefit from the services FP provided to US Sub? 	<p><i>Request and review the following:</i></p> <ul style="list-style-type: none"> Intercompany Agreements Transfer Pricing Study Intercompany Invoices Taxpayer Presentation: A presentation from US Sub of the types of intercompany services with FP, how services are delivered, how costs are determined and charged, and the management structure of each entity. 	

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Issue 1, Step 2: Review Potential Issues

Foreign Shareholder Activities and Duplicative Services

Issue 1

Whether FP can charge US Sub for services or are the services nondeductible foreign shareholder activities.

Explanation of Issue	Resources	6103 Protected Resources
<p>Shareholder activities: An activity that has the <u>sole effect</u> to either:</p> <ul style="list-style-type: none"> protect the renderer’s capital investment in the recipient or in other members of the controlled group and/or facilitate compliance by the renderer with reporting, legal, or regulatory requirements that apply to the renderer <p>is <u>not</u> considered to provide a benefit to the recipient. If there is no benefit to the recipient, then the recipient cannot deduct the activity on the US tax return. It is important to note the words “sole effect.” This is an absolute term. If any benefit at all is conveyed, then some remuneration is required.</p> <p>Day-to-day management activities generally will not be considered shareholder services as they do provide a benefit to the recipient. Corporate reorganizations may confer a benefit, or not. The most important thing to remember is that all the facts and circumstances of the transaction must be analyzed.</p> <p>To determine whether the accounting service expenses allocated from FP to US Sub are nondeductible foreign shareholder activities the exam team will need to establish the facts.</p>	<ul style="list-style-type: none"> Treas. Reg. §1.482-9(l)(3)(iv) 	

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Issue 1, Step 3: Additional Factual Development

Foreign Shareholder Activities and Duplicative Services

Issue 1

Whether FP can charge US Sub for services or are the services nondeductible foreign shareholder activities.

Fact Element	Resources	6103 Protected Resources
<p>Some questions to consider specific to shareholder activities are:</p> <ul style="list-style-type: none"> ▪ Does US Sub have its own accounting and finance department? ▪ Does US Sub record its own individual transactions and prepare financial statements in accordance with its own local (US) accounting practices? ▪ Are any reporting requirements imposed on US Sub by third parties, such as banks? What are those reporting requirements? For example, do banks require GAAP financials. Or do banks require IFRS financials. ▪ Does FP have its own accounting and finance department? 	<ul style="list-style-type: none"> ▪ Treas. Reg. §1.482-9(l)(3)(iii). ▪ Personnel charts ▪ Accounting department flowchart and/or manual ▪ Functional analysis ▪ Interviews ▪ Invoices 	

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Issue 1, Step 3: Additional Factual Development (cont'd)

Foreign Shareholder Activities and Duplicative Services

Issue 1

Whether FP can charge US Sub for services or are the services nondeductible foreign shareholder activities.

Fact Element	Resources	6103 Protected Resources
<ul style="list-style-type: none"> ▪ What are FP's home country financial reporting requirements? ▪ If an activity is identified and the benefit is unclear does the taxpayer have an explanation of the benefit conferred and significant facts and circumstances? ▪ How did the company measure the benefit? ▪ Did the company determine the economic or commercial value of the benefit? ▪ Can the taxpayer provide the actual amount allocated and how the calculation was made? 	<ul style="list-style-type: none"> ▪ Treas. Reg. §1.482-9(l)(3)(i). <p>Related issue is allocation of expenses under IRC 861. (See Job Aid - Proforma IDRs - Home Office Allocation IDRs 1 - 4. These may be helpful in also determining transfer pricing functions through allocation of IRC 861 costs)</p>	

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Issue 1, Step 3: Additional Factual Development (cont'd)

Foreign Shareholder Activities and Duplicative Services		
Issue 1		
Whether FP can charge US Sub for services or are the services nondeductible foreign <u>shareholder activities</u> .		
Fact Element	Resources	6103 Protected Resources
<ul style="list-style-type: none"> ▪ Does US Sub forward its own fully completed financial reports to FP? ▪ Does FP use US Sub's financials in the same form as they receive them? If not, what changes are made and why (i.e.; are US Sub's financials not used in the same form as provided to meet the compliance requirements imposed by FP's home country)? 	<ul style="list-style-type: none"> ▪ Ask the taxpayer to provide the company's position on why they do not consider the activity a shareholder activity. 	


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Issue 1, Step 4: Develop Arguments

Foreign Shareholder Activities and Duplicative Services


Issue 1

Whether FP can charge US Sub for services or are the services nondeductible foreign shareholder activities.

Explanation of Approach	Resources	6103 Protected Resources
<p>If the conversion of the GAAP financial statements to IFRS is solely for the benefit of FP, then the activity is a shareholder activity and US Sub should not pay for it.</p> <p> DECISION POINT: Has a benefit been received from the services?</p> <p>Important considerations:</p> <ul style="list-style-type: none"> ▪ Whether US Sub would pay an unrelated third party to perform the same or similar accounting services as FP performs? If they would not pay an unrelated third party, then this may indicate a benefit was not conveyed. ▪ If FP stopped performing the services for US Sub, would US Sub start performing the service itself? 		

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Issue 1, Step 4: Develop Arguments (cont'd)

Foreign Shareholder Activities and Duplicative Services		
Issue 1		
Whether FP can charge US Sub for services or are the services nondeductible foreign <u>shareholder activities</u> .		
Explanation of Approach	Resources	6103 Protected Resources
 CONSULTATION: Consult with the Transfer Pricing Practice and/or local counsel on shareholder service questions. A computer audit specialist may be able to help search the general ledger of large companies.		

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Issue 2, Step 2: Review Potential Issues

Foreign Shareholder Activities and Duplicative Services

Issue 2

Whether FP can charge US Sub for services or are the services nondeductible foreign duplicative activities.

Explanation of Issue	Resources	6103 Protected Resources
<p>The step to be discussed in Issue 2 is to discover if the performance of the accounting and financial services by FP that are allocated to US Sub are considered a duplicative activity which provides no benefit to US Sub.</p> <p>An activity which is duplicative of activities already performed by the recipient is generally not considered to provide a benefit to the recipient and charges are disallowed unless some additional benefit to the recipient can be shown.</p> <p>A thorough examination of the facts necessary to distinguish benefits for purposes of shareholder activities, duplicative activities, indirect or remote activities and passive activities under Treas. Reg. Sec. 1.482-9(l) is required.</p>	<p>Treas. Reg. §1.482-9:</p> <ul style="list-style-type: none"> ▪ Treas. Reg. 1.482-9(l)(1) ▪ Treas. Reg. 1.482-9(l)(2) ▪ Treas. Reg. 1.482-9(l)(3)(i) ▪ Treas. Reg. 1.482-9(l)(3)(iii) ▪ Examples 4, 5 and 6 Treas. Reg. 1.482-9(l)(5) 	

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Issue 2, Step 2: Review Potential Issues (cont'd)

Foreign Shareholder Activities and Duplicative Services

Issue 2

Whether FP can charge US Sub for services or are the services nondeductible foreign duplicative activities.

Explanation of Issue	Resources	6103 Protected Resources
<p>Duplicative Activity: A duplicative activity is an activity performed by a controlled taxpayer (US Sub) that duplicates an activity that is performed by another controlled taxpayer (FP) for its (FP's) own account.</p> <p>A duplicative activity can also be an activity that is <i>reasonably anticipated</i> to be performed by another controlled taxpayer.</p> <p>US Sub must receive a benefit for the service to be deductible on the tax return.</p>		

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Issue 2, Step 3: Additional Factual Development

Foreign Shareholder Activities and Duplicative Services

Issue 2

Whether FP can charge US Sub for services or are the services nondeductible foreign duplicative activities.

Fact Element	Resources	6103 Protected Resources
<p>Steps to perform or questions to consider in determining if duplicative activities exist, include:</p> <ul style="list-style-type: none"> ▪ Does the tax return show possible duplicative service expenses such that the same expense categories are deducted on the tax return as is being invoiced through to US Sub by FP? Need to distinguish US Sub personnel expenses from those expenses that are charged to US Sub by FP. ▪ Do intercompany contracts have any potential duplicative accounts? ▪ Does the taxpayer's functional analysis performed for the transfer pricing study address potential duplicative services? ▪ Trace possible service expenses to the general ledger for incurrence of direct departmental costs (for example payroll) at the same time as there is an intercompany allocation journal entry flowing to the account that could be a potential duplicative account. 	<ul style="list-style-type: none"> ▪ Treas. Reg. §1.482-9(l)(3)(iii) ▪ Treas. Reg. 1.482-9(l)(5) Examples 4, 5 and 6 ▪ Intercompany contracts ▪ Functional analysis ▪ Questionnaires ▪ Interviews ▪ Consult each company's financial records looking for potential duplicative accounts 	

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Issue 2, Step 3: Additional Factual Development (cont'd)

Foreign Shareholder Activities and Duplicative Services

Issue 2

Whether FP can charge US Sub for services or are the services nondeductible foreign duplicative activities.

Fact Element	Resources	6103 Protected Resources
<ul style="list-style-type: none"> ▪ Analyze each company's financial records looking for potential duplicative accounts. ▪ Would the performance of your own functional analysis be beneficial to the examination? ▪ Would interviews or questionnaires uncover other activities that are not listed in intercompany agreements or contracts? If so, interview personnel in the departments which are potentially duplicative. ▪ Do taxpayer invoices have potential duplicative costs? ▪ Did FP or a related foreign party file US Form 1120-F which could indicate potential duplicative expense accounts? ▪ Review any Forms 1120-F filed by parent or foreign related parties. ▪ Advise the taxpayer you are examining for duplicative services and request the taxpayer's position 	<ul style="list-style-type: none"> ▪ Invoices ▪ Form 1120-F 	

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Issue 2, Step 3: Additional Factual Development (cont'd)

Foreign Shareholder Activities and Duplicative Services		
Issue 2		
Whether FP can charge US Sub for services or are the services nondeductible foreign <u>duplicative activities</u> .		
Fact Element	Resources	6103 Protected Resources
<ul style="list-style-type: none"> ▪ Whether the service duplicates an activity that US Sub already performs: <ul style="list-style-type: none"> – Does US Sub have its own Accounting and Finance Departments? – Does US Sub independently perform these functions? – Does US Sub prepare all its own reports required for its own US (local) filing requirements (book, tax, etc.)? – Does FP simply repeat/duplicate the actual activity that US Sub’s accounting and finance departments already performed? 		


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Issue 2, Step 3: Additional Factual Development (cont'd)

Foreign Shareholder Activities and Duplicative Services		
Issue 2		
Whether FP can charge US Sub for services or are the services nondeductible foreign <u>duplicative activities</u> .		
Fact Element	Resources	6103 Protected Resources
<ul style="list-style-type: none"> ▪ Whether the activity provides a benefit to the US Sub: <ul style="list-style-type: none"> – What benefit does US Sub receive from the allocated accounting and finance expenses from FP? – Does FP’s accounting and financing function enhance US Sub’s ability to produce reports, statements, or other information it could not otherwise produce? – Does US Sub receive any economic or commercial value/benefit from the duplicative service? 		

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Issue 2, Step 4: Develop Arguments

Foreign Shareholder Activities and Duplicative Services		
Issue 2		
Whether FP can charge US Sub for services or are the services nondeductible foreign <u>duplicative activities</u> .		
Explanation of Approach	Resources	6103 Protected Resources
<p>The functional analysis questionnaire, interviews and IDR responses are key to establishing whether or not the services are duplicative.</p> <p>The examiner must establish that:</p> <ul style="list-style-type: none"> ▪ The service duplicates an activity that US Sub already performs or ▪ The activity provides no benefit to US Sub. <p>If US Sub benefits from preparation of IFRS statements by obtaining loans from other banks, some benefit may be received and require compensation.</p> <p> DECISION POINT: Are the services duplicative?</p>		


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Issue 2, Step 4: Develop Arguments (cont'd)

Foreign Shareholder Activities and Duplicative Services

Issue 2

Whether FP can charge US Sub for services or are the services nondeductible foreign duplicative activities.

Explanation of Approach	Resources	6103 Protected Resources
<p>Would US Sub pay an unrelated third party to perform the same or similar services as FP performs? If US Sub would not pay an unrelated third party to perform the same or similar services as FP performs it may indicate that no benefit was received and this was a duplicative service activity that US Sub already performs for itself.</p> <p>If FP stopped performing the service for US Sub, would US Sub start performing the service itself? Or does US Sub already perform this service for itself?</p> <p> CONSULTATION: Consult with the Transfer Pricing Practice and/or local counsel on duplicative service questions. A computer audit specialist may be able to help search the general ledger of large companies.</p>		

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Training and Additional Resources

Chapter 6.9.1 General Overview of Transfer Pricing Concepts

Type of Resource	Description(s) and/or Instructions for Accessing	References
CENTRA sessions	<ul style="list-style-type: none"> ▪ Overview and Introduction to IRC Sec 482 FINAL with BR 6 revisions.ppt, ELMS #50767 ▪ High Value Services (HVV248923), ELMS #44759 ▪ How to examine IRC 482 area and develop facts (QLM462916) ▪ Functional Analysis (LMT059366) 	
Issue Toolkits	<ul style="list-style-type: none"> ▪ Transfer Pricing Functional Analysis Questionnaire ▪ Checklist – IRC § 482 (Transfer Pricing) ▪ 6662(e) Checklist ▪ Job Aid - Proforma IDR - Home Office Allocation IDRs 1 - 4 	
Other Training Materials	<ul style="list-style-type: none"> ▪ IRM 4.61.3.4.5 – How to Develop a Section 482 Case ▪ IRM 4.60.2 MAP and Competent Authority ▪ IRM 20.1.5.9.3 6662(e) - Penalties for 482 Adjustment ▪ IRM 4.46.3-5 Exhibit - Transfer Pricing Compliance Processes ▪ Transfer Pricing Functional Analysis Questionnaire ▪ BNA Tax Management Int'l Portfolio 890, WS 1, Sample Questionnaire for Intercompany Transactions 	

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Glossary of Terms and Acronyms

Acronym	Definition
FP	Foreign Parent
IDR	Information Document Request
IDRS	Integrated Data Retrieval System
IPN	Issue Practice Network
IPS	Issue Practice Service
IRC	Internal Revenue Code
IRM	Internal Revenue Manual
ISI	Income Shifting Inbound
UIL	Uniform Issue Listing
US	United States
US Sub	US Subsidiary

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US Branch Allocations (non-treaty ECI determinations)	9422.01	IPS Unit: IPS Unit: ISI/9422.01_01(2013) Gross Effectively Connected Income of a Foreign Corporation Non Treaty ISI/9422.01_01(2013)
Expense Allocations	9422.01	IPS Unit: Section 861 Home Office and Stewardship Expenses ISI/9422.01_05(2013)
Provision for High Value Services	9422.05	IPS Unit to be Developed
Management Fees	9422.05	IPS Unit: Management Fees, ISI/9422.05_01
IRC 482	9422.07	IPS Unit – Overview of IRC Section 482 DCN: ISI/9411.07_01(2013)
Requirements for IRC 482	9422.09	IPS Unit – Three Requirements of IRC 482, ISI/9422.09_02(2013)
Taxpayer Use of IRC 482	9422.09	IPS Unit – Taxpayers Affirmative Use of IRC 482 DCN: ISI/9422.09_03(2013)
Services Cost Method (SCM)	9422.09	IPS Unit: Services Cost Method Inbound Services, ISI/9422.09_04
Arm's Length Standard	9422.09	IPS Unit: Arms Length Standard, ISI/9422.09_06(2013)