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Section 482 of the Code authorizes the IRS to adjust the income, deductions, credits, or allowances of commonly controlled taxpayers to prevent evasion of taxes or to clearly reflect their income. The regulations under section 482 generally provide that prices charged by one affiliate to another, in an intercompany transaction involving the transfer of goods, services, or intangibles, yield results that are consistent with the results that would have been realized if uncontrolled taxpayers had engaged in the same transaction under the same circumstances. Advance Pricing Agreement Program The APA Program provides an alternative dispute resolution mechanism for taxpayers and the IRS to resolve complex international transfer pricing cases. Frequently Asked Questions (FAQs) Find answers to frequently asked questions (FAQs) about Transfer Pricing. Page Last Reviewed or Updated: 06 Dec 2021

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