



Transfer Pricing in the 1990s: Tax Management Perspectives

Roger Y. Tang

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Transfer pricing is a dynamic and multidimensional topic that has captured the attention of academicians, corporate executives, and tax authorities for many decades. The issues of transfer pricing are very complex and the stakes are extremely high because more than 40 percent of international trade is trade between related entities. This book examines many important tax and management issues related to transfer pricing. These issues include new transfer pricing regulations and their implications, the selection of proper transfer pricing methods, major environmental variables, and issues concerning the administration of a transfer pricing system. The author also presents many interesting findings from a recent study on U.S. transfer pricing practices.

The author begins by describing the nature of intrafirm transactions in a corporate environment and the significance of intrafirm transactions in international trade. Recent changes and major transfer pricing legislation and regulations in the United States are explained. New transfer pricing regulations in Canada, Japan, South Korea, and the European Community and their implications are also discussed. These are followed by a presentation on research methodology and profile of 143 respondent firms. The author then explains the findings on transfer pricing methods and environmental variables of international transfer pricing. Current transfer pricing practices are compared with those of an earlier study done in 1977. Other issues such as system objectives, resolution of policy conflicts, and policies on outside purchases are covered by this monograph. General conclusions from this research and suggestions for further research are also provided.

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