



Transfer Pricing Arms Length Principle International Tax Law (Series on International Taxation) (Series in International Taxation)

Jens Wittendorf

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**Transfer Pricing Arms Length Principle International Tax Law (Series on International Taxation)
(Series in International Taxation)** Jens Wittendorf

Transfer Pricing Arms Length Principle International Tax Law analyzes the legal basis for the arm's length principle and the contents of the principle in U.S. tax law as well as the OECD Model Tax Convention and Transfer Pricing Guidelines. It includes a thorough review of international case law on transfer pricing from the US., Canada, Australia, United Kingdom, Germany, France, the Netherlands, Denmark, Sweden and Norway.

The book consists of the following chapters: **Part One - Introduction Part Two, The Legal Basis for the Arm's Length Principle**

- U.S. Tax Law
- OECD
- Other International Law

Part Three, The Concept of the Arm's Length Principle

- General
- U.S. Tax Law
- German Tax Law
- Article 9(1) of the OECD Model

Part Four, General Arm's Length Rules

- Recognition of the Controlled Transaction
- Combined and Separate Arm's Length Test
- Set-Offs
- Multiple Year Analysis
- Comparability Requirement
- Foreign Legal Restrictions
- Arm's Length Range

Part Five, Special Arm's Length Rules

- Services
- Cost Sharing
- Intangibles

Part Six, Transfer Pricing Methods

- General
- Transfer Pricing Methods

Part Seven, Conclusion

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