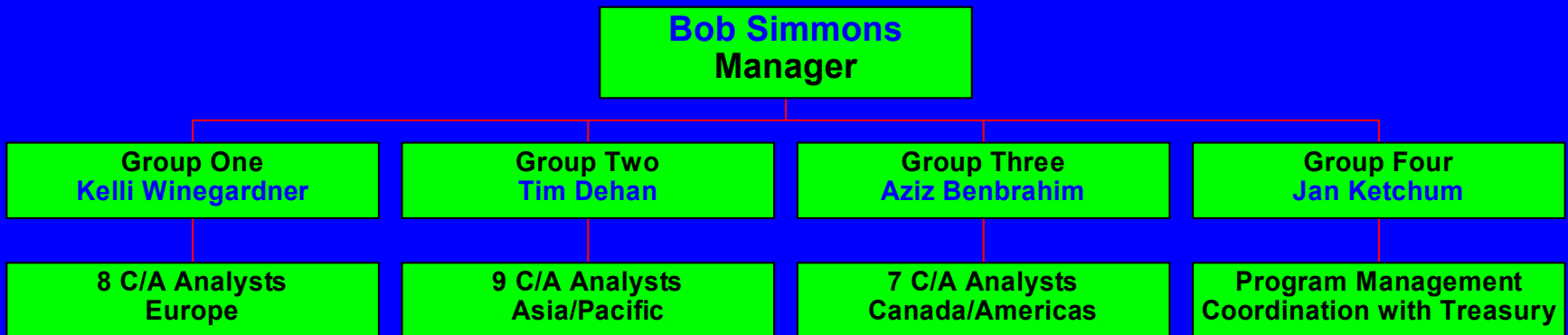


WHO IS COMPETENT AUTHORITY?



- **Director International
delegated as U.S. C/A**
- **Tax Treaty Staff
Resolves Disputes with
Other Countries**
- **Administers Treaties**

TAX TREATY OFFICE



COMPETENT AUTHORITY AND FIELD EXAM



- **Develop/Propose Issues**
 - Identify Issues
 - Develop Position
 - Prepare MAP Report
- **Evaluate Foreign Initiated Adjustments**
 - Provide Analysis
 - Provide Rebuttal
- **Implement C/A Determination**

COMPETENT AUTHORITY AND FIELD EXAM



- **Simultaneous Audits with Other Countries**
- **C/A Administers Requests for Information under Treaties**
- **Revenue Service Representatives (RSR's) Located in U. S. Embassies**

LMSB FIELD COUNSEL AND COMPETENT AUTHORITY



- Counsel Requests Foreign Information for Trials from C/A
- Counsel Advises Exam in Simultaneous Examinations

LMSB FIELD COUNSEL AND COMPETENT AUTHORITY



- Counsel Interacts with RSR's at Embassies
- Counsel asks RSR's to Interview Witnesses & Obtain Foreign Public Documents

COMPETENT AUTHORITY INVOLVEMENT IN APA'S



- **Negotiates APA Bilateral Agreements**
- **Bilateral Agreements = TP, U.S., and Another Country**
- **Unilateral Agreements=TP & U.S.**

STATISTICS

TAX TREATY APA INVENTORY

<u>Fiscal Year</u>	<u>Cases Received</u>	<u>Cases Disposed</u>	<u>Year End Inventory</u>
1996	59	20	117
1997	39	35	121
1998	33	31	123
1999	45	45	123
2000	58	47	134

Tax Treaty Average Processing Time

Processing Time of Advance Pricing Agreements*

<u>Fiscal Year</u>	<u>Days</u>
1996	368
1997	240
1998	323
1999	439
2000	381

*Does not include processing time of APA Staff