

SCHULMAN, RONCA AND BUCUVALAS, INC.
145 EAST 32ND STREET
NEW YORK, NEW YORK 10016

STUDY NUMBER 9173
January 2, 2001
OMB No. 1545-1720

INTERNET VERSION

TYPE: www.srbi.com/#####

2000 IRS CONTEMPORANEOUS DOCUMENTATION SURVEY

Please enter your seven-digit personal identification number in field below, then click on "NEXT PAGE" to begin the survey. If you are resuming the survey, simply re-enter your PIN and you will be returned to the point you left off.

If you have trouble accessing the survey or navigating the screens, you may email the project director at SRBI, Mr. Kevin Sharp at k.sharp@srbi.com or call toll-free on 1-800-659-5432 and ask to speak to someone about project number 9173.

Thank you in advance for participating in the survey.

Personal Identification Number (PIN)

NEXT PAGE

2000 IRS CONTEMPORANEOUS DOCUMENTATION SURVEY

OMB Clearance No. 1545-1720

ESTIMATED BURDEN STATEMENT

The reporting burden for this form is estimated to average 60 minutes, including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding the burden estimate or any other aspect of this form to:

Internal Revenue Service
Western Area Distribution Center
Tax Forms Committee
Rancho Cordova, CA 95743-0001

The Office of Management and Budget
Paperwork Reduction Act
OMB No. 1545-1720
Washington, DC 20503

PAPERWORK REDUCTION ACT STATEMENT

This information is being collected to provide information to the Internal Revenue Service regarding the efficacy of transfer pricing policies under IR code section 482. Response to this request is voluntary. No action may be taken against you for refusing to supply the information requested. No Privacy Act Information is being collected.

NEXT PAGE

HELP

EXIT

2000 IRS CONTEMPORANEOUS DOCUMENTATION SURVEY

Thank you for participating in the IRS's Contemporaneous Documentation Survey. The IRS has asked Schulman, Ronca & Bucuvalas, Inc. (SRBI), the national public opinion research organization, to help gather facts about the efficacy of transfer pricing policies under IR code section 482; specifically, the survey focuses on provisions of section 6662(e) which concern the contemporaneous documentation of related-party cross-border transactions.

The United States Congress is requiring the IRS to conduct this study. The study's findings will be reported directly to Congress upon its completion along with interim status reports of the survey's progress during the data collection period.

Select Link below to View

[Message from Commissioner, Large & Mid-Size Business Division](#)

To continue, please click the **NEXT PAGE** button at the bottom of the screen.

NEXT PAGE

HELP

EXIT

2000 IRS CONTEMPORANEOUS DOCUMENTATION SURVEY

Confidentiality and Anonymity

To assure confidentiality, each questionnaire is assigned a random Personal Identification Number (PIN). If you experience any technical problems with the survey, we will need this number in order to help you. You will also need it to retrieve your questionnaire if you decide to stop and continue at another time.

It is important that you write down this ID number and keep it in a secure place. In some cases, it may be necessary for more than one individual at a company to complete the survey. It is important that the questions are answered by the most knowledgeable person or persons at the company. While it is acceptable to make the process a collaborative one, any person or persons completing the survey at your company will need to use the same personal identification number we sent to you. In other words, there is only one PIN assigned for each company.

SRBI was commissioned to conduct this survey in order to ensure that the results are completely confidential. SRBI is required through the terms of its contract not to share any information that could be used by anyone to identify individual businesses or individuals.

NEXT PAGE

HELP

EXIT

2000 IRS CONTEMPORANEOUS DOCUMENTATION SURVEY

INSTRUCTIONS

Please read all the instructions before beginning the survey

Page 1 of 3

Moving Forward and Backward in the Questionnaire:

Only use the PREVIOUS PAGE and NEXT PAGE buttons at the bottom of each page to navigate the questionnaire. Do not use the “forward” and “back” arrows on the navigation toolbar (at the top of your screen).

Please Note: In some cases, you may need to use your scroll bar to move to the bottom of the page to see the PREVIOUS PAGE and NEXT PAGE buttons. The scroll bar will not appear unless it is needed.

You must provide a response to each question before you will be allowed to advance to the next one. Most questions allow you not to answer by giving you the option of “Decline to comment” or “not applicable.” However, a few questions will require you to enter a response.

You are able to change any of your answers provided that you have not submitted the survey. By using the PREVIOUS PAGE AND NEXT PAGE buttons, you may either advance or retreat to any completed screen in the survey. However, once you have submitted the survey, you will not be able to access it again.

PREVIOUS PAGE

NEXT PAGE

HELP

EXIT

2000 IRS CONTEMPORANEOUS DOCUMENTATION SURVEY

INSTRUCTIONS

Page 2 of 3

Directions for using the “radio buttons”:

For most of the questions, you will be using “radio buttons” to indicate your responses. Use your mouse to click on the buttons. When you click on a radio button, it darkens. Only one radio button can be selected at a time. When another is selected, the first one “gives up” its selection. Once you have clicked on a button to answer a question, there is no way to make all the buttons for that question blank again.

Example: Select two or more of the following options on the sample question below.

My favorite comic strip is:

- Blondie
- Cathy
- Dilbert
- Zippy the Pinhead
- Other

NEXT PAGE

HELP

EXIT

2000 IRS CONTEMPORANEOUS DOCUMENTATION SURVEY

INSTRUCTIONS

Page 3 of 3

Ending a Session, Saving Answers, and Printing:

If you cannot finish the questionnaire in one session, either click on the "EXIT" button at the bottom of the page or the "X" button in the upper right corner of the screen. Your answers will be saved. Please make sure you have written down your random ID number. You will need that number to resume the survey at another time. When you do resume the questionnaire, you will automatically start on the last page that you completed.

If you want a copy of your answers, use the PRINT button on your navigation toolbar (at the top of your screen) to print each page after you complete it (**Note: you can only print the survey one page at time**).

Getting Help

If you have trouble accessing the survey or navigating the screens, then click on the "HELP" button at the bottom of the screen where you will find the answers to the most frequently occurring problems. Of course, you may at any time contact SRBI by either calling the toll-free number of our Washington D.C. office for assistance, or emailing the project director directly. This information is also provided in "HELP."

PREVIOUS PAGE

NEXT PAGE

HELP

EXIT

WHEN “HELP” LINK IS SELECTED:

**TROUBLE SHOOTING:
ANSWERS TO THE MOST COMMONLY OCCURRING TECHNICAL PROBLEMS**

If you need to speak to a customer service representative, then call SRBI toll-free at 1-800-659-5432 between the hours of 9:00 a.m. and 5:30 p.m. Eastern time and ask to speak to someone about the IRS Contemporaneous Documentation Survey; or you may e-mail the project director, Kevin Sharp, at k.sharp@srbi.com.

PROBLEM	TRY
<p>You pressed the NEXT PAGE button but received the following message:</p> <p>One or more questions were left blank. You must answer all questions before you may proceed.</p>	<p>Be sure you have provided a response to each question item. You must provide a response to every item in order to proceed to the next question. You are allowed to select “no answer” if you do not wish to provide a response; however, you must select one of the options in order to advance. Please be sure you have made a selection, then click on the NEXT PAGE button again.</p> <p>Some questions require open-ended comments. You must type some response, such as “none” or “not sure” into the comments field. Then hit the NEXT PAGE button to advance.</p>
<p>You hit the BACK OR FORWARD button on your browser’s navigation toolbar and received an error message.</p> <p style="text-align: center;">OR</p> <p>You hit the NEXT PAGE button after selecting a response, but the survey either returned you to the previous question, or it gave you an error message</p>	<p>Hit the REFRESH button if you are using Microsoft’s Internet Explorer, or RELOAD if you are using Netscape’s Navigator. If this does not correct the problem, then exit the survey by clicking on the “X” button in the top right corner of the screen. Re-access the survey using your 7-digit PIN and you will be returned to the place you left off. You may have to re-enter your response to the last question you answered.</p>
<p>Remember that you can always exit the survey by pressing the “X” button in the top right corner of your screen. If you are forced to abort the program, you should restart your computer then re-access the survey using the 7-digit PIN. Your previous answers will be saved, and you will be returned to next question left answered.</p>	

[CLICK HERE TO RETURN TO SURVEY](#)

PDF FILE OF LETTER:

**MESSAGE FROM THE IRS
COMMISSIONER, LARGE & MID-SIZE BUSINESS DIVISION**

The following is a survey that is being sent to a statistically valid sample of large and mid-size corporations. This survey is being conducted in accordance with an instruction from the United States Congress for the IRS to study the effectiveness of section 6662(e). For more information about this directive you can refer to Senate Report No. 106-87, Treasury and General Government Appropriation Bill 2000 at pages 34 and 35.

The fact that your business received this survey does not mean that you will be subject to examination with respect to your transfer pricing under section 482. Your responses to this survey will be used exclusively as part of a study of the application of section 482 and the effect of section 6662(e). Your responses will not be used to select (or non-select) your company for examination. Finally, this questionnaire does not constitute an IRS "contact" under Treas. Reg. 1.6662-6(a)(2) and hence does not prevent your company from filing a qualified amended return under that provision, if it should so choose, to mitigate any potential penalty under section 6662(e).

As you know, section 482 requires taxpayers to charge an "arm's length" price for goods, services and intangibles exchanged between related parties, that is, the price which would have been charged for a similar transaction to an unrelated party. Section 6662(e) establishes penalties for taxpayers that have their income adjusted by the IRS pursuant to section 482, where the adjustment exceeds certain thresholds. Taxpayers may avoid these penalties if they have reasonable contemporaneous documentation supporting their transfer pricing at the time they file their original return. This documentation is described in section 6662(e). Although taxpayers are not required to have contemporaneous documentation, it is anticipated that many will prepare such documentation in order to avoid penalties.

The following questions ask for information about your company's experience with section 482 and your current practice regarding section 6662(e) documentation. In general, this survey focuses on your most recent filed tax return, i.e. the tax return filed for the 1998 taxable year. Please complete this questionnaire and return it to the indicated address within 30 days.

You have my personal assurance that we have ensured that your individual responses will be kept confidential. The survey firm of Schulman, Ronca & Bucuvalas, Inc. (SRBI) is conducting this survey, and only summary data will be provided to the IRS. Your individual responses or any other identifying data will not be supplied to the IRS. As with any survey, a high response rate is very important. We do want and need to hear from you. I thank you in advance for your participation.

Sincerely yours,

Larry R. Langdon
Commissioner,
Large and Mid-Size Business Division

2000 IRS CONTEMPORANEOUS DOCUMENTATION SURVEY

Percentage of Survey completed

1%

PART I. ASSESSING THE EXTENT TO WHICH PROVISIONS OF SECTION 6662(e) WERE UTILIZED BY YOU THE TAXPAYER

The following information is being requested to assist us in analyzing and categorizing the results of this survey for the purpose of improving the process.

Q.1 What year is your company's most recently filed federal income tax return?

- 2000 (Fiscal year ending in 2000)
- 1999
- 1998
- Before 1998 **SKIP TO END/SCREEN OUT**

The following questions (Q.2 through Q.7) will help us analyze the results in broad categories of a company's size. They will also help us determine the scope and breadth of the contemporaneous documentation of related-party cross-border transactions. Again all responses are completely confidential.

Q.2 What was your company's net gross receipts or sales, as reported on Form 1120, line 1c on your [YEAR] return?

- Less than \$10 million **SKIP TO END/SCREEN OUT**
- \$10M, less than \$31M
- \$31M, less than \$62M
- \$62M, less than \$125M
- \$125M, less than \$250M
- \$250M, less than \$500M
- \$500M, less than \$1,000M (\$1 Billion)
- Over \$1,000M (\$1 Billion)
- Decline to comment

To view a copy of Form 1120 Line 1c, click on the link below

[See Form 1120, Line 1c](#)

Q.3 For your [YEAR] return, did you file one or more Forms 5471, Forms 5472, did you file both, or did you file neither?

- Form(s) 5471 only **SKIP TO Q.5**
- Form(s) 5472 only **GO TO Q.4**
- Both Form 5471 and 5472 **GO TO Q.4**
- Neither Form 5471 nor 5472 **SKIP TO Q.7**

Decline to comment

SKIP TO Q.7

Q.4 What is the combined total of all lines 11 and 22 (total transactions between reporting corporate and foreign related parties) on Part IV of all of the 5472's you filed in [YEAR]?

- Less than \$10 million
- \$10M, less than \$31M
- \$31M, less than \$62M
- \$62M, less than \$125M
- \$125M, less than \$250M
- \$250M, less than \$500M
- \$500M, less than \$1,000M (\$1 Billion)
- Over \$1,000M (\$1 Billion)
- Not applicable (did not complete Form 5472, Part IV)
- Decline to comment

To view a copy of Form 5472 Part IV, click on the link below

[See Form 5472 Part IV](#)

[CONDITIONAL: IF Q.3=2 THEN SKIP TO Q.7; IF Q.3=1 OR 3 THEN GO TO Q.5]

Q.5 When you filed your Form 5471 in [YEAR], did it include at least one Schedule M?

- | | |
|--------------------|--------------------|
| Yes | GO TO Q.6 |
| No | SKIP TO Q.7 |
| Decline to comment | GO TO Q.6 |

Schedule M of Form 5471 records transactions between Controlled Foreign Corporations and shareholders or other related persons. Companies are required to complete a separate Schedule M for each controlled foreign corporation.

Q.6 According to the Form 5471 Schedule M that you filed with your [YEAR] return, what was the total of all columns (b through f) on lines 9 and 18 (total transactions between Controlled Foreign Corporations and related parties) on all Schedule M forms combined?

Note: You will need to add up the columns for each Schedule M you filed with your [YEAR] return. Enter the sum of all columns (b through f) for lines 9 and 18 from all Schedule M forms you attached (you could be adding up to a total of 10 columns on each Schedule M).

- Less than \$10 million
- \$10M, less than \$31M
- \$31M, less than \$62M
- \$62M, less than \$125M
- \$125M, less than \$250M
- \$250M, less than \$500M
- \$500M, less than \$1,000M (\$1 Billion)
- Over \$1,000M (\$1 Billion)
- Not applicable (did not complete Form 5471, Schedule M)
- Decline to comment

To view a copy of Schedule M, click on the link below.
[See Schedule M](#)

Section 482 defines “controlled” as:

“Any kind of control, direct or indirect, whether legally enforceable, and however exercisable or exercised. It is the reality of the control which is decisive, not its form or the mode of its exercise.”

The term “controlled taxpayer” means any one of two or more organizations, trades, or businesses owned or controlled directly or indirectly by the same interests.

Q.7 Did your company enter into any transactions between controlled affiliates (as “control” is defined by section 482) other than what you reported on either Form 5471 or Form 5472?

- Yes
- No **SKIP TO Q.8**
- Decline to comment **SKIP TO Q.8**

Q.7a What were the total dollar amounts for the year [YEAR] of all transactions entered into between controlled affiliates **not** otherwise reported on Forms 5471 or Forms 5472?

- Less than \$10 million
- \$10M, less than \$31M
- \$31M, less than \$62M
- \$62M, less than \$125M
- \$125M, less than \$250M
- \$250M, less than \$500M
- \$500M, less than \$1,000M (\$1 Billion)
- Over \$1,000M (\$1 Billion)
- Not applicable (did not enter into any transactions other than those reported on either Forms 5471 or Forms 5472)
- Decline to comment

[ADD LINK]: [Definition of “Controlled”](#)

[CONDITIONAL: IF Q.4=9 AND (Q.5=2 OR Q.6=9) AND (Q.7=2 OR Q.7a=9) THEN SKIP TO END AND SCREEN OUT; ELSE GO TO Q.8]

Q.8 Approximately, what percentage of the total dollar value of your controlled related-party cross-border transactions in [YEAR] did you prepare contemporaneous documentation as outlined in section 6662(e)?

- Documentation for all/nearly all transactions (95% or more) **SKIP TO Q.9**
- Documentation for 75% to 94% of transactions **GO TO Q.8a**
- Documentation for 50% to 74% of transactions **GO TO Q.8a**
- Documentation for 25% to 49% of transactions **GO TO Q.8a**
- Documentation for 5% to 24% of transactions **GO TO Q.8a**
- Documentation for less than 5% of transactions **GO TO Q.8a**

[ADD LINK]: [Definition of “Controlled”](#)

Q.8a Which of the following explanations best describe why you did not prepare transfer pricing documentation on all transactions? Check as many reasons as applicable.

We believe that our transfer pricing is correct and that we will not be subject to a section 482 adjustment.

Our transactions are based upon market prices and are easily verified.

The information produced through our normal accounting reports is sufficient documentation for this purpose.

Any potential audit adjustment would not meet the penalty threshold under section 6662(e).

The cost of preparing the documentation was too expensive.

The documentation effort was too complicated and burdensome.

The tax department lacked the resources, personnel, or budget required to prepare the documentation.

The cost of preparing the documentation is greater than our tax exposure risk to section 6662(e) penalties.

We prepared section 6662(e) documentation for a previous taxable year, and there have been no material changes that would affect our transfer pricing.

Our transfer pricing is consistent with an earlier IRS settlement on this issue, and there have been no material changes that would affect our transfer pricing.

Had no impact on U.S. income tax.

Other (please specify):

Decline to comment

[CONDITIONAL: IF Q.8 = “6” THEN SKIP TO Q.19; ELSE GO TO Q.9]

Q.9 The following is a list of the documentation requirements of Treasury Regulations section 1.6662-6(d)(2)(iii) which include 10 types of “principal documents” required for the documentation to comply with section 6662(e).

For each of the principal documents listed below, please indicate how difficult it was for your company to prepare the basic transfer pricing analysis by selecting whether it was “not difficult,” “somewhat difficult,” or “very difficult.” If you have never prepared the type of documentation described, then select “did not prepare documentation,” however, you must select one response for each item.

	Not Difficult 1	Somewhat Difficult 2	Very Difficult 3	Did not prepare documentation 4
a. Overview of the business				
b. Description of the organizational structure of all related parties engaged in transactions potentially relevant under section 482				
c. Documentation explicitly required by the regulations under section 482				
d. Description of the transfer pricing method selected and explanation of why it was selected				
e. Description of the methods that were considered and explanation of why they were not selected				
f. Description of the controlled transactions				
g. Description of the comparables that were used				
h. Explanation of the economic analysis and projections relied upon in developing the method				
i. Description of any relevant data that was obtained after the end of the tax year and before filing a tax return, and which would help determine if a specified method was selected and applied in a reasonable manner				
j. Index of the principal and background documents and a description of the record keeping system				

PART II. INFORMATION ABOUT THE COST TO PROVIDE CONTEMPORANEOUS DOCUMENTATION

The purpose of the following questions (10 to 18) is to gather information relevant to the cost of preparing contemporaneous documentation and its impact on funds allocated to tax compliance.

Q.10 How was the transfer pricing documentation for the [YEAR] return prepared?

- Internally
- Externally
- A combination of inside and outside sources
- Decline to comment

Q.11 As part of your decision to prepare pricing documentation, did you estimate the cost of compliance?

- Yes
- No
- Decline to comment

Q.12 Did you undertake a cost/benefit analysis based upon your tax exposure risk?

- Yes
- No
- Decline to comment

Q.13 Did you seek advice from an external person or entity (e.g. a tax attorney, CPA, or other tax specialist or someone from an accounting or economic analysis firm) regarding the preparation of transfer pricing documentation or having a transfer pricing study performed?

- Yes
- No
- Decline to comment

Q.14 What is the approximate number of full-time equivalent staff (FTE's) you currently have committed toward handling issues relating to documentation and other transfer pricing issues?

- 0
- 1 to 10
- 11 to 25
- 26 to 50
- More than 50
- Decline to comment

IRS CONTEMPORANEOUS DOCUMENTATION SURVEY

Q.15 Considering all costs, both external and internal, about how much was spent in the past year on preparing transfer pricing documentation studies? Note: Exclude the costs of conducting document study updates.

- \$0
- \$1 to \$100,000
- \$100,001 to \$200,000
- \$200,001 to \$500,000
- \$500,001 to \$1,000,000
- More than \$1,000,000
- Decline to comment

Q.16 Approximately what percentage of your total annual tax compliance budget reflects the cost of addressing all transfer pricing issues (e.g., transfer pricing documentation, audit related costs, litigation, etc.)?

Percent

Decline to comment

Q.17 In 1994, the IRS published final section 482 regulations. At about the same time, Congress enacted section 6662(e) transfer pricing penalties. In light of these developments, has the percentage of your total tax compliance budget spent on transfer pricing issues increased, decreased or stayed about the same since your 1993 tax year end?

- Increased
- Decreased
- Stayed about the same **SKIP TO Q.19**
- Not applicable **SKIP TO Q.19**
- Decline to comment **SKIP TO Q.19**

Q.18 Please estimate the average annual amount of money spent in preparing transfer pricing documentation studies in years prior to 1994.

- \$0
- \$1 to \$100,000
- \$100,001 to \$200,000
- \$200,001 to \$500,000
- \$500,001 to \$1,000,000
- More than \$1,000,000
- Decline to comment

PART III. CONTEMPORANEOUS DOCUMENTATION AND THE EXAMINATION PROCESS

[ASKED OF EVERYONE]

The purpose of the following questions (19 to 31) is to assist us in assessing the extent to which timely submission of contemporaneous documentation facilitates the examination process.

Q.19 How many different years since your 1993 tax return (the tax return whose year ended after December 31, 1993) has your company had to respond to the IRS (one or more times for a given year) on a potential transfer pricing issue where contemporaneous documentation relevant to section 6662(e) had been prepared?

- None **SKIP TO Q.32**
- Once **SKIP TO Q.20**
- More than once **GO TO Q.19A**
- Decline to comment **SKIP TO Q.20**

Q.19a How many different years total has your company had to respond, at least once per year, since 1993?

Times

Decline to comment

Q.20 Have any transactions for which contemporaneous documentation was prepared during this period (1994 to 1999) been examined by the IRS?

- Yes
- No **SKIP TO Q.32**
- Decline to comment **SKIP TO Q.32**

Q.21 What was the most recent year a transaction for which contemporaneous documentation was prepared was examined by the IRS?

- 1999 1995
- 1998 1994
- 1997 Before 1994 → **SKIP TO Q.32**
- 1996

Q.22 Thinking about your most recent, that is, your [YEAR FROM Q.21] return, at what point in the examination process were you advised that the Internal Revenue Service proposed to pursue a possible transfer pricing issue?

- At the opening conference
- After the opening conference but before the midpoint of the examination process
- After the midpoint of the examination process
- Decline to comment

Q.23 For the [YEAR FROM Q.21] return, were you asked to provide contemporaneous documentation?

Yes

No

SKIP TO Q.32

Decline to comment **SKIP TO Q.32**

Q.24 If transfer pricing was identified as an audit area by the IRS, at what point in the examination process of your [YEAR FROM Q.2 1] return were you asked to provide contemporaneous documentation? (Select only one)

At the opening conference

After the opening conference but before notification that a potential transfer pricing was under consideration

Upon notification that a transfer pricing issue was under consideration

Within 30 days after notification

Within 60 days after notification

61 days or more after notification

Not requested at all

Decline to comment

Q.25 How long did it take you to respond to the request for contemporaneous documentation for your [YEAR FROM Q.21] return?

Within 30 days after the request

Within 60 days after the request

61 days or more after the request was received

Decline to comment

Q.26 After providing contemporaneous documentation for your [YEAR FROM Q.21] return to the IRS, what was the period of time between providing such information and substantive discussion or follow-up questions regarding the information provided?

Within 30 days after providing the information

Within 60 days after the providing the information

61 days or more after providing information

Unknown at this time

Decline to comment

Q.27 From your perspective was your submission of contemporaneous documentation on your [YEAR FROM Q.21] return given adequate consideration?

Yes **SKIP TO Q.28**
No **GO TO Q.27a**
Decline to comment **SKIP TO Q.28**

Q.27a Which of the following reasons best explain why your contemporaneous documentation was not given adequate consideration? (Select all that apply)

Contemporaneous documentation apparently not considered

Key information provided in contemporaneous documentation asked to be resubmitted

Not provided opportunity to discuss submission

Conclusions being drawn based on assumptions adequately addressed in submission but not reflected in response prepared by IRS

IRS personnel reviewing submission lacked economic expertise to assess and adequately respond to submission

IRS personnel reviewing submission lacked expertise, other than economic, to assess and adequately respond to submission

Decline to comment

IRS CONTEMPORANEOUS DOCUMENTATION SURVEY

The following question pertains to the 10 types of “principal documents” required under Treasury Regulations section 1.6662-6d(2)(iii) for the documentation to comply with 6662(e).

Q.28 Based on your experience with the examination process relating to your [YEAR FROM Q.21] return, for each of the principal documents listed below please indicate by selecting the appropriate response, the extent to which you modified (or intend to modify) subsequent documentation by selecting the appropriate response.

	Did/will not significantly modify subsequent documentation	Significantly increase scope and depth of documentation utilizing internal resources	Significantly increase scope and depth of documentation utilizing external and internal resources	Decrease scope and depth of documentation
a. Overview of the business				
b. Description of the organizational structure of all related parties engaged in transactions potentially relevant under section 482				
c. Documentation explicitly required by the regulations under section 482				
d. Description of the transfer pricing method selected and explanation of why it was selected				
e. Description of the methods that were considered and explanation of why they were not selected				
f. Description of the controlled transactions				
g. Description of the comparables that were used				
h. Explanation of the economic analysis and projections relied upon in developing the method				
i. Description of any relevant data that was obtained after the end of the tax year and before filing a tax return, and which would help determine if a specified method was selected and applied in a reasonable manner				
j. Index of the principal and background documents and a description of the record keeping system				

Q.29 What was the final outcome of the examination process regarding your [YEAR FROM Q.21] with respect to issues for which contemporaneous documentation was prepared?

No adjustment was proposed

Adjustment was proposed

Not determinable

Decline to comment

Q.30 Thinking about the examination of your [YEAR FROM Q.21] return, which of the following statements best describes your assessment of the impact of submitting contemporaneous documentation on the time and cost expended in resolving transfer pricing issues?

Submission of contemporaneous documentation significantly reduced the time and cost expended by the corporation in addressing issues raised during the examination process.

Submission of contemporaneous documentation had little or no impact on the time and cost expended by the corporation in addressing issues raised during the examination process.

Q.31 What impact do you think the submission of contemporaneous documentation will have on the time and cost expended by the corporation in addressing issues raised during examinations in the future?

Will reduce the time and cost significantly

Will reduce the time and cost somewhat

Will have little or no impact on the time or cost

Will increase the time and cost somewhat

Will increase the time and cost significantly

Decline to comment

Q.32 Please provide the following information pertaining to your principal business activity:

- a. Business activity code number
- b. Principle Business activity
- c. Principle Product or Service

This completes the survey.

Q.33 Please use the space below to comment on any of the previous questions on the survey. In particular, please comment on any questions that you found confusing, difficult to understand, or difficult to comply with. Your comments will help us improve the quality of the survey.

Also in the box below, please estimate the amount time that it took you to complete the survey. This information is requested for the Office of Management and Budget.

You may review previous questions and your answers to them by pressing the PREVIOUS PAGE button. (NOTE: Please remember not to press the BACK or FORWARD buttons on your browser).

If you would like to complete the survey now, then type your comments (or “none”) in the space below, and you will be given the opportunity to submit your answers.

Q.34 Press “Submit” if you are ready to submit your survey. Once your survey is submitted, you will not be able re-access the questionnaire.

Yes, Submit

THANK YOU FOR PARTICIPATING IN THE SURVEY