

Your corporation has been identified as one that has interacted with IRS examination in regard to a transfer pricing issue and/or a case that was closed by the IRS's International Business Compliance or the Transfer Pricing Practice in Calendar Year 2014. We appreciate your assistance in identifying any difficulties that you may have noted during the examination process. Your candid responses will support our efforts to improve the transfer pricing process.

1. How would you rate your IRS transfer pricing examination experience?

Based on your experience, the IRS transfer pricing examination process was effective and produced an accurate end result:

- a) Agree.
- b) Disagree.

Comments: _____

2. How knowledgeable did the IRS examination team seem to you?

The IRS examination team was knowledgeable and appeared well-qualified to conduct the audit:

- a) Agree.
- b) Disagree.

Comments: _____

3. How well did you feel the international examiners/specialists understood what your transfer pricing position was?

The IRS examination team listened to your concerns and understood your position:

- a) Agree.
- b) Disagree.

4. How clear and accurate was the information that the IRS provided to you?

Information provided to us by the IRS examination team was clear and accurate:

- a) Agree.
- b) Disagree.

Comments: _____

5. Did your experience with the Transfer Pricing Audit Roadmap adequately address your issues/concerns?

The Transfer Pricing Audit Roadmap was a helpful resource in addressing your examination issues and concerns:

- a) Agree.
- b) Disagree.
- c) We have no knowledge of the Transfer Pricing Audit Roadmap

Comments: _____

6. How long did the transfer pricing audit process take to complete?
Factoring in the examination scope, your audit was completed in a reasonable amount of time:

- a) Agree.
- b) Disagree.

Comments: _____

7. Our transfer pricing examination was resolved in:

- a) Less than one year
- b) Between one year and two years
- c) Between two years and three years
- d) Over three years

Comments: _____

8. Were you satisfied with the examination results?

We believe that the transfer pricing examination was conducted in a fair and balanced manner:

- a) Agree.
- b) Disagree.

Comments: _____

9. Did your transfer pricing related examination result in an adjustment?

Your transfer pricing examination resulted in:

- a) A Net Credit Allowance.
- b) A Net Debit Assessment.
- c) No Adjustment.

10. Did your transfer pricing-related examination result in a material penalty?

Your transfer pricing examination resulted in:

- a) A 20% Penalty.
- b) A 40% Penalty.
- c) Other penalty. Please specify _____
- d) No Penalty.

11. Would you rank transfer pricing as one of the most important tax challenges facing your corporation?

Your organization allocates significant tax planning resources to transfer pricing:

- a) Agree.
- b) Disagree.

12. Was your transfer pricing experience with the IRS better or worse than you expected?

In your experience, the IRS transfer pricing examination process was:

- a) Professional and competent.

- b) Mediocre
- c) Sub-standard

Comments: _____

13. Do you know what IRS function was ultimately responsible for the final decision on your transfer pricing issue?
- a. International Business Compliance
 - b. Transfer Pricing Practice
 - c. Do not know
 - d. Other. Please specify: _____

14. Overall, how satisfied were you with the customer service you received during this experience?

Based on your transfer pricing examination experience, the IRS needs to improve (mark all that may apply):

- a) Examination process transparency.
- b) Examination team member communication skills.
- c) Examination process timeliness.
- d) Examination team member training.
- e) Nothing.

Please use the space below to describe any specific obstacles encountered during your transfer pricing experience with the IRS, suggestions to make the transfer pricing process simpler/more effective for everyone involved, or to comment on any other transfer pricing examination aspects not covered by our questions.
