



International Transfer Pricing: The Valuation of Intangible Assets

By Monica Boos

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The valuation of intangible assets causes tax lawyers and economists a lot of trouble. And when assets cross borders, it gets worse. The (maybe not so-surprising) result is that a considerable number of multinational enterprises use a transfer pricing method to value intangible assets that seems not to comply with regulations of either home or host tax authorities. Although this is a matter of the utmost practical concern, the persistence; even growth; of the problem clearly raises theoretical issues. This volume considers the valuation of intangible assets from both perspectives, theory and practice, building its practical recommendations on a sound theoretical analysis of the appropriateness of transfer pricing rules for intangible assets as well as on the adequacy of transfer pricing standards and methods for the economic reality of multinational enterprises.

the ongoing policy discussions on the subject among international organizations, tax authorities, and taxpayers. The price-setting behavior of multinational enterprises; why intangibles are valuable; the elusiveness of economic fairness standards when every case is different; these are among the thought-provoking issues raised in this book. As both a thorough summary of the major ideas and key public policies in its specialized field and a clarifying presentation of recommendations as well as topics and issues for further research, *International Transfer Pricing ; The Valuation of Intangible Assets* will greatly benefit international taxation professionals, whether in business, government, or academia.

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