

Transfer Pricing

Transfer pricing is a key part of our [international tax](#) practice, and Miller & Chevalier is widely viewed as a leader in the field. *Chambers* commentators have recognized that the firm has "notable capability to advise on transfer pricing issues." We help clients design, implement, and defend their pricing strategies, handling matters covering intercompany pricing of tangible goods, intangibles, services, and financings, as well as related expense allocation issues. Our clients come from a wide spectrum of industries, including consumer products, automotive, technology, life sciences, electronics, natural resources, telecommunications, retail, manufacturing, and business services. We advise our clients on developments in U.S. transfer pricing rules and enforcement, as well as global trends including OECD initiatives on base erosion and profit shifting and digitalization.

Our lawyers are expert in resolving transfer pricing disputes, during audit, appeals, and in litigation. We also have extensive experience successfully guiding clients through the APA and MAP processes.

Rankings and Recognition

- *Chambers USA*: Tax Team of the Year, 2016
- *Chambers USA*: Tax: Controversy (Nationwide), 2007 - 2022
- *Chambers USA*: Government Relations: Specialist Tax Firms (Nationwide), 2019 - 2022
- *Chambers USA*: Tax (District of Columbia), 2003 - 2022
- *Legal 500*: Tax: Contentious (U.S.), 2007 - 2022
- *Legal 500*: Tax: International Tax (U.S.), 2013 - 2022
- *Legal 500*: Tax: Non-Contentious (U.S.), 2013 - 2022
- *International Tax Review "Americas Tax Awards"*: Americas Tax Policy Firm of the Year, 2012 - 2013, 2015 - 2016
- *International Tax Review "Americas Tax Awards"*: Washington, DC Tax Firm of the Year, 2013
- *International Tax Review "Americas Tax Awards"*: Washington, DC Transfer Pricing Firm of the Year, 2012
- *International Tax Review*: World Tax (Washington, DC), 2012, 2014 - 2020
- *International Tax Review*: World Transfer Pricing (National), 2014 - 2020
- *International Tax Review*: Tier 1 U.S. Firm, Tax Planning Survey, 2018