

United States

Summary of CbC Reporting and Transfer Pricing Documentation Rules

Country-by-Country Report

- *Effective Date*: Tax years beginning on or after June 30, 2016.
- *Filing Threshold*: U.S. MNEs with annual consolidated group revenue of US\$850 million or more in the preceding annual accounting period.
- *Local Filing*: Not required.
- *Information Reported*: Consistent with OECD guidance.
- *Language*: English.
- *Forms/Filing Instructions (see Bloomberg Tax International Tax Forms database)*:
 - CbC Notification of Reporting Entity: Not required.
 - CbC Report: Form 8975.
- *Deadline for Filing Notification of Reporting Entity*: Not required.
- *Deadline for Filing CbC Report*: Filed with the U.S. parent entity's income tax return for the covered year (including extensions).
- *Penalties*: Penalty rules under §6038 generally apply.
- *Exchange of Information*:
 - U.S. CAA CbC: For the latest updates, see the IRS [Country-by-Country Reporting Jurisdiction Status Table](#).

Master File

There are no OECD Master File requirements in the United States.

Local File

There are no OECD Master File requirements in the United States.

Transfer Pricing Documentation

Although transfer pricing documentation is not required; the U.S. transfer pricing documentation regulations provide the principal and background documents that must be maintained to satisfy the contemporaneous documentation requirement of the transfer pricing penalty regulations. All principal documents must be submitted to the IRS within 30 days of a request.

Tax Return Disclosures

Form 5471 (Information Return of U.S. Persons with Respect to Certain Foreign Corporations); Form 5472 (Information Return of a 25% Foreign-Owned U.S. Corporation or a Foreign Corporation Engaged in a U.S. Trade or Business); and Form 8865 (Return of U.S. persons with Respect to Certain Foreign Partnerships) disclose information on related party transactions with foreign entities. The forms are filed with the income tax return.