

**To:** Keidel, Albert  
**Subject:** FW: Transfer Pricing Issues in India - readout from USIBC meeting  
**Importance:** High

hi - I wanted to flag this issue for you to see if you've dealt with transfer pricing issues in China. This question (see below) was posed a meeting on this issue yesterday at an US-India business council meeting. thanks. Geetha

-----Original Message-----

**From:** Rao, Geetha  
**Sent:** Wednesday, August 08, 2001 1:34 PM  
**To:** McDonald, Larry; Brown, Patricia A.  
**Cc:** Mills, Marshall  
**Subject:** Transfer Pricing Issues in India - readout from USIBC meeting  
**Importance:** High

USIBC meeting - Tuesday August 8

The GOI is amending the Income Tax Law to deal with income computation from international transactions between associated enterprises. The USIBC meeting yesterday discussed some of the weaknesses/problems of the current legislation and requested further discussion (with Treasury involvement). DoC, State, Deloitte Touche, PWC, Arthur Anderson, KPMG, and Thelen, Ried and Priest were present.

**Key issues**

[(b)(5)]

USIBC may request that this issue be raised at the upcoming O'Neill-Sinha meeting in November.