


Navigate the evolving tax landscape of IRS transfer pricing actions.

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Recent developments reinforce importance of reviewing transfer pricing approach

In the United States, the IRS has escalated its approach to companies that did not respond to transfer pricing compliance letters by referring them for potential examination. Taxpayers should continue to monitor the progress of this transfer pricing compliance initiative as it may provide insight into future IRS initiatives. An [EY Tax Alert](#) has more details.

In *Loper Bright Enterprises v. Raimondo*, No. 22-451 (28 June 2024), the U.S. Supreme Court overruled *Chevron* deference, now requiring courts to independently interpret statutes rather than deferring to agency interpretations. This significant change affects regulatory compliance and could have far-reaching implications for taxpayers and federal agencies. An [EY Tax Alert](#) has more details.

In light of these developments, [Ryan Kelly](#), EY Americas ITTS Tax Controversy Leader, reminds clients to conduct a comprehensive evaluation of their approach to transfer pricing disputes, emphasizing the importance of these changes within the broader international tax controversy landscape.

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