

[Your Company Letterhead]

[Date]

[Contact Name/APA Coordinator]

[Tax Authority Name]

[Department/Division]

[Address]

[City, State, Zip Code]

RE: Request for Pre-Filing Consultation for an Advance Pricing Agreement (APA)

Dear [Contact Name],

On behalf of [Company Name], we are writing to formally request a pre-filing consultation to discuss the possibility of entering into an Advance Pricing Agreement (APA) regarding our cross-border intra-group transactions.

The purpose of this consultation is to explore the suitability of an APA for the following controlled transactions:

- [Type of transaction, e.g., Sale of finished goods]
- [Type of transaction, e.g., Provision of management services]
- [Type of transaction, e.g., Licensing of intellectual property]

We intend to discuss the following during the meeting:

- A brief overview of our global business operations and organizational structure.
- The proposed transfer pricing methodology.
- The proposed scope and term (years) of the APA.
- Relevant critical assumptions and comparable data.

We would prefer to pursue a [Unilateral / Bilateral / Multilateral] APA involving the tax authorities of [Name of Country/Countries].

Please let us know your availability for an initial meeting. We are prepared to provide a more detailed briefing memorandum prior to our discussion if required.

Thank you for your time and consideration of this request.

Sincerely,

[Signature]

[Name of Authorized Officer]

[Title]

[Phone Number]
[Email Address]