



TaxNewsFlash

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United States-Switzerland: Competent authority arrangement implementing arbitration process

IRS Announcement 2020-13—which appears in the Internal Revenue Bulletin 2020-35 (dated Monday, August 24, 2020)—includes text of a “competent authority arrangement” entered into by the competent authorities of the United States and Switzerland regarding implementation of the arbitration process under the United States-Switzerland income tax treaty and related Protocols.

Read text of the competent authority arrangement (in Announcement 2020-13) in [IRB 2020-35](#) [PDF 2.18 MB]

The competent authority arrangement includes definitions of terms under the mutual agreement procedure (MAP) proceedings and addresses how to request competent authority assistance.

KPMG observation

The new document is significantly more detailed than similar arrangements published regarding the United Kingdom and Netherlands MAPs, and is more akin to the procedure laid out under the Belgium MAP in that the arrangement with Switzerland includes more detailed provisions describing the timelines for each step of the procedure and the eligibility requirements for arbitrators.

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