



Andrew C. Parsons

PRESENT POSITION

PRECISION ECONOMICS, LLC, Washington, DC, February 2003 – December 2010 (Senior Economist/Vice President), February 2025 – Present (Consultant)

- Manage transfer pricing reports/cases for both government tax authorities (*e.g.*, IRS, Australian Tax Office, and Canada Revenue Agency) and taxpayers regarding tangible and intangible transfers of assets, covering industries such as software, semiconductor, pharmaceuticals, chemicals, medical products and consumer products.
- Served as project manager for lead economic expert for the IRS in one of the largest transfer pricing dispute and settlement on record, *GlaxoSmithKline Holdings (Americas) v. Commissioner of Internal Revenue*, for the Australian Tax Office in the first major transfer pricing litigation in Australia, *Roche Products Pty. Ltd. vs. Federal Commissioner of Taxation*, and for the Canadian Department of Justice in *McKesson Canada Corporation v. The Queen*.
- Testified regarding urea and pineapples in hearings before the U.S. International Trade Commission.
- Draft reports, perform data analysis and provide research assistance for public policy reports covering such diverse topic areas as pharmaceutical price regulations, insurance and the profitability levels of trading specialists.

EXPERIENCE

INTERNAL REVENUE SERVICE, Washington, DC, January 2011 – February 2025
APMA Team Leader/Economist

- Founding member of the Advance Pricing and Mutual Agreement (APMA) Planning and Advisory Committee for Economists (PACE); developed curriculum for and taught classes on transfer pricing to IRS economists across the country, organized and facilitated workgroups on economic issues, and held office hours for individual economic consults.
- Served as an economic consultant on various transfer pricing litigation cases involving billions of dollars in adjustments, including *Coca-Cola v. Commissioner*, one of the first major Tax Court victories for the IRS in transfer pricing in decades.
- Created the economic transfer pricing practice network for IRS economists that developed training, analysis and written materials, provided issue resolution through formation of task groups, and connected IRS economists to enhance communication across the IRS.
- Wrote and defended economic transfer pricing reports for Advance Pricing Agreements (APAs), Mutual Agreement Procedures (MAPs) and IRS audits regarding tangible and intangible transfers of assets, and financial products, covering such industries as pharmaceutical, retail, automotive, chemicals, and consumer products.
- Drafted APA and MAP position papers and participated in negotiations with foreign tax authorities, which include the Israel Tax Authority (ITA), Canada Revenue Agency (CRA), the HM Revenue & Customs (HMRC), the Japanese National Tax Association (NTA), and the German Federal Central Tax Office.
- Served as a panelist at transfer pricing forums both at the IRS and externally at transfer pricing conferences.



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GEORGETOWN UNIVERSITY, Washington, DC, August 2002 – May 2003

Research Assistant

- Researched companies' industry categorization by firms like Value Line, Morningstar and Hoover's for valuation comparable analysis.

ALAYTHEON CONSULTING, Washington, DC, August 1998 – August 2002

Financial/Research Consultant

- Grew sole proprietorship to manage over six million dollars of personal assets for individuals through stock portfolio analysis and fixed income security investments.
- Increased average clients' cash flow by ten percent through asset reallocation, cutting costs and in-depth cash flow planning.

EDUCATION

Georgetown University, The Robert Emmett McDonough School of Business, Washington, DC

Master of Business Administration

May 2003

- Honors: Beta Gamma Sigma; High Distinction

Cornell University, College of Engineering, Ithaca, NY

Master of Engineering, Operations Research and Industrial Engineering

May 1996

- Honors: Omega Rho; Dean's List

Bachelor of Science, Operations Research and Industrial Engineering

January 1996

SEMINARS, TESTIMONY & ARTICLES

- "Discount Rate Challenge," National Association for Business Economics: 2013 NABE Transfer Pricing Symposium, Washington, DC, July 31, 2013.
- "Profit Potential - Best Practices When Applying the CUT/CUP Method," National Association for Business Economics: 2012 Transfer Pricing Round Table Series, Washington, DC, January 10, 2012.
- "Economic Aspects of Transfer Pricing Principles," Council for International Tax Education: U.S. Transfer Pricing Planning & Controversies, Washington, DC, June 7, 2010.
- "Economic Aspects of Transfer Pricing Principles," Council for International Tax Education: U.S. Transfer Pricing Planning & Controversies, Houston, TX, June 8, 2009.
- "The Rise of Intangibles: Applying Rules of Thumb to Profit Splits" *Tax Management Transfer Pricing Report*, Vol. 17, No. 4, June 19, 2008.
- "Basic Methods of Transfer Pricing: An Economic Approach," IIR Ltd.: Fundamentals of Transfer Pricing, London, UK, January 30, 2008.
- "Basic Methods of Transfer Pricing: An Economic Approach," IIR Ltd.: Fundamentals of Transfer Pricing, London, UK, September 19, 2007.
- "Basic Methods of Transfer Pricing: An Economic Approach," IIR Ltd.: Fundamentals of Transfer Pricing, London, UK, January 31, 2007.



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- “Economic Testimony,” United States International Trade Commission, Inv. Nos. 731-TA-706 (Sunset Review), testimony on January 18, 2007, hearing on canned pineapple fruit.
- “Economic Testimony,” United States International Trade Commission, Inv. Nos. 731-TA-340 E and H (Sunset Review), testimony on September 22, 2005, hearing on solid urea.
- “Writing an Economic Transfer Pricing Report,” Council for International Tax Education: U.S. Transfer Pricing Planning & Controversies, New York, NY, August 8, 2005.
- “The Economics of Transfer Pricing: Independent Arm’s Length Analysis,” Council for International Tax Education: U.S. Transfer Pricing Planning & Controversies, Los Angeles, CA, October 25, 2004.
- “Transfer Pricing: Due Diligence and Risk Review,” IIR Ltd.: Corporate Tax Congress, London, UK, September 29, 2004.

February 2025