

Masatake Kuramoto

Managing Director



Contact

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Masatake (Masa) Kuramoto is an accomplished and well-respected transfer pricing expert with over 25 years of experience in transfer pricing strategy, documentation, planning and implementation, disputes, and advance pricing agreements (APAs). He is a proactive, hands-on leader who manages experienced professionals on diverse portfolios addressing complex transfer pricing issues and is adept at interacting with executives in the Advance Pricing Mutual Agreement program. Mr. Kuramoto works with Japanese multinational clients on engagements across a variety of industries including chemicals, consumer goods, steel, electronics, pharmaceuticals, automotive, and other major industries in Japan and the US.

In transfer pricing and operating model planning matters, Mr. Kuramoto has directed teams overseeing the building and managing of transfer pricing documentation and the review and creation of transfer pricing policies and processes. He helps clients structure integrated strategies that address tax risks to help businesses achieve sustainable tax planning. He also assists clients with their transfer pricing compliance and documentation, including the analysis and documentation of transactions between related parties for consistency with the arm's length principle for tax purposes. Mr. Kuramoto has developed and implemented transfer pricing policies, procedures, and systems for setting, monitoring, and documenting intercompany tax transactions.

Mr. Kuramoto has worked on transfer pricing disputes and tax controversy issues including transfer pricing examinations from the National Tax Agency in Japan and the IRS, appeals and alternative processes, APAs, the competent authority process, and arbitration. He assisted over 30 Uni- and Bilateral APA and Mutual Agreement Procedures projects for Japanese multinational companies and succeeded in bringing fair and reasonable conclusions on tax authorities' examinations for his clients. He regularly speaks on transfer pricing-related topics at various Japanese chambers of commerce organizations and Japanese business associations.

Languages

English
Japanese

Education

MS in economics, Michigan State University, The Eli Broad College of Business
BA in political science, Michigan State University

Practice Areas

Transfer Pricing

About NERA

NERA Economic Consulting (www.nera.com) is a global firm of experts dedicated to applying economic, finance, and quantitative principles to complex business and legal challenges. For over half a century, NERA's economists have been creating strategies, studies, reports, expert testimony, and policy recommendations for government authorities and the world's leading law firms and corporations. With its main office in New York City, NERA serves clients from more than 25 offices across North America, Europe, and Asia Pacific.