REVENUE MEMORANDUM ORDER NO. 11-2010 issued on February 2, 2010 prescribes the policies and guidelines on the monitoring, review and determination of the tax consequences of “Big-Ticket Items”.

A transaction is considered as a “Big-Ticket Item” (BTI) based on the following:

a. If the amount involved exceeds ₱ 200,000,000. This threshold amount is considered on a per single and unrelated event or transaction basis, and shall not take into account the summation or the total of several unrelated and multiple events or transactions.

b. If it involves a request for ruling filed with the BIR where the amount of the transaction is over ₱ 1,000,000.

The following offices shall be responsible for the monitoring of BTI:

a. Large Taxpayers Service (LTS) – Regular
b. LTS – Excise
c. Enforcement Service

Said offices must communicate with the concerned taxpayer(s) involved in the BTI within 5 working days from the date of the aforesaid transaction, or from the date of discovery of the transaction.

The Assistant Commissioner of the responsible office shall send an Access to Records letter to the taxpayer. The submission of the requested documents by the taxpayer within the prescribed deadline must be strictly enforced and failure of the taxpayer to comply should result in the institution of the available sanctions, including the issuance of subpoena duces tecum.

For cases of requests for ruling involving transactions with an amount in excess of ₱ 1,000,000.00, the BIR legal office receiving the copy of the ruling request shall furnish a copy to the BIR office having jurisdiction over the taxpayer who filed the request for a ruling. Said BIR office shall request for information on this transaction using the Access to Record form, and submit a report on the results of the evaluation to the BIR legal office handling the ruling request not later than 15 working days from receipt of the documents.