

Form 54 – Frequently Asked Questions

Form of application under section 168 of the Income-tax Act, 2025

Name of form as per I.T. Rules, 1962	NEW FORM	Name of form as per I.T. Rules, 2026	54
Corresponding section of I.T. Act, 1961	92CC	Corresponding section of I.T. Act, 2025	168
Corresponding Rule of I.T. Rules, 1962	10-I	Corresponding Rule of I.T. Rules, 2026	119

1. What is Form 54 ?

Ans: In cases wherein, the Taxpayer has already signed an Agreement or has previously filed an application under Form 3CED (new Form 51) for APA which is being processed, filing a fresh Form 3CED (new Form 51) represents a repetition of applications which runs counter to the aim of the APA program of providing advanced certainty to applicants in terms of their tax obligations. This is even more relevant in cases where the transactions proposed to be undertaken and the terms and conditions proposed in the current application are the same or highly similar to those in the earlier signed APA/ application filed. This renewal form aims to ensure non-duplication of efforts and lowering of compliance burden for applicants already engaged in the APA process.

2: Who should file Form 54?

Ans: Any Taxpayer who has entered into or is contemplating entering into international transactions with an associated enterprise and has previously signed an APA/ applied for an APA with same/similar transactions can file the proposed Renewal Form, subject to certain conditions laid out in the Form. Eligible applicants seeking rollback can also file this form.

3: Is Form 54 mandatory?

Ans: Form 54 is optional.

4: What is the time limit for filing Form 54?

Ans: The renewal form must be filed before the start of the first tax year for which the APA is sought in respect of transactions which are of a continuing nature from dealings that are already occurring; or before undertaking the transaction in respect of remaining transactions and is applicable for a duration, typically of five tax years ahead in case of forward-looking APAs, and four tax years back in case of rollback, for a total of nine tax years.

5: How many times can Form 54 be filed in a year?

Ans: Form 54 is **filed once a year.**

6: What documents are required to file Form 54?

Ans: Documents required are specifically mentioned in the Form and include (but are not limited to):

- Financial Statements for the covered years of the APA Application
- Inter-company agreements relevant to the Application

7: Can I edit Form 54 after submission?

Ans: No. Once Form 54 is submitted and acknowledgment is generated, it **cannot be edited.** Ensure all details are correct before submission.

8: Do I need to attach proof of payment?

Ans: Yes. Proof of payment for the renewal Application (challans/BSR codes) is mandatory for validation and processing.

10: What if I do not have a PAN?

Ans: Form 54 cannot be submitted without a valid PAN.

11: Can Form 54 be filed offline?

Ans: No. Form 54 can only be submitted **online** through the Income Tax e-Filing portal.

12: Why has the new Renewal Form been provided?

Ans: The renewal form aims to ensure non-duplication of efforts and lowering of compliance burden for applicants already engaged in the APA process. It also aims to accelerate the APA program by providing visibility to the department and the APA teams over cases which have the same/similar transactions and terms and conditions as APAs signed/applied for previously, potentially leading to lower processing times.

While the details in the Form are similar to those asked for in Form 51, i.e. Application for an Advanced Pricing Agreement, detail/documentary requirements are relaxed to the extent of deviation from details/documents already submitted as part of an earlier APA application filed/APA signed.

- Similar to the NEW form 51 which combines the erstwhile Form 3CED (to apply for an Advance Pricing Agreement) and Form 3CEDA (to apply for Rollback of an Advance Pricing Agreement), rollback requests have been accommodated in the renewal form as well. This has been done in view of the similarities of the two forms and shall lead to reduction in compliance burden and avoiding duplication of Forms
- A number of queries which raised in the earlier version of the Form along with additional documentary requirements have been omitted with the aim of lowering compliance burden. Further, details have been asked for in easy-to-fill tabular form to the extent possible.