

Taxation of Multinational Corporations

- Structure
 - U. S. corporations pay tax at standard rate on global taxable income
 - Credit for foreign taxes paid
- Subsidiary status
 - Deferral of taxes on income from foreign enterprise
 - Repatriation
- Income allocation
 - Arm's length system
 - Transfer-pricing problem

Effects Of Taxation On Multinational Corporations

James R. Hines



Effects Of Taxation On Multinational Corporations:

The Effects of Taxation on Multinational Corporations Martin Feldstein, James R. Hines, Jr., R. Glenn Hubbard, 2007-12-01
The tax rules of the United States and other countries have intended and unintended effects on the operations of multinational corporations influencing everything from the formation and allocation of capital to competitive strategies. The growing importance of international business has led economists to reconsider whether current systems of taxing international income are viable in a world of significant capital market integration and global commercial competition. In an attempt to quantify the effect of tax policy on international investment choices, this volume presents in-depth analyses of the interaction of international tax rules and the investment decisions of multinational enterprises. Ten papers assess the role played by multinational firms and their investment in the U.S. economy and the design of international tax rules for multinational investment. The volume analyzes channels through which international tax rules affect the costs of international business activities and examines ways in which international tax rules affect financing decisions of multinational firms. As a group, the papers demonstrate that international tax rules have significant effects on firms' investment and other financing decisions.

Taxing Multinational Corporations Martin Feldstein, James R. Hines, Jr., R. Glenn Hubbard, 2007-12-01
In the increasingly global business environment of the 1990s, policymakers and executives of multinational corporations must make informed decisions based on a sound knowledge of U.S. and foreign tax policy. Written for a nontechnical audience, *Taxing Multinational Corporations* summarizes the up-to-the-minute research on the structure and effects of tax policies collected in *The Effects of Taxation on Multinational Corporations*. The book covers such practical issues as the impact of tax law on U.S. competitiveness, the volume and location of research and development spending, the extent of foreign direct investment, and the financial practices of multinational companies. In ten succinct chapters, the book documents the channels through which tax policy in the United States and abroad affects plant and equipment investments, spending on research and development, the cost of debt and equity finance, and dividend repatriations by United States subsidiaries. It also discusses the impact of U.S. firms' outbound foreign investment on domestic and foreign economies. Especially useful to nonspecialists is an appendix that summarizes current United States rules for taxing international income.

Fiscal Policy Alan J. Auerbach, 1997
The eight chapters in this volume fall into three subject areas: government budget management and control, federal entitlement programs, and attempts to influence private sector behavior through tax code management. Policymakers are often hard-pressed to understand what economists have to say on policy issues, and scholars and students need to know what the latest research findings are and what questions remain unanswered. *Fiscal Policy: Lessons from Economic Research* presents the work of leading contributors to the public finance literature. The papers were originally presented at a 1996 conference sponsored by the Robert D. Burch Center for Tax Policy and Public Finance at the University of California, Berkeley. Although the papers are broad in scope, they are not intended to be neutral, comprehensive surveys of the literature. Instead, authors

were encouraged to focus on the issues they thought most important or interesting The conference confirmed that on some questions there is a broad consensus and on others there is strong disagreement Because perspectives differ after each paper two discussants offer their own views on the subject More so than in many conference volumes these comments are an integral part of each presentation The eight chapters fall into three subject areas government budget management and control federal entitlement programs and attempts to influence private sector behavior through tax code management

Contributors Henry J Aaron B Douglas Bernheim David M Cutler Nada Eissa Jeffrey Frankel William G Gale Roger H Gordon Edward M Gramlich Bronwyn H Hall Kevin A Hassett James R Hines Jr Hilary Williamson Hoynes R Glenn Hubbard Robert P Inman Laurence J Kotlikoff Robert A Moffitt Joseph P Newhouse James M Poterba John M Quigley Robert D Reischauer David Romer Daniel L Rubinfeld John B Shoven Jonathan S Skinner Joel Slemrod John B Taylor **The Taxation of**

Multinational Corporations Joel Slemrod, 2012-12-06 The six papers in this volume represent state of the art empirical and conceptual research on various aspects of the taxation of multinational corporations They were commissioned for and presented at a conference organized by Price Waterhouse LLP on behalf of the International Tax Policy Forum held in Washington DC in March 1994 The first four papers were originally published in the May 1995 issue of International Tax and Public Finance The Slemrod paper appeared in the Policy Watch Section of the November 1995 issue of that journal The foregoing papers were subject to the normal refereeing procedures of the journal and the summaries that follow are drawn from there The Leamer paper has not been previously published Altshuler and Mintz examine one aspect of the 1986 U S Tax Reform Act the change in the rules for the allocation of interest expense between domestic U S and foreign source income In the absence of rules a parent with excess credits could reduce U S tax liability by allocating interest expense toward itself thus reducing its taxable domestic income without any compensating increase in either the U S tax due on foreign source income or the foreign tax due which is independent of U S rules **OECD Tax Policy Studies Tax Effects on Foreign**

Direct Investment Recent Evidence and Policy Analysis OECD, 2007-12-20 This publication reports the results of a project examining taxation and foreign direct investment FDI **International Taxation and Multinational Activity**

James R. Hines, 2009-02-15 Because the actions of multinational corporations have a clear and direct effect on the flow of capital throughout the world how and why these firms behave the way they do is a major issue for national governments and their policymakers With an unprecedented ability to adjust the scale character and location of their global operations international corporations have become increasingly sensitive to the kind and degree of tax obligations imposed on them by both host and home countries Tax rules affect the volume of foreign direct investment corporate borrowing transfer pricing dividend and royalty payments and research and development National governments that tax the profits of international firms face important challenges in designing tax policies to attract them This collection examines the global ramifications of tax policies offering up to date theoretically innovative and empirically sound perspectives on a problem of immense

significance to future economic growth around the globe *USITC Publication*, 1998 *International Taxation Handbook* Colin Read, Greg N. Gregoriou, 2007-04-13 Description and extensions of the capital income effective tax rate literature M M Ruiz F G rard M p 11 41 **Multinational Corporations** Nasrollah Saifpour Fatemi, Gail W. Williams, Thibaut De Saint-Phalle, Fairleigh Dickinson University. Graduate Institute of International Studies, 1970 Studies in International Taxation Alberto Giovannini, R. Glenn Hubbard, Joel Slemrod, 2007-12-01 As a united global economy evolves economists and policymakers are forced to consider whether the current system of taxing income is inconsistent with the trend toward liberalized world financial flows and increased international competition To help assess existing tax policies and incentives this volume presents new research on how taxes affect the investment and financing decisions of multinationals today The contributors examine the effects of taxation on decisions about international financial management business investment and international income shifting They consider the influence of tax rules on dividend policy decisions within multinationals the extent to which tax incentives affect the level and location of research and development across countries and the fact that foreign controlled companies operating in the United States pay lower taxes than do domestically controlled companies The contributors to this volume are Rosanne Altshuler Alan J Auerbach Neil Bruce Timothy Goodspeed Roger H Gordon Harry Grubert Bronwyn H Hall David Harris Kevin Hassett James R Hines Jr Roy D Hogg Joosung Jun Jeffrey K Mackie Mason Jack M Mintz Randall Morck John Mutti T Scott Newlon James M Poterba Joel Slemrod Deborah Swenson G Peter Wilson and Bernard Yeung Investment Behavior of Multinational Corporations in Developing Areas Bret Lee Billet, If political power is directly related to economic wealth then multinational corporations are powerful actors in the international system The sales of some are greater than the gross national product of some of the most economically advanced countries in the world This book examines key political and economic factors that influence the behavior of multinationals when they decide where to make direct investments as well as how their investment decisions affect the development process and policies in host countries It also looks for discernible patterns in the behavior of multinationals that originate in different home countries These include corporations from Development Assistance Committee DAC countries that are members of the Organization of Economic Cooperation and Development OECD Japan and the United States *OECD Tax Policy Studies Corporate Tax Incentives for Foreign Direct Investment* OECD, 2001-08-20 This report considers various corporate tax measures to encourage FDI and a range of issues relevant to assessing their use **Impact of U.S. Tax Rules on International Competitiveness** United States. Congress. House. Committee on Ways and Means, 2001 *Survey of Current Business*, 2006 Presents current statistical data on economic activity *Nation-States and the Multinational Corporation* Nathan M. Jensen, 2008-01-21 What makes a country attractive to foreign investors To what extent do conditions of governance and politics matter This book provides the most systematic exploration to date of these crucial questions at the nexus of politics and economics Using quantitative data and interviews with investment promotion agencies investment location consultants

political risk insurers and decision makers at multinational corporations Nathan Jensen arrives at a surprising conclusion Countries may be competing for international capital but government fiscal policy both taxation and spending has little impact on multinationals investment decisions Although government policy has a limited ability to determine patterns of foreign direct investment FDI inflows political institutions are central to explaining why some countries are more successful in attracting international capital First democratic institutions lower political risks for multinational corporations Indeed they lead to massive amounts of foreign direct investment Second politically federal institutions in contrast to fiscally federal institutions lower political risks for multinationals and allow host countries to attract higher levels of FDI inflows Third the International Monetary Fund often cited as a catalyst for promoting foreign investment actually deters multinationals from investment in countries under IMF programs Even after controlling for the factors that lead countries to seek IMF support IMF agreements are associated with much lower levels of FDI inflows *Working Paper Series* ,2002 Multinational corporations in the dollar devaluation crisis and the impact of direct investment abroad in the U.S. economy United States. Congress. Senate. Committee on Foreign Relations. Subcommittee on Multinational Corporations,1976 **Multinational Corporations and United States Foreign Policy: Multinational corporations in the dollar devaluation crisis and the impact of direct investment abroad in the U.S. economy** United States. Congress. Senate. Committee on Foreign Relations. Subcommittee on Multinational Corporations,1973 **Multinational Corporations** ,1973 **The Effect of Treaties on Foreign Direct Investment** Karl P Sauvant,Lisa E Sachs,2009-03-27 Over the past twenty years foreign direct investments have spurred widespread liberalization of the foreign direct investment FDI regulatory framework By opening up to foreign investors and encouraging FDI which could result in increased capital and market access many countries have improved the operational conditions for foreign affiliates and strengthened standards of treatment and protection By assuring investors that their investment will be legally protected with closed bilateral investment treaties BITs and double taxation treaties DTTs this in turn creates greater interest in FDI

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