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Service Summary A striking feature of
the modern U.S. economy is its
growing openness—its increased
integration with the rest of the world.
The attention of tax policymakers has

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recently been focused on the

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It is the taxation of U.S. business operations that has been the recent focus of policymakers, and that has raised the question of basic tax reform

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in the international sector: is the
current U.S ...

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This report describes and assesses
the principal prescriptions that have
been offered for broad reform of the

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Alternatives current U.S. system for taxing international businesses. The report begins with an overview of current law and of possible revisions. It then sets the framework for considering economic efficiency as well as tax shelter activities.

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United Nations Reform: U.S. Policy
and International Perspectives

Congressional Research Service 1

Introduction United Nations (U.N.)

reform is an ongoing policy issue for
the United States, and may be a point
of focus during the 112th Congress.

As the single largest financial

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contributor to the U.N. system,

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dividends must relate to foreign
earnings ie dividends attributable to a
us trade or business do not qualify a

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shareholder receiving

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The United States International
Communications Reform Act of 2014
is a bill that would revise U.S.
international broadcasting and

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Communications structures, missions, and objectives. The bill would also replace the Broadcasting Board of Governors with the United States International Communications Agency. The bill was introduced into the United States House of Representatives during the 113th United States

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~~United States International
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international taxation: Alternatives | A
striking feature of the modern U.S.
economy is its growing openness-its
increased integration with the rest of
the world. The ...

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The United States International
Communications Reform Act of 2014
is a bill that would revise U.S.
international broadcasting and
communications structures, missions,

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and objectives. The bill would also
replace the Broadcasting Board of
Governors with the United States
International

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Epub Library Tax Reform 101
Alternatives To Our Current Tax
System the tax reform act of 2014
settled on two main brackets for
production income 10 and 25 with a 35

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Alternative
bracket set aside for rare other income
a lower corporate tax rate down to 25
from 35

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We quantify the net effect of recent
U.S. tax reform on the tax rates of

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public U.S. corporations and find they decreased by 7.5 to 11.4 percentage points on average following tax reform. Further, we separately examine the effect of tax reform on purely domestic firms and multinational firms because some key provisions only affect multinational firms.

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~~The Effect of U.S. Tax Reform on the
Tax Burdens of U.S. ...~~

The new branded party, Reform UK, are 100-1 to win the most seats at the next general election. It looks like Nigel Farage is back into the spotlight in UK politics, and we have even taken

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Is the current U.S. tax system for taxing U.S. international business the appropriate one for the modern era of globalized business operations, or should its basic structure be reformed?

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Contents of this report: The Current System and Possible Revisions; Neutrality, Efficiency, and Competitiveness; Assessing the Existing Tax System; Territorial Taxation: The Dividend Exemption Proposal; A Residence-Based System in Practice; President Obama's

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Proposals to Restrict Deferral and Cross-Crediting; Tax Havens: Issues and Policy Options; General Reforms of the Corporate Tax and Implications for International Tax Treatment. Charts and tables. This is a print on demand edition of an important, hard-to-find publication.

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A striking feature of the modern U.S. economy is its growing openness--its increased integration with the rest of the world. The attention of tax policymakers has recently been focused on the growing participation of U.S. firms in the international economy

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and the increased pressure that engagement places on the U.S. system for taxing overseas business. Is the current U.S. tax system for taxing U.S. international business the appropriate one for the modern era of globalized business operations, or should its basic structure be reformed?

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The current U.S. system for taxing international business is a hybrid. In part the system is based on a residence principle, applying U.S. taxes on a worldwide basis to U.S. firms while granting foreign tax credits to alleviate double taxation. The system, however, also permits U.S.

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firms to defer foreign-source income indefinitely--a feature that approaches a territorial tax jurisdiction. In keeping with its mixed structure, the system produces a patchwork of economic effects that depend on the location of foreign investment and the circumstances of the firm. Broadly, the

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System poses a tax incentive to invest in countries with low-tax rates of their own and a disincentive to invest in high-tax countries. In theory, U.S. investment ...

Hearing on the impact of international tax reform on U.S. competitiveness :

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Alternative hearing before the Subcommittee on Select Revenue Measures of the Committee on Ways and Means, U.S. House of Representatives, One Hundred Ninth Congress, second session, June 22, 2006.

The United States' failure to educate

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its students leaves them unprepared to compete and threatens the country's ability to thrive in a global economy and maintain its leadership role. This report notes that while the United States invests more in K-12 public education than many other developed countries, its students are ill prepared

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to compete with their global peers. According to the results of the 2009 Program for International Student Assessment (PISA), an international assessment that measures the performance of 15-year-olds in reading, mathematics, and science every three years, U.S. students rank

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fourteenth in reading, twenty-fifth in math, and seventeenth in science compared to students in other industrialized countries. The lack of preparedness poses threats on five national security fronts: economic growth and competitiveness, physical safety, intellectual property, U.S.

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global awareness, and U.S. unity and cohesion, says the report. Too many young people are not employable in an increasingly high-skilled and global economy, and too many are not qualified to join the military because they are physically unfit, have criminal records, or have an inadequate level

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of education. The report proposes three overarching policy recommendations: implement educational expectations and assessments in subjects vital to protecting national security; make structural changes to provide students with good choices; and, launch a

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"national security readiness audit" to hold schools and policymakers accountable for results and to raise public awareness.

Under what conditions do the

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governments of developing countries manage to reform their way out of political and economic instability? When are they instead overwhelmed by the forces of social conflict? What role can great powers play in shaping one outcome or the other? This book is among the first to show in detail how

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the United States has used foreign economic policy, including foreign aid, as a tool for intervening in the developing world. Specifically, it traces how the United States promoted land reform as a vehicle for producing political stability. By showing where that policy proved stabilizing, and

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where it failed, a nuanced account is provided of how the local structure of the political economy plays a decisive role in shaping outcomes on the ground.

On July 22, 2014, the Senate Committee on Finance held a public

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Alternative hearing on the taxation of cross-border income. This book, prepared by the staff of the Joint Committee on Taxation for the hearing, includes a description of present law, background on recent global activity related to the taxation of cross-border income, and descriptions and a comparison of

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Recent proposals to reform the U.S. international tax system.

A career of nearly three decades with the CIA and the National Intelligence Council showed Paul R. Pillar that intelligence reforms, especially measures enacted since 9/11, can be

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deeply misguided. They often miss the sources that underwrite failed policy and misperceive our ability to read outside influences. They also misconceive the intelligence-policy relationship and promote changes that weaken intelligence-gathering operations. In this book, Pillar

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confronts the intelligence myths
Americans have come to rely on to
explain national tragedies, including
the belief that intelligence drives major
national security decisions and can be
fixed to avoid future failures. Pillar
believes these assumptions waste
critical resources and create harmful

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Alternative, diverting attention away from smarter reform, and they keep Americans from recognizing the limits of obtainable knowledge. Pillar revisits U.S. foreign policy during the Cold War and highlights the small role intelligence played in those decisions, and he demonstrates the negligible

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effect that America's most notorious intelligence failures had on U.S. policy and interests. He then reviews in detail the events of 9/11 and the 2003 invasion of Iraq, condemning the 9/11 commission and the George W. Bush administration for their portrayals of the role of intelligence. Pillar offers an

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Alternative approach to better informing U.S. policy, which involves insulating intelligence management from politicization and reducing the politically appointed layer in the executive branch to combat slanted perceptions of foreign threats. Pillar concludes with principles for adapting

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foreign policy to inevitable
uncertainties.

This study offers a blueprint for
reforming US taxation of international
income to accommodate the economic

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realities of the 1990s, especially heightened competition from Europe and Japan. A guiding theme is to ensure that the tax system helps make the US a hospitable location for R&D facilities and other headquarter activities of multinational firms, and for the production and export of high-

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technology goods and services. The author recommends a.o. the taxation of direct investment income on a territorial basis and abolition of the foreign tax credit, suggests the allocation of US headquarters expense (including R&D outlays) entirely against US-source income, advocates

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that only the US tax royalties and fees that are paid from abroad for know-how generated in the US, urges a 10 percent R&D tax credit for all R&D performed in the US, recommends the taxation of portfolio income solely by the resident country, and urges binding arbitration to resolve the

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growing caseload of transfer pricing
disputes.

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