

Longview Consolidation Corporate Tax Software

The EU Common Consolidated Corporate Tax BaseA Common Consolidated Corporate Tax Base for Europe – Eine einheitliche Körperschaftsteuerbemessungsgrundlage für EuropaThe Taxation of Corporate Groups Under ConsolidationWill Corporate Tax Consolidation Improve Efficiency in the EU?Achieving a Common Consolidated Corporate Tax Base in the EU Taxation of Corporations and Personal Income in New YorkThe Consolidated Laws of the State of New YorkReorganizations, Mergers, Or ConsolidationsTaxation of Corporations in New York, Massachusetts, Pennsylvania and New JerseyLaws of the State of New YorkPennsylvania County Court ReportsWhite's Corporation Annual ...Michigan Consolidated Gas Company v. Public Service Commission, 389 MICH 624 (1973)Cases Argued and Decided in the Supreme Court of the United StatesNibur Building Corporation V. Commissioner of Internal RevenueThe State Corporation as a Party in the Federal Courts ...McKinney's Consolidated Laws of New York AnnotatedGeneral Statutes of Kansas, 1889Massachusetts ReportsReports of Cases Argued and Determined in the Supreme Court of Judicature of the State of Indiana Dennis Weber Wolfgang Schön Antony Ting Albert van der Horst Malcolm Gammie Henry Montefiore Powell New York (State) Corporation Trust Company Robert Harvey Whitten New York (State) Pennsylvania. County courts Frank White Francis Elisha Baker New York (State) Kansas Massachusetts. Supreme Judicial Court Indiana. Supreme Court The EU Common Consolidated Corporate Tax Base A Common Consolidated Corporate Tax Base for Europe – Eine einheitliche Körperschaftsteuerbemessungsgrundlage für Europa The Taxation of Corporate Groups Under Consolidation Will Corporate Tax Consolidation Improve Efficiency in the EU? Achieving a Common Consolidated Corporate Tax Base in the EU Taxation of Corporations and Personal Income in New York The Consolidated Laws of the State of New York Reorganizations, Mergers, Or Consolidations Taxation of Corporations in New York, Massachusetts, Pennsylvania and New Jersey Laws of the State of New York Pennsylvania County Court Reports White's Corporation Annual ... Michigan Consolidated Gas Company v. Public Service Commission, 389 MICH 624 (1973) Cases Argued and Decided in the Supreme Court of the United States Nibur Building Corporation V. Commissioner of Internal Revenue The State Corporation as a

Party in the Federal Courts ... McKinney's Consolidated Laws of New York Annotated General Statutes of Kansas, 1889 Massachusetts Reports Reports of Cases Argued and Determined in the Supreme Court of Judicature of the State of Indiana *Dennis Weber Wolfgang Schön Antony Ting Albert van der Horst Malcolm Gammie Henry Montefiore Powell New York (State) Corporation Trust Company Robert Harvey Whitten New York (State) Pennsylvania. County courts Frank White Francis Elisha Baker New York (State) Kansas Massachusetts. Supreme Judicial Court Indiana. Supreme Court*

in october 2016 the european commission relaunched its plan to harmonize national income tax systems via the common consolidated corporate tax base ccctb perhaps the most ambitious reform of eu tax law ever attempted this timely book offers an early analysis of this important proposal and its implications covering issues such as the project s scope and main elements international considerations the relationship with oecd s base erosion and profit shifting beps initiative consolidation and anti abuse rules with carefully selected papers first presented at a january 2017 conference hosted by the amsterdam centre for tax law this volume focuses on such topics and issues as the following ways in which the proposed ccctb is designed to preserve the competence of member states to set their own tax rates reduction of the administrative burden for multinational companies incentives for research and development automatic cross border relief within the eu detailed analysis of the proposal s formula apportionment regime proposed new controlled foreign company cfc rules and interest limitation rule because of the commitment of many member states to keep their corporate income tax systems competitive on a stand alone basis the proposed ccctb is enormously controversial this book provides authoritative insights into problems likely to arise and discusses the prospects of how the proposal is likely to be implemented thus this book proves to be of immeasurable value to taxation policymakers practitioners and academics

preface this book contains the proceedings of the international tax conference on the c th th mon consolidated corporate tax base ccctb that was held in berlin on 15 16 may 2007 the conference was jointly organised by the german federal ministry of finance the centre for european economic research zew mannheim and the max planck institute mpi for intellectual property competition and tax law munich more than 250 participants from all over europe and other regions scholars politicians business people and tax administrators discussed the eu pean commission s proposal to establish a ccctb three panels of tax experts evaluated the common tax base with respect to structural elements consolidation

allocation international aspects and administration the conference made clear that the ccctb has the potential to overcome some of the most intriguing problems of corporate income taxation within the common market common tax accounting rules substantially reduce compliance and administrative costs consolidation of a group's profits and losses effects cross border loss compensation which removes a major tax obstacle for european cross border investment at the same time tax planning with respect to financing and transfer pricing is pushed back within the european union moreover as far as the ccctb applies member states are able to remove tax provisions that are targeted at cross border tax evasion and that might be challenged by the jurisdiction of the european court of justice

antony ting presents the first comprehensive comparative study of the tax consolidation regimes adopted in eight countries

the european commission favours the introduction of a consolidated corporate tax base to overcome the distortions arising from the existing system of separate accounting the blueprints for consolidation are simulated with the applied general equilibrium model cortax we show that the benefits of a common consolidated tax base are limited due to two weaknesses formula apportionment which is needed to allocate the consolidated taxable profits across jurisdictions creates for mnes new tax planning possibilities to exploit tax rate differentials in the european union in addition it triggers tax competition as the incentives for member states to attract foreign investment by reducing their tax rates are enforced the second weakness arises from the unlevel playing field which is introduced if only part of the firms chooses to participate in the consolidation the gains from consolidation can be fully grasped if it is obliged for all firms and accompanied by harmonisation of the tax rate

this report offers a positive assessment of the basic compatibility of ifrs and tax principles it also provides constructive information and guidance to the european commission to identify the elements of member states tax systems that must be considered to achieve convergence to a ccctb from the starting point of ifrs the task force also emphasises however that a common corporate tax base among member states is not enough any ccctb should be compatible with the eu's lisbon objectives and to meet those objectives there needs to be a single common tax base with consolidation and allocation in a form that is competitive efficient and flexible book jacket

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