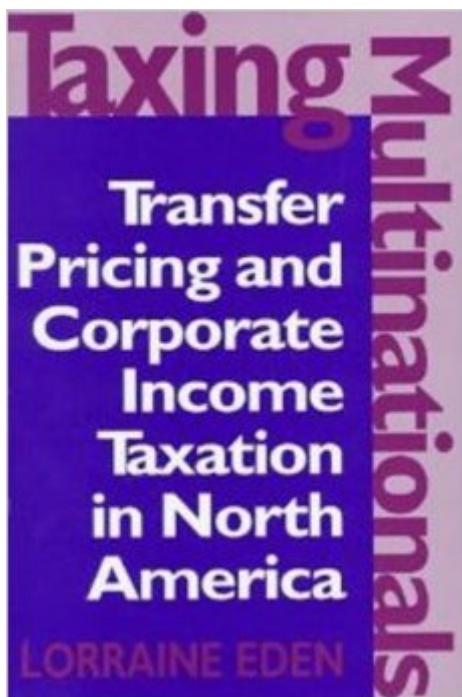


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Taxing Multinationals: Transfer Pricing And Corporate Income Taxation In North America



Synopsis

Governments face complex problems in taxing crossborder, intrafirm transactions of multinational enterprises. Such transactions dominate world trade flows and critically affect national tax revenues. However, their values - transfer prices - are set typically inside the multinationals. As a result, governments have established complicated rules based on the arm's length standard to discourage transfer price manipulation. This book draws on the fields of international business, economics, accounting, law, and public policy as they pertain to transfer pricing. It includes a state-of-the-art review of the economic theory of transfer pricing; an international business approach to multinationals and intrafirm trade in North America; complete outlines of the corporate income tax laws and regulations in Canada, the United States, and Mexico as they apply to transfer pricing; a thorough discussion of the roles of the U.S. Treasury and the OECD in developing the arm's length standard; summaries of key transfer pricing court cases; samples of accounting practices and problems; and a critical look at the current tax issues and public policy proposals in regard to taxing multinationals in the twenty-first century. *Taxing Multinationals* should be of interest to practitioners, researchers, and policy makers who deal with multinational enterprises, international taxation, and intrafirm transactions.

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Perhaps the best (introduction) book on transferprices and multinationals I've ever read. Eden provides a good introduction in the economic theory of multinationals founded on the theory of the firm. Afterwards, she presents the microeconomic basis of the effects of taxation on the production

process within the MNE. Propositions for a future taxation system in the EU are made, also the unitary concept is evaluated.

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