

Contents

<i>List of figures</i>	xiv
<i>List of tables</i>	xv
<i>Notes on contributors</i>	xvi
<i>Acknowledgments</i>	xx
<i>List of abbreviations</i>	xxi
1 Introduction: international tax coordination – an interdisciplinary perspective on virtues and pitfalls	1
MARTIN ZAGLER	
1.1 Motivation	1
1.2 Interdisciplinary research in international taxation	2
1.3 Chapter synopsis	10
2 Rethinking tax jurisdictions and relief from international double taxation with regard to developing countries: legal and economic perspectives from Europe and North America	13
PASQUALE PISTONE AND TIMOTHY J. GOODSPEED	
2.1 Introduction	13
2.2 Economic views of international tax jurisdiction	14
2.3 The legal rationale of international tax jurisdiction in the light of European law	21
2.4 Rethinking tax jurisdictions: a possible new model	31
3 How to combat tax evasion in tax havens? A legal and economic analysis of OECD and EU standards on exchange of information in tax matters with a special focus on capital income	37
DIETMAR AIGNER AND MICHAEL TUMPEL	
3.1 Introduction	37

3.2	<i>OECD standards on exchange of information</i>	39
3.3	<i>EU standards on exchange of information on capital income</i>	47
3.4	<i>An economic perspective</i>	50
3.5	<i>An economic evaluation</i>	54
3.6	<i>Conclusions</i>	59
4	Double tax avoidance and tax competition for mobile capital	61
	MARKUS LEIBRECHT AND THOMAS RIXEN	
4.1	<i>Introduction</i>	61
4.2	<i>Double tax avoidance as the institutional foundation of tax competition</i>	63
4.3	<i>Empirical evidence on the role of DTAV in tax competition</i>	71
4.4	<i>Summary and conclusions</i>	78
	<i>Appendix</i>	80
5	Intra-firm dividend policies: evidence and explanation	98
	CHRISTIAN BELLAK AND NADINE WIEDERMANN-ONDREJ	
5.1	<i>Introduction</i>	98
5.2	<i>A review of empirical results on dividend smoothing</i>	99
5.3	<i>Dividend smoothing in the intra-firm context: why parent companies do or do not smooth dividends of subsidiaries</i>	101
5.4	<i>Summary</i>	112
6	Cross-border hybrid finance and tax planning: does international tax coordination work?	115
	EWALD ASCHAUER, EVA EBERHARTINGER AND WOLFGANG PANNY	
6.1	<i>Introduction</i>	115
6.2	<i>Cross-border hybrid finance and international taxation</i>	117
6.3	<i>Model</i>	118
6.4	<i>Results</i>	126
6.5	<i>Conclusion and future research</i>	132
	<i>Appendix: list of abbreviations</i>	133

7 Investigating the shift toward a value-added-type destination-based cash flow capital income tax (VADCIT)	134
KLAUS HIRSCHLER AND MARTIN ZAGLER	
7.1 <i>Introduction</i>	134
7.2 <i>The VADCIT model</i>	135
7.3 <i>Legal questions</i>	139
7.4 <i>Analysis of VADCIT</i>	140
7.5 <i>Statistical effects</i>	145
7.6 <i>Fiscal effects</i>	146
7.7 <i>Economic distortions</i>	147
7.8 <i>Conclusions</i>	147
 8 The case for and against an EU tax	 148
MICHAEL LANG AND MARTIN ZAGLER	
8.1 <i>Introduction</i>	148
8.2 <i>Corporate income tax (CCCTB)</i>	154
8.3 <i>Personal income tax</i>	159
8.4 <i>Modulated VAT</i>	163
8.5 <i>Excise duties on tobacco and alcohol</i>	166
8.6 <i>Energy taxation</i>	169
8.7 <i>Climate charge on aviation</i>	171
8.8 <i>Communication tax</i>	173
8.9 <i>A tax on financial transactions</i>	174
8.10 <i>Transfer of seignorage revenue</i>	175
8.11 <i>Summary</i>	176
 <i>Bibliography</i>	 179
<i>Index</i>	195