

Practical Guide to U.S. Taxation of International Transactions (Sixth Edition) (Practical Guides)

Robert J. Misey, Michael S. Schadewald

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Practical Guide to U.S. Taxation of International Transactions provides readers with a practical command of the tax issues raised by international transactions and how those issues are resolved by U.S. tax laws. The book emphasizes those areas generally accepted to be essential to tax practice. The book is written primarily as a desk reference for tax practitioners and is organized into four parts. Part I provides an overview of the U.S. system for taxing international transactions, and also discusses the U.S. jurisdictional rules and sourceof-income rules. Part II explains how the United States taxes the foreign activities of U.S. persons, and includes chapters on the foreign tax credit, deemed paid foreign tax credit, anti-deferral provisions, foreign currency translation and transactions, export tax benefits, planning for foreign operations, and state taxation of foreign operations. Part III describes how the United States taxes the U.S. activities of foreign persons, including the taxation of U.S.-source investment-type income and U.S. trade or business activities, as well as planning for foreign-owned U.S. operations. Finally, Part IV covers issues common to both outbound and inbound activities, including intercompany transfer pricing, tax treaties, cross-border mergers and acquisitions, and international tax practice and procedure.

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