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## Parthasarathi Shome

# Taxation History, Theory, Law and Administration



Parthasarathi Shome London School of Economics London, UK International Tax Research and Analysis Foundation Bengaluru, India

ISSN 2192-4341 (electronic)
Springer Texts in Business and Economics
ISBN 978-3-030-68213-2 ISBN 978-3-030-68214-9 (eBook)
https://doi.org/10.1007/978-3-030-68214-9

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To Dipti Shome, my mother, in loving memory

hostinato rigore

—Leonardo da Vinci 1452–1519 A.D. painter, architect, engineer and thinker of the High Renaissance

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#### **About the Author**

**Parthasarathi Shome** is Visiting Senior Fellow at the London School of Economics; Chairman, International Tax Research and Analysis Foundation (ITRAF), India, www.parthoshome.com; and Member, Academic Board of Advanced Diploma in International Taxation (ADIT), London.

He served in the Government of India as Minister of State and Secretary between 2004 and 2015, as Chairman, Tax Administration Reform Commission (TARC), as Adviser to the Indian Finance Minister, and as Chairman, Expert Committee on GAAR (international tax avoidance), and other assignments.

Between 2008 and 2011, he was Chief Economist, Her Majesty's Revenue and Customs (HMRC), United Kingdom. He served as Director of two of India's frontline economic research institutions: International Council for Research on International Economic Relations (ICRIER), 2011–2013, and National Institute of Public Finance and Policy (NIPFP), 1995–1997.

He served at the IMF between 1983 and 2004 in various capacities including Chief of Tax Policy, the first Senior Economist in the Office of the Managing Director, and a diplomatic assignment as Director, IMF Singapore Institute. He has provided technical assistance in the fiscal field to 35 countries in Africa, Asia, Europe, and Latin America and drafted many related policy reports.

He rose to a tenured Professorship at the American University, Washington D.C., 1975–1983. His Ph.D. thesis on the incidence of the corporation income tax from Southern Methodist University, Dallas, 1975, fetched him the Jeanne S. Mattersdorf Award of the National Tax Association of America as "an outstanding student in the field of taxation and public finance". He received Brazil's highest civilian honour, *Commander of the Order of the Southern Cross*, for contributions to Brazilian tax reform, in 2000.

He is widely published in peer-reviewed journals including *IMF Staff Papers*, *Journal of Public Economics*, *National Tax Journal (US)*, *Oxford Economic Papers*, *Oxford Review of Economic Policy*, *Public Finance*, and several others. He has written and edited books from Cambridge University Press, Lexis Nexis, Oakbridge, Orient Blackswan, Oxford University Press, Springer, Wolters Kluwer, and others. He continues to be a popularly invited speaker in conferences and seminars across the globe. He has published a professional memoir and a coffee table volume on Naïve Art in which he became interested during his global travels to 80 countries.

#### **Abbreviations**

AAAR Appellate Authority for Advance Ruling

AAR Authority for Advance Ruling

AB Administrative Burden AC Accumulated Credit AC Average Cost

ADB Asian Development Bank
ADR Alternative Dispute Resolution
AHT Agriculture Holdings Tax
ALP Arm's Length Price
AMT Alternate Minimum Tax

AO Assessment Officer AoA Article of Association AoPs Association of Persons

AP Average Product

APA Advance Pricing Agreement

AR Advance Ruling

ARA Advance Ruling Authority
ATAD Anti-Tax Avoidance Directive

AY Assessment Year
B2B Business-to-Business
B2C Business-to-Consumer

BC Before Christ
BCE Before Common Era

BCTT Banking Cash Transaction Tax
BEPS Base Erosion and Profit Shifting

BRICS Brazil, Russia, India, China, and South Africa

C2C Consumer-to-Consumer
CA Competent Authority
CbC Country-by-Country

CBDT Central Board of Direct Taxes

CBIC Central Board of Indirect Taxes and Customs
CBIN Common Business Identification Number

CC Chief Commissioner

xxx Abbreviations

CC Compliance Cost

CCC Customer Communication Centre
CCC Customs Co-operation Council
CCFT Corporate Cash-Flow Tax
CCI Constant Cost Industry
CCT Common Customs Tariff
CENVAT Central Value-Added Tax
CFCs Chlorofluorocarbons

CFC Controlled Foreign Company CFO Chief Financial Officer

CGE Computable General Equilibrium CGST Central Goods and Services Tax

CGT Capital Gains Taxes

CIC Community Indifference Curves

CII Cost Inflation Index

CIS Commonwealth of Independent States

CIT Corporate Income Tax

CMAA Customs Mutual Administrative Agreement

CN Combined Nomenclature

CoRA Comparative Risk Assessment Initiative

CPC Central Processing Centre

CPM Cost Plus Method

CRM Customer Relationship Manager
CRS Common Reporting Standards
CSR Corporate Social Responsibility

CST Central Sales Tax
CT Corporate Tax

CTA Covered Tax Agreement
CTS Corporate Tax Statistics
CTT Commodities Transaction Tax

CUP Comparable Uncontrolled Price Method

C-VAT Consumption-Type VAT CVD Countervailing Duty

DANIDA Danish International Development Agency

DCI Decreasing Cost Industry
DDT Dividend Distribution Tax

DFID Department for International Development
DGFT Directorate General of Foreign Trade

DL Deadweight Loss

DPV Discounted Present Value

DRI Directorate of Revenue Intelligence

DRP Dispute Resolution Panel
DST Digital Services Tax

DTAA Double Tax Avoidance Agreement EBIT Earnings Before Interest and Taxes

EBITDA Earnings Before Interest, Taxes, Depreciation, and Amortisation

Abbreviations xxxi

EC Education Cess

EC Empowered Committee
ECU European Customs Union

EC-VAT Empowered Committee of State Finance Ministers

EDI Electronic Data InterchangeEDR Early Dispute ResolutionEFS Elasticities of Factor Substitution

EIC East India Company

EL Equalisation Levy

ESS Electronically Supplied Services

EU European Union EWB Electronic Way Bill

FAQ's Frequently Asked Questions

FATCA Foreign Account Tax Compliance Act

FBT Fringe Benefits Tax

FC Fixed Cost

FDI Foreign Direct Investment

FF Fully Funded

FHTP Forum on Harmful Tax Practices
FII Foreign Institutional Investor
FIU Financial Intelligence Unit
FPI Foreign Portfolio Investor
FTA Forum on Tax Administration

FTC Foreign Tax Credit

FTS Fees for Technical Services FTT Financial Transaction Tax

FY Financial Year G20 Group of 20

GAAR General Anti-Avoidance Rule

GATT General Agreement on Trade and Tariffs

GDP Gross Domestic Product
GOI Government of India
GST Goods and Services Tax

GSTN Goods and Service Tax Network HEC Health and Education Cess

HIRE Hiring Incentives to Restore Employment HMRC Her Majesty's Revenue and Customs

HRA House Rent Allowance HTVI Hard-to-Value Intangibles HUF Hindu Undivided Family

ICAI Indian Chartered Accountant Institute

ICAP International Compliance Assurance Programme

ICEGATE Indian Customs and Central Excise Electronic Commerce

ICI Increasing Cost Industry

ICRIER Indian Council for Research on International Economic Relations

xxxii Abbreviations

ICT Information and Communications Technology

IEO Independent Evaluation Office

IF Inclusive Framework

IGST Integrated Goods and Services Tax
IIT Indian Institute of Technology
IMF International Monetary Fund

IOTInternet of ThingsIPIntellectual PropertyIPRIntellectual Property RightsIRSInternal Revenue Service

ITA Income-Tax Act

ITAT Income Tax Appellate Tribunal

ITC Input Tax Credit

ITeS Information Technology Enabled Services
ITIC International Tax and Investment Centre

ITR International Tax Regime
I-VAT Income-Type VAT

KAI Knowledge, Analysis, Intelligence KPIs Key Performance Indicators

LAN Local Area Network
LBS Large Business Service
LDCs Least Developed Countries
LIBOR London Inter-Bank Offered Rate
LLP Limited Liability Partnership

LoB Limitation of Benefits LTA Leave Travel Allowance LTCG Long-Term Capital Gains **LTFP** Long-Term Fiscal Policy LTU Large Taxpayer Unit Monitoring and Evaluation M&E MAP Mutual Agreement Procedure MAT Minimum Alternate Tax

MC Marginal Cost MD Managing Director

METR Marginal Effective Tax Rate

MIDS Madras Institute of Development Studies

MLI Multilateral Instrument
MNE Multinational Enterprise
MoA Memorandum of Association
MODVAT Modified Value Added Tax
MoU Memoranda of Understanding

MP Marginal Product

MRS Marginal Rate of Substitution
MRT Marginal Rate of Transformation
MRTS Marginal Rate of Technical Substitution
MSME Micro, Small, and Medium Enterprise

**Abbreviations** xxxiii

**MVT** Motor Vehicle Taxation

**NACIN** National Academy of Customs, Indirect Taxes and Narcotics

**NADT** National Academy of Direct Taxes **NAFTA** North American Free Trade Agreement

**NAMA** Non-Agricultural Market Access

**NCMP** National Common Minimum Programme

**NEC** National E-assessment Centre NGO Non-Governmental Organisation **NIC** National Insurance Contribution

**NIPFP** National Institute of Public Finance and Policy

**NPA** Non-Performing Asset NTT National Tax Tribunal

**OECD** Organisation of Economic Co-operation and Development

OIT Offshore Indirect Transfer Tax

**OPTR** Observatory on the Protection of Taxpayers' Rights

**OTS** Office of Tax Simplification **PAN** Permanent Account Number

**PAYG** Pay-As-You-Go **PBR** Pre-Budget Review

**PCC** Principal Chief Commissioner PE Permanent Establishment **PGT** Tax on Passengers and Goods PIS Passenger Information System

PIT Personal Income Tax PN Participatory Note

**POEM** Place of Effective Management

Place of Supply PoS PoW Programme of Work PP **Production Possibility PPF** Public Provident Fund PPP Public-Private Partnership PPT Principal Purpose Test **PSM** Profit Split Method PTC Proforma Tax Credit P-VAT Production-Type VAT

**PVE** Permanent Virtual Establishment R&D Research and Development RBI Reserve Bank of India **RCM** Reverse Charge Mechanism **REC** Regional E-assessment Centre **RIA** Regulatory Impact Assessment **RMD** Risk Management Division **RPM** Resale Price Method

**RST** Retail Sales Tax

**SAAR** Specific Anti-Avoidance Rules

SAFE FoS Framework of Standards to Secure and Facilitate Global Trade xxxiv Abbreviations

SC Settlement Commission

SC Surcharge

SCM Standard Cost Model SCN Show Cause Notice

SCST Scheduled Caste and Scheduled Tribe

SDLT Stamp Duty Land Tax

SEP Significant Economic Presence SERPRO Federal Data Processing Service

SEZ Special Economic Zones
SFC State Finance Commission
SGST State Goods and Services Tax

SHEC Secondary and Higher Education Cess

SLA Service Level Agreement

SLOB Simplified Limitation on Benefit SMEs Small and Medium-Sized Enterprises

SPV Special Purpose Vehicle STCG Short-Term Capital Gains STT Security Transaction Tax

TARC Tax Administration Reforms Commission

TAS Tax Advocate Service

TBML Trade-Based Money Laundering

TC Total Cost

TCS Tax Collected at Source

TDOTS Tax Dispute Online Tracking System TDRC Taxpayer Dispute Resolution Centre

TDS Tax Deducted at Source

TIN Taxpayer Identification Number
TNMM Transactional Net Margin Method

TP Transfer Pricing

TPO Transfer Pricing Officer

TRAQ Tax Risk Assessment Questionnaire
TREAT Tax Risk Evaluation and Assurance Tool

TRIPS Trade-Related Aspects of Intellectual Property Rights

UA Unified Approach
UK United Kingdom
US United States

USTR U.S. Trade Representative UTDT Universidad Torcuato Di Tella

VAT Value-Added Tax WAN Wide Area Network

WCO World Customs Organization

WDV Written-Down Value WHO World Health Organization

WHT Withholding Tax

WTO World Trade Organization

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	First Report, Chap. III). CC Chief Commissioner,	
	CIT Corporate Income Tax, GST Goods and	
	Services Tax; <i>ICT</i> Information and Communication	
	Technology, ITeS Information Technology Enabled	
	Services, <i>LTU</i> Large Taxpayer Unit	427
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