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# The International Tax Revolution

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Abbreviations

ADS	Automated Digital Services
AEoI	Automatic Exchange of Information
ALS	Arm’s Length Standard
ATAD	Anti-Tax Avoidance Directive
ATO	Australian Tax Office
ATR	average tax rate
BEAT	Base Erosion and Anti-Abuse Tax
BEPS	Base Erosion and Profit Shifting
BP	Benefits Principle
BVI	British Virgin Islands
CAMT	Corporate Alternative Minimum Tax
CAMTC	Commentaries on the Articles of the Model Tax Convention
CBCR	Country-by-Country Reporting
CCCTB	Common Consolidated Corporate Tax Base
CEN	Capital Export Neutrality
CFA	Committee on Fiscal Affairs
CFB	Consumer-Facing Businesses
CFC	Controlled Foreign Corporation
CIN	Capital Import Neutrality
CIV	Collective Investment Vehicles
CON	Capital Ownership Neutrality
CRS	Common Reporting Standard
CRS	Congressional Research Service
DD	Double Deduction
D/NI	Deduction/No Inclusion
DPT	Diverted Profits Tax
DST	Digital Services Taxes
EATR	Effective Average Tax Rate

EBITDA	Earnings before Interest, Taxes, Depreciation, and Amortization
EC	European Commission
EL	Equalizations Levy
EMTR	Effective Marginal Tax Rate
EoIR	Exchange of Information on Request
ESG	Environmental, Social, and Corporate Governance
ETR	Effective Tax Rate
EU	European Union
FATCA	Foreign Account Tax Compliance Act
FDI	Foreign Direct Investors or Investment
FDII	Foreign Derived Intangible Income
FFI	Foreign Financial Institution
FHTP	Forum on Harmful Tax Practices
FTA	Forum on Tax Administration
FTC	Foreign Tax Credit
GAAR	General Anti-Avoidance Rule
GAFA	Google, Apple, Facebook, and Amazon
GDP	Gross Domestic Product
GILTI	Global Intangible Low-Taxed Income
GLoBE	Global Anti-Base Erosion
IF	Inclusive Framework
IGA	Intergovernmental Agreements
IIR	Income Inclusion Rule
IMF	International Monetary Fund
IRA	Inflation Reduction Act
IRC	Internal Revenue Code
ITC	Investment Tax Credits
ITR	International Tax Regime
LOB	Limitation on Benefits
MAAL	Multinational Anti-Tax Avoidance
MAATM	Multilateral Agreement on Administrative Cooperation in Tax Matters
MAP	Mutual Agreement Procedure
MLI	Multilateral Instrument
MNE	Multinational Enterprises
MTC	Multilateral Tax Convention
OECD	Organisation for Economic Co-operation and Development
OEDT	Obligations to Eliminate Double Taxation
PCOI	Permanent Committee on Investigations (US Senate)
PE	Permanent Establishment
PPT	Principal Purpose Test or Primary Purposes Test

*List of Abbreviations*

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PSI	Permanent Subcommittee on Investigations
QBAI	Qualified Business Asset Investment
QDMTT	Qualified Domestic Minimum Top-Up Tax
QFTB	Qualified Flow Through Tax Benefits
QI	Qualified Intermediary
QRTC	Qualified Refundable Tax Credits
R&D	Research and Development
R&E	Research and Experimentation
SBIE	Substance-Based Income Exclusion
SHIELD	Stopping Harmful Inversions and Ending Low-Tax Developments
STP	Single Tax Principle
STTR	Subject to Tax Rule
TANF	Temporary Assistance for Needy Families
TCJA	Tax Cuts and Jobs Act
TFDE	Task Force on the Digital Economy
TIEA	Tax Information Exchange Agreements
TPG	Transfer Pricing Guidelines
UK	United Kingdom
UN	United Nations
UPE	Ultimate Parent Entity
USTR	United States Trade Representative
UTPR	Undertaxed Profits Rule
VAT	Value Added Tax
VCLT	Vienna Convention on the Law of Treaties
WTO	World Trade Organization