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## Fixing U S International Taxation

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international tax rules

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The problems Shaviro identifies as causing the US international tax policy debate to be "trapped in an iron box" include (i) the focus of international tax policy on neutrality norms and neutrality analysis, (ii) the "accident" of deferral, (iii) the working assumption that the tax rate on foreign source income (FSI) should be the same as that on domestic source income, and (iv) limiting reform proposals to the choice between exemption and worldwide/foreign-tax-credit systems.

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dysfunctional.

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