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Interpretation of Tax Treaties is a detailed analytical guide to the interpretation of tax treaties at the national level The book focuses on how domestic courts interpret and apply the OECD Commentary to OECD Model Tax Convention on Income and on Capital Adopting a global perspective the book gives a systematic presentation of the main interpretive proposals put forward by the OECD Commentary and analyses selected cases decided in domestic tax systems in order to assess whether and how such solutions are adopted through national judicial process and indeed which of these are of most practical value The book operates on two levels firstly it sets out a clear and comprehensive framework of tax treaty law which will be an important tool for any tax practitioner Secondly the book provides crucial guidance on issues of tax treaty law as applied at domestic level such as investment or business income dispute resolution and administrative cooperation **Department of**

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