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TAXATION OF INTERNATIONAL TRANSACTIONS A. Introduction 1. Importance of Tax Law and Practice. The profits from transactions involving international trade and investment are almost always subject to potential income taxation by at least two countries.

TAXATION OF INTERNATIONAL TRADE AND INVESTMENT

Sections 861-865 and the regulations thereunder provide specific rules for sourcing different types of income. These rules provide a basis for sourcing interest, dividends, rents, royalties, personal services income, transportation income, space and ocean income, inventory sales, and international communication income.

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