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cloud computing may be borderless but taxes are territorial it is easy to imagine how the two concepts can clash much effort has gone into harmonizing tax rules across borders with the result that many jurisdictions have very similar tax rules even so taxation remains a basic expression of national sovereignty the goal of this thesis is to examine how international tax law applies to the cross border cloud computing business both multinational providers and customers of cloud computing services are analyzed reflecting three traditional areas of international tax scholarship the goal could be stated in three questions which jurisdictions have the right to tax what kinds of cloud computing transactions can be taxed what amount of the profit is taxable in more technical terms this means enquiring into how the use of cloud computing affects the permanent establishment status of taxpayers how the different kinds of cloud computing transactions are characterized under international double taxation treaties and how the calculation of taxable cloud computing profit is affected by transfer pricing in light of the current political events the thesis also offers recommendations de lege lata through a systematic approach its first part assesses the current taxation of cloud computing the second part evaluates whether the findings of this initial assessment conform to various superior principles of good rulemaking it identifies which of the present tax rules ought to be adapted the final part considers how the rules could be amended to become more compliant with the superior principles in this way part i embodies the thesis part ii the antithesis and part iii seeks a synthesis

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objects and methods method overloading and overriding inheritance interfaces and packages exception handling multithreaded programming enumerations autoboxing and annotations the i o classes generics lambda expressions modules records sealed classes text blocks switch expressions pattern matching with instanceof string handling the collections framework networking event handling awt swing the concurrent api the stream api regular expressions javabeans servlets much much more

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