Summary of Contents

Volume 1

Chapter 1. History and General Policy Considerations
Appendix 1A. Additional Reading
Chapter 2. Basic Concepts
Appendix 2A. Additional Reading
Chapter 3. Foreign Accrual Property Income and Income from an Active Business
Appendix 3A. Additional Reading
Chapter 4. Imputation of Foreign Accrual Property Income
Appendix 4A. Additional Reading
Chapter 5. Foreign Affiliate Distributions
Appendix 5A. Additional Reading
Chapter 6. Foreign Affiliate Reorganizations
Appendix 6A. Additional Reading
Chapter 7. Partnerships and the Foreign Affiliate Rules
Appendix 7A. Additional Reading
Chapter 8. Tax Avoidance
Chapter 9. Interest Deductibility
Chapter 10. Imputation of Income under Section 17
Appendix 10A. Additional Reading

Volume 2

Chapter 11. Case Commentary
Chapter 12. Foreign Affiliate Dumping
Chapter 13. Administrative Matters
Chapter 14. Transfer Pricing
Chapter 15. Hybrid Mismatch Rules

Chapter 16. Global Minimum Tax

Appendices

Appendix A. Reference Materials

Appendix A1. Income Tax Technical News

Appendix A2. Department of Finance Comfort Letters (2000-present)

Appendix A3. Tax Treaties

Appendix A4. Income Tax Act

Appendix A5. Income Tax Regulations

Appendix B. Archived Materials

Appendix B1. Chapter 2: Basic Concepts (Archived)

Appendix B2. Chapter 3: Foreign Accrual Property Income and Income from Active Business (Archived)

Appendix B3. Chapter 4: Imputation of Foreign Accrual Property Income (Archived)

Appendix B4. Chapter 5: Foreign Affiliate Distributions (Archived)

Appendix B5. Chapter 6: Foreign Affiliate Reorganizations (Archived)

Appendix B6. Chapter 7: Partnerships and the Foreign Affiliate Rules (Archived)

Appendix B7. *[Reserved]*

Appendix B8. Chapter 9: Interest Deductibility (Archived)

Appendix C. New Developments

Appendix C1. Tax Alert-Canada 2011 Issue No. 30.2

Table of Cases

Index