

List of formulas and primary results to be available at <infolab.stanford.edu/pub/gio/VIC/MNC.xlsx> ©Gio Wiederhold 2010.

F #	topic (go to)	Worksheet	line	amounts	amounts given	more		
Formulas requiring computation	description in worksheet	name	<i>italics</i>	computed		not in pdf		
Preface								
<i>Preface F0.1</i>	not cited	<i>U.S. employees of large corpora</i>	TaxHines99					
Chapter 1	MMMM							
F Ch1.1	1	<i>industry margin</i>	Prices	50	10%	26%	25%	
<i>F Ch1.3</i>	3	<i>eff. rate on domestic sales</i>	MNC Taxes	63	11.1%	21.83%	Manufacturing	23.4%
<i>F Ch1.4</i>	4	<i>earnings margin</i>	ForestEtAl	271	66.5%	66.5%	97.7	76.6%
Chapter 2	AAAA	MNC's growth						
<i>F Ch.1</i>	1	<i>MNCreceipt</i>	MNCacctg	38	\$ 93.90	\$ 75.12	\$ 72.12	
F Ch2-2	2	<i>Tax on LSA local income</i>	Tax rates	3	51.25%			
<i>F Ch1.3</i>	3	<i>Tax rates on EMEA income</i>	Tax rates	29	9.6%	austria rev	\$ 21.785	tax
<i>F Ch2.4</i>	4	<i>Buy-in per IIP-VM used by ATA</i>	ATAcalcs/Buy-in paymer	3	50.001	6.000	-	
Ch2-AAAA.5	5	<i>Conch RAB sales</i>	MNC data	D63	42%	<add \$25M operational cost>		ATA p/e
F2.6	6	<i>loan</i>	Buy-in Payments	31	\$ 12,231,344	\$ 50,000,000	8.00%	5
Ch2-AAAA-7	7	<i>First year R&D share</i>	MNC research	O12	\$ 28.04	\$ 37.85		
<i>Ch2-AAAA</i>	8	<i>limited growth</i>	MNC research	D5	12%			
<i>F Ch2.9</i>	9	<i>RAB with AJCA acquisitions</i>	MNC data	M78	44.0%	54.0%	72.6%	
<i>F Ch2.10,12-14</i>	10,12,13	<i>Early acquisitions ATA</i>	ATAcalcs	10	50.000	21.000	7.350	28.350
Ch2-AAAA-11	11	<i>Market cap</i>	MNC data	D10				
Ch2-AAAA-12	12	<i>taxrate</i>	ATAcalcs	C11	5.25%	35.00%		
Ch2 -F13	13	<i>net with interest on capital</i>	MNC taxes	74	316.515	36.982	100.926	
Ch2-AAAA-14	14	<i>2004 AJC acquisition actual</i>	ATAcalcs	18	24.941	154.059	475.059	500.000
Ch2-AAAA-15	15	<i>without the tax break</i>	ATAcalcs	13	166.271	475.059		641.330
Ch2-AAAA-16	16	<i>employess</i>	ATAcalcs	14	57%			
Ch2-AAAA-17	17	<i>2004 AJC acquisition ATA IP sh</i>	ATAcalcs	15	106.659	49.732	5.600	112.259
Ch2-AAAA-18	18	<i>Acquisitions and Buy-in</i>	ATAcalcs	15	595.851	874.851	825.060	
<i>F Chap 2.19</i>	19	<i>IP obtained by MNC</i>	ATAcalcs	16	275.709	177.660	64%	RAB with AJCA acqui
<i>Ch2-AAAA.20</i>	20	<i>base RAB</i>	ATAcalcs	64	69.1%	18%	52%	69.3%
<i>F Ch2.21</i>	21	<i>Tax summary</i>	MNC Taxes	113	16.045	45.843	51.80%	44.459
<i>F2.22</i>	22	<i>long range</i>	MNC Taxes	114	8.86%	13.69%	13	
<i>F 2.23</i>	23	<i>cost of capital</i>	MNCacctg	47	2.1%	\$ 9.500		
<i>F2.24</i>	24	<i>Commodity earnings</i>	MNC Taxes	116	1.75%	35.00%	5.00%	
Ch2-AAAA-25	25	<i>Fig Ch2.10</i>	ForestEtAl	4				
<i>F-Ch2.26</i>	26	<i>total tax</i>	ForestEtAl	50	2.43%	\$ 1.09	\$1.33	\$ 2.51
Ch2-AAAA-27	27	<i>margin at Forest</i>	ForestEtAl	31	71%	66%		
Ch2-AAAA-28	28	<i>Generic</i>	ForestEtAl	Q3	\$ 31.25			
<i>F Ch2.29</i>	29	<i>long range</i>	MNC Taxes	11	10.82%	11		
Table 2.2	1	<i>Sales revenue</i>	MNCacctg	48 to 64		0.00%		
Chapter 3	PPPP	IP and intellectual capital						
Ch3-PPPP	2	<i>centroid calc</i>	MNC data	Q	8.78	4.9	1.20	
Ch3-PPPP	3	<i>operating income</i>	MNC data	22	250.00	Buy-in	313.60	AJC acq
Ch3-PPPP	4	<i>Discounted sales</i>	MNC data	47	32%			

Chapter 4		TTTT	Transfer Pricing						
F Ch4.1 RABs		1	MNC to CFH RAB ratios	MNC data	40	44%	42%	46%	54%
CH4-2		2	Estimated buy-in	MNC data	47	4.55%	\$ 783.200	\$ 747.600	
F Ch4.3 to F Ch4.8		3 to 8	<now Formulas only>	none		old paper?			
F Ch4.9		9	Indefinite life	Maniacs	72	17.880	7.417	MNC life to 10%	13.64%
F Ch4.10		10	Manuel&Carlos	Buy-in payments	88	<to do>			
F Ch4.11		11	Pat-inc acquisition	Buy-in payments	90	21.5%	2.100	0.735	-0.7504
		10							
Chapter 5		VVVV	Valuation						
F Ch5.1,2		1,2	Market cap	MNC data	10	\$ 1,850.000	18,500,000	0%	\$ 2,000.00
F Ch5.2, & 4		2	Shares out and options	MNC data	18	\$ 1,974.250	\$ 216.750	20%	5%
F Ch5.3		3	value of the Workforce	MNC data	37	\$ 258.250			
F Ch5.2, & 4		4	acquisitions	MNC data	19	\$ 2,000.000	\$ 2,216.750	270.000	
Ch5-5		5	Gross intangibles	MNC data	24	\$ 1,630.000	\$ 2,056.000	4.00	11.9%
F Ch5.6		6	SIC7372	Industry Market cap	38	30%	18%		
F Ch5.7		7	Hatch	ForestEtAl	107	32.1%	11.5%	\$ 1,892.647	see F7.25V
F Ch5.8		8	MNC to CFH RAB ratios	MNC data	54	\$ 717.200	\$ 904.640	44%	\$ 1,630.000
	Table AppF.4		MC-VM results	MNC data	52	\$ 1,850.000	\$ 1,757.500	\$ 2,000.000	\$ 2,216.750
	Table AppF.4		Tangibles at MNC	MNC data	53	\$ 220.000	\$ 436.750	\$ 100.000	\$ 136.750
	Table AppF.4		Intangibles	MNC data	54	\$ 1,630.000	\$ 1,320.750	\$ 1,900.000	\$ 2,080.000
	Table AppF.4		CONCH	MNC data	55	\$ 717.200	\$ 581.130	\$ 836.000	\$ 915.200
F Ch5.9		9	margin	MNC data	18	62%	46%		
F Ch5.10		10	Erlang for \$10,000	MNC data	59	375.6	620.5	867.1	1,060.2
	Table AppF.5	for 5.10	Income without AJCA acquisition	MNC data	70	250.0	265.0	280.4	y10:
	Table AppF.5	more	NPV	MNC data	71	233.1	214.9	197.7	y10:
F Ch5.11		11	Income without AJCA acquisition	MNC data	70	\$ 107.780	\$ 406.600	26.5%	
	App F with F Ch5.11	11	discounting examples	MNC data	110	250.000	15.0%	233.126	66.269
F Ch5.12		12	with Gordon	MNC data	102	1,666.667		applied after 5 years	1,438.000
	Table AppF.6		income graph data	MNC data		10,004.600	2,472.588	20 years	17,693.000
	Table AppF.6	for 5.14		MNC data	68	250.000	265.000	280.360	y10:
F Ch5.13		13	delta	MNC data	76	7.7%	13.2%	\$ 332.47	\$ 489.30
F Ch5.14		14	CONCH	MNC data	78	\$ 4,150.488	\$ 1,089.369	\$ 1,177.299	
F Ch5.15		15	Interquartile distributors	Comparables	40	4.98%			
F Ch5.16		16	% of manuf rev	MNC data	129	4.917%	66%		
F Ch5.17		17	commodity company	MNC data	130	4.4%	6.1%	7.8%	
F Ch5.18		18	asset ratio tangible/all	MNC data	34	4.19%	\$ 2,056.000		
F Ch5.19		19	Non routine income	MNC data	136	36.00%	5.00%	\$ -	\$ 1,613.41
	Table AppF.8	more	M2, IncVM	MNC data		\$ 10,004.600	\$ 1,761.859	\$ 8,341.400	\$ 4,150.488
	Table Ch5.5	more	With midyear correction	MNC data		\$ 2,472.588	\$ 1,218.545	\$ 2,295.026	\$ 1,089.369
		more	Table Ch5.5	MNC data		\$ 2,168.014	\$ 1,068.444	\$ 2,012.324	\$ 955.180
F Ch5.20		20	NPV for Inc-VM	MNC data	126	\$ 1,613.41	\$ -	41.06%	36.00%
F Ch5.21		21	Figure Ch5.5	Maniacs	25	1.75	2.41	release interval	2.54
	Fig.Ch5.4&Table AppF.9	for 21	IP M1 left	Maniacs	29	60.7%	33.2%	23.6%	12.9%
F Ch5-22		22	Total HW & SW left	Maniacs	36	18.95	19,0		
F Ch5-23		23	HW left from model 1	Maniacs	23	50%	39%	27%	20%
	Figure Ch5.5	21	SW contribution	Maniacs	33	0.50	0.61	0.74	0.80

F Ch5-24		24	Software life	Maniacs	39	7.96	life at 10%	8,0		
	Fig. Ch5-6			Maniacs	43	100.0%	43.4%	13.4%	7.2%	
	0			0 Maniacs	41	4.00	-		4.38	0.0%
F Ch5.25		25	Old code left from V3	Maniacs	144	16.46	567.411		17.7	7,907.219
F Ch5.26		26	Predictive diminution	Maniacs	167	15.5	547.5		16.7	6,489.652
	Figure Ch5.8		MANImobile	Maniacs	52	0%	100%	77%		68%
F Ch5.27		27	lag	Maniacs	91	1.20	8.62		3.00	10.42
F Ch5.28		28	IP reduced life income	Maniacs	162	1,366.683	3,897.26		567.411	7,907.219
F Ch5.29		29	Arm's-length lag	Maniacs	197	3.00	7.5		0.41	3.075
F Ch5.30		30	Lag and estimated life	Maniacs	225	3,868.045	18.5		1,589.468	667.186
F Ch5.31		31	first-to-market			21.9%	119.656			
F Ch5.32		32	NPV without AJCA	Maniacs	265	464.29	669.54		552.64	547.53
	Table Ch5.6		Estimated life + lag	Maniacs	257	15.54	7.42		16.746	18.54
	more		MNC op.inc.without AJCA	Maniacs	260	6,489.65	7,748.80		2,700.68	3,428.28
	more		IP income wo AJCA	Maniacs	262	1,206.74	1,589.47		742.06	1,046.90
F Ch5.33		33	range	Maniacs	106	464.29	667.186	36%		1,250.07
	Table Ch5.7		actual life	Maniacs	255	17.66	19.46		7,907.219	9,476.151
F Ch5.34		34	dif.	Maniacs	263	2.67%	0.92%			
F Ch5.35		35	Total IIP-VM technical	Maniacs	265	780.816	667.186		1,170.207	856.822
<moved see also F7.14>>										
F Ch5.37		36	exclusive	ATA calcs	45	43%	7%			
F Ch5.38		37	Comparable Royalties	Comparables		<20%>	<table based on [Parr:07] to be inserted>			
F Ch5.36		38	On revenue	Buy-in payments	54	50.2%	19.97%	25.00%		
F Ch5.39		39	discounted CUT	Buy-in payments	59	778.894	<<Does that account for the cost-sharing payments that are due?			
F Ch5.40a..e		40	Operating profit to sales	MNCacctg	14	34.27%	70.10%		67%	2.26
F Ch5.40f		40f	p/e ratio	MNC data	133	12.00	1,850.00		154.21	12.00
F Ch5.40g		40g	Tobin's Q	MNCacctg	44	4.00	1,850.00	Debts		50.00
	For Example Ch5.2	Table	interquartile			5.294	3.857		2.688	1.444
F Ch5.41		41	Berry matching	Comparables	42	942.075	1.646		2.35	
F Ch5.42		42	ip/e ratio	Comparables	30	10.57	154.212		1,850.000	220.000
F Ch5.43		43	p/e computation	Comparables	41	10.30	ATA p/e		1.25	
F Ch5.44		44	CONCH IP	Comparables	41	667.031	64.769		10.299	42%
F Ch5.45		45	PS-M base	MNC data	120	69.017				
F Ch5.46		46	revenue contri-butions	MNCacctg	27	130.700				
F Ch5.47		47	Royalty	MNC data	157	27.1%	41.1%		5.0%	9.0%
F Ch5.48		48	R&D to be capitalized	Maniacs	126	215.404	489.556		340.443	368.064
F Ch5.49		49	IWWID investments	Maniacs	275	52.808	from		50.000	
F Ch5.50		50	IWWID contribution	Maniacs	284	19.69%	5.00%		27.06%	21.73%
not used		51	added reimbrsements?							
F Ch5.52		52	royalty amount	MNC data	160	890.305	3,290.422			
F Ch5.53		53	value	MNC Research	40	67%	2.0625		7.5	1.5
F Ch5.54		54	remaining research contributi	MNC Research	39	22.0%	187.700		135.000	441.7005142
	Table Ch5.11	Table	R&D expenses	MNC Research	45	13.822	17.278		34.555	51.833
		Table	survival rate	MNC Research	60	10.8%	16.2%		24.2%	36.3%
		Table	remaining research contributi	MNC Research	61	1.490	2.793		8.374	18.833
F Ch5.55		55	capitalized	MNC Research	65	4.449	6.834		16.796	30.961

F Ch5.56	56	<i>Three years</i>	MNC Research	68	709.693				
F Ch5.49	57	<i>Discounted</i>	MNC Research	51	4,897.688	use sum only		1,462.062	1,664.304
F Ch5.58	58	<i>leverage factor</i>	MNC Research	58	6.90			1295.340	
F Ch5.59	59	<i>rollover</i>	MNC Research	72	569.950		1295.340 [wilson:07]		10.2
F Ch5.60	60	<i>using multiplier at buyin</i>	MNC Research	61	593.36		400.79	785.94	6.15
F Ch5.61	61	<i>capitalized</i>	MNC Research	78	118.354	63%		114.032	
F Ch5.62	62	<i>options</i>	MNCacctg	49	297.323		360.403		
F Ch5.63	63	<i>for PP-VM</i>	ATA calcs	25	120.928	44.8%		270.000	119.050
		Table Ch5.15				M1:MC-VM pre	MC-VM post	M2:Inc- VM	M3: IIP-VM
		Table Ch5.15	<i>Conch</i>	Buy-in payments	D	717.200	904.640	955.180	780.816
		Table Ch5.15	<i>MNC</i>	Buy-in payments	C	1,630.000	2,056.000	2,012.324	1,691.190
F Ch5.64	64	<i>Summary</i>	Buy-in payments	65	792.402	385.230		48.6%	127.727
F Ch5.65	65	<i>interquartile to ATA ratio</i>	Buy-in payments	67	6.12%	8.8%		816.671	841.692
F Ch5.66	66	<i>ATA</i>	Buy-in payments	76	21.000	50.001			
	67	<i>cost share</i>			17.4%				
F Ch5-68	68	<i>Veritas</i>	ForestEtAl	94	8%				

Chapter 6		HHHH Taxhavens							
Ch6-HHHH.1	1	<i>Domestic Corporate earnings</i>	EffectOfNoTax	17	\$ 1,261,600	1,315,500		1,159,800	851,500
		AppF.14	[Rosotti:05, fig.13.3]		23.1%	\$ 650,000	\$	500,000	
<i>Ch6-available in US</i>		<i>left</i>	EffectOfNoTax	46	\$ 490,000	0			
<i>Ch6-available offshore</i>		<i>0</i>	EffectOfNoTax	47	\$ 690,000				
Ch6-HHHH.2	2	<i>available for investment</i>	EffectOfNoTax	30	\$ 515,113	41%		33%	
Ch6-HHHH.3	3	<i>Receipts from foreign sources</i>	EffectOfNoTax	31	\$ 695,000	174%		45%	
Ch6-HHHH.4	4	<i>Unpaid</i>	EffectOfNoTax	59	\$ 264.00	\$ 132.00	\$	132.00	
		Figure Ch6.2	EffectOfNoTax	5					
Ch6-HHHH.5	6	<i>Greece</i>	Taxhavens	36	24%	\$ 35.000000	\$	27,930.000	15.40%
Ch6.7	7	<i>Irish taxable</i>	ForestEtAl	37	\$ 0.11	\$ 5,737,071	\$	0.02	\$ 809,939
<i>F6.8a</i>	8	<i>spending on Job training</i>	TaxRatesInt		757.760	0.300%		19.430%	
<i>for F6.9</i>		9,C	[Stahl:12]					30000	
F6.9	9,P	<i>five taxhaven total</i>	worldwide	583	\$ 326,230	MNC			
Ch6.10	10	<i>City of London</i>	Taxrates	116	\$ 57.988	\$ 414.200000		14%	
<i>For F6-11</i>	11	<i>cost per Maniac</i>	Ports	22	\$ 1.96	\$ 1,690	\$	2,253	shipping
F6.12	12	<i>CFC/parent</i>	CorpTax	300	11.6	83%			
not used now, but keep		<i>total</i>	Taxhavens	77	44				

Chapter 7 EEEE		Effect on MNC taxes							
EEEE.1	1	<i>ATA fraction</i>	Buy-in payments	1	50.001	\$ 792.402		6.3%	
F Ch7.2	2	<i>range and delta of mean</i>	Buy-in payments	2	48.62%	385.230			vs ATA
F Ch7.3	3	<i>p/e ratio</i>	ATAcalcs	3	1.24	50.001		110.000	12.231
F Ch7.4	5	<i>relative IQ range</i>	Buy-in payments	4	111.411	13.6%	below		17.5%
		Table Ch7.1	Pointers	147	\$ 905	\$ 955	\$	781	\$ 779
F Ch7.5	5	<i>RO-VM (7th)</i>	Buy-in payments	5	6.31%	6.12%		8.77%	
F Ch7.6	6	<i>Finalsaving</i>	ATAcalcs	6	240.618	285.835	not discounted	\$	8,291.400
F Ch7.7	7	<i>IIP-VM (3rd)</i>	Buy-in payments	7	7.5%	6.4%		113.630	667.186
F EEEE.8	8, D1	<i>ATA results</i>	ATAcalcs	8	30%	(113.630)		6.1%	8.8%

Ch7.EEEE.9	9, D2	research in progress	ATAcalcs	9	22%				
F Ch7.10	10, D3	dim ratio	Maniacs	10	35%	65%	19%	81%	
F Ch7.10	11, D4	lag effect	Maniacs	11	89%	83%	\$	955.180	
for EEEE.4	20	effective lag	Maniacs	148	0.99	2.6775			
Ch7.EEEE.12	12, D4c	centroid	ATAcalcs		122%				
Chap7- EEEE.13	13, D5	NPV factor	Maniacs		80%	77%		84%	at
Ch7.EEEE.14	14, D6	exclusive	ATAcalcs		43%				
Ch7.EEEE.15	15, D7		MNC data		4.8%	44%		42%	
Chap7- EEEE.16	16, D8		Maniacs	0.04	86%	3,868.045		3,320.914	0.428571429
F-EEEE.17	17, D9		Buy-in payments		83%	\$ 12,231,344		76876144.32	\$ 827.83
Ch7.EEEE.18	18, D10	ratio	ATAcalcs		98%	49%		0.315	
F-EEEE.19	19	Product of discrepancies	ATAcalcs	0	9.56%	3.63%			
	Table Ch7.2	Reduction	ATAcalcs	57	85.43%	78.03%		65.41%	88.58%
	Table Ch7.2	when applied leaves	ATAcalcs	52	69.79%	85.43%		78.03%	simple
F Ch7.20		ATA Inc-VM	ATAcalcs	3	50.001	6.02%		42%	10,004.600
F-7+EEEE-21	21	tax on US earnings	Buy-in payments		39.68	87.500		55.421	53.974
F-7+EEEE-22	22	tax on repayments+int	Buy-in payments	<61>				69.922	3.211
F Ch7.23	23	repayments+interest	Buy-in payments		203.036	152.277	first year		255.223
F-7+EEEE-24	24	max payback	MNC Taxes		14.00	360.190		32,303.11	
F-7+EEEE.25	26	ratio of loan to market cap	Buy-in payments		32.6%	722.962		816.671	36.8%
Ch7.26U		Veritas acq.	ForestEtAl		7.95%	2500		1675	2087.5
Ch7.26V		Veritas acq.	ForestEtAl	112	8.9%	\$ 1,870.229	\$	1,892.647	
Ch7.26W		tax savings	ForestEtAl	111	40%	\$ 536.580			
F Ch.5.27	27	Capital accumulated wo acqui	MNC Taxes	82	150	55.49		135.000	36.066
F Ch5.28	27	capital accumulated	MNC Taxes		300.229	13.631		633.978	286.598
F-Chap7-28	28	PP-VM	ATAcalcs	11	50.000	21.000		17.4%	0.185
Chap7.29	29	Market cap intangible	ATAcalcs	13	242.000	112.837			
F-Ch7.30	30	next 3 years	MNC Taxes	88	200.705	500.934		36.982	537.916
F-Ch7-31	31	5,8 year research expenses	MNC research	36	1,058.186	548.810			
	32	>stock missed>			<\$42M>				
	33	gropwth fo4 5 more			<\$659>				
F Ch7.34	34	Amount to be repatriated	MNC Taxes		475.059	26.323		501.382	62.673
F-EEEE-7.33 <hold>		correction for share value							
F Ch7.35	35 x2	left	MNC Taxes		(0.773)	18.735		62.673	
F Ch7.36	36	2004 AJC acquisition actual	ATAcalcs	14	106.659	49.732		52.7%	0.246
	Table 7.3				120.928	202.389		21.000	49.732
F Ch7.37	37	discount due to dilution	MNC data		8.1%				
F Ch7.38	38	MNC share	ATAcalcs		77.2%	366.659			
F Ch7-39	39	reduced valuation	MNC Acctg		-6.7%	(108.400)		1,613.638	
F Ch5.40	40	Buy-in gift	Buy-in payments	90	780.00	766.670		50.001	816.671
F Ch7.41	41	average increment	MNC data		14.8%	106.480			
F Ch7.42	42	prior+acqs & control premium	MNC data		16.6%	118.800			
F7.43, F9.cs	43	Transfer costshare payments	MNC Taxes	70	\$ 78.813	\$ 18.41	\$	23.00	\$ 145.00
F Ch7.44	44	MNC R&D	MNC Taxes	79	1.358	501.382		369.275	117.992
F Ch7.45	45	sum of gifts	Buy-in payments		961.388	779.999		85.659	95.730
F Ch7.46	46	Intellectual capital	MNC Taxes		434.059				

F Ch7.47	47	Product writeoffs	ATAcalcs	14	20.000				
F Ch7.48	48	SG&A/gross	MNCacctg		11.8%				
F Ch5.49	49	R&D workforce	MNC research	65	(0.03)	(7)	77	200	
F Ch7.50	50 x 2	Conch RAB sales	MNC data	162	70.1%	22.44%	44.00%	46.63%	
		income graph data	MNC data		15.2%	600.500	routine	4.92%	
		tax on those			21.83%	131.065			
F Ch7.51	48	accumulation	MNC Taxes		1,457.701				
F Ch7.52	52	Revenue	MNC Taxes		5.76%	50.30%	Manufacturing	17.5%	
					4.12%		Computer and electron	18.5%	
	53				68.3%	\$ 84.00	\$ 181.00		
	54			53			Deductions		
Figure Ch7-4	F9.4	total income	MNC data	166	315	145	170	60	
	51		Corptax	51	21.0%		Manufacturing		

Chapter 8	IIII	The capability of the IRS							
F Ch8.1	1		IRSdata	46	0.51%	\$ 11,100.000			
F Ch8.2	2	Blake	IRSdata	48	16.0%	\$ 345,000.000			
		2008	US taxes	8	39.1%	30.7%	10.4%	5.9%	
		budget data	IRSdata						
F Ch8.3	3	GDP	US taxes		\$ 2,217,000	\$ 6,813,000	\$ 14,369,100		
F Ch8.4	4	2010 estimated	IRSdata	14	235,776	6,756			
		Other sources	IRS data	141	\$ 44,229	\$ 33,068	\$ 175,000	80.0%	
F Ch8.?	Table Ch8.:	Corporate fraction of total \$	US taxes	22	13%	60,000	7%	99,000	
F Ch8.5	4	GE AR 10	ForestEtAl		5.63	\$ 78,958.000	\$ 14,030.000		
F Ch8.6	6	Option value of audit risk	Corp tax		\$ 248.18	\$ 35.01	\$ 7.09		
F Ch8.7	7	Astra Zeneca	ForestEtAl	79					
F Ch8.10	8	Double taxation among counti	US taxes	64	45.0%	51.25%	35.0%	15.0%	
F Ch8.8	8+	SME	ForestEtAl	35	1 to 19	\$ 5,294,970			
F Ch8.9	9	Belize	US taxes	66	35.65%	25.00%	51.25%	17.00%	
F Ch8.11	11	81 Total income tax after cred	US taxes	409	25.34%	276,744,284	382,242,436		
F Ch8.12	12	dividends	US taxes	65	44.75%	25.34%	36.54%	43.08%	
F Ch8.11	11	effects	US taxes	67	36.54%	43.08%	(\$100)		
F Ch8.13	12	Dividend exclusion	ForestEtAl	73	4.22%	4.43%			
F Ch8.14	14	LB&I	IRS data		600	875	1475 [Shulman:11P]		
F 8.15	15	Effective tax rate	here now		62%	#REF!	\$ 170.000	9.40%	

Chapter 9		Nation and You							
Ch 9.1	1	size ratio	Pointers		0.02%	4,943	313.60	1,550,000	
F Ch9.2	2	Data from Figures Ch8.5 and Fig Ch6.3							
F9.empsize	3	Firms with more than 1000	Employment	49	0.105%	0.023%	6,327	51,190,059	
F9.4	4	SMEs	[HinesS:09]						
F ch9.3	5	large U.S CCs with < \$1M tax	CorpTax		8,687	61%	5,320	38%	
F ch 9.2	6	taxes per co	CorpTax/MNC taxes		89,361	7.85%	25.96%	9.09%	
F 9.fs	7	US corp foreign sales	graph estimate		20.00%	[Jackson:10]			
F Ch9.USRD %	8	research spending	CorpTax		0.82%	12.95%	bogoslaw	\$ 233,920.000	

		othe sources	310	1.11%	13.1%		13% Microsoft
F AppF.RD - not signifivant \		Research ratios	344	7.74%	1.35%		
F Ch9.asg	9	assets / gross	19	3.11	1.37	0.78	220.00
F Ch9.c	10	p/e		3.30	for all US corps	for MNC	12.00
F Ch9.ff	11	gross foreign output US paren		29.73%			
F Ch9.gs	12	employee ratio	314	36%	1.81	42%	
F Ch9.HTcap	13	30 high tach companies High t	7	40.8%	\$ 2,477,619	91.6%	\$430B
F Ch9.rd	14	R&D including acquisitions	29-Oct	168.93	18.9%	23.7%	ratio R&D/grossop p
F Ch9.15	15	R&D including acquisitions	29				
F7.43, F9.cs	16	Transfer costshare payments	70	78.81	9%	12.59	18.41
F Ch9.17	17	MNC costsharing		111%			
F Ch9.rdp	18	To the US		15.76%	0.00%		
F Ch9.19	19	US assets		11%			
F Ch9.fl	20	Taxes in US	23	3.22%	[Gibbs]		
Figure 9.2	21	offshore assets		690.0000	used 8.13	138.000	5000
F7.43, F9.cs	22	Transfer costshare payments	70	15.9%		78.81281491	\$ 109.03
F9.fe		Muforeinn source taxes/tax revenue		2.50%			
F Ch9.23	23	pass-through extrapolation		(1.04)	510.00	460.00	(240.00)
Figure Ch9.6		excess spending	454	1949-1953	1953-1957	1957-1961	1961-1965
		not yet plotted		-22%	-11%	-5%	-8%
F Ch9.27	24	exp per Corp	475	760.00	730.45	2.76	270.00
F Ch9.28	25	extimate of loss of corporte tax		2% of us revenue			
F Ch9.26	25	wedge		<improve sketch with real number	135%	74%	
F Ch9.29	27	R&E benefit	132	\$ 6.595			
	27	Manufacturing	67	21.0%	34.1% max		18.2%
F Ch9.30	27			16.0%	354,710.000	270,000.000	
F Ch9.12	29	Corporate	219	100,024	84,710		
	30	choices		21.0%	24%	370	1550
F Ch9.31 \$B	31,32	start value corrected	7	142.892	684.32	1339.52	95.04
F Ch9.of	32		26	7.0%	2002	381.000	2008
F Ch9.36	33	Plains.....		6.47%	[Bea:11]	7	New
F Ch9.37	34	FDI vs deficit					
NNNN.1	35	DARPA/Cisco		\$30B			
F Ch9.ens	36	US employees of multinationc		3.0300	(1.6880)		
F9.40	37	tax gap per Rosotti:05, fig 13.3		30.0%	\$650	\$500	
F Ch9.amc	??	Table Ch9 .2	108	1998	\$ 8.117	\$ 38.224	\$ 78.857
F9.res	??			23%			
F Ch9.4	24	eff. rate on all sales		6.40%	\$ 693.710	11.84%	82%
FF9.e		employes	294	18.20%	employes pay+		27.14%
F Ch9.8		taxhaven effect	128	57%	52.9%	750B	
F Ch9.f ratio for multinationals of s		ratio for multinationals of s	305	60.96%	39.04%	1.55	10.57%

F10.20	19	capital gains	EffectNoTax		\$	69,051	\$	48,699	scaled from 1993	70%		
F10.20	20	Corporate fraction of total	US taxes		\$	228,523	corporate	228,523		228,522,752		
F10.21	21	proposed rise for dividends an	EffectNoTax	182	\$	9,597	\$	27,436	\$	31,472	31%	
F10.22	22	tax incentives for S-corporatio	EffectNoTax		\$	5,000	estimate					
F10.23	23	total	EffectNoTax		\$	114,465	\$	114,058		50.09%	4.30%	
F CH10.24	24	business tax preparation cost	EffectNoTax		\$		\$	50,000	\$	102,000	\$	1,000
F10.25	25	IRS audits										
F10.26	26	Qualified dividends [1]	US taxes	300		81.91%		25,412,544		123.570	18.09%	
F Ch10.27	27	Nonprofit organizations a 597	CorpTax			4.2%						
F CH10.retirement	28	sums/averages	CorpTax	157		26.3%		37057.233		68%	64	
F Ch10.imm	29	Immigration legal & illegal				0.102		4.43%		[Us cebsus]	311,591,917	
	30	US population										

<u>F Ch10.24</u>		individual	US taxes	18		138.893908		2.51		286.52	
Table S-3	???	Corporate taxes	US taxes	0		191000		899000		2163000	
F10.6		81 Total income tax after cred	US taxes			28.60%					
RRRR-5		VAT	Maniacs	154		5.41%	\$	166.67	\$	1,233.33	5.71%
RRRR.3	3	US apportioned tax rate	MNCacctg			14.7%	\$	22.703			
		combined effect on collection	EffectNoTax								
<u>F Ch10.19</u>											
Ch RRRR.10		combined effect of investment	EffectNoTax			23.9%	\$	8,140	\$	1,558,140	deMooij:05 OECD
		effect of movemnt taway fror	EffectNoTax								
Ch10 RRRR.U	removed	Underground Economy	US taxes	27		1.48%					
F Ch10.iR			US taxes	20							
F Ch10.hm		Mortgage on owner-occupied	Tax expenditures	140		65,000.000		14,369,100.00		0.452%	\$ (13,388,975.21)
Figure Ch10+	extra	US multinational employment	GNP&GDP	19		-4.3%		8.0%		279.04	301.23

Appendix A

MNC's Books

V	1	Table AppA.2		125	\$	525.00	140%	\$	375.60	100%	
F App A.1			MNC data								
Table AppA.2		SG&A based on gross income				11.8%	\$	33.58			
	2	forest	MNC data	113		14.37%		2.71%		2.44%	32.66%
F AppA.2	2	Market estimate	MNC data	131		1,542		10	p/e ratio		
F AppA.3	3	Balance Statement	MNCacctg	67 to70		40		30		50	90
F AppA.4	4	market/ book	MNC data	176		7.01					
A AppA.5	5	Market/book ratio	ForestEtAl	55		2.45		1.47			1.47

Appendix B

Laws and regulations

F AppB.1	0	Temporary regs	Laws&Regs	29		62%		79%		71%
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Appendix C

Royalties

F AppC.1	1	cap[utalized value				21%		1.25		16.67%	1
F AppC.2	2					royalty		5.2%		21%	25%
F AppC.2		MNC Margin	MNCacctg	154.212		41%		0			

F AppF.4	4	royalty on earnings --> revenu	MNCacctg		9.01%			
AppG.5		effect in income\$M	MNCacctg		0.677		0.948	
AppG.5?		Very low risk royalty	MNCacctg	E1-16				
F AppC.5		Royalty begets	Royalty	J33	#####		819	
F AppC.6	0	Buy-in per IIP-VM used by ATA	Royalty		#####		48	
Ch4-TTTT moved to G	8	startup loan	Buy-in payments					

Appendix D		Definitions						
	1	AJCA	TaxRatesInt	10	312	16.38	362	0.85
App.D.2	3	centroid	none					
F AppD.3		price/profit ratio	MNC data		5.41	price to EBIT	3.51	
	4	interquartile	Comparables	40				
F AppD.4		post buy-in	price to EBIT					
F AppD.5		routine income	MNC data	34	4.19%			
App.D.6	6	p/e ratio	prices	0.12	9.09	20		
app.D.8		GNP vs GDP			3.2%	7.2%	-0.5%	3.0%

Appendix E		Tax expenditures						
F AppE.4	1	Hungerford	TaxExpenditures	222	13.4%	\$ 117	\$ 747,206.00	1,100.000
F appE.1B OMB12	1b	ratio	Tax Expenditures		12.6% total		Corporations 2010	124,500
F AppE.3	2	Deficit reduction	TaxExpenditures	390	195.84			
F AppE.2	3	Ratio	US taxes	20	4.71			
F AppE.1	4	Frac.Corp.	Tax Expenditures		13.4%	614,212	100,024	14.3%
AppE.2	5	Mortgage on owner-occupiea	Tax Expenditures	194	\$ 165,887.396	\$ 70,091.000	98,550	
F AppE.5	6	foreign reinvestmet	TaxExpenditures		19.20	7.000	7.597	4.600
F appE.10	7	assuming 1 hire or less per bl	Tax expenditures	338	0.69%	29,497,000	203,500	
F Ch9.11	8	Veterans	Tax expenditures	259	15.83%			
Table AppE.1		Other	Tax Expenditures		\$ 701,835.000			
Table AppE.2	9	Temporary tax expenditures (t	Tax Expenditures		\$ 38,947.000	\$ 37,447.000		
							0	4130
AppE.3	2	repatriation effect	ATAcalcs	18	\$ 500.000			
AppE.R		R&E rate	Offshoring					
F Ch10.ER		Ratio of corp tax exp /corp ta	Tax Expenditures	222	20%			
F Ch10.CT		Ratio of corp tax/ all tax	Tax Expenditures	170	0.437696024	100,023.500	228,522.752	
				170	10%	228,522.752	2,219,980.000	

Appendix F								
see Ch5.10 etc								
Table AppF.14	see F6.1	Dogett:11	Effect of No Tax	40	9.36%	21.34% Tigta	\$	300,000

Table AppG.4 see F Ch5.8

Appendix G

Payment Mechanisms

F G.0	<see F2.1. interest accumulated in CONC MNC taxes		75	36.982	3.5%		
AppG.1	<i>data used in Figure App.D.1</i>	MNCacctg					
AppG.2	<i>transfer price</i>	ATAcalcs	F 14	50	496		
AppG.3	<i>Cum Interest</i>	Buy-in payments		\$ 11,156,718			
AppG.4		0 Buy-in payments	0	\$ 15,719,426	\$ 15,375,200	\$	76,876,144


