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with these and other questions related to the application of Article 17 that prepared bya subgroup of was Working Party 1 on Tax Conventions and Related Questions. That public discussion draft included proposals for additions and changes to the Commentary on the OECD Model Tax Convention resulting from the work of that subgroup.

ISSUES RELATED TO ARTICLE 17 OF THE MODEL TAX CONVENTION

various issues directly or indirectly related to the 1977 Model Convention. This work resulted in a number of reports, some of which recommended amendments to the Model Convention and its Commentaries.1 9. In 1991, recognizing that the revision of the Model Convention and the Commentaries had become an ongoing process, the Committee on Fiscal ...

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There are four basic categories of triangular cases that will be discussed in this thesis. They are (i) PE triangular cases, (ii) dual resident triangular cases, (iii) reverse PE triangular cases and (iv) reverse dual resident trian- gular cases.

Chapter 1 Introduction 1.1. Introduction

The 2017 pdate primarily comprises changes to the OECD Model Tax Convention U (the OECD Model) that were approved as part of the BEPS Packageor were foreseen as part of the follow -up work on the treaty-related BEPS measures.

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