MICHIGAN LEGAL STUDIES

COMPARATIVE

CONFLICT RESOLUTION PROCEDURES

IN TAXATION

An Analytic Comparative Study

Published under the auspices of The University of Michigan Law School (which, however, assumes no responsibility for the views expressed) with the aid of funds derived from gifts to The University of Michigan by William W. Cook and by the Ford Foundation.
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An Analytic Comparative Study

By

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Ann Arbor
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1968
ACKNOWLEDGMENTS

The five distinguished foreign tax experts who prepared, respectively, the analyses of the dispute-resolving process followed in the five European countries covered here have no responsibility whatsoever for the analytical or critical comparison which appears in PART ONE. Their individual country-by-country analyses—set forth in PARTS TWO through SIX* and geared to a common outline—were used by me in comparing analytically, in PART ONE, the merits of the structural arrangements, practices, and procedures of the five European countries, both inter se and with those of the United States. Indeed, because all but one of the European authors continue to hold high posts in their respective tax administrations, copies of PART ONE deliberately were not made available to them prior to publication. In consequence, I assume entire responsibility for any erroneous interpretations of their analyses which may appear in PART ONE.

Elizabeth G. Brown, Research Associate, The University of Michigan Law School, assisted in my work on PART ONE, suggested changes in the initial drafts prepared by each of the European authors, and translated PART THREE covering France.

Finally, I gratefully acknowledge the support provided by the Ford Foundation in facilitating the comparative aspects of this study, the help of the American Bar Foundation in pursuing my own study of relevant U.S. administrative practices and procedures, and the compassion of my understanding secretary, Mrs. Jean Hughes.

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*Initial drafts of these parts were completed, some in 1964 and others in 1965. Revisions were last reviewed by the authors in April 1967, at which point the manuscripts were modified to accommodate the more important intervening procedural changes.
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