

ÍNDICE

PREFACE

INTRODUCTION

FIRST PART: CAN BE TAXED THE DIGITAL ECONOMY?

1. Overview and taxonomy
2. Boundaries of the digital economy
3. Digital sector and digital transactions
4. Approaches to define the digital economy
 - 4.1. Bottom-up definitions
 - 4.2. Top-down definition
 - 4.3. Flexible definitions

SECOND PART: WHAT ACTIVITIES WILL BE TAXED?

1. The «value creation»: a questioned criterion
2. Digital business models
3. Main sectors
 - 3.1. Automated digital services
 - 3.1.1. Activities included in the positive list
 - 3.1.2. Activities comprised in the negative list
 - 3.2. Consumer-facing businesses
 - 3.3. Activities excluded from both categories
4. Tax-disruptive digital elements
5. Tax-disruptive business models
6. Multisided platforms and value creation
7. European Union proposals: taxed activities
8. MNE´s included in the scope of amount «A»

THIRD PART: WHAT ARE THE REVENUE SOURCING RULES AND THEIR INDICATORS?

1. The OECD and the New Diplomacy
2. The new revenue sourcing rules
 - 2.1. Source rules for automated digital services
 - 2.2. Source rules for consumer-facing business
3. Hierarchy of indicators
4. Indicators in automated digital business
5. Indicators in consumer-facing business
6. The Spanish approach about to the tax on digital services

CONCLUSIONS

REFERENCES