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Andreas Cebulla

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Special Features of the UN Model Convention Anna Binder, Viktoria Wöhrer, 2019-10-01 Detailed research on the UN Model Convention s unique features The UN Model Convention has a significant influence on international tax treaty practice and is especially used by emerging and developing countries as a starting point for treaty negotiations Driven by the aim to achieve consistency in the international tax treaty practice the structure and content is to a large extent similar in the UN Model and the OECD Model However whereas the OECD has historically focused its efforts on issues mainly relevant for developed countries the UN Tax Committee has continuously attempted to specifically take into account tax treaty policies for developing countries when drafting and amending the UN Model Convention Compared to the OECD Model Convention the UN Model Convention aims at giving more weight to the source principle Popular examples are the PE definition in the UN Model which provides for a lower threshold than Article 5 of the OECD Model or Article 12A on Fees for Technical Services which has been introduced with the latest amendment of the UN Model Convention 2017 and allows for a withholding tax to be levied on payments to non residents when the payer of the fee is a resident of that contracting State irrespective of where the services are provided Interestingly in the discussions of the tax challenges arising from the digitalization of the economy the OECD and the G20 are also exploring options to allocate more taxing rights to the jurisdiction of the customer and or user i e the market jurisdictions As this has traditionally been the focus of the UN Model Convention its unique features and developing countries practices could be taken into account when exploring new nexus rules that are not constrained by the physical presence requirement This book contains the master's theses of the full time LL M program 2018 2019 for which Special Features of the UN Model Convention has been chosen as the general topic With this book the authors and editors do not aim at discussing each article of the UN Model Convention but rather focus on the unique features of the UN Model Convention which are explored in detail This is supplemented with an evaluation of the function and relevance of the UN Tax Committee in the international tax policy discussion and with an analysis of the influences of the OECD s BEPS project on the UN Model he OECD s BEPS project on the UN Model **Against Utopia -Technology won't save us** Victor de la Fuente, 2022-01-10 Against Utopia Technology Will Not Save Us is a book that unsettles because it dismantles an illusion We live surrounded by discourses that promise a perfect future built on algorithms metaverses and machines that make decisions for us The dominant narrative speaks of self driving cars that will end accidents of artificial intelligences that will solve what humans cannot of cryptocurrencies that will free the economy of genetic advances that will perfect life and of a Singularity that will take us beyond our own intelligence But behind that vision lies a false promise the idea that technology on its own will be enough to save us The author a technophilosopher invites us to question this mirage The transformative power of each innovation is acknowledged but all of them carry the imprint of those who create them biases ethical dilemmas hidden interests and unforeseen consequences The metaverse with

its promise of parallel worlds where anything is possible may end up eroding the way we relate to each other Autonomous vehicles heralded as the dawn of a new era in mobility raise unsettling questions about work decision making power and dependence on systems we barely understand Artificial intelligence far from being neutral reflects and amplifies our limitations and although cryptocurrencies and NFTs are presented as symbols of freedom and disruption their environmental impact volatility and speculative use reveal a darker side Even biogenetics capable of altering the most intimate aspects of life forces us to confront questions that verge on the sacred What does it mean to intervene in the code of the human Where do we draw the line And on the horizon looms the Singularity that promise of a definitive leap into the posthuman which inspires not so much hope as vertigo This book does not seek to deny the importance of innovation or to paint a bleak future for the mere sake of criticism Its aim is a critical exercise to look at technology without the veil of utopia to accept its power and at the same time its risks and limitations Because the real decision does not lie in the machines but in the way we choose to coexist with them Against Utopia is ultimately an invitation to think calmly in a time that seems to be moving far too fast A call not to confuse promises with certainties and to remember that the future is not designed solely with code but with responsibility reflection and human consciousness **Open AI and Computational Intelligence for Society 5.0** Pandey, Rajiv, Srivastava, Nidhi, Prasad, Rajesh, Prasad, Jayashree, Garcia, Manuel B., 2024-11-29 As technology rapidly advances the complexity of societal challenges grows necessitating intelligent solutions that can adapt and evolve However developing such solutions requires a deep understanding of computational intelligence CI and its application in addressing real world problems Moreover ethical considerations surrounding AI such as bias and accountability are crucial to ensure responsible development and deployment of intelligent systems Open AI and Computational Intelligence for Society 5 0 offers a comprehensive exploration of CI providing insights into intelligent systems theory design and application This book is a practical guide for scientists engineers and researchers seeking to develop thoughtful solutions for complex societal issues Integrating disruptive technologies and frameworks illuminates the path toward creating intelligent machines collaborating with humans to enhance problem solving and improve quality of life *Open Innovation Ecosystems* Daniel Fasnacht, 2018-11-19 Sharing information and knowledge co innovating with clients communities and competitors and adopting cognitive technology robo advisors crowdfunding and blockchain reflect current socio economic behaviour Emerging growth regions in Asia demographic shifts intergenerational wealth transfers and increasing regulations are other trends that amplify each other disrupt the client journey and affect the entire economy Moreover unprecedentedly new market entrants outside the financial sector be it Amazon Apple Google or Facebook are increasingly expanding their scale and scope to offer financial services Featuring case studies of Chinese business ecosystems such as Alibaba Ant Financial that have transformed from displaying domestic and organic growth to rapid global expansion this highly readable book gives you glimpses of how banking services are evolving We break down everything you need to know about the foray of challenger

banks into the financial services You learn how they link health to wealth data and gain advantages through analytical capabilities in the race to attract sophisticated clients with highly personalized experiences. The next level of creating and capturing value for clients and businesses involves platform models embedded in cross sector ecosystems Digital platforms are the crucial entry point to global markets creating value for multiple sides They leverage self driving ecosystems that go beyond linear value chains applied in traditional business models as the sources of growth in an interconnected world are collaboration and network effects The winners will be those who open up and engage themselves in an ecosystem that transcends organizational boundaries and performs without sector borders because every actor contributes to the value constellation of the system The book provides practitioners and scholars with new insights into open and holistic business models where competition in future will be between ecosystems rather than at the company level It encourages leaders to expand their skills and think through the lens of the ecosystem theory while developing compelling strategies to serve the next generation clients Next-Generation Wireless Networks Meet Advanced Machine Learning Applications Comsa, Ioan-Sorin, Trestian, Ramona, 2019-01-25 The ever evolving wireless technology industry is demanding new technologies and standards to ensure a higher quality of experience for global end users This developing challenge has enabled researchers to identify the present trend of machine learning as a possible solution but will it meet business velocity demand Next Generation Wireless Networks Meet Advanced Machine Learning Applications is a pivotal reference source that provides emerging trends and insights into various technologies of next generation wireless networks to enable the dynamic optimization of system configuration and applications within the fields of wireless networks broadband networks and wireless communication Featuring coverage on a broad range of topics such as machine learning hybrid network environments wireless communications and the internet of things this publication is ideally designed for industry experts researchers students academicians and practitioners seeking current research on various technologies of next generation wireless Advanced Introduction to Law and Artificial Intelligence Woodrow Barfield, Ugo Pagallo, 2020-10-30 networks Woodrow Barfield and Ugo Pagallo present a succinct introduction to the legal issues related to the design and use of artificial intelligence AI Exploring human rights constitutional law data protection criminal law tort law and intellectual property law they consider the laws of a number of jurisdictions including the US the European Union Japan and China The Future of Work and Technology Andreas Cebulla, 2023-12-20 This book making reference to case law and statutes examines how global technological advances shape the way we work and allocate work today and how we might do so in the future exploring advances in robotics artificial intelligence green technology and implications for workforce skills and future welfare It uses Australia as a case study contrasting the country's experience to those elsewhere The book is a cross disciplinary collaboration that brings together the expertise of engineers data scientists economists and sociologists The reader is offered an overview of the current uses of advanced digital technologies and what it means for today s workforce

society and economy The book also looks to the future Current uses of advanced technologies lag its already existing capability The contributions note potential future applications of technology and the economic social and workplace implications of technological change This book should be of interest to anyone studying and wishing to better understand what work might look like in the future and how we might prepare for likely changes **Software Engineering and Advanced Applications** Davide Taibi, Darja Smite, 2025-10-09 This three volume set constitutes the refereed proceedings of the 51st Euromicro Conference on Software Engineering and Advanced Applications SEAA 2025 held in Salerno Italy during September 10 12 2025 The 62 full papers were carefully reviewed and selected from 177 submissions These papers were organized in the following topical sections Part I Data and AI Driven Engineering Cyber Physical Systems Model Driven Engineering and Modeling Languages Part II Practical Aspects of Software Engineering Systematic Literature Reviews and Mapping Studies in Software Engineering Part III Software Management Measurement Peopleware and Innovation Software Process and Product Improvement Software Analytics Mining Software Open Datasets and Repositories Emerging Computing The Engineering Index Annual ,1994 Since its creation in 1884 Engineering Index has covered virtually Technologies every major engineering innovation from around the world It serves as the historical record of virtually every major engineering innovation of the 20th century Recent content is a vital resource for current awareness new production information technological forecasting and competitive intelligence The world's most comprehensive interdisciplinary engineering database Engineering Index contains over 10 7 million records Each year over 500 000 new abstracts are added from over 5 000 scholarly journals trade magazines and conference proceedings Coverage spans over 175 engineering disciplines from over 80 countries Updated weekly The Compu-mark Directory of U.S. Trademarks, 1991 Sales and Idea Book ,1949 American Agriculturist ,1912 A New Pronouncing Dictionary of the Spanish and English Languages ,1902 Grain and Feed Journals Consolidated (some Issues Omit Consolidated),1913 The Athenaeum .1886 The Cultivator & Country Gentleman, 1889 The farm the garden the fireside **Army-Navy-Air Force Register** and Defense Times ,1921 A New English Dictionary on Historical Principles: part 1. H (1901) James Augustus Henry Editor & Publisher, 1929 The fourth estate Murray,1901 Barrel and Box and Packages ,1917

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