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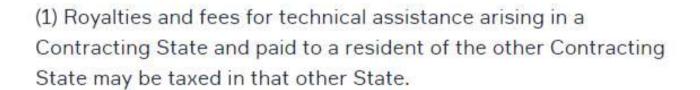
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Royalties and Fees for Technical Assistance



(2) However, such royalties and fees for technical assistance may also be taxed in the Contracting State in which they arise and according to the laws of that State, but if the beneficial owner is a resident the other Contracting State, the tax so charged shall not exceed 10 percent of the gross amount of the royalties or fees for technical assistance.

(3) The term "fees for technical assistance" as used in this



Author

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