

DAFTAR PUSTAKA

A. Buku / Literatur

- Adolph H. Matz and Milton Usry. *"Cost Accounting-Planning and Control"*. Eight Edition. South Western Publishing Co. Cincinnati, 1984.
- Alwasilah, A. Chaedar. *"Pokoknya Kualitatif Dasar – Dasar Merancang Dan Melakukan Penelitian Kualitatif"*. PT. Kiblat Buku Utama, Jakarta.
- Anthony, Robert N. and Govindarajan, Vijay. *"Management Control System."* Eleven Edition. Mc.Graw-Hill. 2003.
- Cox, James F, Gerry Howe and Lynn H. Byod. *"Transfer Pricing Effects on Locally Measured Organizations."* Industrial Management.
- Creswell, John W. *"Research Design – Qualitative and Quantitative Approaches"*. New Delhi, 1994.
- Darussalam dan Danny Septriadi. *"Konsep Dan Aplikasi Cross-Border Transfer Pricing Untuk Tujuan Perpajakan."* Danny Darussalam Tax Center (PT. Dimensi Internasional Tax). Jakarta, Juli 2008.
- Dunn, William N. *"Pengantar Analisis Kebijakan Publik."* Edisi Kedua. Gajahmada University Press. Yogyakarta, 2003.
- Dye, Thomas R. *"Understanding Public Policy."* Tenth Edition. Pearson Education, Inc. Upper Saddle River, New Jersey, 2002.
- Feinschreiber, Robert. *"Transfer Pricing Method, An Application Guide."* John Wiley & Sons, Inc, New Jersey, 2004.
- Gross, Michael H. and Eric R. Greif. *"Choosing and Offshore."* Cybertax in the New Millenium and Orchard Hill Press, 2000.
- Gunadi. *"Pajak Internasional."* Edisi Revisi 2007. Lembaga Penerbit Fakultas Ekonomi UI, Jakarta, 2007.
- , *"Transfer Pricing, Suatu Tinjauan Akuntansi, Manajemen dan Pajak."* PT. Bina Rena Pariwisata. Jakarta, 1994.
- Keegen, Warren J. *"Global Marketing Management, Sixth Edition."* Prentice Hall Series in Marketing, USA.

Universitas Indonesia

- Kerlinger, Fred N. *“Asas – Asas Penelitian Behavioral”*. Indonesian Edition - Edisi ketiga. Gadjah mada University Press. Yogyakarta, 2006
- Lyons, Susan M.. *“International Tax Glossary, 2bd Ed.”* International Bureau of Fiscal Documentation Publikations BV. Amsterdam, 1996.
- Mansury, R., *Pajak Penghasilan Lanjutan* (In Hill Co, 1996). *An Inquiry into the Nature and Causes of the Wealth of Nations*, Indianapolis: Liberty Classic, 1981.
- Musgrave, Richard A. dan Peggy B. Musgrave. *“Keuangan Negara Dalam Teori Dan Praktek.”* Erlangga, 1991.
- Mc Carten, William J. *“International Transfer Pricing and Taxation, in Tax Policy Handbook, Edited by Parthasarathi Shorne.”* International Monetary Fund. Washington DC, 1995.
- Nugroho D, Riant. *“Kebijakan Publik – Formulasi, Implementasi, Dan Evaluasi”*. Gramedia. Jakarta, 2003.
- Rose ed., Richard *“The Dynamics of Publik Policy.”* London, 1976.
- Scholes, Myron S. dan Mark A. Woleson. *“Taxes and Business Strategy – A Planning Approach”*. Prentice-Hall, Inc. New Jersey, 1992
- Shapiro, Alan C. *“Multinational Financial Management.”* Allyn & Bacon, Inc., Toronto, 1982.
- Suandy, Erly. *“Perencanaan Pajak.”* Edisi Pertama, Salemba Empat. Jakarta, 2001
- Surahmat, Rachmanto. *“Persetujuan Penghindaraan Pajak Berganda, Sebuah Pengantar.”* PT. Gramedia Pustaka Utama. 2000.
- Victor Thuronyi, *“Tax Law Design and Drafting”*. Washington DC. International Monetary Fund, 1998.
- Yudkin, Leon. *“A Legal Structure for Effective Income Tax Administration”*. International Tax Program, Harvard Law School, Cambridge, 1971.

B. Karya Ilmiah (disertasi dan tesis)

- Fu’Ada , Yulia Anastasia. *“Advance Pricing Agreement (APA) Suatu Perbandingan antara Draft Ketentuan APA Indonesia dengan ketentuan APA Amerika Serikat.”* Tesis. Pascasarjana UI.

Universitas Indonesia

- Hardjatmo. *"Tindakan Yuridis yang Ditempuh oleh Direktur Jenderal Pajak selaku Otoritas Fiskal dan PT. ABC selaku Wajib Pajak dalam Menghadapi Masalah Transfer Pricing Ditinjau Dari Aspek Hukum Indonesia."* 2007.
- Hidayanti, Yusrum. *"Advance Pricing Agreement (APA) Dan Penanganan Kasus Transfer Pricing Menurut Hukum Positif Perpajakan Indonesia."* Tesis. Pascasajana UI, 2006.
- Ibrahim, Syahrul. *"Analisis Kebijakan Penguasaan Tanah Skala Besar Untuk Pembangunan Perumahan Dan Pemukiman Di Kabupaten Bekasi."* Tesis, Jakarta, 2000.
- Kurniawan, Agus Junio. *"Penerapan Advance Pricing Agreement (APA) sebagai Suatu Ketentuan Perpajakan Dalam Mengatasi Permasalahan Transfer Pricing."* Skripsi, Universitas Indonesia, 2005.
- Rahayu, Ning. *"Praktik Penghindaran Pajak (Tax Avoidance) Pada Foreign Direct Investment yang Berbentuk Subsidiary Company (PT. PMA) Di Indonesia (Suatu Kajian Terhadap Kebijakan Anti Tax Avoidance."* Disertasi. Fisip UI, 2008.
- Said, Zainil Abidin. *"Kebijakan Publik."* Yayasan Pancur Siwah. Jakarta, 2002.
- Wahab, Solihin A. *'Analisis Kebijakan dari Formulasi ke Implementasi Kebijakan.* Bumi Aksara. Jakarta, 1991.

C. Peraturan Perundang – undangan

Republik Indonesia, Undang – Undang Nomor 7 Tahun 1983 sebagaimana telah disempurnakan terakhir dengan Undang – Undang Nomor 36 Tahun 2008 tentang Pajak Penghasilan.

-----, Surat Edaran Direktur Jenderal Pajak Nomor.: SE-04/PJ.7/1993 tertanggal 9 Maret 1993 tentang Petunjuk Penanganan Kasus – Kasus *Transfer Pricing*.

D. Makalah & Artikel

Arnold, Brian J. and Michael J. McIntyre. *"International Tax Primer."* Kluwer Law International. Deen Haag, 1995.

Universitas Indonesia

- Azzara, Thomas P. *"Tax Havens of the World."* New Providence Press. Bahamas, 1999.
- Baedhowi, *"Implementasi Kebijakan Otonomi Daerah Bidang Pendidikan (Studi Kasus Di Kabupaten Kendal dan Kota Surakarta."* Disertasi, Jakarta, 2004.
- Chong, Spencer. Qisheng Yu, et al. Artikel: *"Advance Pricing Agreement – Negotiating China's Tax System & APA Framework: Lessons from The November 2007 China – Korea Accord."* PricewaterhouseCoopers – China Home, January, 2008
- Mardiasmo. *"Advance Pricing Agreement dalam Kaitannya dengan Upaya Meminimalisasi Potential Tax Risk."* Jurnal Akuntansi Pemerintah Vol.3 No.1, Oktober 2008.
- Sharon, Craig A. Artikel: *"Announcement and Report Concerning APA."* IRS. March 27, 2009
- Yung Fang Wendy Guo, *"A Special Report in China, in Transfer Pricing, 4th Edition"*. International Tax Review. London, 2000.

E. Lain - lain

- Ernst and Young: *Transfer Pricing 2003 Global Survey practices, perceptions and trends in 22 countries.* 2003
- Deloitte. *"Strategy Matrix for Global Transfer Pricing."* Planning for Methods, Documentation, Penalties, and Other Issues. 2008.
- Departement of Economic & Social Affairs. *"United Nations Model Double Taxation Convention Between Developed and Developing Countries."* United Nations, New York, 2001
- OECD. *"Transfer Pricing Guidelines for Multinational Enterprises and Tax Administration."* Paris July 1995.
- PricewaterhouseCoopers. *"International Transfer Pricing 2008."* Tahun 2008.