

## DAFTAR PUSTAKA

### I. BUKU

- Surahmat, Rachmanto (2001), *Persetujuan Penghindaran Pajak Berganda (Sebuah Pengantar)*, PT Gramedia Pustaka Utama, Jakarta.
- Gunadi. (2007). *Pajak Internasional Edisi Revisi*, Lembaga Penerbit Fakultas Ekonomi Universitas Indonesia, Jakarta.
- Bungin, Burhan. (2007). *Penelitian Kualitatif: Komunikasi, Ekonomi, Kebijakan Publik , dan Ilmu Sosial Lainnya*, Kencana Prenada Media Group, Jakarta.
- Irawan, Prasetya. (2007). *Penelitian Kuantitatif & Kuantitatif Untuk Ilmu-ilmu Sosial*, Departemen Ilmu Administrasi Fakultas Ilmu Sosial dan Ilmu Politik Universitas Indonesia, Jakarta.
- Nurmantu, Safri. (2003). *Pengantar Perpajakan*, Granit, Kelompok Yayasan Obor Indonesia, Jakarta.
- Ladjamudin, Al Bahra Bin (2006). *Rekayasa Perangkat Lunak*, Penerbit Graha Ilmu, Yogyakarta.
- Isenbergh, Joseph. (2005). *International Taxation (Concepts and Insights)*. Foundation Press.
- Russo, Raffaele. (2005). *The Attribution of Profits to Permanent Establishment*. International Bureau of Fiscal Documentation Publication Incorporation, USA.
- Barenfeld, Jesper (2005). *Taxation of Cross-Border Partnerships : Double Tax Relief in Hybrid and Reverse Hybrid Situations*, International Bureau of Fiscal Documentation Publication Incorporation, USA.
- W. Lawrence, Neuman (2000), *Social Research Methods: Qualitative and Quantitative Approaches*, 4th ed. Boston: Allyn and Bacon, USA.
- Daymon, Christine (2008), *Metode-Metode Riset Kualitatif dalam Public Relations & Marketing Communications*. Mizan Media Utama, Jakarta.
- Mulyono, Hasyim (2008). *Buku Pintar Komputer*. Kriya Pustaka, Jakarta.
- Singarimbun, Masri (editor). (1987). Metode Penelitian Survai. Lembaga Penelitian, Pendidikan dan Penerangan Ekonomi dan Sosial (LP3ES), Jakarta.
- Faisal, Sanafiyah, (1990). *Penelitian Kualitatif Dasar-Dasar dan Aplikasinya*. Yayasan Asah Asih Asuh, Malang.
- Arikunto, Suharsimi, (1998), *Metode Penelitian; Suatu Pendekatan Praktek*, Rineka Cipta, Jakarta.

Hadi, Sutrisno. (1989). *Metodologi Research II*. Penerbit Andi Offset, Yogyakarta.

Basrowi dan Sukidin, (2002). *Metode Penelitian Kualitatif Perspektif Mikro (Grounded Theory, Feneomenologi, Etnometodologi, Etnografi, Dramaturgi, Interaksi Simbolik, Hermeneutik, Konstruksi Sosial, Analisis Wacana, dan Metode Refleksi)*, Insan Cendekia. Surabaya.

Moleong, L. J. (2004). *Metodologi Penelitian Kualitatif*; PT Remaja Rosdakarya, Bandung

## II. JURNAL

Goradia, Shefali (1998). *International Taxation of Software*, Nishith Desai Associates, <http://www.nishithdesai.com/Research-Papers/International%20Taxation%20of%20Software.pdf>

Shah, Nirav (2003). *Tax Treatment of Software Licence Payments – An Indian Perspective*, Asia-Pacific Tax Bulletin.

Heredia, Alejandro García (2005). *Software Royalties in Tax Treaties: Should Copyright Rights Be Reconsidered in the OECD Commentary on Article 12?*, Asia-Pacific Tax Bulletin.

The eComTaxpert Group (2002). *Taxation Of Electronic Commerce In India*, Nishith Desai Associates. <http://lawthinktank.com/Final-Ecomtaxpert.pdf>

Tschang, Ted (2003). *China's Software Industry and Its Implications for India*. OECD Development Centre Technical Papers No. 205. OECD, Paris

Nollen, Stanley (2004). *Intellectual Property in the Indian Software Industry: Past Role and Future Need*. McDonough School of Business Georgetown University Washington, DC, USA. [http://www.iipi.org/reports/India\\_Software.pdf](http://www.iipi.org/reports/India_Software.pdf)

Shah, Daksha Baxi and Bijal (2000). *Electronic Commerce Taxation Evolves in India*, Special Reports Tax Notes International.

Seth, Shreyas Jhaveri and Mansi (2008). *Software Taxation in India Takes a U – Turn*, Tax Notes International.

Li, Jinyan (2000). *E-Commerce Taxation In China*. Special Reports Tax Notes, Tax Notes International Journal. USA.

Li, Jinyan (1995). *Tax Implications of Doing Business in China*. Canadian Tax Journal, Canada. [http://www.ctf.ca/PDF/95ctj/1995CTJ1\\_Li.pdf](http://www.ctf.ca/PDF/95ctj/1995CTJ1_Li.pdf)

Sarwono, Jonathan. (2003). *Strategi Melakukan Penelitian di Internet*. [http://js.unikom.ac.id/o\\_r/vdr.html](http://js.unikom.ac.id/o_r/vdr.html)

Cohen,, Vinod Valloppillil dan Josh, (1998). *Open Source System and Analyzes Linux and its strategic impact in Windows*. Microsoft Confidential. USA  
<http://iowa.gotthefacts.org/011607/6000/PX06501.pdf>

Balakrishnan, Pulapre. (2006). *Benign Neglect or Strategic Intent? Contested Lineage of Indian Software Industry*. Economic and Political Weekly. India.  
[http://www.psb1.uum.edu.my/terkini/2007/Januari/second/Ekonomi/Economic%20and%20Political%20Weekly%20\(Vol.41,No.36,Sept.2006\).pdf](http://www.psb1.uum.edu.my/terkini/2007/Januari/second/Ekonomi/Economic%20and%20Political%20Weekly%20(Vol.41,No.36,Sept.2006).pdf)

### III. PERATURAN

Undang-undang Nomor 36 Tahun 2008 Tentang Perubahan Keempat Atas Undang-undang Nomor 7 Tahun 1983 Tentang Pajak Penghasilan.

*Income Tax Act, 1961, as Amended by Finance Act, 2008, National Website of the Income Tax Department of India,* <http://www.incometaxindia.gov.in/>

*Provisional Regulations on Enterprise Income Tax of the People's Republic of China,* <http://www.chinatax.gov.cn/n6669073/n6669088/6888563.html>, 2009

*Income Tax Law of the People's Republic of China on Enterprises with Foreign Investment and Foreign Enterprises,* <http://www.chinatax.gov.cn/n6669073/n6669088/6888509.html>

*Model Tax Convention on Income and on Capital, Condensed Version*, OECD, July 2008

*OECD Council, Tax Treatment of Software, April 2000*

*Articles of the United Nations Model Double Taxation Convention Between Developed and Developing Countries*, United Nations 2001  
[http://faculty.law.wayne.edu/tad/Documents/Tax\\_treaties/UN\\_Model\\_01.pdf](http://faculty.law.wayne.edu/tad/Documents/Tax_treaties/UN_Model_01.pdf)

Keputusan Direktur Jenderal Pajak Nomor KEP-316/PJ./2002 tanggal 17 Juni 2002 tentang Perlakuan Pajak Penghasilan Atas Pengeluaran/Biaya Perolehan Perangkat Lunak (*Software*) Komputer

### IV. TESIS

Cuaca. (2006). *Analisis Sengketa Perpajakan Atas Perbedaan Interpretasi Pengertian Royalti (Studi Kasus Perencanaan Pajak yang dilakukan oleh PT XYZ)*, Tesis, Pasca FISIP UI.

Muchamad Arifin, (2005). *Analisa Kebijakan Pajak Penghasilan atas Transaksi dengan E-commerce*. Tesis, Pasca FISIP UI

## V. MEDIA INTERNET

Hertiana (2009), *Pendapatan Software SAP Asia Pasifik dan Jepang Tumbuh 23% pada 2008*, SDA News, <http://www.sda-indo.com/>, diakses tanggal : 12 Februari 2009

Yurnalis, Widia (2007), *Pajak Royalti Rancu?*, SDA News, <http://www.sda-indo.com/>, diakses tanggal : 25 Mei 2009

Suryadhi, Ardhi (2007), *Software Kadang Masih Kena Pajak Royalti*. Detikinet, [www.detik.com](http://www.detik.com), diakses tanggal : 15 Februari 2009

Calvary, Rizal (2009), *2012, Pasar TI Indonesia Diproyeksikan Rp 59,7 T*, Investor Daily, [www.investorindonesia.com](http://www.investorindonesia.com), diakses tanggal : 30 April 2009

