

No. 3654. CONVENTION BETWEEN THE ITALIAN REPUBLIC AND THE UNITED STATES OF AMERICA FOR THE AVOIDANCE OF DOUBLE TAXATION AND THE PREVENTION OF FISCAL EVASION WITH RESPECT TO TAXES ON INCOME. SIGNED AT WASHINGTON ON 30 MARCH 1955<sup>1</sup>

EXCHANGE OF NOTES CONSTITUTING AN AGREEMENT<sup>2</sup> CONTINUING APPLICATION OF THE ABOVE-MENTIONED CONVENTION TO THE NEW ITALIAN TAXES ON INCOME. ROME, 13 DECEMBER 1974

*Authentic texts: Italian and English.*

*Registered by the United States of America on 11 March 1976.*

I

[ITALIAN TEXT — TEXTE ITALIEN]

MINISTERO DEGLI AFFARI ESTERI

Roma, 13 dicembre 1974

Signor Ambasciatore,

Ho l'onore di riferirmi alla Convenzione tra gli Stati Uniti d'America e la Repubblica Italiana per evitare le doppie imposizioni e per prevenire le evasioni fiscali in materia di imposte sul reddito, firmata a Washington il 30 marzo 1955.

Come è noto, il Governo italiano ha attuato radicali mutamenti nel suo sistema fiscale con effetto dal 1° gennaio 1974.

Al fine di mantenere le relazioni di reciproco vantaggio che si sono sviluppate tra i nostri due Paesi nell'ambito della Convenzione, ed in attesa di procedere al rinnovo di quest'ultima, il Governo italiano propone di applicare in via provvisoria la citata Convenzione alle nuove imposte statali sui redditi, con decorrenza dal 1° gennaio 1974, al fine di consentire la continuità nell'applicazione della Convenzione stessa.

A tale scopo il Governo italiano darà applicazione alle norme della Convenzione a decorrere dal 1° gennaio 1974 con riferimento a: (1) l'imposta sul reddito delle persone fisiche e (2) l'imposta sul reddito delle persone giuridiche.

Ho l'onore di proporre che la presente Nota e la risposta che V.E. vorrà indirizzarmi costituiranno un accordo fra i nostri due Governi ai fini dell'applicazione della Convenzione suddetta.

Voglia gradire, Signor Ambasciatore, i sensi della mia più alta considerazione.

[Signed — Signé]<sup>3</sup>

S.E. John A. Volpe  
Ambasciatore degli Stati Uniti d'America  
Roma

<sup>1</sup> United Nations, *Treaty Series*, vol. 257, p. 169.

<sup>2</sup> Came into force provisionally on 13 December 1974 by the exchange of the said notes, with retroactive effect from 1 January 1974, in accordance with the provisions of the said notes.

<sup>3</sup> Signed by Cesidio Guazzaroni — Signé par Cesidio Guazzaroni.

[TRANSLATION — TRADUCTION]

*The Italian Director General for Economic Affairs, Ministry of Foreign Affairs,  
to the American Ambassador*

MINISTRY OF FOREIGN AFFAIRS

Rome, 13 December 1974

Dear Mr. Ambassador:

[See note II]

Please accept, Mr. Ambassador, the assurances of my highest consideration.

[CESIDIO GUAZZARONI]

S.E. John A. Volpe  
Ambassador of the United States of America  
Rome

## II

*The American Ambassador to the Italian Director General for Economic Affairs,  
Ministry of Foreign Affairs*

Rome, December 13, 1974

Dear Mr. Ambassador:

I have the honor to refer to your note of today's date which reads in translation as follows:

"I have the honor to refer to the Convention between the United States of America and the Italian Republic for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income, signed at Washington on March 30, 1955.<sup>1</sup>

"As you are aware, the Italian Government made fundamental changes in its tax structure with effect from January 1, 1974.

"In order to continue the mutually advantageous relationships which have developed between our two countries under the Convention, and in anticipation of a renegotiation of the Convention, the Italian Government proposes to apply provisionally the Convention to the two new State taxes on income, effective as of January 1, 1974, in order to assure the continued application of the aforementioned Convention.

"Accordingly the Italian Government will, from and as of January 1, 1974, apply the provisions of the Convention to (1) the income tax on physical persons (*l'imposta sul reddito delle persone fisiche*) and (2) the income tax on juridical persons (*l'imposta sul reddito delle persone giuridiche*).

"I have the honor to propose that the present note and your reply thereto will constitute an agreement between the two governments for the purpose of the application of the aforementioned Convention."

I have the honor to confirm to you that my Government is in agreement with the statements in Your Excellency's Note.

<sup>1</sup> United Nations, *Treaty Series*, vol. 257, p. 169.

Please accept, Dear Mr. Ambassador, the assurances of my highest consideration.

Sincerely,

*[Signed]*

JOHN A. VOLPE

His Excellency Cesidio Guazzaroni  
Director General for Economic Affairs  
Ministry of Foreign Affairs  
Rome

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