

**TABLE OF CONTENTS / LIST OF AUTHORS**

Preface	The impact of US domestic law on the application of the Treaty	David Benson Luc Rampen	Partner at Ernst & Young Senior Manager at Ernst & Young
Art. 1	General Scope	Werner Huygen	Partner at Ernst & Young
Art. 2	Taxes Covered	Renaat Van den Eeckhaut Nicolas Tancredi	Partner at Deloitte Senior at Deloitte
Art. 3	General Definitions	Luc De Broe  Robert Neyt	Professor at Katholieke Universiteit Leuven, Of Counsel at Stibbe Associate at Loyens & Loeff, Researcher at Katholieke Universiteit Leuven
Art. 4	Resident	Philippe Hinnekens	Partner at Eubelius
Art. 5	Permanent Establishment	Steven Claes	Partner at Ernst & Young
Art. 6	Income from Real Property	Werner Huygen	Partner at Ernst & Young
Art. 7	Business Profit	Tim Wustenberghs	Partner at Laga, Professor at Universiteit Antwerpen
Art. 8	Shipping and Air Transport	Kristof Spagnoli	Partner at Eubelius
Art. 9	Associated Enterprises	Patrick Cauwenbergh  Ann Gaublomme	Partner at Deloitte, Professor at Universiteit Antwerpen Senior Manager at Deloitte
Art. 10	Dividends	Alain Huyghe Géry Bombeke	Partner at Baker & McKenzie Senior Associate at Baker & McKenzie
Art. 11	Interest	Jan Van Gompel	Head Tax Investment Banking at Fortis Bank
Art. 12	Royalties	Enrico Schoonvliet	Partner at Loyens & Loeff
Art. 13	Gains	Marc De Munter	Partner at DLA Piper
Art. 14	Income from Employment	Bernard Peeters	Partner at Tiberghien Advocaten, Lecturer at Vrije Universiteit Brussel
Art. 15	Directors' Fees	Camille Lebègue	Counsel at Loyens & Loeff
Art. 16	Entertainers and Sportsmen	Bart Peeters	Researcher at FWO Vlaanderen
Art. 17	Pensions	Marc Vandendijk Chantal Hendrickx	Partners at Vandendijk & Partners Advocaten- Avocats
Art. 18	Government Service	Renaat Van den Eeckhaut	Partner at Deloitte
Art. 19	Students, Trainees, Teachers and Researchers	Renaat Van den Eeckhaut Nicolas Tancredi	Partner at Deloitte Senior at Deloitte
Art. 20	Other Income	Anne Van de Vijver	Senior Manager at Ernst & Young, Researcher at Universiteit Antwerpen
Art. 21	Limitation on Benefits	Arthur Bax	Knowledge Manager at PricewaterhouseCoopers
Art. 22	Relief from Double Taxation	Marnix Van Keirsbilck	Partner at Dumon, Sablon Vanheeswijck
Art. 23	Non-Discrimination	Werner Heyvaert Kim Bronselaer	Partner at Stibbe Associate at Stibbe, Researcher at Vrije Universiteit Brussel
Art. 24	Mutual Agreement Procedure	Howard Liebman Michael Plodek	Partner at Jones Day Tax Counsel at Lockheed Martin Corporation
Art. 25	Exchange of Information	Caroline Docclo	Of Counsel at Tiberghien Advocaten, Professor at Université Libre, Bruxelles
Art. 26	Assistance in Collection	Tom Jansen	Officer at Federal Public Service of Finance, Professor at Fiscale Hogeschool
Art. 27	Members of Diplomatic Missions and Consular Posts	Nicolas Angelet  Jean-Michel Degee	Partner at Liedekerke, Wolters, Waelbroeck, Kirkpatrick, Professor at Université Libre, Bruxelles Partner at Liedekerke, Wolters, Waelbroeck, Kirkpatrick
Art. 28	Entry into Force	Anne Van de Vijver	Senior Manager at Ernst & Young, Researcher at Universiteit Antwerpen
Art. 29	Termination	Anne Van de Vijver	Senior Manager at Ernst & Young, Researcher at Universiteit Antwerpen