Essays on the Macroeconomic Effects of Taxation

by

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A Dissertation Presented in Partial Fulfillment
of the Requirements for the Degree
Doctor of Philosophy

Approved April 2018 by the
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ARIZONA STATE UNIVERSITY

May 2018

ABSTRACT

This dissertation is a collection of two essays relating to the dynamic effects of taxation.

In the first chapter, I focus on a key challenge faced by tax reforms: their short-run welfare consequences. I examine a consumption-based tax reform that, despite the long-run welfare gains it generates, causes the welfare for some groups such as retirees or the working poor to fall during transition between steady states. Using a life-cycle model with heterogeneous households, I show how to devise a transition path from the current U.S. federal tax system to a consumption-based tax system that improves the welfare of current generations as well as those who are born in the long-run steady state. In a nutshell, all households alive at the time of the policy change can choose when they want to switch to the new tax system, or whether they want to switch at all. I find that implementing a tax reform with this feature improves the welfare of 95% of the population in the short run, compared to less than 25% of population in the conventional case with no choice. It takes about 20 years for half of the population to pay their taxes under the new tax code.

In the second chapter, I study the aggregate consequences of the differential tax treatments of U.S. businesses focusing on the role of legal forms of organization. I develop an industry equilibrium model in which the organizational form is an endogenous choice. This model incorporates the key trade-off that businesses face when choosing their legal forms: the tax treatment of the business income; the access to external capital, and the potential level and evolution of productivity over time. The model is matched to the firm dynamic features of U.S. businesses and the contributing share of each legal form in total output. Using the model, I study revenue-neutral tax reforms in which legal forms receive the same tax treatments,

and I find that the incentives induced by tax structure for organizational form and external finance are both large. Relative to the benchmark economy, unifying the tax code for all legal forms, can lead to 8% increase in the aggregate output.

To

My parents,

because I owe it all to you. qorbuneton beram!

My Husband,

for letting me experience the kind of love

that people freely die for

ACKNOWLEDGMENTS

First, I would like to express my sincere gratitude to my adviser Gustavo Ventura for continuous support of my Ph.D. study and related research, for his patience, motivation, and immense knowledge. His guidance helped me during the research and writing of this dissertation. I could not imagine having a better adviser and mentor for my Ph.D. study.

Second, I would like to thank the members of my dissertation committee, Berthold Herrendorf and Alexander Bick, for their insightful comments and encouragement, and also for the hard questions that inspired me to broaden my research. Without their valued support, it would not have been possible to conduct this research.

I am grateful to my loving parents, Mahboubeh and Mahmoud, and my darling sisters , Saeedeh and Bahareh. There were moments during this journey when I could not be with them though they needed me. I am grateful for their love and understanding. I thank with love my husband, Pedram. Understanding me best as a Ph.D. student himself, Pedram has been my best friend and great companion and has loved, supported, encouraged, entertained, and helped me get through this agonizing period in the most positive way.

And, last but by no means least, I thank everyone in the Department of Economics. It had been a great journey with all of you these last five years.

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Chapter 1

INTRODUCTION

This dissertation is a collection of two essays relating to the dynamic effects of taxation.

The standard overlapping generations model predicts large efficiency and welfare gains in the long run from using consumption as the tax base instead of income. Nevertheless, considering the transitional dynamics of the tax reform indicates that, despite the potential large long-run welfare gains, moving toward a consumption-based tax system involves substantial welfare losses along the transition. So the main challenge in such policy reforms is to design a transition that addresses the short-run welfare consequences of the reform. In the first chapter of my dissertation, I propose an alternative method for implementing such a tax reform: allowing everyone, who is alive during the first transition period, to choose the preferred tax system. Therefore, those who face losses with the new tax code can stay in the old one. In words, I endogenize peoples move to the new system. The spirit of this method which I call gradual method- allowing agents a choice between alternative policies- is more general. In fact, it is useful for implementing policy reforms that create welfare gains in the long run but entail negative welfare consequences in the short run, social security reform is one of them. In my paper I choose to describe the gradual method in the context of a proportional consumption tax reform, in which, the current federal income tax system, which is an income-based tax system, is substituted with a proportional consumption-based tax system.

The model that I use in the paper is a heterogeneous overlapping generation

model, because the evaluation of large-scale government programs or policy changes, ideally requires models that take into account both general equilibrium effects and the heterogeneous impact of policies across the population. Therefore, heterogeneous OLG model is a natural choice, and I extend it to incorporate the choice of the preferred tax system during transitional periods. This means that solving the model in transitional periods requires dealing with a non-standard transition path.

The idea of a voluntary switch to the new tax system that I put forth in the paper makes adopting the new tax system a protracted process. The first groups who switch to the new system are the younger, more productive generations who benefit from avoiding the non-linearity of the current tax system. While those who are negatively impacted in the conventional reform-the poor and agents in older generations-are among the last groups to switch to the new system. The cost of the gradual implementation is that it takes longer for the economy to reach the new steady state, and realize the long-run effects of the new tax system. I find that implementing the tax reform gradually, results in having 95% of population supporting the reform, while the corresponding percentage under the conventional reform in only 24.6%. Another thing to point out is that the gradual method removes almost all the welfare losses for those alive at the time of the reform along with decreasing the gains for the winners of that group. In other word, it is a way to shrink the variation of the welfare effects as well.

The second chapter, titled "Taxation and Legal Form of Organization", is focused on the firm-side of the economy and how it has been affected by the corporate tax.

Since the passage of the Tax Reform Act of 1986 the significance that various types of organizational forms have played in business activity has changed dramatically. The share of businesses organized as pass-thorough entities (e.g. S-corporations, who

are not subject to corporate income tax), in total U.S. business receipts increased from 16.1% in 1986 to 38.8% in 2012, while the share of traditional C-corporations in total number of businesses, declined from 16% to 4.9%. A series of tax reforms and changes in legislation over this period made pass through legal forms of organization more attractive choices for many businesses and played significant roles in creating this dramatic alteration of distribution of legal forms of businesses over time.

In this chapter I argue that choosing a legal form of organization based on the tax treatment of businesses distorts the capital allocation and affects the size of aggregate output. I develop a model of firm dynamics in which the legal form of organization is an endogenous choice for businesses that are heterogeneous with respect to their productivity. The model captures the trade-off between tax treatments of each form of organization and the access to capital. I calibrate the model to be consistent with the firm dynamic characteristics of the U.S. businesses as well as the contributing share of each legal form in total output. Using the calibrated model and taking into consideration the general equilibrium effect under the assumption of revenue neutrality, I find that unifying the tax treatment across all legal form of businesses increases aggregate output by 8 percentage points in the long run. The key for this finding is that removing the tax distortions affecting the choice of legal form of organization reallocates the capital towards more productive firms and improves the aggregate output.

Chapter 2

GRADUAL TAX REFORMS: IF YOU LIKE IT, YOU CAN KEEP IT

A key challenge faced by tax reforms is their short-run welfare consequences. In this paper, I focus on a consumption-based tax reform that, despite the long-run welfare gains it generates, causes the welfare for some groups such as retirees or the working poor to fall during transition between steady states. Using a life-cycle model with heterogeneous households, I show how to devise a transition path from the current U.S. federal tax system to a consumption-based tax system that improves the welfare of current generations as well as those who are born in the long-run steady state. In a nutshell, all households alive at the time of the policy change can choose when they want to switch to the new tax system, or whether they want to switch at all. I find that implementing a tax reform with this feature improves the welfare of 95% of the population in the short run, compared to less than 25% of population in the simple case with no choice. It takes about 20 years for half of the population to pay their taxes under the new tax code.

2.1 Introduction

Multiple features of the current U.S. federal tax system make the study of tax reforms an important object of research. Many proposals for reformulating the tax code suggest eliminating individual and corporate income taxes and implementing a new tax system based on consumption Zodrow and Mieszkowski(2008)([52]). Several authors show that replacing the current federal tax system with a system that levies taxes on all income with complete deductibility of savings would increase the economy's long-run output and improve the welfare of people born in the new steady state. This result mainly comes from the fact that taxing consumption does not distort saving decisions at the margin. Ventura(1997)[49] and Altig et al.(2001)[1], among others, show that a newborn agent would prefer to be born into the steady state of the economy with a consumption tax system rather than the one with the progressive income tax and capital income tax system.

However, Except for few papers like Altig et al.(2001)[1], the short-run welfare consequences of such a reform have not been addressed in existing literature. The central problem is that although consumption-based tax reform leads to welfare gains in the long run, achieving these gains typically involves welfare losses for generations who are alive at the time of the tax reform. Therefore, these individuals would favor the status quo over the reformed tax regime. Hence, it is challenging to implement a consumption tax reform that is simultaneously welfare improving for both current generations and those born in the long run.

In this paper I address this issue. I build an equilibrium life-cycle model with heterogeneous households and endogenous labor supply. Using this model, I show that a move from the current U.S. federal income tax system to a flat consumption tax system can be feasible as well as welfare improving for households alive at the

time of the policy change. The key to this result is that I allow for a voluntary rather than compulsory switch to the new tax regime for generations alive at the time of the policy change. In a nutshell, all households who are alive during the first period of the transition can choose their preferred tax system: the benchmark tax system or the consumption tax system. In my analysis, I explicitly endogenize households' move to the new tax system, and quantify the aggregate as well as the welfare implications of this reform.

My paper builds on the tradition of analyzing the transition dynamics in overlapping generation economies, in the spirit of Auerbach and Kotlikoff(1987)[4]. I compute the perfect-foresight transition path, with the initial state parametrized to the current U.S. federal tax system (hereafter the benchmark tax system). I keep the government revenue constant along the transition and in the new steady state. Thus, the result I obtain do not depend on an issuance of government debt to finance the new regime. The model features within-cohort heterogeneity, with differences arising from agents' permanent productivity types, which also evolve as they age. I study the effects of the new tax system on different birth cohorts and different income groups.

I first consider a *simple* form of revenue-neutral transition from the steady state of the benchmark economy toward the steady state of the economy with a flat consumption tax. In this version, after the date of the policy change, all households who are alive at the time of the tax reform, along with those who are born in the new tax system, are taxed using the reformed tax code (a flat consumption tax). Doing a conventional reform in my calibrated model illustrates the tension; future generations born in the long run benefit from the reform while more than 75% of generations who are alive at the time of the reform experience welfare losses.

Then I introduce a flexible form of revenue-neutral transition, which I refer to as the **gradual tax reform**. In the gradual tax reform, all households who are alive at the time of the policy change have the option of choosing between the benchmark tax system and the consumption tax system, with one condition: having chosen the new tax system, they cannot go back to the old one. For all households who are born after the reform, the new tax code (the flat consumption tax) applies.

In principle, welfare effects for all generations depend on their ages, productivity abilities, and asset holdings. Changing the tax base from income to consumption, changes the distribution of tax burden across generations. In the simple tax reform, during the first transition period, the young, more productive agents are largely unaffected, or they experience welfare gains. However, the elderly agents face welfare losses independent of their productivity types. Older generations, who possess a large share of capital stock, and do not have a labor income, face a higher tax burden in the consumption tax system. This group are mainly consuming out of their wealth which they saved from their after-tax income. Therefore, consumption taxes are levied on their wealth, hence placing a higher burden on older agents. Likewise, the low-productivity agents lose given the non-linear features of current tax system. Altogether, in the first period of transition, 75.6% of agents experience welfare losses and only 24.6% of the population enjoy welfare gains and hence, would favor the tax reform.

By presenting all agents alive at the time of policy change with the choice of their preferred tax system, the gradual tax reform improves the welfare effects compared to the simple tax reform. In the first period of transition, welfare losses are negligible and about 95% of the population experience welfare gains and favor the tax reform. However, these gains are not for free, and the important differences lie in the speed of

the transition to the new steady state. With the gradual tax reform, it takes 1.7 times longer for the economy to reach the new steady state, implying that the beneficial effects of the new tax system materialize more slowly in the gradual tax reform. Another consequence of introducing the tax reform gradually is that adopting the new tax system is a protracted process. Because of the revenue-neutral nature of the reform, the consumption tax rates are higher in the initial periods of the transition. The higher consumption tax rate translates into a higher tax burden on those who are born in the new tax system and affects their welfare.

The paper is organized as follows: Section 2 provides a review of the related literature. Section 3 presents the life-cycle model. Section 4 discusses its parametrization. Sections 5 and 6 contain the main results. Critical discussions of the results including additional exercises and sensitivity analysis are presented in Section 7, and Section 8 concludes.

2.1.1 Related Literature

The long-run welfare implications of various tax reforms are the focus of many studies (see, e.g., Hall et al. (1995)[26], Ventura (1999)[50], Altig et al. (2001)[1], Diaz Gimenez and Pijoan-Mas (2206)[14], Domeij and Heathcote (2004)[16], Nishiyama and Smetters (2007a)[43], Lopez-Daneri (2016)[39]). Except for Altig et al.(2001)[1], these studies mainly focus on the long-run effects of modifying the tax code and do not explore the effects of tax structure on generations living through the initial transition periods to the new steady state.

One of the pioneering papers that considers the transitional effects of tax changes is Summers (1981)[48]. In this paper, Summers compares steady state utility for a model with fixed labor supply; his study also attempts to measure the efficiency

consequences of an explicit transition from one tax system to another. Summers' transition analysis, however, is based on the assumption of myopic rather than rational expectation and he assumes a completely inelastic supply of labor.

Altig et al. (2001)[1] and Auerbach and Kotlikoff (1983)[3] are two papers that analyze the consequences of tax reforms along the transition path. Altig et al. (2001)[1] use a general equilibrium simulation model with intragenerational heterogeneity to examine the consequences of a revenue-neutral move from an income tax system to some alternative consumption-based tax system, such as a flat income tax and a flat-rate consumption tax system. They compute the entire transition path and conclude that the poor members of generations alive at the time of the policy change lose under the flat-rate consumption tax system.

The point of departure of this paper is to examine short-run as well as long-run consequences of the reforms while highlighting the difficulties and to suggest a practical solution grounded in economic theory. The method of gradual tax reform is a practical way to implement any structural tax reform. Notice that although the method is discussed in the context of a consumption tax reform, it is a broadly applicable framework for implementing any policy reform that provides higher welfare in the long run. One potential context is reforming the social security system, see Huggett and Ventura(1999)[33], Conesa and Krueger(1999)[10] among others, for discussions. In fact, several papers study the transitional dynamics of moving to a privatized social security and find sizable welfare gains in the long run , along with considerable short-run welfare losses that cannot be compensated with the long-run gains, see Huang et al.(1997) [32], Kotlikoff et al.(2001)[37], Feldstein and Samwick (1998)[18] and Nishiyama and Smetters (2007b)[44] as examples.

My paper is related to the literature that focuses on studying taxation in the

dynamic general equilibrium model, such as those proposed by Conesa and Krueger (2006)[11], Guner et al. (2012)[23], Badel and Hugget (2014)[5], and Guner et al. (2016)[25].

2.2 Model

I study a discrete time general equilibrium life-cycle economy with individual heterogeneity and endogenous labor supply.

2.2.1 Demographics

The economy is populated by J heterogeneous overlapping generations. Each period, a continuum of agents are born and live for J periods. Population at time t is denoted by N_t and grows at a constant rate n , that is $N_{t+1} = (1+n)N_t$. The demographic structure is stationary such that age j agents constitute a fraction μ_j of the population at each point in time.

2.2.2 Preferences

All agents value the path of consumption and leisure according to the following utility function:

$$\sum_{j=1}^{J} \beta^{j-1} u(c_j, l_j), \tag{2.1}$$

where c_j and l_j denote consumption and labor at age j. The period utility function is

$$u(c_j, l_j) = \log(c_j) - \frac{l_j^{1+\frac{1}{\gamma}}}{1+\frac{1}{\gamma}}, \tag{2.2}$$

where γ is the Frisch elasticity .

2.2.3 Technology

The production technology is represented by a Cobb-Douglas production function that transforms capital K and labor L into output Y according to

$$Y = K^{\alpha} L^{1-\alpha}, \tag{2.3}$$

where α is the capital share parameter. The resource constraint is

$$C_t + K_{t+1} - K_t(1-\delta) + G_t \leqslant K_t^{\alpha} L_t^{1-\alpha}, \tag{2.4}$$

where Υ is the depreciation rate of the capital stock, G_t is public consumption, and C_t is aggregate private consumption.

2.2.4 Individual Constraints

All agents are born with no assets and face mandatory retirement at age $T+1$; that is they work for T periods and then live as a retiree for T^R periods.

The market return per hour of labor supplied by an age j agent at time t is given by $w_t e(z,j)$, where w_t is the wage rate that is common to all agents and $e(z,j)$ is a function that represents the efficiency units that combines the effects of age j and a permanent productivity shock z with $z \in \mathcal{Z}$, $\mathcal{Z} \subset \mathscr{R}^+$. Each newborn agent draws a productivity shock z from the probability distribution $F(z)$, which remains constant during the working life cycle. In what follows, I call the agent with the productivity shock z, the type z agent.

A agent of age j and type z with $e(z,j)$ efficiency units chooses consumption $c_{j,t}$, labor hours $l_{j,t}$, and level of asset holdings for next period $a_{j+1,t+1}$. The budget constraint is:

$$c_{j,t} + a_{j+1,t+1} \leqslant a_{j,t}(1+r_t) + (1-\tau^{ss}) w_t e(z,j) l_t + b_{j,t} - Tj, t, \tag{2.5}$$

$$c_{j,t} \geqslant 0, \tag{2.6}$$

$$a_{j+1,t+1} \geqslant \underline{a}\ \forall j, \tag{2.7}$$

where $a_{j,t}$ is the asset holding at age j and time t; r_t is the risk-free net return on asset holding; τ^{ss} is the constant flat social security tax rate on labor earning; $b_{j,t}$ is the social security benefit, which equals 0 at working ages and a fixed benefit during

the retirement periods; and $T_{j,t}$ are taxes paid. The constraint $a_{j+1,t+1} \geqslant \underline{a}$ implies that agents are not allowed to borrow beyond a borrowing constraint.

2.2.5 Government, Taxes, and Transfers

In this model economy, at each period the government engages in three activities: it spends resources (consumes G), it levies taxes (to finance government consumption G), and it runs a balanced budget social security system.

The social security system is fully funded by social security taxes paid by working agents at a constant marginal tax rate τ^{SS} on their labor income. Social security benefits are distributed evenly among all retirees of different types and different ages i.e. the benefit for each retired agent does not depend on her earning history.

The government finances its consumption G merely through taxation. The current U.S. federal tax system is taken as the benchmark case. To mimic its main features, taxes paid by each agent consist of two components: a flat-rate capital income tax and a non-linear income tax, for which, the tax is levied on labor and capital income as well as social security transfer during the retirement periods:

$$I \equiv \omega e(z,j)l + ra + b_{j,t} \ \ , \ \ for\ all\ \ z\ \ and\ \ j, \tag{2.8}$$

This means that in the benchmark case, the total income tax liability for an agent with income I is

$$T = T_f(I) + \tau^k ar, \tag{2.9}$$

where T_f is a strictly increasing and convex function that represents the nonlinear income tax scheme, and τ^k is the flat capital income tax rate, which replicates the corporate tax in the federal tax system. In the benchmark tax system, for an agent with income I, the marginal tax rate on capital income equals $T_f'(I) + \tau^k$, and the

marginal tax rate on labor income equals $T_f'(I) + \tau^{SS}$.

In the reform scenario, a flat rate consumption tax replaces the U.S. federal income tax, leaving the social security system unchanged. That is, the progressive income tax and the capital income tax are eliminated, and all agents pay a constant tax rate on each unit of consumption and receive a lump-sum transfer. Thus, in the reformed case, the total tax liability for the agent is

$$T = \tau^c c + TR, \tag{2.10}$$

where TR is the fixed lump-sum transfer that agents receive at each period.

2.2.6 Recursive Formulation

In this section I state the decision problem of an agent in my economy in a recursive form. First, I describe the decision problem for the agent when the economy is at the steady state. Then, I demonstrate how the problem changes when the economy is out of the steady state, that is, in the transition from the old steady state to the new steady state.

Steady State

The state of each agent is fully described by the agent's asset holdings a, her type z, and her age j. Time subscripts are dropped as I describe the stationary equilibrium. Let the nonage-dependent part of the state vector be described by $x = (a, z),\ x \in \mathscr{X}$, where a is the current asset holding and z is the permanent productivity shock for the agent that determines her type. The set $\mathscr{X}$ is $\mathscr{X} = [0, \infty) \times \mathscr{Z}$. Therefore, the state vector for any agent is (x, j).

Given the prices (w, r) and the tax regimes ($\Upsilon \in \{B$ *(the benchmark tax system)*

, *R (the reformed tax system)*}), an agent with state (x, j) needs to optimally choose the amount of labor $l(x, j)$ to supply to the market, the amount of consumption $c(x, j)$, and the amount of saving or assets to carry over to the next period $a(x, j)$, in such a way that these choices solve the following dynamic programming problem:

- Working agents ($j \leqslant T$):

$$v(x, j) = \max_{c,l,a'} \Big\{ u(c, l) + \beta v(x', j + 1) \Big\} \tag{2.11}$$

subject to

$$\begin{aligned} c + a' &\leqslant a(1 + r) + we(z, j)l(1 - \tau^{ss}) - \Gamma^{\Upsilon}(c, l, a') \\ c &\geqslant 0, \\ a' &\geqslant \underline{a} \end{aligned} \tag{2.12}$$

- Retirees ($T < j \leqslant T + T^R$):

$$v(x, j) = \max_{c,a'} \Big\{ u(c, 0) + \beta v(x', j + 1) \Big\} \tag{2.13}$$

subject to

$$\begin{aligned} c + a' &\leqslant a(1 + r) + b_j - \Gamma^{\Upsilon}(c, l, a') \\ c &\geqslant 0, \\ a' &\geqslant \underline{a} \\ v(x, T + T^R + 1) &= 0 \quad \forall x, \end{aligned} \tag{2.14}$$

Where $\Gamma^{\Upsilon}(c, l, a')$ is the total tax the agent pays, depending on the tax code of the economy and her optimal choices. The definition of a stationary recursive competitive equilibrium for this class of models is by now standard. [1]

Tax Reform

As the benchmark economy, I take the model with the benchmark tax system, which mimics the features of the current U.S. federal tax system: the flat-rate capital income tax and a the non-linear income tax. In period 0, the economy is in a steady state with this tax system.

I assume that the change in the tax system takes place at the beginning of period 1, before any economic choices have been made. I consider the consumption tax reform being implemented in two potential ways: simple tax reform and gradual tax reform.

Simple Tax Reform: At the beginning of period 1, before any economic choices have been made, the government announces it has abolished the benchmark tax system and replaced it with the consumption tax system. From period 1 onward, all agents have to pay their taxes under the new tax code (the one that uses consumption as the tax base).

Gradual Tax Reform: Let period 1 be the period in which the tax reform occurs. At the beginning of period 1, before any economic choices have been made, the government announces it is replacing the benchmark tax system with the consumption tax system, with a specific condition: all agents who are alive at period 1 have the

[1] Equilibrium definition is provided in appendix A.

option of choosing between the benchmark and the consumption tax system. In particular, all those who are alive at the time of the policy change can choose when they want to switch to the new tax system, or if they want to switch at all. The switch is irreversible. All those born after period 1 have to pay their taxes under the new tax code (the consumption tax code). With this implementation method, it takes time for the economy to reach the point at which the entire population is paying its taxes under the new tax code, in other word, adoption of the new system is a gradual process.

In both methods of implementing the consumption tax reform, the initial point is the steady state of the economy with the benchmark tax system and the final point is the steady state of the economy with the consumption tax system. However, the transition path and the decision problems of the agents depend on the type of the tax reform being implemented.

In what follows, I state the decision problem for the agents in the **gradual tax reform**. However, the decision problem of the agents in the simple tax reform is nested as a special case of the gradual tax reform.

Out of Steady State

In the gradual tax reform, agents fall into two categories: those who have the option of choosing their preferred tax system, and those who have to pay their taxes under the new tax code. The first group comprises all agents who are alive at the time of the policy change and have not yet switched to the new tax system. The second group comprises all agents who are born in the new tax system as well as those who were alive at the time of the policy change and have already switched to the new tax system.

To describe the agent's decision problem, I need to distinguish between the two categories. To do this, I add an indicator variable q to the state vector of the agent. The indicator is a binary variable that signals whether the agent can choose between the two tax systems. Therefore, $q = 0$ indicates the agent belongs to the first group and she can choose her preferred tax code, and $q = 1$ indicates there is no option available for the agent and she must pay her taxes under the new tax code. Now I can define the decision problem for the agents when the economy is out of steady state for each value of q.

At any period t, given the prices (w_t, r_t), an agent of age j with states x and q must choose the amount of labor supply $l_t(x, j, q)$, the amount of consumption $c_t(x, j, q)$, and the amount of saving or assets to carry over to next period $a_{t+1}(x, j, q)$. Furthermore, if $q = 0$, that is the agent has the option of choosing between two tax systems, she must also choose her preferred tax code.

Therefore, optimal decision rules solve the following dynamic programming problem:

- $q = 1$:

$$v_t(x_t, j, q_t = 1) = \max_{c_t, l_t, a_{t+1}} \Big[u(c_t, l_t) + \beta v_{t+1}(x_{t+1}, j+1, q_{t+1} = 1) \Big] \tag{2.15}$$

$$s.t.$$

$$c_t + a_{t+1} = w_t e(z_i, j) l_t (1 - \tau^{ss}) + (1 + r_t) a_t + b_{t,j} - \Gamma_t^R,$$

Notice that this case also describes the decision problem of agents in the simple tax reform. Recall that in the simple tax reform, after the government has announced the change in tax policy, all agents must pay their taxes under the new tax code.

- $q = 0$:

$$v_t(x_t, j, q_t = 0) = \tag{2.16}$$
$$\max\left\{ v_t(x_t, j, q_t = 1), \max_{c_t, l_t, a'_t} \left[u(c_t, l_t) + \beta v_{t+1}(x_{t+1}, j+1, q_{t+1} = 0) \right] \right\}$$
$$s.t.$$
$$c_t + a'_t = w_t e(z_i, j) l_t (1 - \tau^{ss}) + (1 + r_t) a_t + b_{j,t} - \Gamma^B,$$

For the case of $q = 0$, the first part in the maximization problem is the value of choosing the new tax system and the second term is the value of staying in the old tax system.

In equilibrium, goods, capital, and labor markets clear in each period. This determines the corresponding factor prices of the period. The definition of a recursive equilibrium for this economy is provided in Appendix A.

2.3 Parametrization

The parameters of the model have been calibrated so that the initial steady state for the economy replicates selected features of the current U.S. economy. The model period is 5 years. Table 2.1 summarizes the parameter choices.

2.3.1 Demographics

In my model, agents are born at age 25, retire from working at age 65 ($T = 8$), and die at age 85 ($J = 12$), so their life length is 12 model periods and they face mandatory retirement after 8 periods of working. I consider an annual population growth of 1.09%, which corresponds to the average population growth rate for the United States form 1960 to 2009, see the Economic Report of the President 2012, Table B.34.

2.3.2 Technology and Preferences

To set the values for parameters α, the capital share and Υ, the depreciation rate, I follow the standard method of Cooley and Prescott(1995)[12]. To align my model economy with the data, I define the notion of capital to include the stock of fixed private capital, the stock of consumer durables, the stock of inventories, and the stock of land. [2] The capital-to-output ratio averages 2.89 over $1965 - 2007$, at the annual level. The parameter α is set to 0.34, which is the average of the capital share. The depreciation rate is determined endogenously to be 0.074 at the annual level such that the model generates the average investment-to-capital ratio found in the data

[2]The stock of durables is from Current-Cost Net Stock of Fixed Assets and Consumer Durable Goods, BEA, Table 1.1. August 2015, the stock of inventories is from Economic Reports of the President 2012, Table B.1., and the stock of land is from Flow of Funds accounts, balance sheet tables

over the same period.

The intertemporal elasticity of labor supply γ is set to 1. Notice that the macro estimates of the elasticity of labor supply tend o be higher than those from the micro literature. As shown by Keane and Rogerson(2015)[35] the value for γ at the macro level is larger than 1. I have an exercise with a higher value for γ (2.5 instead of 1) in the Discussion section.

The value of parameter β, which is the discount factor is determined endogenously to 0.9675, in such a way that the model generates the same capital to output ratio as I calculate from the data.

2.3.3 Labor Endowments

The labor labor efficiency profile $e(z, j)$ for each agent, consists of two components: a common age-dependent component, and a fixed productivity type with which each agent is born with. We can think of this as a permanent productivity shock that agents draw from a distribution when they are born. To estimate the effiecency profile, I use the available observations on wage (hourly earning). For the age productivity profile I regress the log hourly wage of households on a polynomial of age together with a time fixed effect. For this regression, I use the data from the Current Population Survey (CPS) for $1980 - 2005$. The sample consists of households whose heads are between 25 and 64 years old. All individuals in the sample earn hourly wages above half of the federal minimum wage, and they work at least 260 hours per year, as in Heathcote et al.(2010)[29].

For the permanent productivity shock, I assume that z is drawn from a log-normal distribution function. To estimate the distribution, I use the same sample of data from the CPS, and select the households whose heads are between 25 and 29 years

old, and calculate the yearly standard deviation of the log hourly wages for these households. I normalize the distribution by its mean and set the standard deviation σ_z to 0.51, which is the average of the yearly standard deviation of the log hourly wages calculated from the data. The permanent productivity shock is approximated with seven states.

2.3.4 Taxation

Following Benabou(2002)[6] , Heathcote et al.(2014)[30] and others, I approximate the federal income tax with a two parameter function:

$$t(\tilde{I}) = 1 - \lambda(\tilde{I})^{-\tau}, \tag{2.17}$$

where $t(\tilde{I})$ is an average tax function and $\tilde{I}$ is income normalized by household income, that is income I divided by the mean household income in the economy. The parameter λ defines the level of the tax rate and the parameter τ governs the curvature or progressivity of the system. A larger τ creates a more progressive system. To set values for these parameters, I use the Guner et al.(2014)[24] estimates for all households: $\lambda = 0.902$ and $\tau = 0.036$.

The tax rate τ^k levied on capital income is used to proxy the U.S. corporate income tax. It is estimated as the rate that reproduces the level of tax collections from corporate income taxes after the major reforms of 1986. The average corporate tax revenue as a percentage of GDP is 1.9% for $1987 - 2007$.[3] Using the technology parameter and specifications of output in my model, I obtain $\tau^k = 10.54\%$. Finally, the parameter τ^{SS} the payroll tax rate levied on labor income to finance social security benefits, is set to 10.25%, which is the average of the ratio of the contribution to social

[3]Office of Management and Budget, "Fiscal 2017 Budget of the United States, Historical Tables: Table 2.3–Receipts by Source as Percentages of GDP: 19342016 "

security to labor income for $1990 - 2014$. [4]

Table 2.1: Parameter Values

Parameter	Values	
β	0.967	Discount Factor, target K/Y
τ^k	0.1054	Calibrated Capital Income Tax Rate
τ^{SS}	0.1025	Calibrated Payroll Tax Rate
n	1.09%	Average Population Growth Rate (1990-2009)
γ	1	Frisch Elasticity
α	0.34	Capital Share (1965-2007)
δ	0.067	Depreciation Rate, target I/Y (1965-2007)
σ_z	0.51	Std. Deviation of Permanent Shock
λ	0.902	Federal Income Tax Level Parameter (Guner et al.(2014)[24])
τ	0.036	Federal Income Tax Curvature Parameter (Guner et al.(2014)[24])

Note: this table summarizes parameters values with brief descriptions. The upper panel shows the parameters that are calibrated endogenously using the model and the lower panel shows the parameters chosen exogenous to the model. For detailed explanations see the text.

[4]The contributions considered are those from the Old Age and Survivors Insurance. The data comes from the Social Security Bulletin, Annual Statistical Supplement, 2015, Table 4.A1.

2.4 Findings: Steady States

Both simple and gradual reforms start from the same initial steady state and end in the final steady state of the consumption tax system. I first discuss the quantitative properties of these steady states and then turn to the transition dynamics and the welfare analysis for simple and gradual tax reforms.

Table 2.2 shows how the main aggregate variables compare across the two steady states. The first column describes the initial steady state of the economy where the benchmark tax system (with the non-linear income tax and flat capital income tax) is the formal tax code. The second column characterizes the steady state of the economy under the consumption tax system. Note that the generated tax revenue is the same across both steady states. The condition of generating a constant level of tax revenues is imposed to help pin down the consumption tax rate in the new steady state.

Table 2.2 shows that replacing the benchmark tax system with a consumption tax system leads to 27.6% higher capital accumulation in the steady state. The capital-output ratio increased by 14.5%. Removing the increasing marginal tax rate on capital income motivates agents to accumulate more assets. As a result of an increase in the asset accumulation, and only a modest increase in labor supply, the interest rate decreases by 25% and the wage increases; this is translated into an 11.3% rise in the retirement benefits which come from the increase in the average income. Output increases by 11.1% because of higher levels of capital stock and labor supply. These are the standard effects of replacing a non-linear tax system with a proportional one.

This increase in the size of the economy has implications for the welfare effects

Table 2.2: Comparing Aggregate Variables the Steady States with Different Tax Regimes

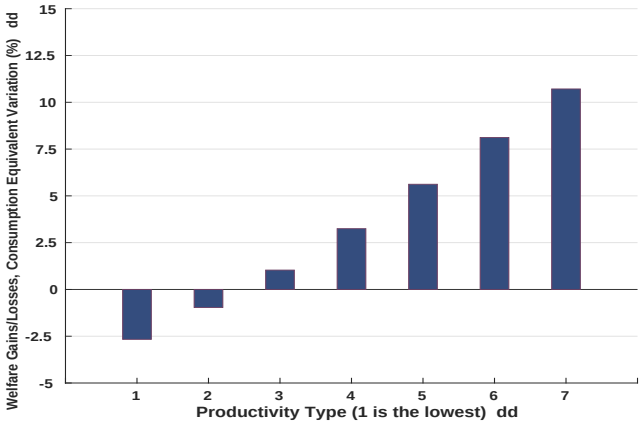
Variables	Benchmark Tax System	Consumption Tax System
τ_c	0%	14.06%
τ_k	10.54%	0%
τ	0.053	0
λ	0.911	1
Output	100	111.3
Capital Stock	100	127.6
Labor Supply	100	103.7
K/Y	2.89	3.31
Household Income (Avg.)	100	108.2
CEV	.	3.4%

Note: This table summarizes the aggregate variables of the economy under a revenue−neutral consumption tax reform in the long run (steady state comparison). The first part describes the tax structure and the second part describes effects of the tax reform on aggregate variables. I normalize the aggregate variables in the steady state of the benchmark economy to 100.

of the consumption tax reform. An agent born in the steady state of the economy with the consumption tax system would benefit from an ex-ante 3.4% higher level of consumption in each period of her life, as opposed to an agent born into the steady state of the economy under the benchmark tax system. Figure 2.1 decomposes the aggregate welfare gain into the welfare gains for various productivity types. As mentioned earlier, the permanent productivity shock is approximated with seven states, which I call types, where Type 1 has the lowest productivity shock, which is about 1/3 of the median productivity shock, and Type 7 has the highest productivity shock which is about 3 times of median productivity shock.

Figure 2.1 reveals that the largest welfare gain from switching to the

Figure 2.1: Distribution of Long-run Welfare Effect of the Consumption Tax Reform



Note: This figure shows the long-run welfare gains/losses distribution of having a consumption tax reform, measured in consumption equivalent variation, for agents with different permanent productivity shock, which is approximated with seven states, each state is called a productivity type and represented with a number on the horizontal axis, with type 1 being the least productive agents. Each bar represents the amount of consumption growth that a newborn in the steady state of the reformed economy would have over the newborn in the steady state of the benchmark economy.

consumption tax system accrues to agents with higher productivity. Higher productivity type agents are naturally those with higher income. The progressive nature of the nonlinear income tax under the benchmark tax system has relatively unfavorable effects on agents with higher levels of income, so the most productive agents clearly benefit the most from replacing a progressive income tax with a flat tax. The lowest-productivity group has a welfare loss of 2.6%, and the welfare gains increase with the increase in productivity.[5]

[5]In the Discussion section, I show that by providing a lump-sum transfer for all agents in the new tax system, even the lowest productivity type enjoys the tax reform.

2.5 Findings: Transitional Dynamics

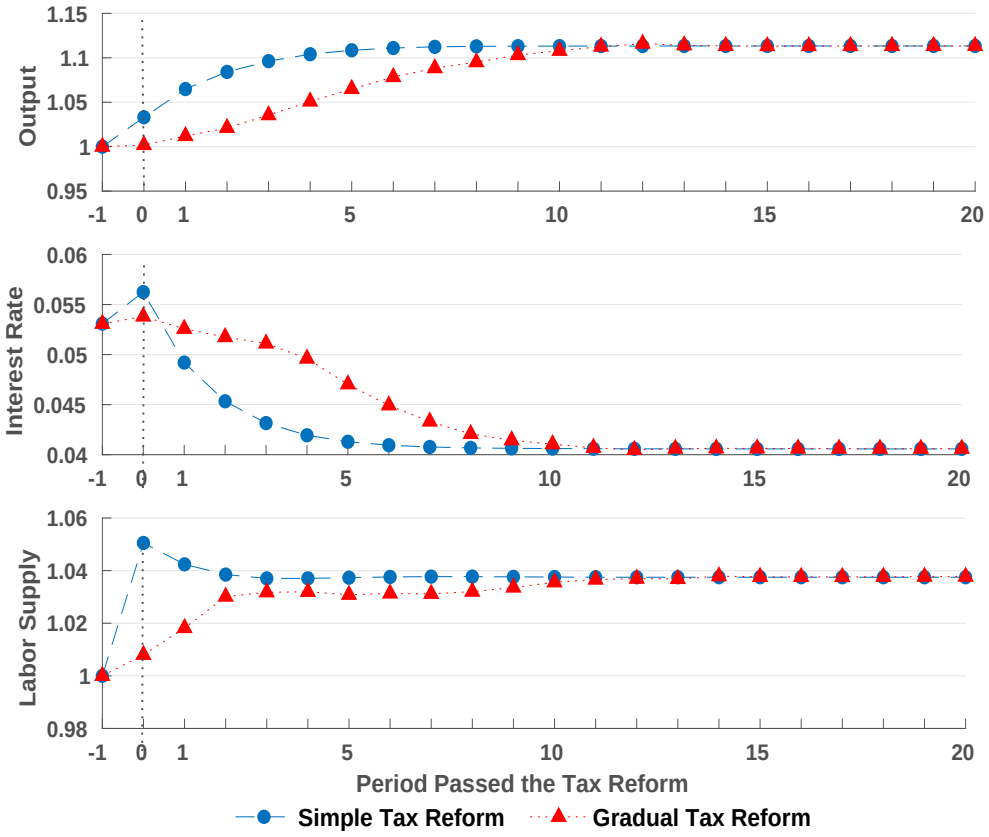
In this section I turn to the discussion of transitional dynamics and short-run welfare effects of both simple and gradual tax reforms. The simple tax reform represents a case in which all agents, even those who have planned their lives under the benchmark tax system, would have to switch to the new tax system immediately after it is implemented. I consider this reform to be a baseline for comparison with the gradual tax reform which phases in the new tax system and phases out the benchmark tax system more gradually. Notice that the reforms are revenue neutral; that is, the economy generates the same level of tax revenue along the transition and in the new steady state as under the initial steady state.

2.5.1 Simple Tax Reform

Figure 2.2 shows the evolution of macroeconomic aggregates along the transition in the simple tax reform. The upper graph shows the evolution path for output, the middle graph shows the transition path for the interest rate, and the lower graph shows the evolution of aggregate labor supply.

It can be seen from Figure 2.2 that under the simple tax reform, the economy reaches its new steady state after about 35 years. With the consumption tax system, the accumulated capital is untaxed, which makes saving more attractive. Therefore, directly after initiating the reform there is a sharp increase in aggregate labor supply, which is essentially the result of a substitution effect that induces delays in consumption as well as leisure, and creates a jump in the labor supply. However, as the aggregate capital stock is predetermined from the period before the policy change, the capital−labor ratio plunges sharply, resulting in an initial spike in the interest rate and a decrease in wage rate and capital−output ratio.

Figure 2.2: Transition Path for Aggregate Macroeconomic Variables in the Simple Tax Reform, and the Gradual Tax Reform



Note: This figure shows the evolution of the macroeconomic aggregates under both the simple and the gradual tax reforms.

In subsequent periods, higher capital accumulation kicks in, which results in further increases in output. This happens despite the fact that wealth effects mitigate some of the increase in the aggregate labor supply, which gradually decreases to its new steady−state value. Also, after its initial surge, the interest rate falls and the wage rate rises, to their new steady−state values.

All these trends are documented quantitatively in Table 2.3. Notice that the labor supply rises by 5% immediately after the policy change. Because of this, output

increases by 3.3% in the first period. This means that about 30% of the total increase in output is realized in the initial period of the tax reform.

Five periods into the reform, the capital stock is 24.6% larger than its initial steady state and output is 10.8% larger. Further along the transition, after 10 periods, output exceeds its initial steady state level by 11.3%, and the capital stock is 27.5% larger. Over the long−run the capital stock is 27.6% higher than its initial steady state and the output is 11.4% larger. As the economy expands, the required consumption tax rate declines. Along the transition, the consumption tax rate falls from 16.1% initially to its long-run value of 14.1%.

Welfare: Figure 2.3 shows the welfare effects, measured by the consumption equivalent variation, during the first transition period for the three groups of agents: the most productive agents, the least productive agents, and the agents with median productivity. This graph confirms that the welfare consequences for agents vary significantly with ages and productivity types.

Notice that all agents who are in their retirement periods, independent of their productivity type, face welfare losses. In fact, older agents are the biggest losers of the reform, with agents age 65 or higher losing about $4 - 8\%$. The rationale for this is the considerably different tax burden these agents face under the consumption tax system. Changing the timing of tax payments over the life cycle significantly alters the burden of taxation across generations. Under the benchmark tax system, the tax burden for retirees is negligible compared to the tax burden of agents who are in their prime working ages. However, under the consumption tax system, because of the consumption−smoothing behavior of agents, and the fact that each agent has to pay a flat tax rate on each units of consumption, the tax burden of retirees is

Table 2.3: Comparison of Aggregate Variables Along Transition Path

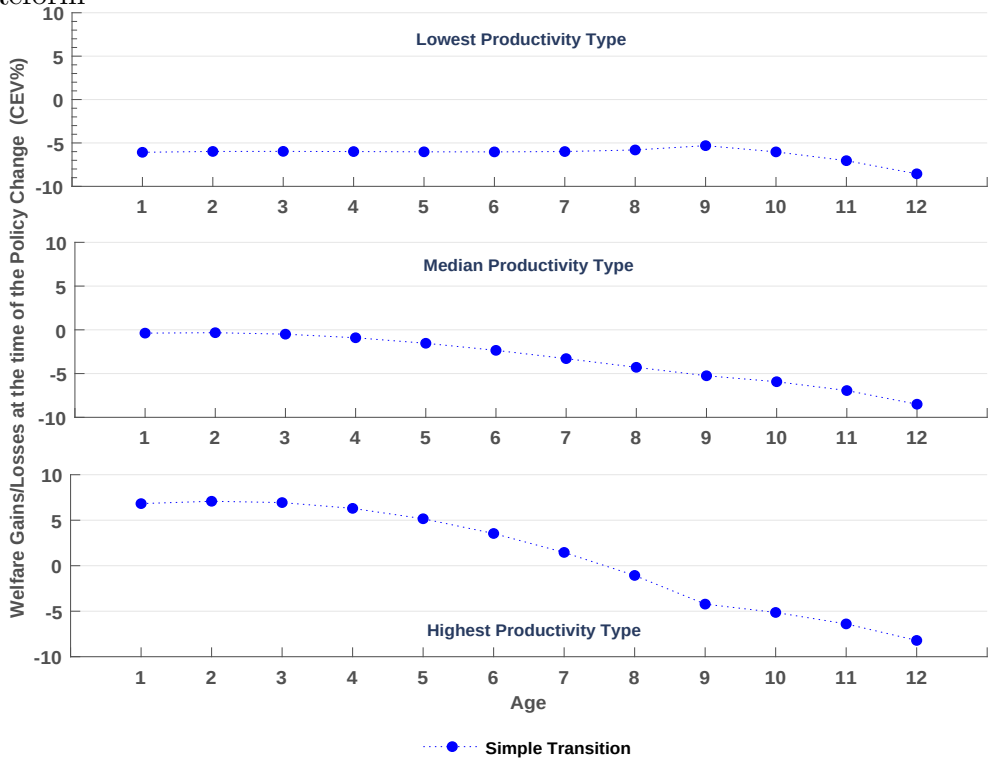
	Periods in the new system	Output	Capital Stock	Labor Supply	Interest Rate	Consumption Tax Rate
	1	103.30	100.00	105.10	0.056	16.09%
Simple	5	110.84	124.63	103.71	0.042	14.34%
Tax Reform	10	111.30	127.55	103.76	0.041	14.07%
	36	111.32	127.67	103.77	0.041	14.06%
	1	100.19	100.00	100.81	0.053	23.35%[b]
Gradual	5	105.07	108.84	103.18	0.049	19.22%
Tax Reform	10	110.31	125.17	103.35	0.041	15.17%
	36	111.30	127.60	103.70	0.041	14.06%

Note: This table provides snapshots of the economy right after the policy change, 5 years into the transition, 10 years into the transition and at the new steady state for both simple tax reform and gradual tax reform. Interest rates are the calculated annual interest rate that are implied by the interest rate for the 5−year−period in the model. Note that in the gradual tax reform no one chooses to switch to the new tax system, the consumption tax rate in the first period is irrelevant. I reported the consumption tax rate at the second period in the table.

comparable to that of working agents. Therefore, agents who are in retirement when the tax reform takes place have already played their role as major contributors to the tax revenue during their working years. With the change in the tax system, they are now expected to provide a considerable part of tax revenue, in their retirement years as well.

Among young agents, the welfare changes are increasing in productivity type. Whereas agents with higher productivity types experience welfare gains, less

Figure 2.3: Welfare Gains/Losses at the First Period of Transition in the Simple Tax Reform



Note: This figure shows the welfare gains/losses, measured in consumption equivalent variation, in the first period of implementing the simple tax reform, for the highest, the lowest and the median productivity type agents.

productive agents are negatively affected by the tax reform. The miscellaneous welfare effects stem from the progressivity of the income tax under the benchmark tax system. The nonlinear income tax scheme has an increasing marginal tax rate that adversely affects agents with higher earnings. Hence, more productive agents who in the this setup have higher income, benefit more from replacing the progressive income tax with a flat−rate consumption tax. This explains why young agents who are more productive experience welfare gains. Less productive agents, no matter their ages, lose, even though they would have higher wages and higher social security benefits in their retirement years.

Overall, my quantitative experiment shows that under the simple tax reform, only 24.6% of the population who are alive at the time of the policy change, experience welfare gains, and the tax reform is detrimental for the rest. Also, the weighted sum of the welfare gains of the winners is just 14% of the weighted sum of the welfare losses borne by the losers. These results show that long−run welfare gains mask the asymmetry in the distribution of short−run welfare effects.

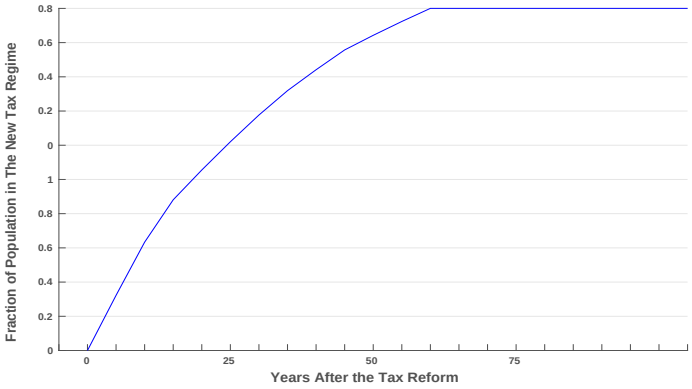
2.5.2 Gradual Tax Reform

The gradual tax reform phases out the benchmark tax system by letting agents, who are alive when the change of policy takes place, choose their preferred tax code. Figure 2.2 shows the evolution of macroeconomic aggregates in the gradual tax reform (the dotted line with triangular points). As shown in this figure, the transition to the new steady state is much slower. Convergence to the new steady state now takes about 60 years, and it takes 18 years for the economy to materialize half of the increase in the output. In the simple tax reform, they take place in the first period of transition.

Figure 2.4 shows the fraction of population who pay their taxes according to the new tax code in each transition. In the first period, during which the change in policy occurs, no one chooses to pay taxes under the new tax code, and it takes about 18 years for half of the population to pay their taxes under the consumption tax system.

Younger, more productive agents are among the first to adopt the new tax system. These are the cohorts who experience higher incomes in their life cycles and are therefore affected more severely by a nonlinear income tax. The consumption tax system is thus more appealing to these groups, and they choose to switch to the new

Figure 2.4: Rate of Adopting the New Tax Regime



Note: This figure shows the fraction of the population who are paying their taxes according to the new tax system at each period of transition. Notice that it takes nearly 3.5 model periods(18 years) to have half of the population in the new tax system.

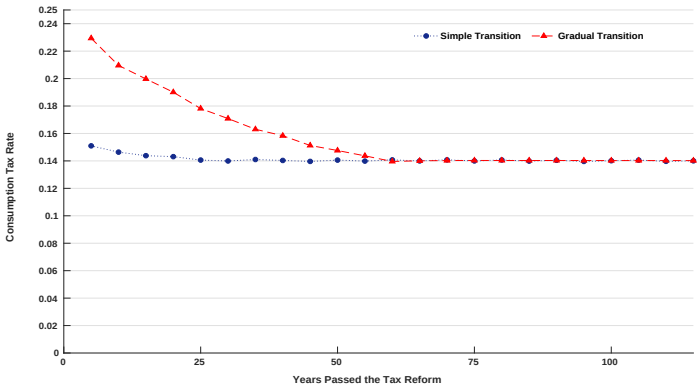
tax system in the initial periods of the tax reform.

The retired agents, no matter their productivity type, choose to stay in the benchmark tax system over the rest of their life. As mentioned before, these agents have already made their economic choices and paid income taxes under the benchmark tax scheme, assuming the tax burden is negligible in their retirement years. Switching to the new tax system increases their tax burdens and is not beneficial for this group.

Having just a fraction of population in the new tax system during the initial periods of the tax reform induces higher consumption tax rates during these periods compared to the simple tax reform as shown in Figure 2.5. Further along the transition, more agents will be willing to pay consumption taxes. As a result, the endogenous consumption tax rate eventually declines to its steady−state value.

The gradual tax reform slows down the emergence of beneficial features of the

Figure 2.5: Comparison of the Consumption Tax Rate at Each Period of Transition to the New Steady state, in the Simple Tax Reform and Gradual Tax Reform



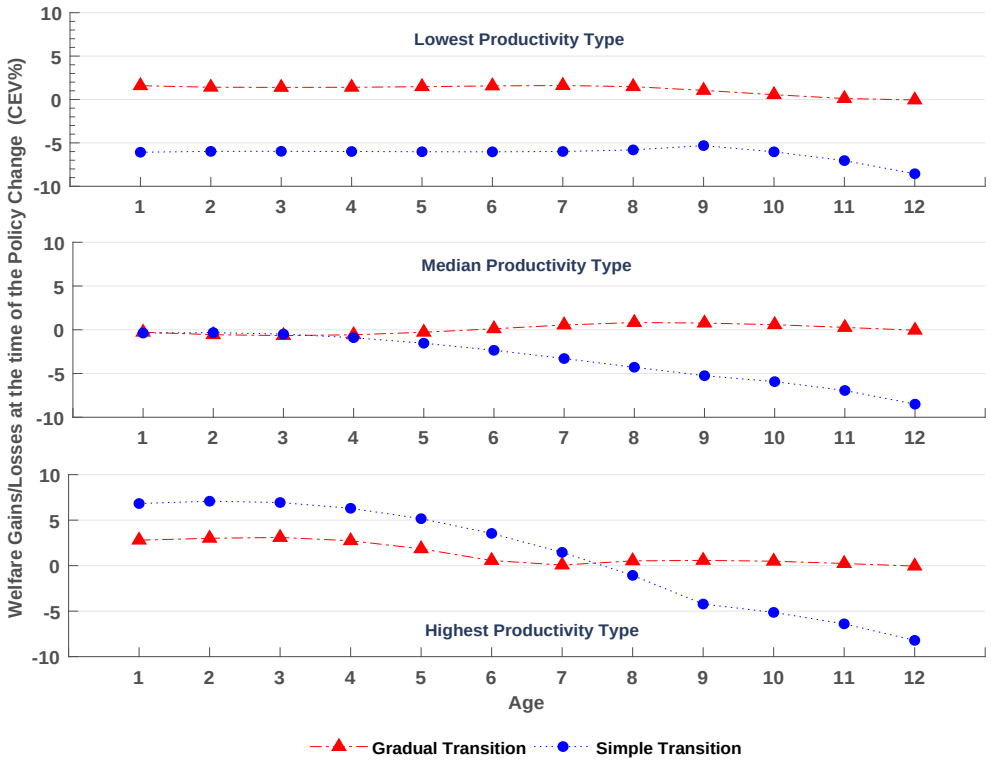
Note: This figure compares the consumption tax rate at each period of transition, needed to generate a constant tax revenue, in the simple tax reform and the gradual tax reform.

consumption tax code in the economy, a fact that is quantified in the second panel of Table 2.3. For example, immediately after the tax reform, there are few noticeable differences in the economy. It takes two model periods for the economy to realize a 30% increase in output, the amount realized during the same period when the policy change goes into effect under the simple tax reform. Five periods into the transition, output increases by 6.4% from its initial steady state compared to 10.3% in the simple tax reform, and the capital stock increases by 13.9% compared to 24.6%.

Hence, with the gradual tax reform, it takes longer for the economy to benefit from the desirable effects of the consumption tax system. Moreover, with the gradual tax reform, the endogenous consumption tax rate required to keep the tax revenue constant is much higher in the early years of the transition than the simple reform.

Welfare: Figure 2.6 shows the welfare gains/losses, measured in consumption−equivalent variation, during the first transition period for all agents who are alive when the tax reform takes place. Comparing the welfare effects of the

Figure 2.6: Welfare Gains/Losses at the First Period of Transition, in the Gradual Tax Reform and the Simple Tax Reform



Note: This figure compares the welfare gains/losses for three types of agent at the first period of transition, measured in consumption equivalent variation, in the simple tax reform (circle dots) and the gradual tax reform (triangle dots).

gradual tax reform with their counterparts in the simple tax reform confirms that allowing agents to choose their preferred tax regime enables them to avoid the unfavorable welfare effects of the tax reform. The gradual tax reform eliminates the adverse effects of changing the tax policy and reduces it to the general equilibrium effects, which happen to be small in this case.

My quantitative results show that under the gradual tax reform, 95% of the population who are alive at the time of the policy change, experience welfare gains, as opposed to 24.6% under the simple tax reform. Younger agents from the median

productivity group are those who are experiencing a tiny welfare losses, that are coming from the general equilibrium effects.

2.6 Discussion

In this section, I run five exercises. First, I rerun the experiment using a consumption tax system that features a lump-sum transfer for everyone, and thus retains some flavor of progressivity. The goal is to investigate whether the negative welfare consequences in the first period are driven by the lack of progressivity of the new tax system. Second, I simulate the model in a partial equilibrium to understand the roles of endogenous factor prices on the results. Third, I investigate the sensitivity of my results to labor supply elasticity by conducting the experiment with a higher value for γ. Forth, I explore whether announcing the change of policy in advance would help ameliorate the negative short-run welfare consequences of the tax reform. Fifth and finally, I compare my method with the one in which the old tax system is phasing out while the new tax system is phasing in over a certain number of periods.

2.6.1 A Linear Progressive Consumption Tax

Although proportional consumption taxes have received a great deal of attention in the literature, it is important to note that consumption-based taxes can also be progressive. In particular, giving a lump-sum transfer to all households is one way of converting a flat consumption tax system into a progressive one. In this section, I rerun the experiment, replacing the benchmark tax system with a consumption tax system that features lump-sum transfers to all agents. The goal of the exercise is to examine whether having the transfer alleviates the negative short-run welfare consequences of the tax reform, and how the gradual tax reform performs in this context.

I consider three levels of transfers: 1%, 2.5%, and 5% of the gross domestic product

(GDP) per capita of the steady state of the benchmark economy. Transfers, such as government consumption, are financed by taxes. Thus, providing higher levels of transfers, induces higher tax rates to keep the government budget balanced.

Table 2.4 reports the value of the aggregate variables with induced changes in the consumption tax rate for the three levels of transfer as well as the one without transfers. As we expected, the need to finance the higher level of transfers increases the consumption tax rate well above the case without any transfers. As a result, the output effects when there are transfers are substantially reduced relative to when there are no transfers. The long-run increase in the capital stock and level of output are lower in tax systems with a higher level of transfers. The labor supply decreases as well.

The aggregate welfare gain increases with the level of transfers. This reflects the fact that providing a fixed level of transfer changes the effective marginal tax rate of agents, which then alters their tax burdens. This is illustrated in Figure 2.7, which decomposes the aggregate welfare gains across agents with different levels of productivity. Looking at the distribution of the welfare gains, we see that the welfare gains for less productive agents who are relatively poor are increasing in the amount of transfers, whereas the gains for agents with higher levels of productivity, decline with the rise of the transfer. Results occurs because the effect of transfers declines as income increases. Poor agents benefit most from transfers, and richer agents bear the burden of financing the transfers.

Figure 2.7 plots the short-run welfare consequences of the consumption tax reform with different levels of transfers. The upper graph shows the welfare effects for agents at the lowest productivity level, and the middle and lower graph show the welfare effects for agents at the median and the highest productivity levels. The

Table 2.4: Comparison of Aggregate Variables for The consumption Tax Reform with Transfers

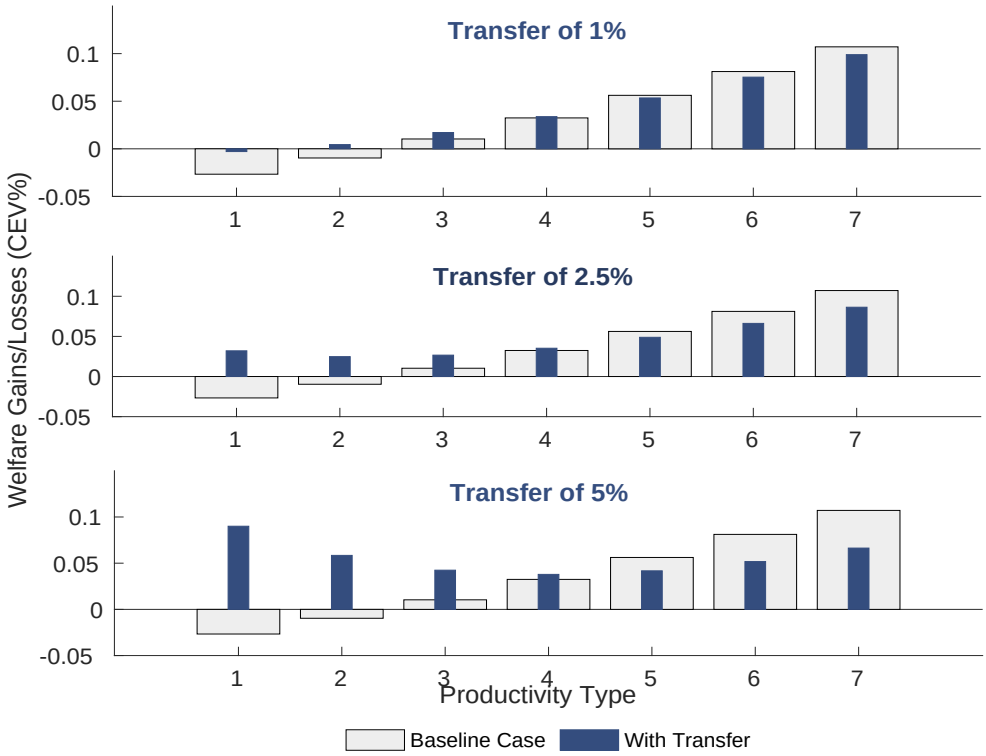
	Benchmark Tax System	Consumption Tax System (Without Transfer)	Consumption Tax System (1% Transfer)	Consumption Tax System (2.5% Transfer)	Consumption Tax System (5% Transfer)
Consumption Tax Rate (τ^c)	.	14.06%	15.49%	17.71%	21.42%
Output	100	111.3	110.7	109.8	108.3
Capital Stock	100	127.6	127.0	126.1	124.6
Labor (efficiency units)	100	103.7	103.1	102.2	100.7
K/Y	2.89	3.313	3.316	3.318	3.325
Household Income (Avg)	100	108.8	108.2	107.2	105.7
Aggregate Welfare Gain (CEV%)	.	3.4%	3.7%	4.1%	4.7%

Note: This table provides a comparison of changes in the aggregate variables in the steady state of the reformed economy, for the consumption tax systems with 0%, 1%, 2.5%, and 5% transfer.

figure confirms that the welfare of the least productive agents, who are the poorest in the economy, increase with the rise in transfers. This suggests that the transfer has a considerable effect on their income that outweighs the cost of financing it out of their taxes. For agents at the median productivity level, who are in the middle income group, the cost and benefit of the transfer have no noticeable effect on their welfare gains. Finally, the welfare gains for the most productive agents, who have the highest income in the economy, decline with the rise in transfers. These groups bear the burden of financing transfers, although the amount they receive in transfers is negligible compared to their income; thus, a consumption tax system with no transfers would be most preferable to them.

Although including transfers mitigates the short−run welfare losses for poor agents, it does not significantly decreases the welfare losses observed under the simple tax reform. As Figure 2.8 shows, the welfare losses could be as large as 12% in consumption equivalent variation (CEV) measure, for the higher productivity

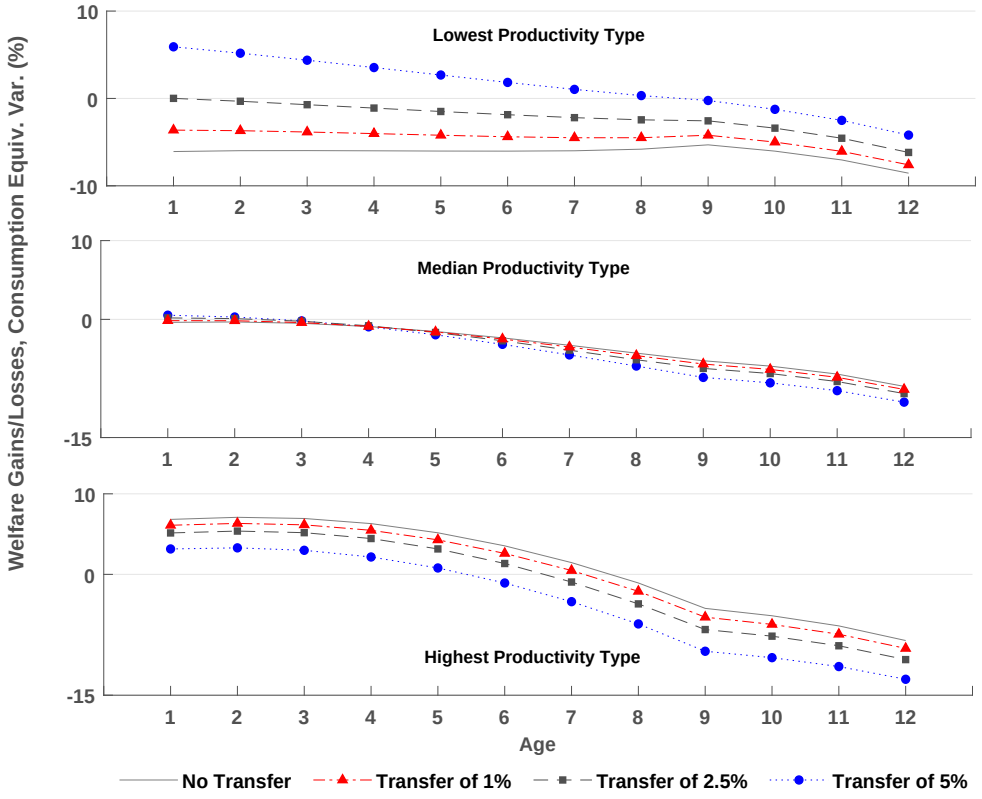
Figure 2.7: Comparison of Aggregate Welfare Effects across Steady States: Consumption Tax System with Transfer



Note: This figure shows the distribution of the welfare gains/losses of switching to a consumption tax system at the steady state of the reformed economy. Each graph compares the distribution of the welfare effects for two cases: the consumption tax system without any transfer (the baseline case) and the consumption tax system with a lump-sum transfer equivalent to of 1%, 2.5% and 5% of GDP per capita for all households.

types who are retired. Even among members of the lowest productivity group, who are the main beneficiary of the transfers, those who are retired face welfare losses as large as 6%. In fact, even with a 5% transfer, agents with higher productivity, as well as agents in their retirement years, still face welfare losses. This suggests that a gradual method could be relevant for implementing a progressive consumption tax reform. Figure 2.9 shows how the gradual tax reform alters the welfare consequences

Figure 2.8: Comparison of the Welfare Effects of the Simple tax Reform at the First Period of Transition: for Consumption Tax Systems with Transfers



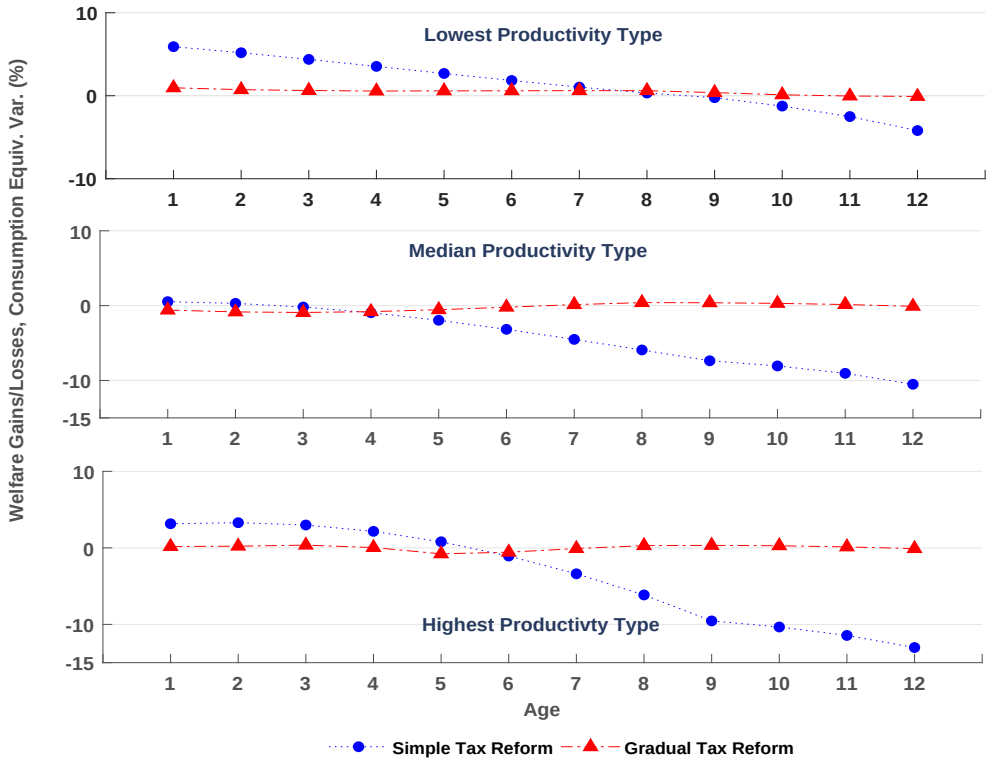
Note: This figure compares the welfare consequences of implementing a consumption tax reform with various levels of transfer, at the first period of transition for three types agent.

of implementing the consumption tax reform with a transfer equivalent to 5% of output per capita . This graph confirms that implementing the reform gradually improves the welfare of agents who are alive at the time of the policy change.

2.6.2 Small Open Economy

To understand the roles of endogenous factor prices, I rerun my experiment in partial equilibrium. I fix the interest rate and wage at their levels in the benchmark economy with the benchmark tax system, and compute the transition path without

Figure 2.9: Comparison of the Welfare Consequences of a Consumption Tax Reform with 5% Transfer, at the First Period of Transition, In the Simple Tax Reform and the Gradual Tax Reform



Note: This figure shows the welfare gains/losses for agents at the first period of implementing a consumption tax system with a lump-sum transfer equivalent to 5% of GDP per capita in the simple tax reform (circle dots) and the gradual tax reform (triangle dots).

requiring market−clearing conditions for labor and capital markets. Table 2.5 shows how the aggregate variables compare across steady states assuming a small open economy. The second column reports variables for the closed economy where prices can adjust, and the third column reports variables for the steady state of the open economy where prices stay unchanged at their initial values.

With fixed factor prices, capital stock is twice as large as its initial steady state value. As discussed earlier, taxing consumption encourages savings. When prices are fixed and cannot react to a higher level of capital accumulation, the high rate of

Table 2.5: Comparison of Aggregate Variables under the Open Economy Assumption

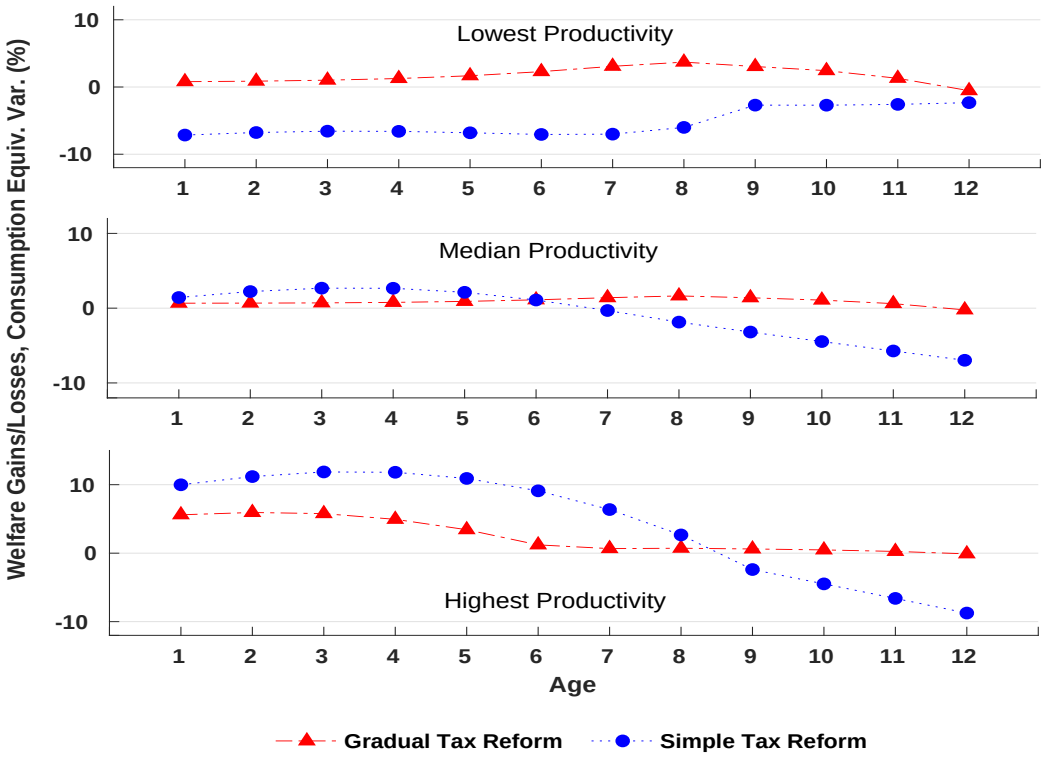
	Benchmark Tax System	Consumption Tax System (Baseline Case)	Consumption Tax System (Small Open Economy)
Consumption Tax Rate (τ^c)	.	14.06%	12.35%
Output	100	111.3	129.9
Capital Stock	100	127.6	215.5
Labor (efficiency units)	100	103.7	100.0
K/Y	2.89	3.313	4.79
Household Income (Avg)	100	108.8	121.9
Aggregate Welfare Gain(CEV%)	.	3.37%	3.43%

Note: This table provides a comparison of changes in the aggregate variables in the steady state of the reformed economy, between the baseline case and the case of a small open economy.

return to capital reinforces this incentive, which in turn induces a huge expansion of the capital stock.

Wage is fixed at a lower level compared to that of the closed economy, and we see that labor supply stays almost unchanged at its initial level. In the consumption tax system, the capital accumulation margin is not taxed; this creates a substitution effect that induces delaying consumption, as well as leisure, which increases the labor supply. In the closed economy, as more capital is accumulated, the prices adjust such that higher wage exerts a downward pressure on labor supply through the wealth effect. In the long−run, these two effects work together so that labor supply increases. In the open economy, wage is constant , but the considerable amount of capital stock creates a wealth effect that seems to offset the substitution effect in such a way that the labor supply does not move in the long−run. Compared to the general equilibrium benchmark, average household income is higher in the open economy.

Figure 2.10: Welfare Effect of a Consumption Tax System: Small Open Economy



Note: This figure shows the welfare gains/losses for agents at the first period of implementing a consumption tax system, with the small open economy assumption, in the simple tax reform (circle dots) and the gradual tax reform (triangle dots).

The long-run aggregate welfare gain is almost the same across both open and closed economies. However, the distribution of welfare gains across productivity types is more concentrated in the open economy. In this case, the rate of return to capital stays unchanged instead of declining, so more productive agents for whom the return to capital is a major source of income, enjoy greater welfare gains. Conversely, less productive agents who live mainly on their labor income and social security transfers, are deprived of higher wages and higher retirement benefits under the open economy. Thus, they must endure larger welfare losses.

Figure 2.10 plots the short-run welfare effects for living generations of the highest, median, and lowest productivity types at the first transition period, for both simple tax reform and gradual tax reform. This figure confirms that keeping prices unchanged does not eliminate the negative effects of the tax reform on agents who are alive at the time of the policy change. In other words, the short-run welfare consequences of the tax reform do not appear to be driven primarily by a change in factor prices.

However, endogenous factor prices slightly affect the distribution of welfare effects for generations alive at the first transition period. Comparing Figure 2.10 with its analog in the closed economy, Figure 2.6, we see that older generations of the lowest productivity type experience smaller welfare losses in the open economy compared to the closed economy. Fixed prices, and in particular, fixed wage, can explain this observation. In the closed economy, at the first transition period, labor supply jumps; this pushes down the capital−labor ratio and therefore decreases the wage rate and affects aggregate labor income. Retired generations receive social security benefits that are proportional to their average labor income. This creates another channel through which these groups are affected by the change in the tax regime. In the small open economy prices are fixed and cannot react to the change in the capital−labor ratio; as a result, average labor income in the first transition period is about 10% higher in the small open economy compared to the closed economy. This translates into higher social security benefits for retirees in the open economy and justifies the observed trend in welfare cost. Overall, Figure 2.10 confirms that the gradual implementation of the reform can address short-run welfare consequences even with fixed factor prices.

2.6.3 The Role of the Labor Supply Elasticity

We know that the macro estimates of the elasticity of labor supply are higher than micro estimates ([15], [45]). In my experiments I set the intertemporal elasticity of labor supply γ equal to 1. However, [35] argues that different mechanisms at play in aggregate settings suggest values of labor supply elasticity higher than 1. In this section, I examine the sensitivity of my results to the value of γ. More precisely, I set the value of γ equal to 2.5, recalibrate the model and rerun the experiment.

As shown in Table 2.6 the higher value of labor supply elasticity slightly magnifies the change in the macroeconomic aggregate variables in the long run. In fact comparing $\gamma = 1$ with $\gamma = 2.5$, the output, capital stock, and labor supply are all higher by about 2 percentage points for the higher value of γ. In particular, having higher labor supply elasticity enables agents to amplify their reaction to the change in the tax code, so the output of the new steady state is higher and the consumption tax rate required to keep the government budget balanced is lower. Also, the aggregate welfare gain is slightly higher for $\gamma = 2.5$.

Figure 2.11 compares the welfare consequences of the consumption tax reform in the first transition period, under the simple tax reform and the gradual tax reform. Comparing this figure with Figure 2.6, it can be seen that the pattern of welfare effects is similar in the high− and low−elasticity cases, and that the gradual tax reform can address the short-run welfare effects of the tax reform here as well.

2.6.4 Anticipated Tax Reform

Major policy changes such as tax reforms, which have profound impacts on the economic behavior of the population, are usually announced in advance. The idea is

Table 2.6: Comparison of Aggregate Variables for Higher Elasticity of Labor

	Benchmark Tax System	Consumption Tax System (with $\gamma = 1$)	Consumption Tax System (with $\gamma = 2.5$)
Consumption Tax Rate (τ^c)	.	14.06%	13.82%
Output	100	111.3	113.2
Capital Stock	100	127.6	129.9
Labor (efficiency units)	100	103.7	105.4
K/Y	2.89	3.313	3.316
Household Income (Avg)	100	108.8	110.0
Aggregate Welfare Gain(CEV%)	.	3.4%	3.8%

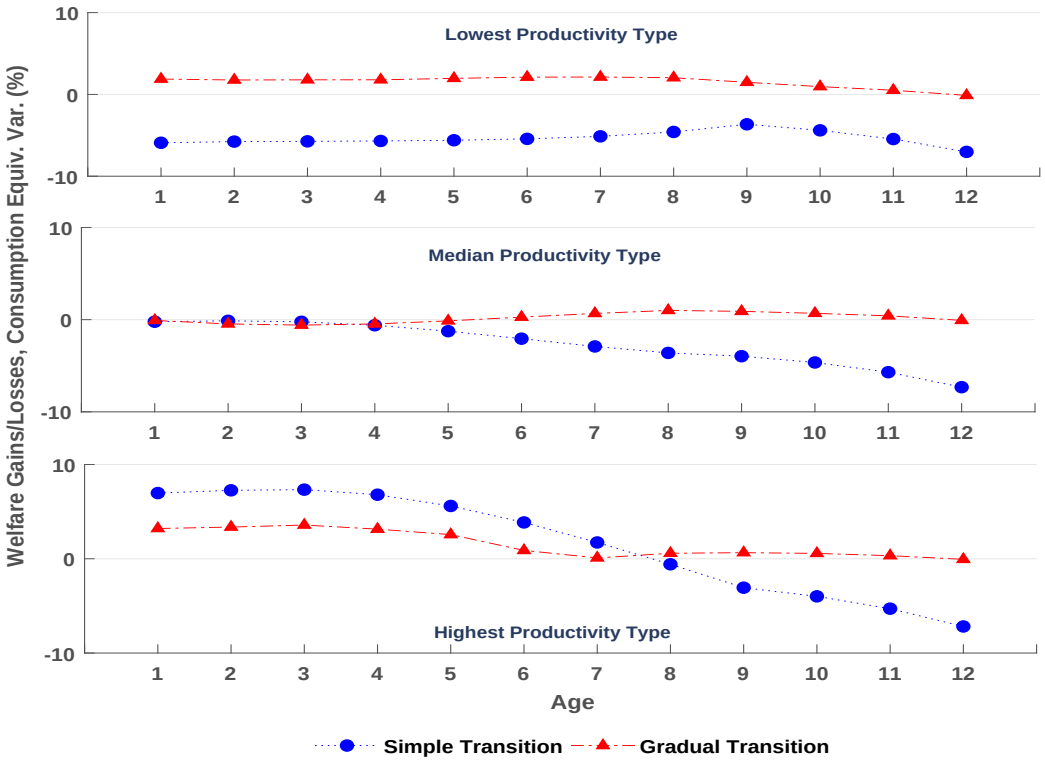
Note: This table provides a comparison of changes in the aggregate variables in the steady state of the reformed economy, for two levels of the labor supply elasticity: $\gamma = 1$ (the baseline case) and $\gamma = 2.5$.

that by knowing that a specific reform will take place in the near future, agents can adjust their economic decisions to alleviate the brunt of the change.

In my major computation, I treat the tax reform as being an unanticipated policy change. To explore the extent to which announcing the policy change beforehand would change short−run welfare consequences of the reform, I conduct the following exercise. Assume that in period 0, before any economic decisions are made, the government announces a change in the tax regime: starting from the next period, the benchmark tax system will be replaced with a flat− rate consumption tax, and everyone has to pay their taxes according to the new tax code.

Figure 2.12 compares the short−run welfare effects of the simple tax reform in the first transition period for both anticipated and unanticipated reforms. It can be seen

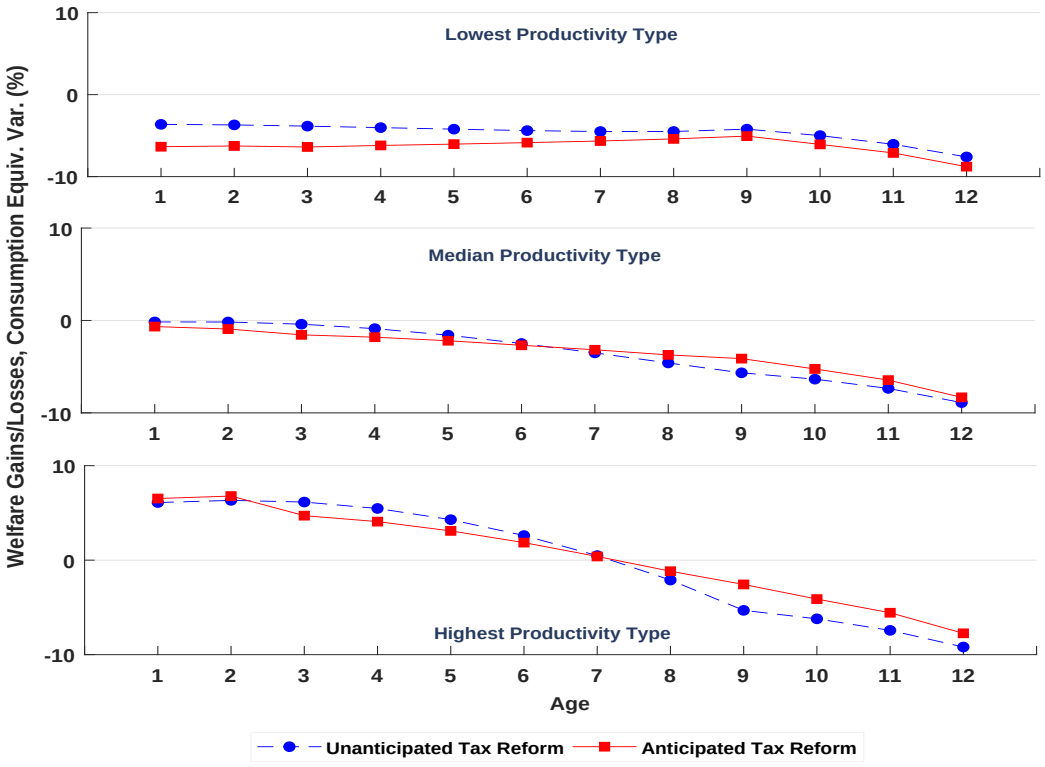
Figure 2.11: Welfare Gains/Losses of a Consumption Tax Reform at the First Period of Transition with $\gamma = 2.5$



Note: This figure shows the welfare gains/losses for agents at the first period of implementing a consumption tax system under the simple tax reform (circle dots) and the gradual tax reform (diamond dots), with a higher labor supply elasticity ($\gamma = 2.5$).

that announcing the tax reform one period ahead, does not appear to mitigate the welfare consequences at the first implementation period. Even with an anticipated reform, 62% of the population endure welfare losses. By announcing the policy one period ahead, agents know that in the next period, they must pay a flat tax on each unit of their consumption, and that their savings will be tax exempt. As a result, they increase consumption and decrease savings in period 0. Thus, in the first transition period, the welfare costs are slightly lower for those who own the lion's share of capital (the older, more productive group), as they now hold lower levels of capital

Figure 2.12: Welfare Gains/Losses of a Consumption Tax Reform at the First Period of Transition: Anticipated Policy Change

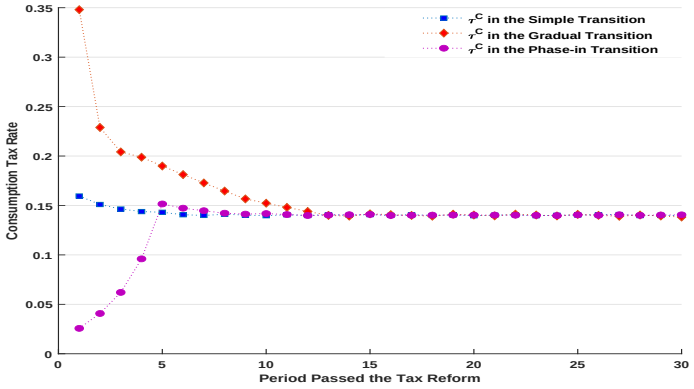


Note: This figure compares the welfare gains/losses for agents at the first period of a consumption tax reform between an unanticipated tax reform (circle dots) and an anticipated tax reform (square dots) in which the tax reform is announced one period ahead. The welfare effects are reported for a simple tax reform.

compared to the unanticipated case. However, as the capital stock is lower in the first transition period, the jump in the labor supply places greater downward pressure on wage compared to the unanticipated case. This means for those living mainly on labor income, the welfare costs are greater. Figure 2.12 reflects these results.

Overall, it can be seen that even the anticipated tax reform creates undesirable short-run welfare consequences for the living generations, and these welfare consequences could be alleviated by implementing the tax reform gradually.

Figure 2.13: Consumption Tax Rate Along the Transition



Note: This figure compares the consumption tax rate at each period of transition, needed to generate a constant tax revenue, in the simple tax reform, the gradual tax reform and the phase-in/phase-out tax reform.

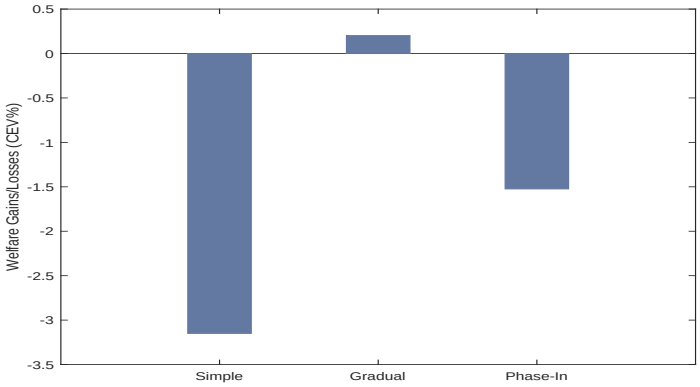
2.6.5 Phasing Out the Current Tax System

One of the procedures discussed in the literature for replacing a major policy system is to gradually phase-out the old system and introduce the new system over a certain period of time [6] . In this section, I compare the performances of a phase-in/phase-out method of implementing a tax reform with the gradual tax reform I propose in this paper.

More specifically, using the model, I simulate a revenue-neutral transition from the old tax system to the new system where the old tax regime is being phased out exponentially over five model periods (20 years), whereas the consumption tax system is introduced and the consumption tax rate is adjusted to keep the tax revenue constant. Figure 2.13 compares the consumption tax rates along the transition for the simple tax reform, the gradual tax reform, and the phase-in/phase-out tax reform. In the phase-in/phase-out reform, during the first five periods where everyone pays

[6] See For examples see [10].

Figure 2.14: Comparison of Aggregate Welfare Effects at the First Period of Transition



Note: This figure compares the aggregate welfare effects at the first period of transition across three tax reforms; the simple tax reform, the gradual tax reform and the phase-in/phase-out tax reform.

taxes in both tax systems, the induced consumption tax rate is lower compared to the simple and the gradual reforms. Starting in the sixth period, the consumption tax system is the only tax regime and everyone pays taxes under this tax code. Hence, the dynamics of the consumption tax rate in this setting closely resemble those of the rate under the simple tax reform.

The aggregate short−run welfare consequences of the three tax reforms are compared in Figure 2.14. The figure shows that although the phase-in/phase-out tax reform improves the welfare effects upon the simple tax reform, it still under-performs the gradual tax reform in that dimension. Comparing the short-run welfare consequences across agents with different productivity type at different ages, we see that the welfare effects on younger agents are mostly similar under the simple tax reform and the phase-in/phase-out tax reform, which suggests the additional burden of paying a consumption tax is being offset by the reduction in income taxes. Relatively older agents are better off with the phase-in/phase-out tax reform than they are with the simple tax reform. But they are worse off with the

phase-in/phase-out tax reform than with the gradual tax reform. The tax burden for these agents under the old tax system is much lower compared to the tax burden for the younger agents, whereas it is almost the same for both groups under the new tax system (recall these are the agents who choose to stay in the old tax system under the gradual tax reform). Hence, the welfare costs would be lower in the phase-in/phase-out reform as agents face a much lower consumption tax rate.

To sum up, although phasing out the old tax system while phasing in the new tax system gradually improves the short-run welfare effects of the consumption tax reform for some groups, it still induces considerable aggregate welfare losses at the first transition period with more than 62% of population experiencing welfare losses. Hence, the gradual tax reform I propose here outperforms this method in addressing the short-run welfare consequences of the reform.

2.7 Conclusion

A central concern in all discussions of tax reform is the dynamics of the transition path of the economy following the implementation of the reform. A major challenge that policy makers face when considering a consumption-based tax reform is how to solve initial resistance to the reform. This inertia is created by undesirable welfare consequences of the reform on generations alive at the time of the policy change, which may make the reform too costly to be politically acceptable. I propose a practical method for implementing tax reforms, which addresses this issue by delaying the adoption of the new tax code. More precisely, in the gradual tax reform, generations alive at the time of the policy change have the option of choosing between the benchmark tax system and the consumption tax system. Almost all current retirees, who would face a much heavier tax burden under the consumption tax system, decide to stay in the old tax regime. Workers, especially more productive ones, who can take advantage of the flat rate consumption tax and exemption of their savings from taxation, opt into the new tax system faster.

Comparing the predicted short-run welfare effects of the gradual tax reform with those of the simple tax reform on generations alive at the first period of the reform, confirms that letting agents choose if and when they want to switch improves their welfare experiences significantly.

My experiment suggests that the gradual tax reform can address most of the unfavorable short-run welfare effects of the tax reform. Although I describe this method in the context of a consumption−based tax reform, it can be broadly used as a practical way of implementing any type of policy reform that provides higher welfare in the long run.

Chapter 3

TAXATION AND LEGAL FORM OF ORGANIZATION

I study the aggregate consequences of the differential tax treatments of U.S. businesses focusing on the role of legal forms of organization. I develop an industry equilibrium model in which the organizational form is an endogenous choice. This model incorporates the key trade-off that businesses face when choosing their legal forms: the tax treatment of the business income; the access to external capital, and the potential level and evolution of productivity over time. The model is matched to the firm dynamic features of U.S. businesses and the contributing share of each legal form in total output. Using the model, I study revenue-neutral tax reforms in which legal forms receive the same tax treatments, and I find that the incentives induced by tax structure for organizational form and external finance are both large. Relative to the benchmark economy, unifying the tax code for all legal forms, can lead to 8% increase in the aggregate output.

3.1 Introduction

The share of pass-thorough businesses [1] in total number of businesses in the U.S. has increased substantially since 1986. According to IRS data, over the period of 1986 to 2012, the share of pass-through entities in the total number of returns grew from 85.2 percent to 95.1 percent. Also, in terms of business receipts, share of pass-through entities increased from 16.1 percent to 38.8 percent. Focusing on the legal forms of organization providing liability protection, we see that the change is even more drastic. The share of pass-thorough businesses among legal forms with limited liability in business receipts, increased from 6.2% in 1986 to 31.9% in 2012.

These developments have taken place in response to changes in tax rates, changes in the types of legal entities providing limited liability, and other changes in the economic and legal landscape governing the operation of businesses. Specifically changes of the tax code and shifts in tax regulations since the Tax Reform Act of 1986 (TRA86) made pass-thorough legal forms more attractive choices for many businesses. However, differences between legal forms of organization extend beyond just the tax treatment. Each legal form of organization brings with it specific rules and limitations on financial structure and availability of external capital for the business which in turn induce changes in the investment decisions, financing decisions and dividend policies. In this paper I argue that choosing a legal form of organization based on tax treatment rather than economic features of an organizational form could create inefficiencies, miss-allocation of capital and has consequences on growth prospect of a business.

In a pass-through business the profit is passes entirely to the owners and taxed according to individual income tax code. In a C corporation, profit is taxed first at the

[1] a pass-through is a business that does not pay corporate income tax, instead all income is passed entirely to the owner and it is taxed according to the individual income tax code. This includes entities like sole proprietorships, partnerships, and S-corporations. Detailed definition and a comparison between various legal forms are provided in section 2

business level according to the corporate income tax code. Later, when dividends are paid out or a shareholder realizes capital gain, the shareholder pays dividend income tax or capital gain tax based on individual income tax code. C corporation are the only legal form of organization that have access to the stock market to generate capital. In other words, the capital of a C corporation can be financed thorough the public capital market. However, capital of pass-through businesses are mainly financed thorough their owners' equity and they don't have access to the public capital market. These features give rise to a trade-off between two choices (1) having access to the public equity market, but facing double taxation (for C corporations) or (2) having no access to public equity, but facing only single taxation of profits (for pass-thorough entities). Capturing this trade-off in a model shed light on the mechanisms through which the tax structure influences organizational form and business operations.

Decreasing the individual income tax rate to a level lower than the corporate income tax rate, similar to the tax reform act of 1986, reduces the tax burden on pass-through entities and makes these types of legal forms more attractive compared to C corporations. However, converting the business to a pass-through entity would affect its structure as the firm would face an increase in the cost of capital. The change in the structure of businesses, would lead to changes in the demand for capital which in turn could influence savings and investments. The key contribution of this paper is providing a framework for quantifying the distortionary effects of the current tax structure on the choice of legal form of organization, the subsequent impact on the allocation of capital among businesses, and the associated effects on capital.

In this paper, I develop an industry equilibrium model in which legal form of organization s an endogenous choice for firms. In this model, production takes place in two types of firms: C-type firms which represents C corporations; and P-type firms which represents pass-through entities. These two types are different with respect to

their cost of external capital, fixed costs of production, and the potential evolution of their productivity over time. Also, they receive different tax treatments. A C-type firm's profit is being taxed at the entity level and once it distributes the after-tax profit to the shareholders, they pay individual income tax on it. Hence, a C-type is being taxed twice. For a P-type firm, the profit passed to the shareholders is subject to individual income tax.

At each period, firms that are heterogeneous with respect to their productivity, can decide if they want to stay for the next period or if they want to exit. If they choose to stay, they can choose their type for the next period, taking into consideration all the differences among a C-type and a P-type. At the beginning of each period, there is an unlimited supply of new firms that can enter the market by paying entry cost. Once they enter, they realize their productivity level for that period and then they can choose their type. This makes it feasible for the model to incorporate the trade-off between choosing to be a C corporation versus a pass-through entity in a setup that can generate firm dynamics.

The model is calibrated to match certain features of U.S. economy such as size distribution of firms, share of C corporations among all U.S. businesses and the output share of C corporations. Using the calibrated model, I proceed to evaluate the effects of taxing all legal forms of organization symmetrically.

I study the aggregate impacts of three modified tax structures, keeping the calibrated parameters fixed and the government tax revenue constant at its level in the benchmark economy. In all the three tax reforms, the *nature* of the tax base is different from the benchmark case, and both types of firms are receiving similar tax treatment. All experiments change the nature of the tax base compared to the benchmark tax system. In all tax structures evaluated here, both types of firms are receiving a uniform tax treatment. Hence, the tax advantages of one type over the

other as in the benchmark tax structure vanish.

In the first tax reform experiment, both C-type firms and P-type firms are taxed only at the corporate level while the labor income is being taxed at the same rate as in the benchmark economy. With both types of firms receiving a same tax treatment, the aggregate output of the economy increases by 7% compared to the benchmark economy, which is the result of reallocating capital to the more productive firms. In the second tax reform experiment, similar to the first one, both types of firms are taxed at the corporate level, but there single tax rate levies on both labor income and business income. The tax rate determined by imposing the revenue neutrally which results in a rate which is slightly lower than the labor income tax in the benchmark economy and a relatively higher than the business income tax in the first tax reform. Hence in this experiment, the aggregate output increases by 2%.

In the third experiment, both types of business taxation are eliminated and dividends from both types of firms are taxed at the same rate as labor income. With this tax structure the aggregate output increases by 18%. Here, eliminating the business income taxation results in a this noticeable increase in the output which highlights the distortionary effect of taxing capital income.

3.1.1 Related Literature

This paper contributes to several strands of literature. First, the empirical literature of firm dynamics in the US. There are many papers exploited microeconomic data to document various interesting facts on this topic. These papers look at issues such as dynamics of small and large firms over the business cycle - Chari et al. (2008)[8], Moscarini and Postel-Vinay(2012)[41] and Kudlyak and Sanchez (2017)[38]; cyclical reallocation of workers across employers depending on the firm size - Haltiwanger et al.(2013)[28]; or job creation by firms of different

size and age - Haltiwanger et al. (2015)[27]. There are some pure empirical papers that investigate the correlation between the tax system and business legal forms of organizations: Nelson (1991)[42], Poterba (1992)[46], Gentry (1994)[21], and Mackie-Mason et al. (1997)[40]. This paper link the changes in tax regulation with dynamic of legal forms of organization of U.S. businesses since 1980s.

Second, This paper contribute to the vast literature of the economic implications of the corporate income tax. Much of the early research focuses on tax incidence issues as exemplified by Harberger (1962)s seminal paper as well as Feldstein (1978)[19], Feldstein and Slemrod (1980)[20], and Gravelle and Kotlikoff (1989)[22]. The main focus of these papers is to study the welfare implications of the corporate income tax. Another strand of literature focuses on the effects of the corporate income tax on firm financing decisions. Bradford (1981)[7] analyzes the effect of a tax on corporate distributions to equity owners. Auerbach and Hines(2002)[2] and Jenson (1986)[34] examine the implications of corporate tax distortions on investment efficiency.

The usual practice in most papers investigating the distortions created by the corporate tax is to take as exogenous a firm's choice of organizational form, assuming for example that some industries are inherently corporate. There are few exceptions such as Kotlikoff and Miao(2013)[36] who posit that the tax impacts entrepreneurs incorporation decisions by affecting business risk sharing, suggesting that the tax-induced distortion of organizational form could have substantial efficiency costs. Chen et al. (2017)[9] evaluate how a corporate income tax reduction affects employment thorough affecting the firm's choice of legal form of organization. And finally, Dyrda and Pugsley (2017)[17] which investigates the effects of change in dynamic of legal forms of businesses on the increase in the income inequality. They propose a heterogeneous agent equilibrium model with workers, entrepreneurs and endogenous choice of legal form of organization and

quantify the contribution of tax reforms thorough the business reorganization channel on the evolution of income inequality of workers and entrepreneurs.

This paper studies the aggregate outcomes and efficiency consequences of the differential tax treatment of business incomes, and its impact on firm dynamics, focusing on the roles of legal forms of organization. I develop an equilibrium firm dynamic model with endogenouse legal form of business. The model features the extensive margin (entry and exit of firms) as well as intensive margin (expansion and contraction of the incumbent firms), i.e. I let the incumbent firms to switch their types throughout their life. This gives the model the capacity to be consistent with the empirical finding on dynamic of business legal forms in the United States. As Dyrda and Pugsley (2017)[17] document, using the U.S. Census micro level firm data, the significant increase in pass-through entities is coming from two sources: first is a secular increase in the share of new businesses which chooses the legal form of a pass-through entity, offsetting nearly perfectly a decline in the share formed as traditional corporations; and second, an increase in the share of corporations converting to pass-through entities, noticeable near tax-reform episodes. Using the model I quantify the distortionary effects of differential tax treatments of business income on capital allocation, exploiting the channel of choosing the legal form of business.

In what follows, I document the empirical trend in the dynamic of business legal forms in the United States over the period of 1986 to 2012. More precisely, I investigate the distribution of business income by organizational form using the IRS tax return data. Also I describe tax reforms and changes in regulations that have taken place over time, and establish the empirical link between changes in tax legislation and the evolution of distribution of business legal forms.

3.2 Legal Forms of Organization of U.S. Businesses

During the past thirty years, the most drastic change in legal forms of organization of U.S. businesses is a secular increase in pass-through entities and a decline in the traditional corporations. Different tax treatment is only one of the characteristics of each legal forms of organization that distinguished them from each other. In this section, I provide a brief summary of features of each type of legal forms in the U.S. and then with these definitions in hand, I provide a review on the numerous legal changes that took place since the passage of the Tax Reform Act of 1986 (TRA86) and describe their effect the actual dynamics of business legal forms in the United States using IRS data.

Businesses in the United States, may operate in a variety of organizational forms, ranging from sole-proprietorship to traditional C corporations. The choice of legal form of organization for the business would usually reflect the need for capital, for flexibility and for owners protection from the liabilities that the business takes on, also the legal form of organization determines the federal level tax burden on the business. The main legal forms of organization in the United states are: sole proprietorship; general partnership; limited partnership; limited liability company; S corporation; and C corporation. Their main characteristics are illustrated in table 3.1.

Sole-proprietorship, is the simplest legal form of organization, one that has no separate legal existence from its owner. There are no legal requirements to operate a proprietorship. This form does not provide any liability protection for the owner, i.e. the owner is personally responsible for all legal obligations of the firm. Also, the life of a proprietorship is limited by the life of the proprietor. The profits and losses of the business flow through to the owner and taxed at owner income level according to individual tax code.

Table 3.1: Main Features of Legal Forms of Organization

	Number of Owners	Taxing Structure	Liability Protection
Sole Proprietorship	1	Pass-through	No
Partnership:			
General Partnership	1+	Pass-through	No
Limited Partnership	1+	Pass-through	No
Limited Liability Company(LLC)	1+	Pass-through	Yes
S corporation	[1,100]	Pass-through	Yes
C corporation	1+	Corporate tax Dividend/capital gain tax	Yes

This table compares legal form of organizations available for U.S. businesses, along three dimensions: number of owners, whether they provide limited liability protection and their tax treatment

General partnership, is very close to sole-proprietorship with more than one owners.

Limited liability partnership, with this form limited liability partners, are not personally liable for the debts of the LLP or any other partner, nor is the partner liable for the malpractice committed by other partners. There must be at least one general partner, who bears unlimited legal liability for the business's legal obligations. The profits and losses of the business pass through to the partners at a pro rata share.

Limited liability company, or LLC is a hybrid between the partnership and the S-corporation. Owners of an LLC enjoy limited liability, ease of transfer of ownership shares, pass-through of income to the owners, and less administrative burden than faced by owners of a corporation. It can be single-owned.

Corporations a corporation is a separate legal entity from its owner. All owners of a corporation enjoy limited liability. In sharp contrast to a proprietorship and partnership, a corporation enjoys an unlimited life as well as free transferability of interest and centralized management . The unlimited life ensures that the firm does not automatically dissolve upon the death, bankruptcy, or withdrawal of the owner. Free transferability of interest implies that each owner may sell his or her interest without the permission of the other owners. And the centralized management means that the decision making belongs to the board of directors and not directly to the general owners.

There are two main type of corporation in the U.S.: C corporations and S corporations. **C corporation** are subject to corporate income tax at both federal and state levels, any earnings distributed to shareholders as dividends or capital gains are subject to a second level of taxation at personal income tax rates. In contrast to C corporations, **S corporation** income passes through to its shareholders so that it is subject to a single level of taxation, at the personal level [2] . The S-corporation was created in 1958 to provide tax relief primarily to small privately held firms. However, they are subject to a number of restrictions, including a limit to one class of stock and a limit on the number of shareholders [3] . Also shareholders of an S corporations must be U.S. citizens or residents, and must be physical entities (a person), so corporate shareholders and partnerships are to be excluded.

We can categorize these legal forms of organization according to their tax treatments. As described above, C corporations, face double taxation of their profit;

[2]Some states, most notably California and New York, recognize the pass-through nature of S-corporations but still impose a tax at the entity level.

[3]Originally, the shareholder limit was set at 10, but subsequently was raised to 15 in 1976, to 25 in 1981, to 35 in 1982, to 75 in 1996 and to 100 in 2004.

first, they pay corporate income tax on their profit at the entity level and further, whenever the after-tax profits are distributed to the shareholders as dividends, or shareholders realize capital gains by selling the corporate shares, they need to pay personal income tax on them. However, C corporation is the only legal forms of organization that is subject to corporate income tax. In fact, S corporation together with all other non-incorporated legal forms pass all profits thorough to their owners, who pay individual income tax on them, hence, they are called pass-thorough entities.

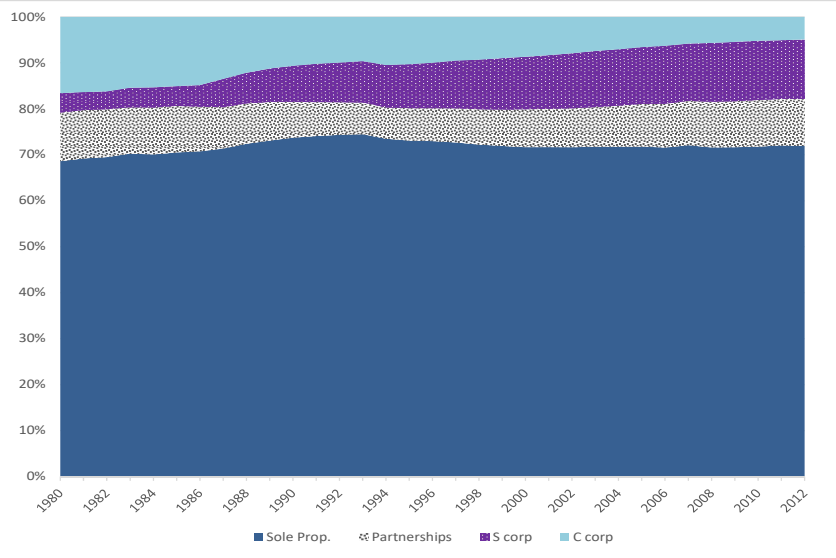
Since 1980, the overall number of tax returns reporting business income has grown from 13 millions to 32.7 millions. The differences in the growth rates among the various return types between 1980 and 2012 are striking. The number of C corporation returns have declined by 25 percent, this is while the total number of corporate returns (C corporation plus S corporations) increased, i.e. the decline in the number of C corporations was offset by an increase in the number of S corporations.

Figure 3.1 and figure 3.2 show the significant changes in the distribution of legal form of organizations in the US over the past thirty years. The share of C corporations in total number of entities dropped from 16.6 percent in 1980 to 4.9 percent in 2012, while the share of business receipts of C corporations in total business receipts decreased from 86.2 percent to 61.2 over the same period.

Over the same period, the share of organizational forms that provide liability protection among all U.S. businesses stay almost constant. However, withing these forms, the share of pass-thorough entities increases significantly in term of number of businesses as well as their share of business receipts (see figure B).

In order to have a better understanding of the size of economic activity taking place in each business form I compare the net income less deficit for all businesses. This is an intermediate measure of taxable income that is calculated prior to taking

Figure 3.1: Share of U.S. Businesses Organized in each of the four Basic Legal Form of Organization



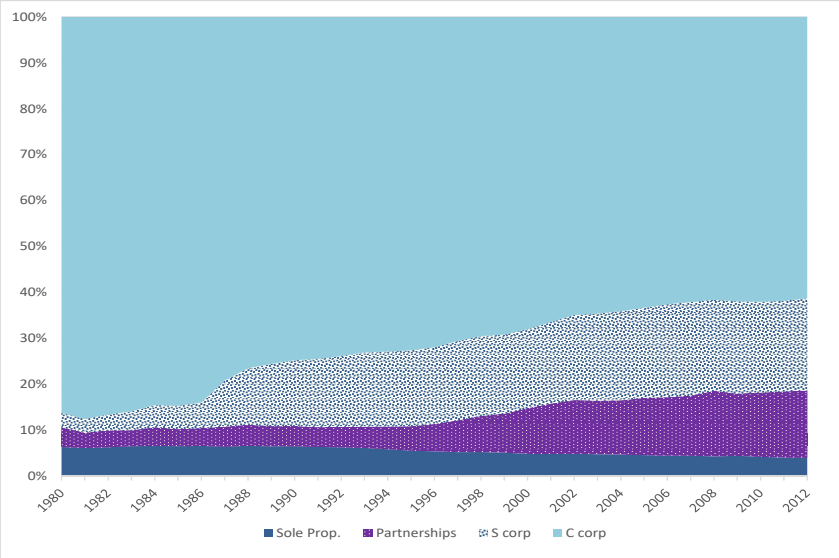
Source: IRS, SOI Tax Stats, and author's calculation.

This figure shows how the percentage of U.S. businesses organized in each of the four main legal forms of organization has evolved over time.

special deductions (it can be either positive or negative). As figure 3.3 shows, the dramatic change in the roles of organizational forms and economic activities is coming from the sharp decline in the share of C corporations. While C corporations reported 74 percent of net income less deficit in 1980, by 2012 that share had declined to 35 percent. The shares for partnerships, mainly limited liberality companies, and S corporations grew over the same period.

The IRS data reports the stock measure for all organizational forms over time. Dyrda and Pugsley (2017) measure both the stock and flows across the legal forms of employer businesses using confidential micro-level Census data. They merge the

Figure 3.2: Share of Each Legal Form of Organization in Total U.S. Business Receipts



Source: IRS, SOI Tax Stats, and author's calculation.

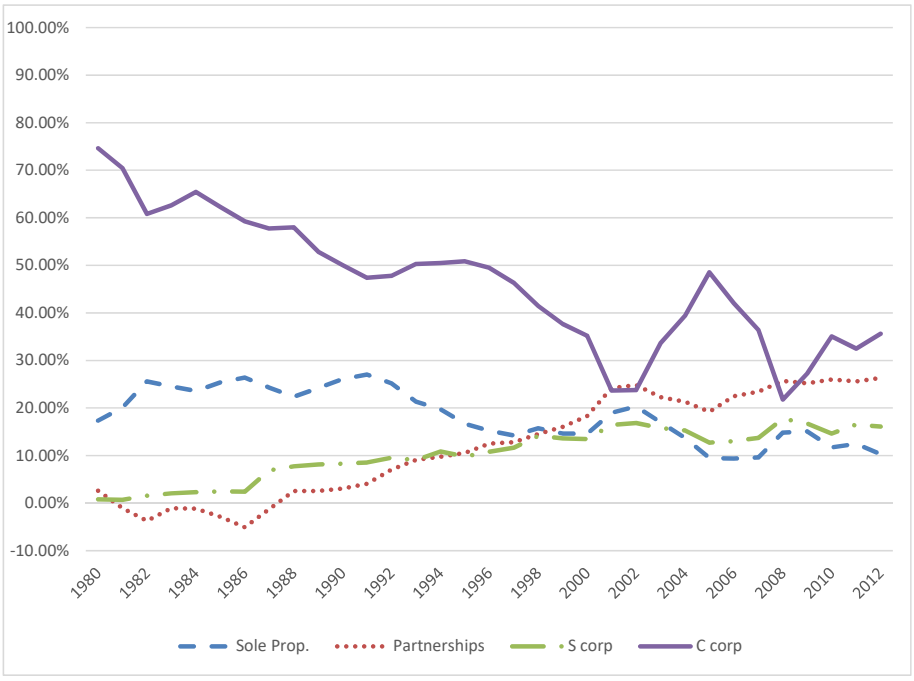
This figure shows the evolution of the share of each legal form of organization in the total U.S. business receipts.

Longitudinal Business Database (LBD), which provides a complete enumeration of nearly all U.S. private sector **establishments**, with additional raw data from the Business Register. They construct matrices to measure transitions across legal forms for each year from 1980 to 2012, and they estimate them for two cases of equally weighted establishments and weighting by each establishments payroll [4] . According to their estimates, the conversion rate from C corporations to pass-through entities increases around periods of major tax reforms that reduced

[4] Dyrda and Pugsley (2017)[17]

> ...Weighting by each establishment payroll, can be interpreted as an activity weighted measure which assigns more weight to large firms.

Figure 3.3: Share of Legal forms of Organization in Total Net Income Less Deficits



Source: IRS, SOI Tax Stats, and author's calculation.

This graph shows how the total net income less deficits of all U.S. businesses is divided among all organizational forms.

personal income tax, in particular the top rates.also, they argue that the surge in business conversions was concentrated in larger firms, because the share of conversions when weighted by payroll is larger (see figure B.2).

3.2.1 Changes Influencing Business Organizational Form since TRA86

In this part I provide a review of numerous legal changes that took place since Tax Reform Act of 1986 (hereafter TRA86) and describe their effect on

organizational form decisions by businesses.

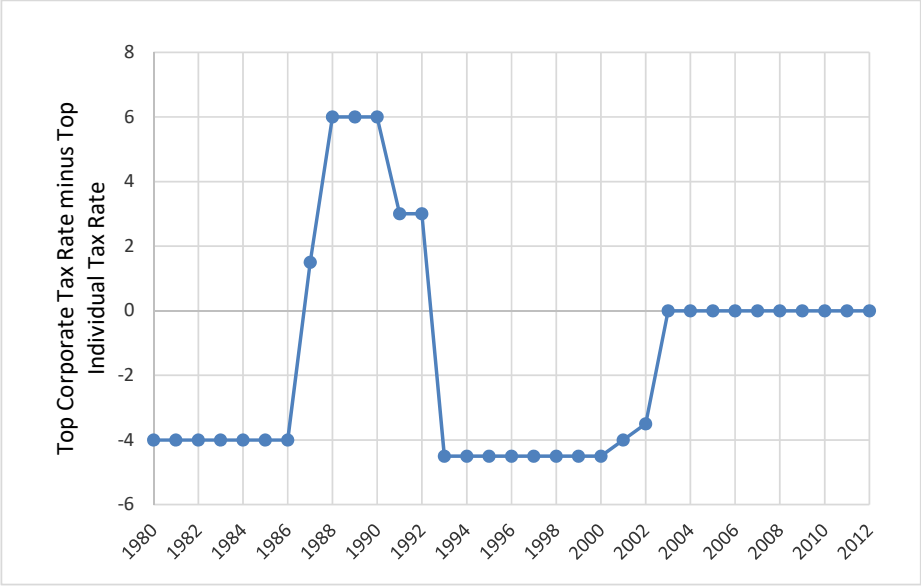
For the first time in the U.S tax history, TRA86 reduced the top individual tax rate below the top corporate tax rate. As it has been shown in figure 3.4 over a two-year phase-in period, the maximum individual tax rate was reduced from 50 percent to 28 percent while the corporate rate declined from 46 percent to 34 percent. As a result, C corporations, which are subject to corporate income tax, were facing a higher tax rate compared to pass-through entities, even not taking into account the dividend tax or the capital gain tax. This encouraged C corporations to change their legal form to one of the pass-through entities to avoid the higher tax rate. [5] . This is consistent with what Dyrda and Pugsley(2017)[17] found in the micro level data. As they have reported, there is a spike in the conversion rate of C corporations to pass-through entities over the same period as TRA86 took place (see figure B.2).

This inverted rate structure lasted until 1993 when the Omnibus Budget Reconciliation Act of 1993 increased the maximum individual rate to 36 percent with a 10 percent surtax on income in excess of $\$250,000$ (married filing jointly), and thus created a new maximum individual marginal tax rate of 39.6 percent. In addition, a new corporate tax rate of 35 percent was introduced on taxable income in excess of $10 million.

The 2001 Economic Growth and Tax Relief Reconciliation Act, along with the Jobs and Growth Tax Relief Reconciliation Act of 2003, reduced the top individual

[5]There were other provisions of TRA86 that created additional disincentives to remaining a C corporation, such as introducing a new corporate Alternative Minimum Tax or repealing the *General Utilities* doctrine, under which a C corporation that sold its assets to another corporation was able to distribute the proceeds of the sale to shareholders without having to pay a corporate level tax.

Figure 3.4: difference Between the Top Corporate Tax Rate and the Top Individual Tax Rate



This graph plots the top corporate income tax rate minus the top individual income tax rate. Hence, for periods in which the corporate tax rate is higher than the individual tax rate the graph shows positive values.

rate to 35 percent, the same as the top corporate rate, beginning in 2003, and those two equal maximum rates persisted through the end of 2012.

In addition to changes in tax structure, there have been other changes that encouraged the expansion of pass-through entities since 1986: the number of shareholders allowed in an S corporation rose from 35 to 100, and changes in state laws facilitated the growth of limited liability companies(LLCs).

3.3 Model

The empirical facts discussed in previous section are useful for understanding the link between tax reforms and changes in regulations with changes in the distribution of legal forms of organization. However they don't highlight a clear role for the choice of legal forms for businesses as a mechanism thorough which changes in the tax legislation distort the capital allocation and aggregate output in the economy. Also it is not clear how the distribution of legal forms of organization would evolve facing a fundamental tax reform. So I need a model to address these issues. In this section, I develop a model of firm dynamics featuring endogenous choice of legal forms of organization.

Time is discrete and infinite. The economy consists of a representative household, a unit measure of heterogeneous firms, and a government. The paper focuses on a steady-state analysis of the model. Next,I describe decisions of each type of agent in the model, and then I define the stationary equilibrium

3.3.1 Preferences

The economy is populated with a unit measure of identical infinitely-lived households, who value the path of consumption according to the following utility function:

$$\sum_{t=0}^{\infty} \beta^t u(c_t)$$

where c_t is the consumption in period t and $0 < \beta < 1$ is the time discount factor. Households are endowed with one unit of time in each period which they supply to the market inelastically.

3.3.2 Technology

In this economy production can take place in two types of firm, one type is a C corporation, denoted by C-type, and the other type is a pass-through firm, denoted by P-type. Both types use capital and labor as inputs and use the same production technology to produce a homogeneous output,

$$f(s,k,n) = s^{1-\gamma}(k^{\theta}n^{1-\theta})^{\gamma} \tag{3.1}$$

where k is capital, l is labor, and s is the productivity shock. Both types of firm are subject to an idiosyncratic productivity shock at each period.
A C-type firm pays tax at the corporate level. Any distribution of the after-tax profit among shareholders is also subject to an individual level tax. Therefore it pays tax twice while s P-type firm passes any profits or loss to the owners and they pay income tax on it.

Apart from receiving different tax treatments,these two types vary along three dimensions:

- Fixed cost of production,

  Another difference is with respect to the fixed cost of production. A C-type firm faces a higher fixed cost of production compared to a P-type firm. [6]

- Rental rate of capital,

  As I discussed before, while C corporation has access to the public equity market which is basically an elastic supply of external equity, a pass-thorough entity can only rely on its owners personal fund to use either as equity or as a collateral

[6]The overhead cost in C-corporations are higher than other types, this an be interpreted as cost of using an specific accounting system, keeping records of the all the board meetings, tax preparation,...

for issuing debt. This feature is captured in the model by introducing a wedge over rental rate of capital for pass-thorough entities. Let R be the rental rate of capital in the market, then the R^p is the rate at which pass-thorough entities can raise capital,

$$R^p = R(1 + \zeta) \tag{3.2}$$

here ζ is the wedge that pass-thorough entities face. This can be think of as an abstract way of capturing the idea that it is harder and therefore, more expensive for pass-through entities to generate external capital.

- Evolution of the productivity shock over time,

  The final difference between the two types are with respect to their productivity paths. Productivity evolves according to an exogenous $AR(1)$ process with an innovation that is independent across firms. The standard deviation for the innovation process is bigger for C-type relative to P-type firms. C corporation is the only legal form that has access to the public equity market, this makes them more eager t pursue projects and investments assessed with higher risk, mainly because they have better opportunities to diversify the risk compared to pass-through entities. This feature is captured through the higher standard deviation for the innovation in the shock process of C-type.

3.3.3 Government

In this model government collects revenue by taxing labor income, dividend income, taxing C-type firms at the corporate level, and taxing P-type firm at their owners income level.

Timing

The timing of the events within a period is as follows:

Incumbent Firms, at the beginning of each period, an incumbent firm pays the fixed cost of production C^F, then the productivity shock for the period, s_t is realized and the firm decides on its current period capital and labor demands. At the end of the period the firm decides between exiting the market and staying for the next period. If the firm exits, it disappears from the model and receives profit zero in all future period. If it stays, the firm can choose its type for the next period; it can choose to continue to the next period with the same type or it can switch the type and start the next period with the new type.

New Entrants, at each period there is a continuum of ex-ante identical potential entrants. new firms have to pay a one-time entry cost of C_e. Once this cost has been paid, the new entrant draws a productivity shock s_t from a distribution η. These draws are independently and identically distributed across entering firms. Given s_t, an entrant chooses its type and its problem is equivalent to an incumbent firm with the same type that has the productivity shock s_t.

Households, at the beginning of each period, households rent their labor endowments and capital stocks to the firms. It has been assumed that households own equal shares in all firms and at the end of each period they receive the labor income, capital income and profit of firms. They choose their consumption and saving at the end of the period.

3.3.4 Decision Problems

This section describes decision problems for both types of firms an the household.

3.3.5 Firms' Decision Problem

The state of each firm at any period, can be described by a pair (Δ, s), where Δ is the type of firm in that period, $\Delta \in \{C, P\}$ and s is the corresponding period productivity shock. While productivity evolves exogenously, firms choose their type endogenously. At the end of each period, after observing current productivity, s, a firm decides on its type for the next period, upon staying in the economy. In this model value of each firm is determined by the present value of the stream of after-tax profits of the firm that are collected by owners.

A C-type Incumbent Firm: for a C-type firm with state (C, s) that is subject to the corporate income tax and the dividend tax, the after-tax tax profit at each period is determined in the following way:

$$\Pi(C, s) = \max_{k,n} \left[\Big([f(s, k, n) - wn - wC_F^C - \delta k][1 - \tau^c] - Rk \Big)(1 - \tau^d) \right] \tag{3.3}$$

where w is the wage rate, R is the rental rate of capital, τ^c is the corporate tax rate and τ^d is the dividend tax rate. The value function of a C-type incumbent firm with state (C, s) is denoted by $V(C, s)$ which is given by

$$V(C,s) = \Big[\Pi(C,s) + \beta \max_{C,P,exit} \Big\{ \int V(C,s')Q^C(s,ds'), \int V(P,s')Q^P(s,ds') - wC_S^C, G \Big\}\Big] \tag{3.4}$$

Here $Q^C(s,s')$ is the transition function for the Markov process of shock s^C, and $Q^P(s,s')$ is the transition function for the Markov process of shock s^P. G is the exit value. C_S^C is the switching cost that the c-corporation has to pay if it chooses to switch type to a pass-through entity for the next period.

A P-type Incumbent Firm: for a P-type incumbent firm with state (P,s) , that is only subject to individual tax, the after-tax profit in each period is determined in the following way:

$$\Pi(P,s) = \max_{k,n} \Big[(f(s,k,n) - wn - wC_F^P - \delta k)(1-\tau^i) - R^P k)\Big] \tag{3.5}$$

where, τ^i is the individual tax rate. The value function of a P-type incumbent firm with state (P,s) is denoted by $V(P,s)$ which is given by

$$V(P,s) = \Big[\Pi(P,s) + \beta \max_{C,P,exit} \Big\{ \int V(P,s')Q^P(s,ds'), \int V(C,s')Q^C(s,ds') - wC_S^P, G \Big\}\Big] \tag{3.6}$$

Here, C_S^P is the switching cost for a pass-thorough entity.

An Entrant Firm, the value of entering gross of entry cost can be computed by

$$V^e = \int_s \max\{V(C,s), V(P,s)\}\eta(ds) \tag{3.7}$$

As value functions are increasing in the level of productivity shock, we can show that there exits a threshold value of shock $\overline{s}$ such that for productivity shock above that value, a new entrant chooses to be a C-type firm and for productivity shocks below that level, a new entrant chooses to be a P-type firm.

The firms decision problem produces four decision rules: the optimal choice of capital $k(\Delta, s)$, the optimal choice of labor $n(\Delta, s)$, stay or exit decision $\mathbb{1}_{exit}$ and the decision to switch the type $\mathbb{1}_{switch}$ ($\mathbb{1}$ is an indicator function).

3.3.6 Households' Decision problem

In this economy households rent the labor and capital to the firms. They are also the owners of the firms and receive their profits. The state of households can be described with the capital K and the firm ownership given by a measure x over firm types. The decision problem of a household with state (K, x) be written as

$$H(K,x) = \max_{c,k'}\{u(c) + \beta H(K', x')\} \tag{3.8}$$

s.t.

$$
\begin{aligned}
c + M\,C_e + K' \leqslant & w(1-\tau^i) + \\
& (1+R)\Big(\int k(C,s)x(C,ds) + \int_{\overline{s}} k(C,s)\eta(ds) + \\
& \int k(P,s)x(P,ds) + \int^{\overline{s}} k(P,s)\eta(ds)\Big) + \\
& \int \Pi(P,s)x(P,ds) + \int_{\overline{s}} \Pi(P,s)\eta(ds) + \\
& \int \Pi(C,s)x(C,ds) + \int^{\overline{s}} \Pi(C,s)\eta(ds) + Tr
\end{aligned}
\tag{3.9}
$$

$$
\begin{aligned}
x'(C,\mathcal{S}) = & \int (1-\mathbb{1}_{switch}(C,s))(1-\mathbb{1}_{exit}(C,s))Q^C(s,\mathcal{S})x(C,ds) \\
& \int \mathbb{1}_{switch}(P,s)(1-\mathbb{1}_{exit}(P,z))Q^P(s,\mathcal{S})x(P,ds) \\
& + M\int_{\overline{s}} (1-\mathbb{1}_{switch}(C,s))(1-\mathbb{1}_{exit}(C,s))Q^C(s,\mathcal{S})\eta(ds) \\
& + M\int^{\overline{s}} \mathbb{1}_{switch}(P,s)(1-\mathbb{1}_{exit}(P,z))Q^P(s,\mathcal{S})\eta(ds)
\end{aligned}
\tag{3.10}
$$

$$
\begin{aligned}
x'(P,\mathcal{S}) = & \int (1-\mathbb{1}_{switch}(P,s))(1-\mathbb{1}_{exit}(P,s))Q^P(s,\mathcal{S})x(P,ds) \\
& + \int \mathbb{1}_{switch}(C,s)(1-\mathbb{1}_{exit}(C,z))Q^C(s,\mathcal{S})x(C,ds) \\
& + M\int^{\overline{s}} (1-\mathbb{1}_{switch}(P,s))(1-\mathbb{1}_{exit}(P,s))Q^P(s,\mathcal{S})\eta(ds) \\
& + M\int_{\overline{s}} \mathbb{1}_{switch}(C,s)(1-\mathbb{1}_{exit}(C,z))Q^C(s,\mathcal{S})\eta(ds)
\end{aligned}
\tag{3.11}
$$

where Tr is the transfer to the household. [7] Equation (10) and (11) gives the next period ownership of firms x'. The first integral in equation (10), represents the incumbent firms of type C, who stayed and did not switch type in period t, the second integral represents the incumbent firms of type P, who stayed but switched to other type in period t. The third line, shows the new entrants who choose C type for the current period and keep their type for the next period as well. And finally the last line, represents the mass of new entrants who choose type P in the current period but decide to switch to C-type for the next period. Equation (11) can be interpreted in the similar way.

Given the model specified above, a stationary equilibrium is defined in the following way.

3.3.7 Equilibrium

At steady state equilibrium, the aggregate state of the economy (K^*, x^*) and equilibrium prices w^* and R^* are constant over time. Firms solves their problem taking equilibrium prices as given and generate decision rules $n^*(\Delta, s)$, $k^*(\Delta, s)$, $\mathbb{1}_{exit}(\Delta, s)$ and $\mathbb{1}_{switch}(\Delta, s)$. Households solve their decision problem, taking firms' decision rules, equilibrium prices and transfers as given, and choose $K' = K^*$ and $x' = x^*$ for the next period. Market clears for good, capital and labor services and government budget constraint holds.

The definition of a recursive equilibrium for this economy is by nowadays standard. Appendix C provides a formal definition of the equilibrium, and appendix D outlines the algorithm for solving the model.

[7] In the equilibrium, the transfer Tr is equal to

$$Tr = (R^p - R)(\int k(P, s)x(P, ds) + \int^{\overline{s}} k(P, s)\eta(ds)) \tag{3.12}$$

3.4 Calibration

This part describes the calibration process of the model, including the choice of calibration targets and discussion of the implication of calibration results.

All parameters are chosen such that the model be consistent with certain features of U.S. economy over period 1980 to 1985.

The model period is one year. Households' period utility function has the log utility form, $u(c) = \log(c)$.

The logarithm of productivity shock s follows an $AR(1)$ process with persistency of ρ and standard deviation of σ. The shock process differs by firm's type, persistency parameter is common between the two but the standard deviation of the innovation is different.

$$\log(s') = \rho \log(s) + \epsilon_\Delta \;\; where \;\; \epsilon_\Delta \sim N(0, \sigma_\Delta^2)$$

I used the method developed in Tauchen (1986) to the $AR(1)$ process with a first-order Markov process.

Distribution of productivity shock for new firms, $\eta(s)$, is a composite lognormal-Pareto distribution which takes a log-normal density up to a threshold and a Pareto density thereafter. A detailed description of driving this composite distribution is provided in appendix E.

The depreciation rate δ is the total depreciation of private fixed assets by

Table 3.2: Parameters Calibrated Independently

Parameter	Description	Value
δ	Depreciation rate	0.07
θ	Importance of capital	0.406
γ	Return to scale	0.802
τ^c	Corporate tax rate	0.46
τ^d	Dividend tax rate	0.2
τ^i	Individual income tax rate	0.5

corporate firms, partnerships, and sole proprietorships (NIPA Fixed Asset Table 6.4 lines 2, 6, and 7) divided by the total private fixed assets of corporate firms, partnerships, and sole proprietorships (NIPA Fixed Asset Table 6.1 lines 2, 6, and 7). The estimated annual depreciation rate is 7.1 percent. Values for parameters θ and γ that are controlling the return to scale and capital share are set such that the model is consistent with the capital share of output in the data.

Tax rates are set to their statutory values over period 1980 to 1985. Before Tax Reform Act of 1986, the statutory corporate tax rate was 46%, the dividend tax rate was 20% and the top marginal income tax rate for individuals was 50%. For this iteration I use the statutory tax rates. Table 3.2 reports parameters that are set independently.

The remaining parameters are calibrated jointly in the model. Table 3.3 provides a summary of these parameters.

A set of empirical moments are used to pin down the value of these parameters. Table 3.4 provides a description of these data moments and compares them with

Table 3.3: Parameters Calibrated Jointly

Parameter	Description	Value
β	Discount rate	0.946
ρ	Persistency of productivity shock	0.969
σ_C	Std. deviation of productivity shock for C-type	0.554
σ_P	Std. deviation of productivity shock for P-type	0.413
C_F^C	Fixed cost of production, C-type *	0.136
C_F^P	Fixed cost of production, P-type *	0.023
C_e	Fixed entry cost *	0.176
ζ	Markup on capital rent for P-type	0.175
C_{switch}^C	Cost of switching from C-type to P-type *	0.117
θ_{eta}	Threshold parameter for entrant's productivity dist. η	9.89
α_η	Tail parameter for η	0.96
σ_η	Std. deviation for η	1.3

*, these cost are in wage unit

moments generated in the model.

Calibrated model fits the data well. Specially, it is able to match the firm-size distribution of firms and the output share of C-corporation. As expected, we see that firms with higher productivity are choosing C-type and firms with lower productivity are choosing P-type. Distribution of both types of firms over productivity levels are shown in figure 3.5.

Table 3.4: Data and Model Moments

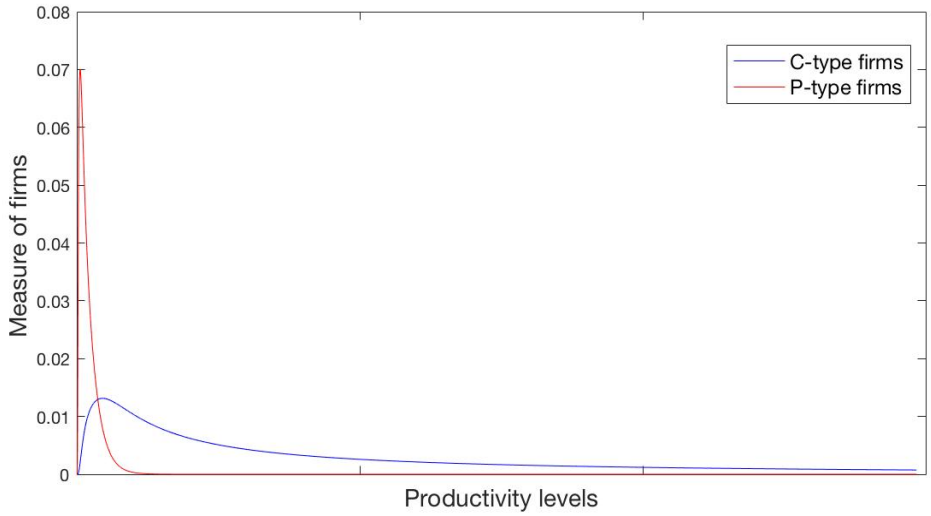
Statistic	Data	Model
Capital output ratio	1.8	1.79
Fraction of C corporation	0.16	0.179
Output share of C corporations	0.84	0.79
Fraction of entry firms	0.12	0.11
Employment share of entry firms	0.04	0.039
Fraction of switching C corporations	0.015	0.013
Firms exiting rate	0.08	0.11
Employment share of top 2% of firms	0.42	0.48
Employment share of bottom 56% of firms	0.062	0.064
Employment share of top 2% of entrants	0.28	0.66
Employment share of bottom 85% of entrants	0.38	0.14

3.5 Tax Reform Experiments

In this section, I use the benchmark model to study the aggregate impact of three modified tax structures, keeping the calibrated parameters fixed and the government tax revenue constant at its level in the benchmark economy.

All experiments change the nature of the tax base compared to the benchmark tax system. In all tax structures evaluated here, both types of firms are receiving a uniform tax treatment. Hence, the tax advantages of one type over the other as in the benchmark tax structure are vanished. In what follows I provide detailed description of each tax structure and discuss their impact on the economy.

Figure 3.5: Distribution of both types of firms over productivity levels



This figure shows the measure of each type of firms with different productivity. Higher productivity firms are C-type and lower productivity firms are mostly P-type.

3.5.1 Tax Reform 1: Uniform Business Income Taxation

In this experiment, the benchmark tax structure is replaced with a tax system in which both C-type firms and P-type firms receive the same tax treatment. More precisely, the dividend tax for C-type firms is abolished and the both types pay business income tax at the entity level, at the same rate τ_1. Also, labor income is taxed at the same rate as in the benchmark economy. The business tax rate, τ_1, is chosen such that the tax revenue stays constant as in the benchmark economy.

Third column of table 3.5 reports the aggregate variable under this tax system. As it can be seen in the table 3.5 replacing the benchmark tax system with the tax structure described above increases the total output by around 8 percent. Fraction of C-type firms is smaller and P-types firms are relatively bigger. The employment share of lower 56% of firms increases by 15% which is mainly coming from the increase in

Table 3.5: Effects of Changing the Tax Structure

	Benchmark	Tax Reform 1	Tax Reform 2	Tax Reform 3
Calculated Tax Rate, τ	.	0.41	0.49	0.56
Capital Output Ratio	1.79	1.89	1.74	2.51
Output	5.1	5.5	5.2	5.9
		(+7.8%)	(+2%)	(+16%)
Output share of C-type	78.6	74.9	74.1	76.4
Fraction of C-type	0.18	0.12	0.14	0.13
Empl. Share of Bottom 56%	6.4	7.4	7.2	7.5
Empl. Share of new Firms	3.9	4.5	4.1	3.8

This table reports how the aggregate variables changes with the change in the tax structure. Tax reform 1 is a uniform business income taxation system in which both types of firms are taxed symmetrically at the entity level, there is no dividend tax and the labor income is taxed at the same as in the benchmark economy. Tax reform 2 is a uniform business income and labor income tax system. compared to tax reform 1, the only difference of tax structure is that here both labor income and business income are taxed at the same rate. And finally, tax reform 3 is a uniform dividend and labor income tax system. In this case, both types of business taxation is abolished and the dividend from both types is taxed at the same rate as the labor income. Note that all tax reform are revenue neutral so the calculated tax rate reported in the first row of the table, is the one required to keep the government revenue constant.

the number of new firms entering the market each period, that are relatively smaller.

The calculated tax rate τ_1 is 0.41, which is lower that the tax rate levies on P-type in the benchmark economy (0.5). It is also below the benchmark's corporate tax rate (0.46) which is levies on C-type. Therefore, with this tax code, there is an expansion of P-type sector relative to the benchmark economy. Part of this expansion is due to

lower exit rate. As we saw in previous section, lower productivity firms are mostly of type P. Facing a lower tax burden increases the present value of a P-type firm at each productivity level and this in turn pushes down the productivity threshold below which a firm decides to exit the market.

Notice that here both types of firms are subject to the business income tax. Hence we still have the notion of distortion on capital accumulation as in the benchmark tax system. However, in contrast to the benchmark case,the tax structure is not in favor of any type. Therefore, the increase in the output is the effect of reallocation of capitalacross types. Unifying the tax treatment across all firms affects firms' choice of legal form of organization, for which the trade-off is between the fixed cost of production and the cost of capital.

3.5.2 Tax Reform 2: Uniform Business and Labor Income Taxation

The tax structure in this experiment is close to the one in tax reform 1. The only difference is that both labor income and business income are taxed at the same rate τ_2, which is picked to generate the same tax revenue as in the benchmark economy. In other word, this is a tax code in which all sources of income are taxed at the same rate τ_2.

The forth column of table 3.5 reports the values of aggregate variables in this tax structure. Here the calculated tax rate τ_2 is 0.49, which is higher compared to the calculated tax rate in tax reform 1 ($\tau_1 = 0.41$). Hence in the business income is subject to a higher tax rate. However, the tax rate on labor income, which is τ_2 is slightly lower that the labor income tax in the benchmark economy (0.5). So we decreases the tax rate on labor income at the cost of increasing the tax rate of business income, which justifies the smaller increase in the total output relative to tax reform 1. As it can be seen in table 3.5, this tax code affects the economy in the

same way as tax reform 1 but in lower magnitude. The fraction of firms choosing to be a C-type is lower compared to the benchmark economy and more new firms enter the market each period.

3.5.3 Tax Reform 3: Uniform Dividend and Labor Income Taxation

In the final tax reform experiment, there is no business taxation. In this tax system, the tax base is comprised dividend from both types of firms ,and labor income. In other word, this tax structure abolishes both types of business taxation, and dividends from both types of firms are taxed at the same rate as labor income, τ_3, which is set to keep tax revenue constant. Notice that this tax code is effectively a consumption tax system.

The most noticeable change of variables in this tax reform is the increase in the aggregate output. As it is reported in the last column of table 3.5, replacing the benchmark tax system with this uniform dividend and labor income tax code, increases the output by 16%. Number of firms of both types increase relative to the benchmark case, but the increase in the number of P-type firms is bigger. Fraction of businesses organized as a C-type shrinks.

Comparing this tax reform with previous reforms highlights the impact of capital income taxation on capital accumulation. More precisely, the big rise in the output is the result of two channels working here: capital accumulation, and capital reallocation. Abolishing the capital income taxation removes the distortion on capital accumulation while equalizing the tax treatment of both types of firms removes distortion on capital allocation. Although the calculated tax rate in this experiment is higher among the three reforms, the increase in the output is almost twice as big, showing the important of distortionary effect of taxing capital income.

3.6 Conclusion

Since the passage of the Tax Reform Act of 1986 the significance that various types of organizational forms have played in business activity has changed dramatically. The share of businesses organized as pass-thorough entities (e.g. S-corporations, who are not subject to corporate income tax), in total U.S. business receipts increased from 16.1% in 1986 to 38.8% in 2012, while the share of traditional C-corporations in total number of firms, declined from 16% to 4.9%. A series of tax reforms and changes in legislation over this period made pass-through legal forms of organization more attractive choices for many businesses and played significant roles in creating this dramatic alteration of distribution of legal forms of businesses over time. The question is to what extend changes in legislation that affect the choice of legal form have impact on real activities.

In this paper I argue that choosing a legal form of organization based on the tax treatment of businesses distorts the capital allocation and affects the size of aggregate output. I develop a model of firm dynamics in which the legal form of organization is an endogenous choice for businesses that are heterogeneous with respect to their productivity. The model captures the trade-off between tax treatments of each form of organization and the access to capital. I calibrate the model to be consistent with the firm dynamic characteristics of the U.S. businesses as well as the contributing share of each legal form in total output. Using the calibrated model and taking into consideration the general equilibrium effect under the assumption of revenue neutrality, I find that unifying the tax treatment across all legal form of businesses increases aggregate output by 8 percentage points in the long run. The key for this finding is that removing the tax distortions affecting the choice of legal form of organization reallocates capital towards more productive firms and improves the

aggregate output.

A significant contribution of this paper is to highlight the necessity of taking into account the choice of legal form of organization for businesses when evaluating any potential tax reforms. Additionally, choice of legal form of organization could have implication on other issues that can be explored in future research. The current model can be extended to have elastic labor supply, which assumed to be inelastic in the current version. As I show in previous parts, the choice of legal form of organization has implication on capital allocation which in turn affect the aggregate labor demand. Hence, modeling an inelastic labor supply, provides an additional margin and can qualitatively improve the result. Also, as I discussed before, each legal form of organization has its own rules and restriction for generating external capital which entails restriction on debt as well as equity. Therefore, choice of legal form of organization has implications on determining the financial structure of a business, which in turn affects the business's decisions in terms of R&D investment, taking on risky projects, the probability of default or bankruptcy,... . Of course, the main challenge is to model firms' ownership of capital within a framework in which a firm could potentially change its organizational form at each period.

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APPENDIX A

GRADUAL TAX REFORM: EQUILIBRIUM DEFINITION

In this appendix I define the equilibrium for the steady states as well as for the economy during the transition when the equilibrium is not stationary.

Steady State, In the model economy, agents are heterogeneous with respect to their productivity types (permanent productivity shocks), their asset holdings and their ages. For aggregating, I need to define a probability measure ψ_j on subsets of the agent state space. The probability measure ψ_j describes the heterogeneity in assets and permanent productivity shocks within an specific cohort. Let $(\mathscr{X}, B(\mathscr{X}), \psi_j)$ be the probability space where $B(\mathscr{X})$ is the Borel $\sigma-$algebra on $\mathscr{X}$ and $\psi_j : [0,1] \to \mathscr{X}$ is a probability measure. The measure of agent with state $x = (a, z_i)$ within the cohort of age j is $\psi_j(x)$.

Definition of Equilibrium. A steady state equilibrium is a collection of decision rules $c(x,j), l(x,j), a(x,j)$, factor prices w and r, taxes paid $T^{\Upsilon}(x,j)$, $\Upsilon \in \{$*The benchmark tax system,The reformed tax system*$\}$, social security transfers b_j, aggregate capital K, aggregate labor L, government consumption G, a payroll tax τ^{ss} , a tax regime $\in$ $\{$*benchmark tax system* , *reformed tax system*$\}$ and distributions $\{\psi_1, \cdots, \psi_J\}$ such that

1. $c(x,j), l(x,j)$ and $a(x,j)$ are optimal decision rules.
2. Factor prices are determined competitively:
   (a) $r = F_1(K,L) - \Upsilon$
   (b) $w = F_2(K,L)$
3. Markets clear :
   (a) $\sum_j \mu_j \int_x \big(c(x,j) + a(x,j)\big) d\psi_j + G = F(K,L) + (1-\Upsilon)K$
   (b) $\sum_j \mu_j \int_x a(x,j) d\psi_j = (1+n)K$
   (c) $\sum_j \mu_j l(x,j) e(z,j) = L$
4. Law of motion of distributions is consistent with individual decision rules:

$$\psi_{j+1}(\mathbf{B}) = \int_x P(x,j,\mathbf{B}) d\psi_j \quad , \quad \forall\, \mathbf{B} \in \mathscr{X} \text{ and } j = 1, 2, \cdots, J$$

   where

$$P(x,j,\mathbf{B}) = \begin{cases} 1 & \text{if } (a(x,j), z) \in \mathbf{B} \\ 0 & \text{otherwise} \end{cases}$$

5. Government budget constraint is satisfied

$$G = \sum_j \mu_j \int_x T(x,j) d\psi_j$$

6. Social security benefits is fully funded by payroll taxes :

$$wL\tau^{ss} = \sum_{z=1}^{Z} \sum_{j=T+1}^{T+T^R} \mu_j b_j$$

Out of the Steady State, Let $\psi_t(A, Z; j, q)$ be the mass of individuals with asset holding $a \in A$, type $z \in Z$, age j who are paying their taxes in the system indexed by q[1] .The probability measure ψ_t is defined for all A in $\mathcal{A}$, the class of Borel subsets of $\mathcal{R}$, all $Z \subset \mathcal{Z}$, all $j \subset \mathcal{J}$ and all $q \in \{0, 1\}$. The dynamic evolution of ψ_t is as follows.

For newborns, if $t = 0$[2]

$$\psi_1(A, Z; 1, q) = \begin{cases} \mu_1 & \text{if } 0 \in A \text{ and } q = 0 \\ 0 & \text{otherwise} \end{cases}$$

if $t \geq 1$

$$\psi_1(A, Z; 1, q) = \begin{cases} \mu_1 & \text{if } 0 \in A \text{ and } q = 1 \\ 0 & \text{otherwise} \end{cases}$$

Everyone dies at age J so

$$\psi_{t+1}(A, Z; J + 1, q) = 0$$

For $1 < j \leq J$, ψ_t evolves according to the following recursion. for the case $q'_t = 0$

$$\psi_{t+1}(A, Z; j, q = 0) =$$
$$\int_{\mathcal{R}^+ \times \mathcal{Z}} (1 - q'_t(a, z, j - 1, q = 0)) I(a'_t(a, z, j - 1, q = 0) \in A) d\psi_t(a, z; j - 1, q = 0)$$

[1]Remember $q = 0$ means the individual paid her taxes under the benchmark tax system in previous period and she has the option of choosing between alternative tax system for this period, and $q = 1$ means she has already switched to the new tax system and there is no option available fr her in this period

[2]μ_1 is the normalized portion of the newborns of all types in the total population alive at each period

This means the mass of individuals in the next period who have not yet switched to the new tax system, are those who had the option in the previous period and chose to stay in the old system.

Similarly, the mass of individuals in the next period who are paying their taxes under the new tax system i.e. who do not have the option of choosing between alternative tax systems, comprise (ι) those who are born after the policy change so they have to pay their taxes under the new tax system; ($\iota\iota$) those who have already switched to the new tax system in previous periods. Therefore

$$\psi_{t+1}(A, Z; j, q = 1) =$$
$$\int_{\mathcal{R}^+ \times \mathcal{Z}} I(a'_t(a, z, j-1, q=1) \in A) d\psi_t(a, z; j-1, q=1) +$$
$$\int_{\mathcal{R}^+ \times \mathcal{Z}} q'_t(a, z, j-1, q=0) I(a'_t(a, z, j-1, q=0) \in A) d\psi_t(x; j-1, q=0)$$

Equilibrium. For the model economy that moves from the benchmark tax system (the one with a progressive income tax and a flat capital income tax) to the new tax system (the flat consumption tax), an equilibrium with perfect foresight transition dynamics is a collection of decision rules $\{(c_t(x,j,q)\ ,\ l_t(x,j,q)\ ,\ a_t(x,j,q), q_t(x,j,q))^J_{j=1,x\in\mathscr{X}}\}^\infty_{t=1}$ [3] , factor prices $\{w_t, r_t\}^\infty_{t=1}$, tax systems $\{T^\kappa_t(x,j)\}^\infty_{t=0,\kappa\in\{benchmark,consumption\}}$, aggregate capital $\{K_t\}^\infty_{t=1}$ and aggregate labor $\{L_t\}^\infty_{t=1}$ and government consumption $\{G_t\}^\infty_{t=1}$ and social security benefit $\{b_{j,t}\}^{T+T^R,\infty}_{j=T+1,t=0}$, with a collection of distributions $\{(\psi_1, \cdots, \psi_{T+T^R})\}^\infty_{t=0}$ such that, for all t :

1. Decision rules solve the decision problem for the agent.

[3] $q_t(x,j,q)$ is a decision rule only for those agents who are allowed to choose between the alternative tax systems at period t, i.e. agents who are alive at the time of the policy change and have not yet switched to the new tax system in periods before t. So $q_t(x,j,q=1)=1$

2. Factor prices are determined competitively

   - $r_t = F_1(K_t, L_t) - \Upsilon$
   - $w_t = F_2(K_t, L_t)$

3. Markets clear :

   (a) $\sum_{q\in\{0,1\}} \sum_j \left[\int_x (c_t(x,j,q) + a_t(x,j,q)) d\psi_t \right] + G_t = F(K_t, L_t) + (1-\Upsilon)K_t$

   (b) $\sum_{q\in\{0,1\}} \sum_j \int_x a_t(x,j,q) d\psi_t = K_{t+1}$

   (c) $\sum_{q\in\{0,1\}} \sum_j \int_x l_t(x,j,q) e(z,j) d\psi_t = L_t$

4. Law of motion of distributions is consistent agent decision rules, as described.

5. Government budget constraint is satisfied

$$G_t = \sum_q \sum_j \int_x (q_{t+1}(x,j,q) T_t^{consumption}(x,j,q) + (1 - q_{t+1}(x,j,q)) T_t^{benchmark}(x,j,q)) d\psi_t$$

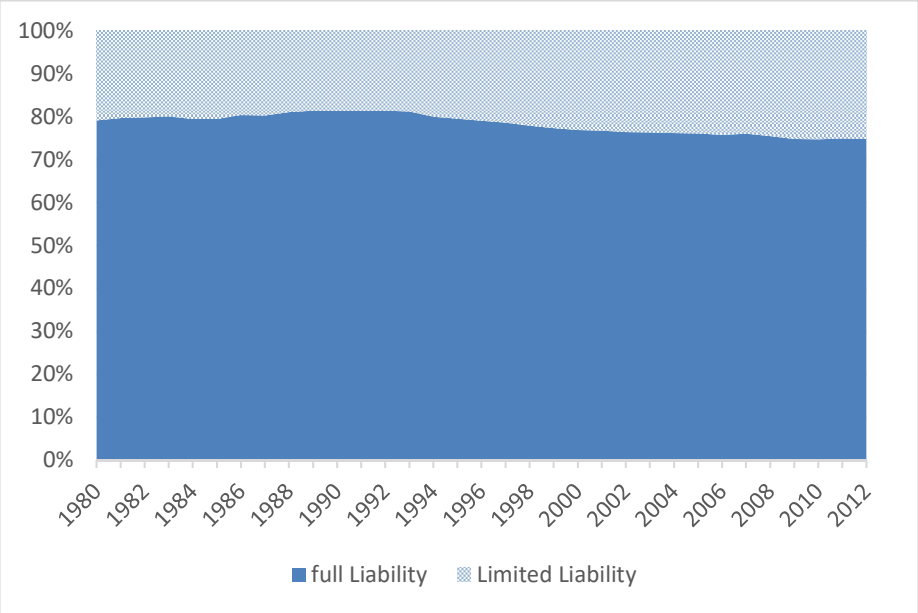
6. Social security benefits equal taxes :

$$w_t L_t \tau^{ss} = \sum_{q\in\{0,1\}} \sum_{j=T+1}^{T+T^R} \int_x b_{j,t} d\psi_t(x,j,q)$$

APPENDIX B

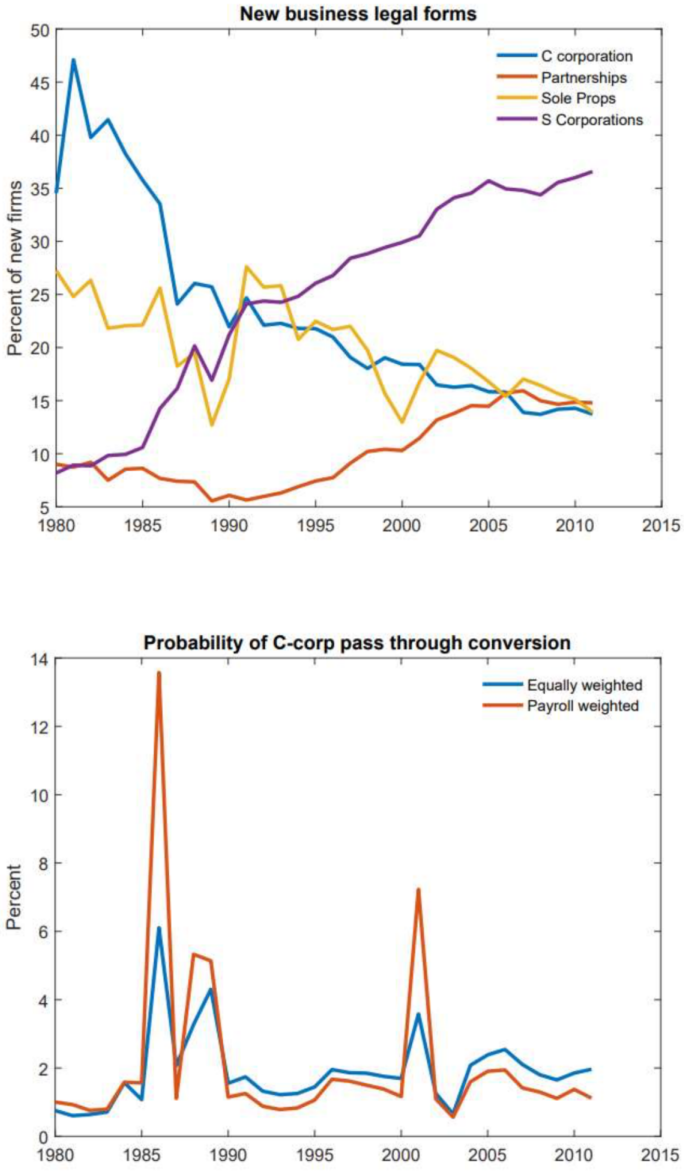
TAXATION AND LEGAL FORM OF ORGANIZATION: EXTRA FIGURES

Figure B.1: Share of Organizational forms with Liability Protection in all U.S. Businesses



This figure compares the share of legal forms with liability protection in the total number of business with the share of legal forms with no protection. we see that the share is roughly constant over the period.

Figure B.2: Conversions around periods of major tax reforms



Source: Dyrda and Pugsley (2017); The left panel plots the share of entrants choosing each legal form. The right panel plots the share of current C corporations who convert to an S corporation.

Data Source: Census LBD and Business Register

APPENDIX C

TAXATION AND LEGAL FORM OF ORGANIZATION: EQUILIBRIUM DEFINITION

In this appendix I define the equilibrium for the economy at the steady state.

In the model economy, firms are heterogeneous with respect to their types ($\Delta \in \{C, P\}$), and productivity level ($s \in S$). For aggregating, I need to define a measure $x(\Delta, s)$, which is the mass of firms with state (Δ, s). This measures define the distribution over firm's state space.

Definition of Equilibrium. A steady state equilibrium is a collection of decision rules $n^*(\Delta, s)$, $k^*(\Delta, s)$, $\mathbb{1}_{exit}(\Delta, s)$ and $\mathbb{1}_{switch}(\Delta, s)$, $K'(K, x)$ and $x'(K, x)$, factor prices w and R, transfer Tr^* and aggregate capital K, government consumption G, such that:

- $n^*(\Delta, s)$, $k^*(\Delta, s)$, $\mathbb{1}_{exit}(\Delta, s)$ and $\mathbb{1}_{switch}(\Delta, s)$ are optimal decision rules.

- Taking firms decisions, prices, M^* and $\overline{s}$ as given, households solve for $K' = K^*$, $x' = x^*$

- Market clearing conditions are satisfied:

$$K^* = \int k^*(\Delta, s) x^*(d\Delta \times ds) + M^* \int k^*(\Delta, s) \eta(ds) \tag{C.1}$$

$$1 = \int n^*(\Delta, s) x^*(d\Delta \times ds) + M^* \int n^*(\Delta, s) \eta(ds) \tag{C.2}$$

$$\begin{aligned} c^* + I^* + M^* C_e + G^* + C_e = & \int f(s, k^*(\Delta, s), n^*(\Delta, s)) x^*(d\Delta \times ds) + \\ & M^* \int f(s, k^*(\Delta, s), n^*(\Delta, s)) \eta(ds) \end{aligned} \tag{C.3}$$

- Law of motion of distributions is consistent with firm decision rules:

$$
\begin{aligned}
x'(C,\mathcal{S}) = &\int (1-\mathbb{1}_{switch}(C,s))(1-\mathbb{1}_{exit}(C,s))Q^C(s,\mathcal{S})x(C,ds) \\
&\int \mathbb{1}_{switch}(P,s)(1-\mathbb{1}_{exit}(P,z))Q^P(s,\mathcal{S})x(P,ds) \\
&+ M\int_{\overline{s}}(1-\mathbb{1}_{switch}(C,s))(1-\mathbb{1}_{exit}(C,s))Q^C(s,\mathcal{S})\eta(ds) \\
&+ M\int^{\overline{s}} \mathbb{1}_{switch}(P,s)(1-\mathbb{1}_{exit}(P,z))Q^P(s,\mathcal{S})\eta(ds)
\end{aligned} \tag{C.4}
$$

$$
\begin{aligned}
x'(P,\mathcal{S}) = &\int (1-\mathbb{1}_{switch}(P,s))(1-\mathbb{1}_{exit}(P,s))Q^P(s,\mathcal{S})x(P,ds) \\
&+ \int \mathbb{1}_{switch}(C,s)(1-\mathbb{1}_{exit}(C,z))Q^C(s,\mathcal{S})x(C,ds) \\
&+ M\int^{\overline{s}}(1-\mathbb{1}_{switch}(P,s))(1-\mathbb{1}_{exit}(P,s))Q^P(s,\mathcal{S})\eta(ds) \\
&+ M\int_{\overline{s}} \mathbb{1}_{switch}(C,s)(1-\mathbb{1}_{exit}(C,z))Q^C(s,\mathcal{S})\eta(ds)
\end{aligned} \tag{C.5}
$$

- Government budget balanced:

$$
\begin{aligned}
G^* = &\tau^c\Big[\int (f(s,k^*(C,s),n^*(C,s)) - wn^*(C,s) - wC_F^C - \delta k^*(C,s))x(C,ds) \\
&+ \int_{\overline{z}} (f(s,k^*(C,s),n^*(C,s)) - wn^*(C,s) - wC_F^C - \delta k^*(C,s))\eta(ds)\Big] \\
&+ \tau^d\Big[\int (f(s,k^*(C,s),n^*(C,s)) - wn^*(C,s) - wC_F^C - \delta k^*(C,s))(1-\tau^c) \\
&- Rk^*(C,s))x(C,ds) \\
&\int_{\overline{s}} (f(s,k^*(C,s),n^*(C,s)) - wn^*(C,s) - wC_F^C - \delta k^*(C,s))(1-\tau^c) \\
&- Rk^*(C,s))\eta(ds)\Big] + \\
&\tau^i\Big[\int (f(s,k^*(P,s),n^*(P,s)) - wn^*(P,s) - wC_F^P - \delta k^*(P,s))x(P,ds) + \\
&\int^{\overline{s}} (f(s,k^*(P,s),n^*(P,s)) - wn^*(P,s) - wC_F^P - \delta k^*(P,s))\eta(ds) + w\Big]
\end{aligned} \tag{C.6}
$$

APPENDIX D

TAXATION AND LEGAL FORM OF ORGANIZATION: ALGORITHM FOR SOLVING THE MODEL

1. Set $R = \frac{1}{\beta} - 1$ and $R^P = (1 + \zeta)R$

2. Guess w

3. Taking Prices (r R^P, w) as given,

   (a) Solve firms' problems:

   $k(\Delta, s)$, $n(\Delta, s)$, $\Pi(\Delta, s)$ $V(\Delta, s)$, $\mathbb{1}_{exit}(\Delta, s)$, $\mathbb{1}_{switch}(\Delta, 1)$

   (b) Calculate V^e using $V(\Delta, s)$

   (c) Check the free entry condition: $V^e = c_e$, and update the w accordingly and start over from step 2 until the free entry condition is satisfied.

4. Set the mass of entrant $M \equiv 1$, solve for stationary distribution of firms x_0, using

   $\mathbb{1}_{exit}(\Delta, s)$, $\mathbb{1}_{switch}(\Delta, s)$

5. Use market clearing condition for labor:

$$\underbrace{1}_{Labor\ supply} = M \ . \underbrace{L_d}_{Labor\ demand\ from\ aggregating\ n(\Delta,s)}$$

   to find the equilibrium level of M.

6. Set $x(\Delta, s) = M.x_0(\Delta, s)$

7. Use the feasibility condition and Government revenue G to find C , Y and K

$$Y = \int f(s, k(\Delta, s), n(\Delta, s))dx + \int f(s, k(\Delta, s), n(\Delta, s))\eta(ds)$$

$$C + I + M.c_e + G + Fixed\,Costs = Y$$

   where I is the investment ($I = \delta K$ in steady state)

APPENDIX E

DERIVING THE LOGNORMAL-PARETO DISTRIBUTION

Cooray and Ananda(2005) [13] were among the first to develop a single composite lognormal-Pareto model which takes a log-normal density up to an unknown threshold and a two-parameter Pareto density thereafter. However, their model has a priori known mixing wights which is very restrictive features, i.e. the continuity and differentiablity conditions make a case such that the model says exactly $\sim 39.2\%$ of the observations are from a lognormal model truncated at at θ , which is always 64.514^{th} percentile of the underlying lognormal model, and the rest of observations are above θ and in accordance with a certain parameter restricted Pareto model. Scollnik(2007) [47] addresses this issue and suggests a lognormal-Pareto mixture model with threshold θ but with an unrestricted mixing weights. This is the model I'm using in this paper.

Let $\mathbf{X}$ be a random variable with the probability density function

$$f(x) = \begin{cases} r\dfrac{1}{\Phi\Big(\frac{ln(\theta)-\mu}{\sigma}\Big)} f_1(x) & \text{if } 0 < x \leq \theta \\ \\ (1-r) f_2(x) & \text{if } \theta \leq x < \infty \end{cases}$$

where Φ is the cumulative distribution function of the standard normal distribution, r is the mixing weight, and $f_1(x)$ and $f_2(x)$ are the lognormal and Pareto densities given by the following equations:

$$f_1(x) = \frac{(1\pi)^{-1/2}}{x\sigma} \exp\Big[-\frac{1}{2}\Big(\frac{ln(x)-\mu}{\sigma}\Big)^2\Big] \ , \quad x > 0$$

$$f_2(x) = \frac{\alpha\theta^\alpha}{x^{\alpha+1}} \ , \quad x > \theta$$

where θ, μ, σ and α are unknown parameters of the density function.