

Lecture

Topic 1

SCOPE AND STRATEGY FOR IMPLEMENTING THE INTEGRATED ADMINISTRATION OF PUBLIC REVENUES

Pedro Pavesi

Advisor

Federal Administration of Public Revenues

(Argentina)

CONTENTS: 1. The process of creation of the Federal Administration of Public Revenues (AFIP).- 2. History of the merged organizations.- 3. The implementation of AFIP.- 4. The characteristics of the merged organizations.- 5. The reasons for the merger.- 6. How much integration?.- 7. The functions of the Federal Administrator.- 8. Technological advantages of the merger.- 9. Positive and negative aspects of the merger.- 10. The future.- 11. Is there a trend toward the integration of the customs service with the tax administration?

1. THE PROCESS OF CREATION OF THE FEDERAL ADMINISTRATION OF PUBLIC REVENUES (AFIP)

Through Decree N° 1156 of October 14, 1996, the President of the Republic of Argentina resolved to merge the General Directorate of Taxation (DGI) and the National Customs Administration (ANA) in a single organization, the Federal Administration of Public Revenues (AFIP).

Through this and other legal regulations, a stage of merger was determined with the following characteristics:

- *Initiation:* October 14, 1996.
- *Task to be performed during the merger process:*
 - Presentation to the Executive Body of draft legal norms determining the responsibilities, powers, rights and obligations of the new entity.
 - In the meantime, the National Customs Administration is taken over and placed under the supervision of the then General Director of the General Directorate of Taxation, who is appointed in advance, Federal Administrator, top level authority of AFIP.

- *Final:* Day of publication in the Official Gazette of the aforementioned documents on the foundation. This took place on July 14, 1997, exactly nine months after the merger was decreed.

This is thus the origin, with full autonomy and operating norms, of the Federal Administration of Public Revenues (AFIP) definitively headed by the General Director of the former DGI.

During these nine months, while on the one hand, the problems involving the design of the new organization and the legal problems of its operation were being solved, the future Federal Administrator took care of relevant customs problems and, in practice, the ANA Controller reported to him.

2. HISTORY OF THE MERGED ORGANIZATIONS

One cannot appraise the current situation without being familiar with the background of the merged organizations, which is summarized below.

2.1 Customs

Customs has been practically the only source of fiscal revenues of the Province (State) of Buenos Aires, since colonial times, the city being the only port authorized to carry out trade abroad. The other provinces (states) created their own ("*internal*") customs offices, which were abolished in 1853, unifying their customs revenues at the federal level.

With foreign trade monopolized by Spain, which gave way to unrestrained contraband and a very slow growth until the mid XIX century, mainly due to the lack of interest of the Spanish Crown in a colony that did not produce precious metals, it was not until 1778 when the Royal Customs of Buenos Aires was created, 32 years after the May Revolution against Spanish dominion, although customs organizations existed previously. This organization will be maintained, although changing its name and transforming "*internal*" customs into "*external*" customs until 1997. It is surprising how the National Constitution proclaimed in 1853 continues to attribute to the National Congress the power to create or eliminate customs offices. The latter actually being customs offices established at different border areas and for the entry or delivery of goods to and from the country, they have acquired through this colonial tradition, a certain status of deeply rooted cultural independence.

2.2 The DGI

Internal taxes entered into force during the country's period of sound development at the end of the century. These were specific taxes on different products which, in contrast to the "*external*" taxes collected by Customs, are up to this day erroneously called "*internal*" taxes. The General Administration of Taxes was established in 1891, and in 1902 it took over the

Administration of Alcohols, created in 1899. This General Administration of Internal Taxes was maintained until 1947.

In 1932, the Tax on Proceeds (income) was created with its respective organization, which took over the Transactions Tax Directorate that had been established in 1931.

Lastly, the organization by product (taxes) is abandoned in 1947, and replaced with the organization by functions: thus establishing the General Directorate of Taxation, which took over the various internal tax organizations existing then.

In 1993, the DGI had to assume a new responsibility, namely: the collection of Social Security Contributions. The DGI thus reaches 1997 with a long history of absorptions, some conflicting ones, others not satisfactorily solved yet (the absorption until reaching full integration of the administration of specific taxes took over 30 years; while the absorption of the entity collecting social security contributions is taking place faster, although there are still norms, procedures and staff that are totally different from the rest of the organization).

3. THE IMPLEMENTATION OF AFIP

In 1997, there is no longer an absorption of Customs by the DGI but rather a *merger*: both organizations disappear as they are integrated into a third one, AFIP, formed by both of them. Of course, customs and internal tax activities maintain their own characteristics, but now they are under the same direction, the same organization and on an equal basis, at least formally.

It must be noted that the actual merger, which took place on July 14, 1997 –is already 3 ½ months old– was performed in a fluid and controlled manner, without significant shocks or conflicts.

This was due to various factors. In the *first* place, a Committee for the Implementation of AFIP was established. A Coordinator headed the process with broad freedom of action. The Committee worked hard for minimizing fears and nonconstructive feelings (the sensation of being invaded, the ambition to invade, the fear of contamination, etc.). Working groups were organized with officials from both organizations specialized in the various issues of the future work together, with the mission of identifying common tasks, similar tasks and those that are specific for each activity. The Committee opened offices in both organizations and likewise numerous meetings were held for clarifying and discussing problems that could originate from the merger.

Secondly, the General Director of the DGI and current Federal Administrator took over the management of events, thus contributing to curb the fear existing at Customs, which was the organization that considered itself most affected by the presidential decision, thus allowing for moving forward toward the aforementioned unification.

Thirdly, it must be admitted that the two existing unions (one corresponding to each organization) maintained a calm attitude, familiarizing themselves with the merger process, without posing any urgent problem and awaiting the evolution of the merger.

It must be borne in mind that the DGI as well as ANA had different working systems, that their classification, levels and compensation mechanisms are different, this situation still prevails and must be solved in the immediate future.

There were, in fact, some situations of fear and uncertainty, but all of them were immediately under control. The main problem has been that of the future organization (structure). In both organizations, vis-à-vis the merger and eventual elimination or modification of positions, tasks and dependencies, there was a very strong pressure from various points in the organization, not only to anchor acquired positions, but to advance in obtaining new positions. This process was very difficult to control. Nevertheless, care was taken in obtaining from upper Government levels authorization for creating a provisional structure that would allow the immediate implementation of the new organization and a six-month period for designing the definitive structure, with the possibility of modifying positions and dependencies. Thus an intermediate time span was allowed to reduce anxieties and voracity and introduce certain rationality to the structural design.

In the nine-month period of implementation of AFIP, the fundamental merger tasks were the following:

- (1) Definition of the Management and Activity Model of AFIP with a medium term vision, which will be analyzed further on. This definition implied intense internal work and discussions with the main officials from both organizations and, of course, was subjected to the final decision of the future Federal Administrator. Worth noting is the collaboration of CIAT in this design, by providing information on the characteristics of similar organizations that are members or attached to CIAT and on organizing an important *workshop* with the top level authorities of similar organizations from Canada, Colombia, Spain and the Netherlands.

This process has been complex since it implied strategic definitions on the organization's management and action model. The model will be analyzed further on.

- (2) Preparation of the bill on organization, functions, powers and duties of the AFIP and its top-level authorities.

The DGI had a Fiscal Procedures Law which, among other things, provided for its basic organization. Customs had an Autarchy Law and a Customs Code which also included provisions on its organization.

It was decided to draft a new autonomous and independent law, according to the management model adopted by AFIP, by repealing existing provisions dealing with the organization of the merged entities.

This bill was consulted with ten tax and customs experts who made 136 observations, of which 32 were repetitive. Of the 104 remaining observations, 68% were accepted.

The definitive bill was circulated through some ten legal, budget and control of public administration offices, as well as different political levels until the President of the Republic finally approved it. This long process called for obtaining a strong consensus and the commitment of the intermediate and high levels of the technical and political areas of the Ministry of Economy and the Presidency.

- (3) Preparation of the structure of the superior levels of the organization, its missions and functions and projected remunerations, as well as important budgetary aspects of the new organization.
- (4) Preparation of the structure below the one previously mentioned, which was determined as provisional, with a six-month term for projecting the definitive organization.
- (5) Preparation of the strategic action guidelines of the future organization.
- (6) Preparation of normative acts to be signed on the same day of the establishment of the organization, in order to facilitate the continuous flow of operations, use of forms and existing procedures, logotypes, formal procedural aspects, rationalization of normative acts, system of delegations, etc.

4. THE CHARACTERISTICS OF THE MERGED ORGANIZATIONS

Figure N° 1, show some data that were characteristic of the DGI and ANA at the time of the merger:

Figure N° 1
Some data on the merged organizations
(1996)

	CUSTOMS	DGI
TOTAL STAFF	4,918	16,915
% PROFESSIONALS	21.7 %	45 %
DEPENDENCIES		
CUSTOMS	53	
AGENCIES AND DISTRICTS		139
COLLECTION		
CUSTOMS (millions U\$S)	2,280	
TAXES (millions U\$S)	6,894	40,544
BUDGET (millions U\$S)	423.5	906.8

BUDGET PER OFFICIAL (U\$S)	86,107	53,612
REMUNERATION OF MAXIMUM LEVEL (%)	100	180

Argentina is experiencing the same situation as that of *some* other countries: the internal tax administration has a higher professional and technical level than that of customs.

The cultures of both organizations are very different, not only because of their history (the DGI was established practically three centuries after the customs institution) but also because of the characteristics of their activities. The DGI began practically in 1931 with a strong inclination toward *a posteriori* control of registrations and vouchers, that is, of *symbols*; Customs was always prone to *a priori* control of *things*, that is, prior to being nationalized. The DGI had to adopt a complex organization, with significant decentralization and delegation of powers and a highly complex system of tax collection and verification. Customs administered a simpler system of tariffs and foreign trade controls, with the power to use the so-called “*Customs Police*”; while the DGI was strictly subjected to judicial authorizations for using the police force in nontrivial cases.

These and other traits of equal importance strongly differentiate the culture, customs, and language of both organizations, even though many of their activities are similar. The DGI has significant experience with the integration of an organization with identical purpose, although with a different vision, customs and culture. That was the absorption of the entity in charge of applying specific taxes, which had been in existence for over half a century and whose integration to the main entity took some decades. As will be analyzed further on, this integration is a priority objective of the AFIP.

5. THE REASONS FOR THE MERGER

The presidential decree which began the ANA - DGI merger process, mainly refers to the fact that both entities are devoted to the collection of funds intended for the Treasury and claims that the unification will contribute to greater efficiency in collection. That is absolutely true. But there were other reasons that were stated in a less formal manner.

It must be borne in mind, with respect to customs collection, that the Mercosur customs union implied the almost total elimination of tariffs within it and that foreign trade among the countries integrating the customs union increased tremendously, although without significantly increasing the collection of tariffs. On the other hand, one must also take into account that the collection of customs duties has lost significance in customs activities (exceeded 3 times by VAT collection), while there is a very active level of foreign trade control in all its different aspects.

Among other reasons promoting the merger of Customs with the DGI is the increasing need of the customs service to adapt itself to the opening of foreign trade and the tremendous increase of commercial exchange. This may be seen in Figure N° 2 and it must be remembered that budgetary

projections for 1998 lead commercial exchange to comfortably exceed 60 billion dollars, that is, 5 times the exchange of 1990, the year prior to the aforementioned opening of foreign trade.

Figure N° 2
Commercial Exchange of the Republic of Argentina
(Millions of dollars)

	1990	1996
Exports	12,353	23,811
Imports	4,077	23,762
Total	16,430	47,573

Although total exchange increased 3 times in 6 years, imports -which are the ones most requiring the customs service- increased 6 times during the same period.

Undoubtedly, the customs service needed to adapt itself promptly to absorb this tremendous increase in activity and to respond to the new modalities which globalization, the ferocious international competition, the consumption *boom* and the increased productivity of the economy imposed on our country. Meritorious and effective efforts were undertaken for that purpose but the speed and importance of changes led customs to a certain loss of control that impelled the Government to the merger of the two fundamental collection Organizations under the leadership of the internal tax administration, a strategic idea which will be brought up again further on.

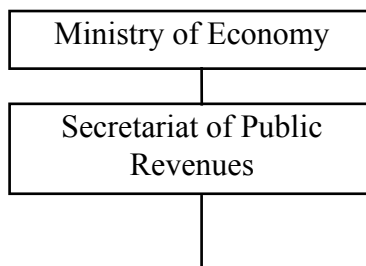
6. HOW MUCH INTEGRATION?

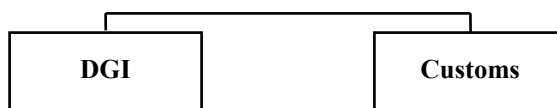
The first problem to be solved was: how much integration between the two existing entities (DGI and ANA) into the new organization, AFIP?

Having solved said problem, the decision made results in the organization of AFIP, the functions of the top-level officials, the budget, etc.

The pre-existing situation was traditionally the following:

Figure N° 3
Situation prior to the merger



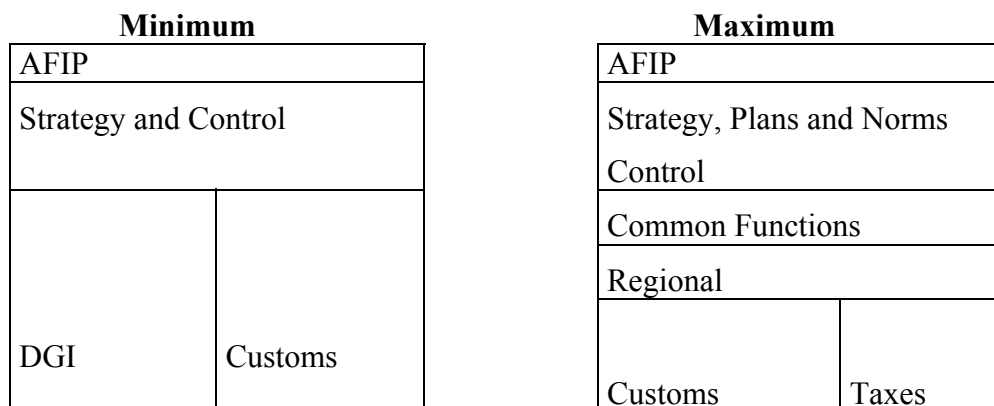


(Actually, the situation existing prior to the creation of AFIP was not exactly as shown, although this was the typical situation for decades: in late 1995, for formal reasons, the DGI became directly dependent on the Ministry).

Several positions were initially presented, which we will summarize into two extreme ideal classes. In one extreme there is total separation, which model we have called "*Traditional*", "*Minimum*", also "*Gatopardista*", since the modifications made to the existing situation were minimum.

At the other extreme, there was total integration, which was called perhaps in not a very precise fashion, the "*Spanish*" or "*Maximum*" model. Both extremes are schematically represented in Figure N° 4.

Figure N° 4
Integration Model



The Minimum Model practically implied no change in situation. The Federal Administrator reigned but did not rule. The latter, the DGI General Director and the National Administrator of ANA (the names were not even changed) were appointed by the Executive Body. The Federal Administrator set strategic guidelines and exercised legality control. Of course, these minimum functions could result in essentially political appointments in the position of administrator.

The Maximum Model implied a high level of integration, up to the level of the regional dependencies, unique for customs and internal taxes, below which such functions were divided for the field operation.

The Minimum Model was strongly advocated by the majority of independent experts, as well as by Customs and DGI officials. Some, for fear of being taken over, others for fear of not

being able to integrate themselves to an activity with which they were unfamiliar and which they mistrusted.

No one was in favor of the Maximum Model. Sound judgement vis-à-vis integration was extreme.

Following a long analysis and discussions and especially, in permanent consultation with the future Federal Administrator, an intermediate model was designed whose scheme is shown in Figure N° 5.

Figure N° 5
Organization scheme of the AFIP

AFIP	
Strategy	
Plans and Programs	
Common Services and Operations	
DGI	DGA
Operation	Operation
Legal	Legal
Technical	Technical

Annex 1 includes an organization chart of AFIP's superior level, which explains the foregoing scheme.

The fundamental criterion was to leave the DGI and Customs, now called General Directorate of Customs (DGA), as operational units similar to the *"business units"* of multinational enterprises, preserving their legal and technical body. General Directors appointed by the Federal Administrator heads them.

Dependent thereon, are the units for determining strategies, plans, programs, control and common services. This group plans and controls action, according to the instructions of the Federal Administrator and the DGI and DGA operational units operate in the field. Dependent on the Federal Administrator are Deputy General Directorates that are in charge of:

- General Planning
- Collection
- Verification
- Systems
- Management of financial and material resources
- Management of human resources
- Control and Auditing

The original design adopted the traditional division between operation and planning, but in practice, due to different reasons, some very sensitive functions, such as tax intelligence and customs police came to be directly dependent on the Federal Administrator through a Deputy General Directorate.

Lastly, it must be noted that the Federal Administrator, appointed by the Executive Body, has the rank of Secretary of State.

A semi-integrated organization has thus been achieved. The fundamental criteria for this solution were:

(1) Sound judgement criterion

- Efforts were made to avoid the traumatic shock that a forced integration of very different cultures and activities would have caused.
- Due note was taken of Colombia's experience, where increased efficiency of Customs during the first two years of the unified organization apparently deteriorated the efficiency of administration of internal taxes.
- It was considered necessary that -as long as there was an intense process of mutual familiarization (including the jargon), exchange of officials as well as activity, of training, development of common working plans- until acquiring the necessary experience, each entity should continue with its operational activities, unifying only the level of the Federal Administrator and of the Deputy General Directorates that are dependent on him.

(2) Synergy criterion

We are convinced that the merger of the DGI and Customs will imply a significant change for the administration of Government revenues (all those of the Argentine government that are not purely financial are collected by the AFIP in an amount close to US\$ 50,000 million). It is not a question of a mere juxtaposition, attachment of two entities, but rather of a feedback process between both for integrating, experiences, methods, information and problems, so as to generate a very powerful synergic process which we wanted to conduct with great care.

Paradoxically, only 3 1/2 months after having begun, we already feel the strength and desire to go beyond the initial legitimate sound judgement.

Perhaps what has been said and the graphs do not represent the real situation: although the DGI and DGA maintain great operational autonomy, the integration of the verification and collection procedures, of the computerized service, of the administration of resources, of planning and control have represented for our country a tremendous progress which, prior to the time

anticipated, has already begun to bear fruit. And this is perceived even in such details as the unification of resolutive acts and the joint meetings of officials from different levels of both General Directorates to discuss common actions.

7. THE FUNCTIONS OF THE FEDERAL ADMINISTRATOR

Although the Federal Administrator has the power to delegate all his management functions to the General Directors and Deputy General Directors and the first ones enjoy broad powers, he preserves for himself maximum power even to remove from office the aforementioned officials.

This concentration of power mainly responds to the sound judgement criterion: vis-a-vis a change that could result in annoying and unsuspected consequences, maximum power is given to the Administrator who, along with his collaborators, becomes the factor of change and integration, but also of control and solution of conflicts. The initial situation of high customs and tax evasion called for a strong Administrator.

To the extent minimum objectives of integration, cohesion and reduction of the thresholds of doubt or resistance are achieved; the Federal Administrator will delegate some of the functions he has currently taken over. At present, the Coordinating Group is analyzing a first system of delegation. The Federal Administrator is not a representative personality: he reigns and governs and therefore requires high level technical capability, which condition avoids the danger of appointments in favor in this crucial position.

It is worth noting that, following the DGI's experience, AFIP has an adequate mechanism of decentralization and delegation of operational functions and that very important measures have already been applied, intended to transform the Regional Heads -and subsequently the Customs Administrators- into real managers, with authority and responsibility and clearly defined operational goals.

8. TECHNOLOGICAL ADVANTAGES OF THE MERGER

Traditionally, the operational characteristics of the DGI and Customs could be summarized as follows:

Figure N° 6
Characteristics of DGI / ANA activity

	Customs	DGI
Attention to:	things	documents
Time	<i>ex ante</i>	<i>ex post</i>
Processing	continuous	Batches
Penalty	criminal offense	Fine

Admitting a certain exaggeration for purely descriptive purposes, Figure N° 6 highlights essentially distinct aspects of the activity of the two merged organizations. However, current requirements of collection and international trade have called for transforming said traditional approach.

Customs can no longer control all merchandise before crossing the borderline. Not only must it control through sampling *prior* to the nationalization of the merchandise, but it must also extend its control, also through sampling, *after* crossing the border and within a certain time frame.

That *ex post* control may be physical in exceptional cases, but in general it is documentary. The tax administration is an expert in every type of *ex post facto* documentary controls: that is its specialty, and therefore, the work in common will be highly effective to combat customs offenses and the subsequent tax offenses.

In turn, Customs, under the pressure of globalization and competition, is urged by importers and exporters, which forces it to extraordinarily increase the speed of its operations, expanding and deepening its information technology, not only to work in real time, but also to improve its controls, which are currently obliged to extend themselves in time. Here also, the internal tax administration has available human and material equipment and broad expertise in computerization issues that will now be at the service of customs control.

However, the influence is reciprocal. The sophistication of evasion, the harsh competition from abroad experienced by Argentine enterprises and which favor evasive practices, lead the tax administration to resort to physical controls of inventories and even facilities and buildings. The DGI examiners are uncomfortable with that task and, in general, have failed. On the other hand, customs inspectors are well trained in the handling of such matters and may be of great assistance to the internal tax administration.

The DGI is also forced to work *ex ante* and, mainly, in real time, by controlling for example, the issuance of invoices or taking samples of daily operations. In Argentina, a customs violation is traditionally considered an offense within the criminal sphere, eventually subject to release from jail. The administrators of internal taxes but, a few years ago, a criminal tax law was issued whose severity has been stressed during the current year loathed the transformation of evasion into an offense.

In this way, there is a positive feedback between the main aspects of both activities, which should give way to a synergic effect of significant importance.

The AFIP's plans incorporate a fundamental postulate:

Every infringer of the customs system is a tax evader.

This leads to common verification and control plans and also to unique collection procedures. A common database is to be established with direct access from both activities, thus

favoring the intelligence and selection work. Common procedures between the DGI and DGA are already successfully being carried out to fight evasion. It is important to point out that the results achieved by the merger into a single organization are more efficient and effective than those achieved through the collaboration of two different organizations.

The aforementioned synergic effect will not be fully developed in a spontaneous manner: AFIP's strategic plans include undertaking intelligent efforts intended to promote it, in order to take full advantage thereof.

A fundamental issue for achieving those effects is that of the Human Resources that are under the responsibility of a specific Deputy General Directorate. Among others, its main functions are the mutual co-optative of the officials from both organizations, cultural integration and training, priority activities of the AFIP.

9. POSITIVE AND NEGATIVE ASPECTS OF THE MERGER

In three and a half months of experience, not much can be said of the favorable and unfavorable situations existing and their future evolution.

On the positive side, the process of accepting the fact that there is only one organization and the former DGI and Customs no longer exist and what is left of them is not what they used to be, is evolving faster than was expected. Although the ideal state has not yet been reached, this is important since it favors the integration process.

This process is already visible in a very encouraging manner in the areas of financial, material and human resources management. The merger has been fluid and programs are being carried out for training and identifying valuable youth in both activities with great success. Also progressing successfully is the computerization of Customs promoted by the respective General Deputy Directorate.

Worth noting are the joint meetings of Customs administrators and regional heads of internal taxes for discussing problems and arriving at common solutions. Joint meetings are also held to determine the definitive structure of the organization.

In general, the customs organization is the one benefitting most at this intermediate stage. As a result of the law for creating AFIP, the entire customs structure has been provided legal instruments for the delegation and autonomous operation, which it previously lacked. On the other hand, citizens are beginning to trust AFIP.

On the *negative* side, there is still a long way to go until arriving at a greater level of cultural integration, of mutual respect, of common working pace and conception. There is still and exchange of pressures between the officials of the former organizations.

Of course, these pressures only generate greater resistance and the latter only achieves greater pressure and even drastic measures involving changes of staff and positions, which does not favor a rational solution to the clash of cultures.

The AFIP's top level authorities are not unaware that this type of actions and reactions can only lead to greater passive resistance from customs officials and greater commitment from the AFIP and DGI officials in customs tasks, which could affect the performance of the internal tax administration. This problem has been fully controlled.

The internal tax administration had four times more officials, twice more budget, five times more collection (strictly, more than 20 times), etc. This obligatorily implies a dominant position, which should be directed toward achieving a reasonable balance. The fact is that global effectiveness of the unified organizations has increased in these initial months.

10. THE FUTURE

As for activities dealing with organization, systems design, procedures and training, the work is endless and is being carried out. The main aspects on which work is currently being done are the following:

(1) *Acceleration of operational integration*

Undoubtedly there is a strong need which promotes integration and will reduce the anticipated terms and it is believed that one will arrive at the Maximum Model of Figure N° 4 sooner than planned. The Systems, Collection, Verification and Human Resources areas are the ones receiving greater attention.

(2) *Greater autonomy of the organization*

It is believed that greater autonomy than that currently existing may be acquired relatively soon.

(3) *Identification and internal training*

Of young and skilled people to take over important responsibilities, without the burden of the culture and tradition of both merged organizations.

(4) *Cultural integration of officials of different origin*

It is believed that this integration, or at least mutual understanding and respect are essential for the success of the organization and it will be achieved through specific achievements of common work based on common procedures.

11. IS THERE A TREND TOWARD THE INTEGRATION OF THE CUSTOMS SERVICE WITH THE TAX ADMINISTRATION?

Several (many?) are the countries that have resorted to the integration of customs service and the administration of internal taxes into a single organization. Of course, it is important to compare the degree of integration of both activities (I suggest that CIAT carry out this research work). As we have said, Argentina currently aims at integration in the Spanish style.

We have the impression that in many countries, an integration that goes beyond a simple juxtaposition or attachment has turned out to be beneficial. The tremendous development of international trade, the fabulous globalization of financial operations, the technological jump of telecommunications, the progress in multimodal transportation, the cheapening of air, land and maritime transportation, the greater efficiency of ports, the proliferation of free zones, the relentless competition that urges to evasion those companies that cannot withstand it, are facts that tend to lead to the common operation of the customs service and the administration of internal taxes, in order to combat evasion, whose common origin has ever broader bases.

The customs union constituted by Mercosur tends to promote, in our opinion, such unification (the two largest countries of Mercosur, Brazil and Argentina already have it in operation).

The development of information technologies and the practice of modern administration, especially, the verification methods, also seem to promote unification.

Save in exceptional cases, in the Argentine experience collaboration between the DGI and Customs when they were separated and had reciprocal autonomy was difficult, deficient and insufficient. Integration affords great possibilities but, of course, it is the most difficult path.

Argentina has undertaken it with optimism and courage. We are inspired by the success of many countries in this field, among which I would particularly like to point out our host.

We have bet on success and feel as winners... with blood, sweat and tears.

Argentina

Federal Administrator of Public Revenues

Private Secretariat

Institutional Relations

General Secretariat

Councilor's Office

General Director of Customs

General Director of Taxation

Deputy General Director of Legal and Customs Technique

Deputy General Director of Metropolitan Customs Operations

Deputy General Director of Inland Customs Operations

Deputy General Director Comptroller

Deputy General Director Collection

Deputy General Director Verification

Deputy General Director Human Resources

Deputy General Director Administration

Deputy General Director Planning

Deputy General Director Legal and Taxation Technique

Deputy General Director Metropolitan Tax Operations

Deputy General Director Inland Tax Operations

Internal Audit Unit

Annex I