

## 第四章 垂直外部性、租稅競爭及最適租稅

從本章開始，我們開始改變一些模型的基本假設。首先，假定在一國之內共有 2 個地方政府，人口均勻分布在  $[0, 1]$  之間，根據 Hoyt (2001) 一文所述， $x_{ji}$  為  $i$  地區內代表性居民對第  $j$  種產品的消費量。若放寬原有假設，目前地區內居民人數為  $\frac{1}{2}$ ，且人具有相同偏好（即消費個體皆同質），故  $x_{ji}$  可代表  $i$  地區第  $j$  種產品的人平均消費量。此外，假定  $x_{ji}$  僅受本地價格之影響，不為外地價格所干擾，所以  $x_{ji} = x_{ji}(q_i)$ <sup>6</sup>。再者，假設各個地區每種私有財貨的供應量皆足以應付其所面對的需求，故沒有供給不足之疑慮。

模型最終在  $t_{ji}^* = t_{ji} + ds$  的情形下達到均衡，其中  $t_{ji}$ 、 $t_{ji}^*$  分別代表本地及外地政府對第  $j$  種商品的課稅額，而  $d$  為人單位距離的交通成本， $s$  則為交易距離。在進行水平租稅競爭下， $i$  地區第  $j$  種產品的總銷售量（即稅基）為  $Q_{ji}$ ，以下則為本地及外地稅率對於境內銷售量的影響。

$$Q_{ji} = x_{ji}(q_i) \left( \frac{1}{2} + \frac{t_{ji}^* - t_{ji}}{d} \right)$$

$$\frac{\partial Q_{ji}}{\partial t_{ji}} = \frac{\partial x_{ji}}{\partial q_{ji}} \left( \frac{1}{2} + \frac{t_{ji}^* - t_{ji}}{d} \right) + x_{ji} \left( -\frac{1}{d} \right) < 0$$

$$\frac{\partial Q_{ji}}{\partial t_{ji}^*} = x_{ji} \left( \frac{1}{d} \right) > 0$$

---

<sup>6</sup>  $x_{ji}$  係假定其他地區第  $j$  種商品價格下，本地居民所決定的平均消費量，而該價格  $q_i$  為本地政府參考其他地方的稅率後，所決定出的價格水準，故本地居民的平均消費量雖僅受該地區價格所影響，但本地之價格水準即把地區間的商品價格差距包含在內。

從上述的第二式中，我們可以把本地稅率對於稅基的影響分解成兩種效果。前項可表示為本地稅率影響區域內價格，致使居民平均消費量所產生的變動。而後項則是本地稅率與外地稅率有所差異時，居民跨區域購買貨品的水平流動效果。

## 第一節 跨區購買行為與稅基完全重疊

與 Hoyt (2001) 一樣，吾人在此假定中央與地方同時對境內的兩種商品課稅。與原始模型不同的是，我們允許消費者跨區購買的行為，這樣一來，地方政府便會利用此二商品稅率來進行「租稅競爭」。至此，整個模型即可將垂直與水平的概念包含在內，而吾人亦可從中觀察兩種財政外部性互動的情形。

地方政府的租稅政策：

$$\underset{t_{1i}, t_{2i}}{\text{Max}} V(q_i, g_i, g_f)$$

$$\text{s. t.} \quad t_{1i} x_{1i}(q_i) \left( \frac{1}{2} + \frac{t_{1i}^* - t_{1i}}{d} \right) + t_{2i} x_{2i}(q_i) \left( \frac{1}{2} + \frac{t_{2i}^* - t_{2i}}{d} \right) = g_i$$

$$\sum_{i=1}^2 \left[ t_{1f} x_{1i}(q_i) \left( \frac{1}{2} + \frac{t_{1i}^* - t_{1i}}{d} \right) + t_{2f} x_{2i}(q_i) \left( \frac{1}{2} + \frac{t_{2i}^* - t_{2i}}{d} \right) \right] = 2g_f$$

f.o.c.

$$\begin{aligned} \frac{\partial L_i}{\partial t_{ji}} = \frac{\partial V}{\partial q_{ji}} + MU_s \left[ x_{ji} \left( \frac{1}{2} + \frac{t_{ji}^* - t_{ji}}{d} \right) - \frac{1}{d} t_{ji} x_{ji} + \sum_{k=1}^2 t_{ki} \left( \frac{1}{2} + \frac{t_{ki}^* - t_{ki}}{d} \right) \frac{\partial x_{ki}}{\partial q_{ji}} \right] \\ + \frac{1}{2} MU_f \left[ \sum_{k=1}^2 t_{kf} \frac{\partial x_{ki}}{\partial q_{ji}} \left( \frac{1}{2} + \frac{t_{ki}^* - t_{ki}}{d} \right) - \frac{1}{d} t_{jf} x_{ji} \right] = 0 \quad j=1,2 \quad (20) \end{aligned}$$

利用 Roy ' s Identity 與 Slutsky Matrix

$$\begin{aligned}
&\Rightarrow -\mathbf{a}x_{ji} + MU_s \left[ x_{ji} \left( \frac{1}{2} + \frac{\mathbf{t}_{ji}^* - \mathbf{t}_{ji}}{d} \right) - \frac{1}{d} \mathbf{t}_{ji} x_{ji} + \sum_{k=1}^2 \mathbf{t}_{ki} \left( \frac{1}{2} + \frac{\mathbf{t}_{ki}^* - \mathbf{t}_{ki}}{d} \right) \left( \frac{\partial h_{ji}}{\partial q_{ki}} - x_{ji} \frac{\partial x_{ki}}{\partial y} \right) \right] \\
&+ \frac{1}{2} MU_f \left[ \sum_{k=1}^2 \mathbf{t}_{kf} \left( \frac{1}{2} + \frac{\mathbf{t}_{ki}^* - \mathbf{t}_{ki}}{d} \right) \left( \frac{\partial h_{ji}}{\partial q_{ki}} - x_{ji} \frac{\partial x_{ki}}{\partial y} \right) - \frac{1}{d} \mathbf{t}_{jf} x_{ji} \right] = 0 \\
&\Rightarrow MRS_{sf} \sum_{k=1}^2 \mathbf{t}_{ki} \left( \frac{1}{2} + \frac{\mathbf{t}_{ki}^* - \mathbf{t}_{ki}}{d} \right) \frac{\partial h_{ji}}{\partial q_{ki}} + \frac{1}{2} \sum_{k=1}^2 \mathbf{t}_{kf} \left( \frac{1}{2} + \frac{\mathbf{t}_{ki}^* - \mathbf{t}_{ki}}{d} \right) \frac{\partial h_{ji}}{\partial q_{ki}} \\
&= x_{ji} \left\{ \frac{\mathbf{a}}{MU_f} - MRS_{sf} \left[ \left( \frac{1}{2} + \frac{\mathbf{t}_{ji}^* - \mathbf{t}_{ji}}{d} \right) - \frac{1}{d} \mathbf{t}_{ji} \right] + \sum_{k=1}^2 \left( MRS_{sf} \mathbf{t}_{ki} + \frac{1}{2} \mathbf{t}_{kf} \right) \left( \frac{1}{2} + \frac{\mathbf{t}_{ki}^* - \mathbf{t}_{ki}}{d} \right) \frac{\partial x_{ki}}{\partial y} + \frac{1}{d} \mathbf{t}_{jf} \right\}
\end{aligned}$$

$\therefore$  Symmetric Equilibrium  $\therefore \mathbf{t}_{ji} = \mathbf{t}_{ji}^*$  , 故我們令  $\tilde{\mathbf{t}}_{ji} = \tilde{\mathbf{t}}_{ji}^* = \tilde{\mathbf{t}}_{js}$

$$\Rightarrow MRS_{sf} \left[ \left( \frac{1}{2} \right) \tilde{\mathbf{t}}_{1s} \mathbf{h}_{j1} + \left( \frac{1}{2} \right) \tilde{\mathbf{t}}_{2s} \mathbf{h}_{j2} \right] + \frac{1}{2} \left[ \left( \frac{1}{2} \right) \tilde{\mathbf{t}}_{1f} \mathbf{h}_{j1} + \left( \frac{1}{2} \right) \tilde{\mathbf{t}}_{2f} \mathbf{h}_{j2} \right] = \mathbf{q}'_s \quad (21)$$

$$\mathbf{q}'_s = \left[ \frac{\mathbf{a}}{MU_f} - MRS_{sf} \left( \frac{1}{2} - \frac{1}{d} \mathbf{t}_{js} \right) + \sum_{k=1}^2 \left( MRS_{sf} \mathbf{t}_{ks} + \frac{1}{2} \mathbf{t}_{kf} \right) \left( \frac{1}{2} \right) \frac{\partial x_k}{\partial y} + \frac{1}{d} \mathbf{t}_{jf} \right]$$

**中央政府的租稅政策：**

$$Max_{\mathbf{t}_{1f}, \mathbf{t}_{2f}} \sum_{i=1}^2 V(q_i, g_i, g_f)$$

$$\text{s. t.} \quad \mathbf{t}_{1i} x_{1i}(q_i) \left( \frac{1}{2} + \frac{\mathbf{t}_{1i}^* - \mathbf{t}_{1i}}{d} \right) + \mathbf{t}_{2i} x_{2i}(q_i) \left( \frac{1}{2} + \frac{\mathbf{t}_{2i}^* - \mathbf{t}_{2i}}{d} \right) = g_i$$

$$\sum_{i=1}^2 \left[ \mathbf{t}_{1f} x_{1i}(q_i) \left( \frac{1}{2} + \frac{\mathbf{t}_{1i}^* - \mathbf{t}_{1i}}{d} \right) + \mathbf{t}_{2f} x_{2i}(q_i) \left( \frac{1}{2} + \frac{\mathbf{t}_{2i}^* - \mathbf{t}_{2i}}{d} \right) \right] = 2g_f$$

f.o.c.

$$\frac{\partial L_f}{\partial q_{ji}} = \frac{\partial V}{\partial q_{ji}} + MU_s \left[ \sum_{k=1}^2 \mathbf{t}_{ki} \left( \frac{1}{2} + \frac{\mathbf{t}_{ki}^* - \mathbf{t}_{ki}}{d} \right) \frac{\partial x_{ki}}{\partial q_{ji}} \right] + MU_f \left[ x_{ji} \left( \frac{1}{2} + \frac{\mathbf{t}_{ji}^* - \mathbf{t}_{ji}}{d} \right) \right]$$

$$+ \sum_{k=1}^2 \mathbf{t}_{kf} \left( \frac{1}{2} + \frac{\mathbf{t}_{ki^*} - \mathbf{t}_{ki}}{d} \right) \frac{\partial x_{ki}}{\partial q_{ji}} \Bigg] = 0 \quad j=1,2 \quad (22)$$

利用 Roy ' s Identity、Slutsky Matrix 及 Symmetric Equilibrium 的概念：

$$\Rightarrow -\mathbf{a}x_{ji} + MU_s \left[ \sum_{k=1}^2 \mathbf{t}_{ki} \left( \frac{1}{2} + \frac{\mathbf{t}_{ki^*} - \mathbf{t}_{ki}}{d} \right) \left( \frac{\partial h_{ji}}{\partial q_{ki}} - x_{ji} \frac{\partial x_{ki}}{\partial y} \right) \right] + MU_f \left[ x_{ji} \left( \frac{1}{2} + \frac{\mathbf{t}_{ji^*} - \mathbf{t}_{ji}}{d} \right) \right. \\ \left. + \sum_{k=1}^2 \mathbf{t}_{kf} \left( \frac{1}{2} + \frac{\mathbf{t}_{ki^*} - \mathbf{t}_{ki}}{d} \right) \left( \frac{\partial h_{ji}}{\partial q_{ki}} - x_{ji} \frac{\partial x_{ki}}{\partial y} \right) \right] = 0$$

在 Symmetric Equilibrium 下， $\mathbf{t}_{ji} = \mathbf{t}_{ji^*} = \mathbf{t}_{js}$

$$\Rightarrow MRS_{sf} \left[ \left( \frac{1}{2} \right) \tilde{\mathbf{t}}_{1s} \mathbf{h}_{j1} + \left( \frac{1}{2} \right) \tilde{\mathbf{t}}_{2s} \mathbf{h}_{j2} \right] + \left[ \left( \frac{1}{2} \right) \tilde{\mathbf{t}}_{1f} \mathbf{h}_{j1} + \left( \frac{1}{2} \right) \tilde{\mathbf{t}}_{2f} \mathbf{h}_{j2} \right] = \mathbf{q}'_f \quad (23)$$

$$\mathbf{q}'_f = \left[ \frac{\mathbf{a}}{MU_f} + \sum_{k=1}^2 \frac{1}{2} (MRS_{sf} \mathbf{t}_{ks} + \mathbf{t}_{kf}) \frac{\partial x_k}{\partial y} - \frac{1}{2} \right]$$

$$\frac{1}{2} \tilde{\mathbf{t}}_{1f} \mathbf{h}_{j1} + \frac{1}{2} \tilde{\mathbf{t}}_{2f} \mathbf{h}_{j2} = 2(\mathbf{q}'_f - \mathbf{q}'_s) = \mathbf{q}''_f$$

$$\frac{1}{2} \tilde{\mathbf{t}}_{1s} \mathbf{h}_{j1} + \frac{1}{2} \tilde{\mathbf{t}}_{2s} \mathbf{h}_{j2} = \frac{2}{MRS_{sf}} (\mathbf{q}'_s - \mathbf{q}'_f) = \mathbf{q}''_s$$

$$\Rightarrow \frac{1}{2} (\tilde{\mathbf{t}}_{1f} + \tilde{\mathbf{t}}_{1s}) \mathbf{h}_{j1} + \frac{1}{2} (\tilde{\mathbf{t}}_{2f} + \tilde{\mathbf{t}}_{2s}) \mathbf{h}_{j2} = (\mathbf{q}''_f + \mathbf{q}''_s) \quad j=1,2$$

由上述地方與中央的最適決策之一階條件可得：

$$\tilde{\mathbf{t}}_{jf} = \mathbf{t}_j^*(\mathbf{q}''_f) \quad , \quad \tilde{\mathbf{t}}_{ji} = \mathbf{t}_j^*(\mathbf{q}''_s) \quad , \quad \tilde{\mathbf{t}}_{jf} + \tilde{\mathbf{t}}_{ji} = \mathbf{t}_j^*(\mathbf{q}''_f + \mathbf{q}''_s)$$

對於 Hoyt (2001) 命題一的影響：

(A) 中央與地方政府有相同的租稅工具時 (即兩者稅基完全相同)，中央與地方對此二貨物的相對稅率仍應相等：

$$\frac{\mathbf{t}_{1i}}{\mathbf{t}_{2i}} = \frac{\mathbf{t}_{1f}}{\mathbf{t}_{2f}}$$

(B) 地方公共財提供過多的情況不一定成立。

將地方與中央的一階條件相減

$$\begin{aligned}
\frac{\partial L_i}{\partial t_{ji}} &= \frac{\partial V}{\partial q_{ji}} + MU_s \left[ x_j \left( \frac{1}{2} + \frac{t_{ji}^* - t_{ji}}{d} \right) - \frac{1}{d} t_{ji} x_j + \sum_{k=1}^2 t_{ki} \left( \frac{1}{2} + \frac{t_{ki}^* - t_{ki}}{d} \right) \frac{\partial x_{ki}}{\partial q_{ji}} \right] \\
&\quad + \frac{1}{2} MU_f \left[ \sum_{k=1}^2 t_{kf} \frac{\partial x_{ki}}{\partial q_{ji}} \left( \frac{1}{2} + \frac{t_{ki}^* - t_{ki}}{d} \right) - \frac{1}{d} t_{jf} x_{ji} \right] \\
&= \frac{\partial V}{\partial q_{ji}} + MU_s \left[ \sum_{k=1}^2 t_{ki} \left( \frac{1}{2} + \frac{t_{ki}^* - t_{ki}}{d} \right) \frac{\partial x_{ki}}{\partial q_{ji}} \right] + MU_f \left[ x_{ji} \left( \frac{1}{2} + \frac{t_{ji}^* - t_{ji}}{d} \right) \right. \\
&\quad \left. + \sum_{k=1}^2 t_{kf} \left( \frac{1}{2} + \frac{t_{ki}^* - t_{ki}}{d} \right) \frac{\partial x_{ki}}{\partial q_{ji}} \right] = \frac{\partial L_f}{\partial t_{jf}} \\
\Rightarrow (MRS_{sf} - 1) x_{ji} \left( \frac{1}{2} + \frac{t_{ji}^* - t_{ji}}{d} \right) &= MRS_{sf} \frac{1}{d} t_{ji} x_{ji} + \frac{1}{2} \sum_{k=1}^2 t_{kf} \left( \frac{1}{2} + \frac{t_{ki}^* - t_{ki}}{d} \right) \frac{\partial x_{ki}}{\partial q_{ji}} + \frac{1}{2d} t_{jf} x_{ji}
\end{aligned}$$

∴ 在 Symmetric Equilibrium 中  $\frac{t_{ji}^* - t_{ji}}{d} = 0$ ，故上式可化簡如下：

$$\frac{1}{2} (MRS_{sf} - 1) x_j = \frac{1}{d} MRS_{sf} t_{js} x_j + \frac{1}{2d} t_{jf} x_j + \frac{1}{2} \sum_{k=1}^2 \left( \frac{1}{2} \right) t_{kf} \frac{\partial x_k}{\partial q_j} \quad (24)$$

若在  $x_j, d > 0$ 、 $t_{js}, t_{jf} \geq 0$  且  $MU_s, MU_f > 0$  的條件下。則 (24) 式右方並無法確定會出現正值或負值，換句話說，我們無法判斷  $MRS_{sf}$  是否會大於 1。即在具有水平與垂直外部性的情況下，不能確認地方與中央公共財相對提供水準。

經由以上的數學推導，我們發現在中央與地方稅基完全重疊的假設

下，地方政府間的水平租稅競爭似乎不會對於兩層級政府租稅政策產生影響，這也就是說中央與地方仍依照最適課稅原則訂定各自稅率，在租稅課徵方面並無產生任何效率的損失。

相較於 Hoyt (2001) 一文，加入水平外部性後，在不考量稅率對於轄區內平均消費的影響下，地方稅率變動會誘使居民做出跨區域購買行為，進而使稅基產生水平流動的情形出現，由於模型假設政府預算平衡，故流動效果會完全反映在公共支出上 ( $\frac{1}{d} MRS_{sf} t_{js} x_j$  與  $\frac{1}{2d} t_{jf} x_j$ )，從而導致公共支出有提供不足之現象。因此，地方公共財是否提供過度需視垂直效果與水平流動效果二者共同決定，而非如原始模型中地方公共財必定呈現過度提供的狀態。如此一來，加入水平競爭的做法可能有效地抵銷原先垂直外部性所造成的支出扭曲，使得兩層級政府在稅收與支出面同時符合效率的條件。

## 第二節 租稅競爭與地方稅基受限

本節中，由於地方政府稅基受限，只能對商品 1 課稅，故此時商品 2 的價格在各區域間均相等，消費者跨區購買的行為僅侷限於商品 1。接下來，我們透過數學推導，檢視納入水平面之做法，是否會對原始結論產生重大的改變。

地方政府的租稅政策：

$$\begin{aligned} \underset{t_i}{\text{Max}} \quad & V(q_i, g_i, g_f) \\ \text{s. t.} \quad & t_i x_i(q_i) \left( \frac{1}{2} + \frac{t_{1i^*} - t_{1i}}{d} \right) = g_i \end{aligned}$$

$$\sum_{i=1}^2 \left[ \mathbf{t}_{1f} x_{1i}(q_i) \left( \frac{1}{2} + \frac{\mathbf{t}_{1i^*} - \mathbf{t}_{1i}}{d} \right) + \mathbf{t}_{2f} x_{2i}(q_i) \left( \frac{1}{2} \right) \right] = 2g_f$$

f.o.c.

$$\begin{aligned} \frac{\partial L_i}{\partial \mathbf{t}_{1i}} = \frac{\partial V}{\partial q_{1i}} + MU_s \left[ x_{1i} \left( \frac{1}{2} + \frac{\mathbf{t}_{1i^*} - \mathbf{t}_{1i}}{d} \right) + \mathbf{t}_{1i} \frac{\partial x_{1i}}{\partial q_{1i}} \left( \frac{1}{2} + \frac{\mathbf{t}_{1i^*} - \mathbf{t}_{1i}}{d} \right) - \frac{1}{d} \mathbf{t}_{1i} x_{1i} \right] \\ + \frac{1}{2} MU_f \left[ \mathbf{t}_{1f} \frac{\partial x_{1i}}{\partial q_{1i}} \left( \frac{1}{2} + \frac{\mathbf{t}_{1i^*} - \mathbf{t}_{1i}}{d} \right) - \frac{1}{d} \mathbf{t}_{1f} x_{1i} + \frac{1}{2} \mathbf{t}_{2f} \frac{\partial x_{2i}}{\partial q_{1i}} \right] = 0 \quad (25) \end{aligned}$$

中央政府的租稅政策：

$$Max_{\mathbf{t}_{1f}, \mathbf{t}_{2f}} \sum_{i=1}^2 V(q_i, g_i, g_f)$$

$$\text{s. t.} \quad \mathbf{t}_{1i} x_{1i}(q_i) \left( \frac{1}{2} + \frac{\mathbf{t}_{1i^*} - \mathbf{t}_{1i}}{d} \right) = g_i$$

$$\sum_{i=1}^2 \left[ \mathbf{t}_{1f} x_{1i}(q_i) \left( \frac{1}{2} + \frac{\mathbf{t}_{1i^*} - \mathbf{t}_{1i}}{d} \right) + \mathbf{t}_{2f} x_{2i}(q_i) \left( \frac{1}{2} \right) \right] = 2g_f$$

f.o.c.

$$\begin{aligned} \frac{\partial L_f}{\partial \mathbf{t}_{1f}} = \frac{\partial V}{\partial q_{1i}} + MU_s \left[ \mathbf{t}_{1i} \frac{\partial x_{1i}}{\partial q_{1i}} \left( \frac{1}{2} + \frac{\mathbf{t}_{1i^*} - \mathbf{t}_{1i}}{d} \right) \right] + MU_f \left[ x_{1i} \left( \frac{1}{2} + \frac{\mathbf{t}_{1i^*} - \mathbf{t}_{1i}}{d} \right) + \mathbf{t}_{1f} \frac{\partial x_{1i}}{\partial q_{1i}} \left( \frac{1}{2} + \frac{\mathbf{t}_{1i^*} - \mathbf{t}_{1i}}{d} \right) \right. \\ \left. + \frac{1}{2} \mathbf{t}_{2f} \frac{\partial x_{2i}}{\partial q_{1i}} \right] = 0 \quad (26) \end{aligned}$$

利用 Roy ' s Identity、Slutsky Matrix 及 Symmetric Equilibrium 的概

念

$$\Rightarrow \frac{1}{2} \left( MRS_{sf} \tilde{\mathbf{t}}_{1s} + \tilde{\mathbf{t}}_{1f} \right) \mathbf{h}_{11} + \frac{1}{2} \tilde{\mathbf{t}}_{2f} \mathbf{h}_{12} = \mathbf{q}_{1f}$$

$$\mathbf{q}_{1f} = \left[ \frac{\mathbf{a}}{MU_f} + (MRS_{sf} \tilde{\mathbf{t}}_{1s} + \tilde{\mathbf{t}}_{1f}) \frac{1}{2} \frac{\partial x_1}{\partial y} + \frac{1}{2} \tilde{\mathbf{t}}_{2f} \frac{\partial x_2}{\partial y} - \frac{1}{2} \right]$$

$$\frac{\partial L_f}{\partial \mathbf{t}_{2f}} = \frac{\partial V}{\partial q_{2i}} + MU_s \left[ \mathbf{t}_{1i} \frac{\partial x_{1i}}{\partial q_{2i}} \left( \frac{1}{2} + \frac{\mathbf{t}_{1i}^* - \mathbf{t}_{1i}}{d} \right) \right] + MU_f \left[ \mathbf{t}_{1f} \frac{\partial x_{1i}}{\partial q_{2i}} \left( \frac{1}{2} + \frac{\mathbf{t}_{1i}^* - \mathbf{t}_{1i}}{d} \right) + \frac{1}{2} x_{2i} + \frac{1}{2} \mathbf{t}_{2f} \frac{\partial x_{2i}}{\partial q_{2i}} \right] = 0 \quad (27)$$

同理

$$\Rightarrow \frac{1}{2} \left( MRS_{sf} \tilde{\mathbf{t}}_{1s} + \tilde{\mathbf{t}}_{1f} \right) \mathbf{h}_{21} + \frac{1}{2} \tilde{\mathbf{t}}_{2f} \mathbf{h}_{22} = \mathbf{q}_{2f}$$

$$\mathbf{q}_{2f} = \left[ \frac{\mathbf{a}}{MU_f} + (MRS_{sf} \mathbf{t}_{1s} + \mathbf{t}_{1f}) \frac{1}{2} \frac{\partial x_1}{\partial y} + \frac{1}{2} \mathbf{t}_{2f} \frac{\partial x_2}{\partial y} - \frac{1}{2} \right] = \mathbf{q}_{1f} = \mathbf{q}_f$$

$$\Rightarrow (\tilde{\mathbf{t}}_{1s} + \tilde{\mathbf{t}}_{1f}) \mathbf{h}_{j1} + \tilde{\mathbf{t}}_{2f} \mathbf{h}_{j2} + (MRS_{sf} - 1) \tilde{\mathbf{t}}_{1s} \mathbf{h}_{j1} = \mathbf{q}_f \quad j = 1, 2$$

經由中央的一階條件，吾人可求得與 Hoyt (2001) 一文相對應的中央稅率：

$$\tilde{\mathbf{t}}_{1s} + \tilde{\mathbf{t}}_{1f} = \mathbf{t}_1^*(\mathbf{q}_f) + (1 - MRS_{sf}) \tilde{\mathbf{t}}_{1s}, \text{ 及 } \tilde{\mathbf{t}}_{2f} = \mathbf{t}_2^*(\mathbf{q}_f)$$

對於 Hoyt (2001) 命題二的影響：

同樣地，我們將中央與地方對於第一種商品的一階條件相減

$$\begin{aligned} \frac{\partial L_i}{\partial \mathbf{t}_{1i}} &= \frac{\partial V}{\partial q_{1i}} + MU_s \left[ x_{1i} \left( \frac{1}{2} + \frac{\mathbf{t}_{1i}^* - \mathbf{t}_{1i}}{d} \right) + \mathbf{t}_{1i} \frac{\partial x_{1i}}{\partial q_{1i}} \left( \frac{1}{2} + \frac{\mathbf{t}_{1i}^* - \mathbf{t}_{1i}}{d} \right) - \frac{1}{d} \mathbf{t}_{1i} x_{1i} \right] \\ &\quad + \frac{1}{2} MU_f \left[ \mathbf{t}_{1f} \frac{\partial x_{1i}}{\partial q_{1i}} \left( \frac{1}{2} + \frac{\mathbf{t}_{1i}^* - \mathbf{t}_{1i}}{d} \right) - \frac{1}{d} \mathbf{t}_{1f} x_{1i} + \frac{1}{2} \mathbf{t}_{2f} \frac{\partial x_{2i}}{\partial q_{1i}} \right] \\ &= \frac{\partial V}{\partial q_{1i}} + MU_s \left[ \mathbf{t}_{1i} \frac{\partial x_{1i}}{\partial q_{1i}} \left( \frac{1}{2} + \frac{\mathbf{t}_{1i}^* - \mathbf{t}_{1i}}{d} \right) \right] + MU_f \left[ x_{1i} \left( \frac{1}{2} + \frac{\mathbf{t}_{1i}^* - \mathbf{t}_{1i}}{d} \right) + \mathbf{t}_{1f} \frac{\partial x_{1i}}{\partial q_{1i}} \left( \frac{1}{2} + \frac{\mathbf{t}_{1i}^* - \mathbf{t}_{1i}}{d} \right) \right. \\ &\quad \left. + \frac{1}{2} \mathbf{t}_{2f} \frac{\partial x_{2i}}{\partial q_{1i}} \right] = \frac{\partial L_f}{\partial \mathbf{t}_{1f}} \end{aligned}$$

$$\Rightarrow MU_f \left\{ (1 - MRS_{sf}) \left( \frac{1}{2} + \frac{\mathbf{t}_{1i}^* - \mathbf{t}_{1i}}{d} \right) x_{1i} + \left( 1 - \frac{1}{2} \right) \left[ \mathbf{t}_{1f} \frac{\partial x_{1i}}{\partial q_{1i}} \left( \frac{1}{2} + \frac{\mathbf{t}_{1i}^* - \mathbf{t}_{1i}}{d} \right) - \frac{1}{d} \mathbf{t}_{1f} x_{1i} \right] \right.$$



$$+ \frac{1}{2} t_{2f} \frac{\partial x_{2i}}{\partial q_{1i}} \left] + \frac{1}{d} MRS_{sf} t_{1i} x_{1i} + \frac{1}{d} t_{1f} x_{1i} \right\} = 0$$

∴ 在 Symmetric Equilibrium 中  $\frac{t_{ji^*} - t_{ji}}{d} = 0$ ，故上式可化簡如下：

$$MU_f \left\{ \frac{1}{2} (1 - MRS_{sf}) x_1 + \left( 1 - \frac{1}{2} \right) \left[ \frac{1}{2} t_{1f} \frac{\partial x_1}{\partial q_1} - \frac{1}{d} t_{1f} x_1 + \frac{1}{2} t_{2f} \frac{\partial x_2}{\partial q_1} \right] + \frac{1}{d} MRS_{sf} t_{1s} x_1 + \frac{1}{d} t_{1f} x_1 \right\} = 0$$

( 28 )

- ( A ) 若  $MRS_{sf} > 1$  且  $\frac{\partial x_{2i}}{\partial q_{1i}} \leq 0$  時，中央不一定要對財貨 1 予以補貼才能消弭地方課稅對其所產生之財政外部性。
- ( B ) 由中央與地方公共財的相對提供水準來判斷地方稅率之垂直外部性的正負也是不恰當的。

Hoyt ( 2001 ) 指出，在僅考慮中央地方的垂直關係時，地方稅基受限不但使政府間的資源配置遭受到扭曲，在某些條件下，中央為消除地方課稅所造成之財政外部性，可能會違反最適課稅原則對商品進行補貼，致使政府於稅收和支出兩方面均做出非最適之決策。然而，加入地方水平租稅競爭的考量後，即使中央與地方相對支出水準仍呈現非最適的狀態（假定  $MRS_{sf} > 1$ ，且維持兩財貨互補假設），中央政府若依照最適課稅法則來訂定稅率，地方課稅對中央稅收所造成之影響還是有可能為水平租稅競爭的流動效果所抵銷<sup>7</sup>。與原始模型相較，當地方稅基受限時，中央地方資源配置雖未符合最適水準，但政府的租稅政策還是有機會達成最適課稅法則的條件。

<sup>7</sup> 因此，當  $MRS_{sf} > 1$  時， $\frac{\partial R_f}{\partial t_{1i}} = 0$  非必要條件。

### 第三節 租稅外部性與政府間移轉制度

Hoyt (2001) 一文明確地告訴我們，當中央地方稅基重疊程度有所差異時，政府的租稅政策及支出水準皆可能為垂直外部性所干擾。因此，作者在文章的最後推論出中央政府應可設計一套移轉制度，有效地解決所有問題。所以，本節之目的，在於驗證引入租稅競爭的概念後，是否會對原先補助制度的條件產生重大之改變。

中央政府的租稅政策：

$$\begin{aligned} & \underset{\mathbf{t}_{1f}, \mathbf{t}_{2f}, \mathbf{t}_{3f}, m_1, m_2}{\text{Max}} \quad \sum_{i=1}^2 V(q_i, g_i, g_f) \\ \text{s.t.} \quad & \sum_{i=1}^2 \left[ (\mathbf{t}_{1f} - \mathbf{t}_{1i} m_1) x_{1i}(q_i) \left( \frac{1}{2} + \frac{\mathbf{t}_{1i}^* - \mathbf{t}_{1i}}{d} \right) + (\mathbf{t}_{2f} - \mathbf{t}_{2i} m_2) x_{2i}(q_i) \left( \frac{1}{2} + \frac{\mathbf{t}_{2i}^* - \mathbf{t}_{2i}}{d} \right) \right. \\ & \left. + \mathbf{t}_{3f} x_{3i}(q_i) \left( \frac{1}{2} \right) - S_i - g_f \right] = 0 \\ & (1 + m_1) \mathbf{t}_{1i} x_{1i}(q_i) \left( \frac{1}{2} + \frac{\mathbf{t}_{1i}^* - \mathbf{t}_{1i}}{d} \right) + (1 + m_2) \mathbf{t}_{2i} x_{2i}(q_i) \left( \frac{1}{2} + \frac{\mathbf{t}_{2i}^* - \mathbf{t}_{2i}}{d} \right) + S_i = g_i \end{aligned}$$

f.o.c.

$$\begin{aligned} \frac{\partial L_f}{\partial \mathbf{t}_{jf}} = \frac{\partial V}{\partial q_{ji}} + MU_s \left[ \sum_{k=1}^2 (1 + m_k) \mathbf{t}_{ki} \frac{\partial x_{ki}}{\partial q_{ji}} \left( \frac{1}{2} + \frac{\mathbf{t}_{ki}^* - \mathbf{t}_{ki}}{d} \right) \right] + MU_f \left[ \sum_{k=1}^2 (\mathbf{t}_{kf} - m_k \mathbf{t}_{ki}) \frac{\partial x_{ki}}{\partial q_{ji}} \left( \frac{1}{2} + \frac{\mathbf{t}_{ki}^* - \mathbf{t}_{ki}}{d} \right) \right. \\ \left. + x_{ji} \left( \frac{1}{2} + \frac{\mathbf{t}_{ji}^* - \mathbf{t}_{ji}}{d} \right) + \frac{1}{2} \mathbf{t}_{3f} \frac{\partial x_{3i}}{\partial q_{ji}} \right] = 0 \quad j = 1, 2 \quad (29) \end{aligned}$$

$$\begin{aligned} \frac{\partial L_f}{\partial \mathbf{t}_{3f}} = \frac{\partial V}{\partial q_{3i}} + MU_s \left[ \sum_{k=1}^2 (1 + m_k) \mathbf{t}_{ki} \frac{\partial x_{ki}}{\partial q_{3i}} \left( \frac{1}{2} + \frac{\mathbf{t}_{ki}^* - \mathbf{t}_{ki}}{d} \right) \right] + MU_f \left[ \sum_{k=1}^2 (\mathbf{t}_{kf} - m_k \mathbf{t}_{ki}) \frac{\partial x_{ki}}{\partial q_{3i}} \left( \frac{1}{2} + \frac{\mathbf{t}_{ki}^* - \mathbf{t}_{ki}}{d} \right) \right. \\ \left. + \frac{1}{2} x_{3i} + \frac{1}{2} \mathbf{t}_{3f} \frac{\partial x_{3i}}{\partial q_{3i}} \right] = 0 \quad j = 3 \quad (30) \end{aligned}$$

$$\frac{\partial L_f}{\partial m_j} = MU_s \left[ \mathbf{t}_{ji} x_{ji} \left( \frac{1}{2} + \frac{\mathbf{t}_{ji^*} - \mathbf{t}_{ji}}{d} \right) \right] - MU_f \left[ \mathbf{t}_{ji} x_{ji} \left( \frac{1}{2} + \frac{\mathbf{t}_{ji^*} - \mathbf{t}_{ji}}{d} \right) \right] = 0$$

$$\Rightarrow MU_s = MU_f \quad (31)$$

$$\frac{\partial L_f}{\partial S} = MU_s - MU_f = 0 \quad (32)$$

同理，利用中央政府租稅政策的一階條件，並套用前述的轉換方式

$$\because \text{在 Symmetric Equilibrium 中 } \mathbf{t}_{ji} = \mathbf{t}_{ji^*} = \mathbf{t}_{js} \therefore \frac{\mathbf{t}_{ji^*} - \mathbf{t}_{ji}}{d} = 0,$$

$$\Rightarrow \frac{1}{2} \left[ \tilde{\mathbf{t}}_{1f} + \tilde{\mathbf{t}}_{1s} + (MRS_{sf} - 1)(1 + m_1) \tilde{\mathbf{t}}_{1s} \right] \mathbf{h}_{j1}$$

$$+ \frac{1}{2} \left[ \tilde{\mathbf{t}}_{2f} + \tilde{\mathbf{t}}_{2s} + (MRS_{sf} - 1)(1 + m_2) \tilde{\mathbf{t}}_{2s} \right] \mathbf{h}_{j2} + \frac{1}{2} \tilde{\mathbf{t}}_{3f} \mathbf{h}_{j3} = \mathbf{q}_{jf} \quad (33)$$

$$\mathbf{q}_{jf} = \left\{ \frac{\mathbf{a}}{MU_f} + \sum_{k=1}^2 \left[ MRS_{sf} (1 + m_k) \mathbf{t}_{ks} + (\mathbf{t}_{kf} - m_k \mathbf{t}_{ks}) \right] \left( \frac{1}{2} \right) \frac{\partial x_k}{\partial y} - \frac{1}{2} + \frac{1}{2} \mathbf{t}_{3f} \frac{\partial x_{3i}}{\partial y} \right\}$$

$j = 1, 2$

$$\frac{1}{2} \left[ \tilde{\mathbf{t}}_{1f} + \tilde{\mathbf{t}}_{1s} + (MRS_{sf} - 1)(1 + m_1) \tilde{\mathbf{t}}_{1s} \right] \mathbf{h}_{31}$$

$$+ \frac{1}{2} \left[ \tilde{\mathbf{t}}_{2f} + \tilde{\mathbf{t}}_{2s} + (MRS_{sf} - 1)(1 + m_2) \tilde{\mathbf{t}}_{2s} \right] \mathbf{h}_{32} + \frac{1}{2} \tilde{\mathbf{t}}_{3f} \mathbf{h}_{33} = \mathbf{q}_{3f} \quad (34)$$

$$\mathbf{q}_{3f} = \left\{ \frac{\mathbf{a}}{MU_f} + \sum_{k=1}^2 \left[ MRS_{sf} (1 + m_k) \mathbf{t}_{ks} + (\mathbf{t}_{kf} - m_k \mathbf{t}_{ks}) \right] \left( \frac{1}{2} \right) \frac{\partial x_k}{\partial y} - \left( \frac{1}{2} \right) + \frac{1}{2} \mathbf{t}_{3f} \frac{\partial x_3}{\partial y} \right\}$$

$j = 3$

**地方政府的租稅政策：**

$$\text{Max}_{\mathbf{t}_{1i}, \mathbf{t}_{2i}} V(\mathbf{q}_i, g_i, g_f)$$

$$\text{s. t. } \frac{1}{2} \sum_{i=1}^2 \left[ (\mathbf{t}_{1f} - \mathbf{t}_{1i} m_1) x_{1i}(\mathbf{q}_i) \left( \frac{1}{2} + \frac{\mathbf{t}_{1i^*} - \mathbf{t}_{1i}}{d} \right) + (\mathbf{t}_{2f} - \mathbf{t}_{2i} m_2) x_{2i}(\mathbf{q}_i) \left( \frac{1}{2} + \frac{\mathbf{t}_{2i^*} - \mathbf{t}_{2i}}{d} \right) \right]$$

$$+ \mathbf{t}_{3f} x_{3i}(q_i) \left( \frac{1}{2} \right) - S_i \Big] = g_f$$

$$(1+m_1) \mathbf{t}_{1i} x_{1i}(q_i) \left( \frac{1}{2} + \frac{\mathbf{t}_{1i}^* - \mathbf{t}_{1i}}{d} \right) + (1+m_2) \mathbf{t}_{2i} x_{2i}(q_i) \left( \frac{1}{2} + \frac{\mathbf{t}_{2i}^* - \mathbf{t}_{2i}}{d} \right) + S_i = g_i$$

f.o.c.

$$\begin{aligned} \frac{\partial L_s}{\partial \mathbf{t}_{ji}} = \frac{\partial V}{\partial q_{ji}} + MU_s \left[ \sum_{k=1}^2 (1+m_k) \mathbf{t}_{ki} \left( \frac{1}{2} + \frac{\mathbf{t}_{ki}^* - \mathbf{t}_{ki}}{d} \right) \frac{\partial x_{ki}}{\partial q_{ji}} + (1+m_j) \left( \frac{1}{2} + \frac{\mathbf{t}_{ji}^* - \mathbf{t}_{ji}}{d} \right) x_{ji} - \frac{1}{d} (1+m_j) \mathbf{t}_{ji} x_{ji} \right] \\ + \frac{1}{2} MU_f \left[ \sum_{k=1}^2 (\mathbf{t}_{kf} - m_k \mathbf{t}_{ki}) \left( \frac{1}{2} + \frac{\mathbf{t}_{ki}^* - \mathbf{t}_{ki}}{d} \right) \frac{\partial x_{ki}}{\partial q_{ji}} - m_j x_{ji} \left( \frac{1}{2} + \frac{\mathbf{t}_{ji}^* - \mathbf{t}_{ji}}{d} \right) - (\mathbf{t}_{jf} - \mathbf{t}_{ji} m_j) x_{ji} \left( \frac{1}{d} \right) \right. \\ \left. + \frac{1}{2} \mathbf{t}_{3f} \frac{\partial x_{3i}}{\partial q_{ji}} \right] = 0 \quad j = 1, 2 \end{aligned} \quad (35)$$

對於 Hoyt (2001) 命題三的影響：

由中央政府的一階條件，我們可知在最適的補助制度下  $MU_s = MU_f$ 。

利用此條件，吾人將中央與地方的一階條件相減可得

$$\begin{aligned} \left( 1 - \frac{1}{2} \right) MU_f \left\{ \left[ \sum_{k=1}^2 (\mathbf{t}_{kf} - m_k \mathbf{t}_{ki}) \left( \frac{1}{2} + \frac{\mathbf{t}_{ki}^* - \mathbf{t}_{ki}}{d} \right) \frac{\partial x_{ki}}{\partial q_{ji}} - m_j x_{ji} \left( \frac{1}{2} + \frac{\mathbf{t}_{ji}^* - \mathbf{t}_{ji}}{d} \right) - \frac{1}{d} (\mathbf{t}_{jf} - \mathbf{t}_{ji} m_j) x_{ji} \right. \right. \\ \left. \left. + \frac{1}{2} \mathbf{t}_{3f} \frac{\partial x_{3i}}{\partial q_{ji}} \right] + \frac{2}{d} (\mathbf{t}_{jf} - \mathbf{t}_{ji} m_j) x_{ji} + \frac{2}{d} (1+m_j) \mathbf{t}_{ji} x_{ji} \right\} = 0 \quad j = 1, 2 \end{aligned}$$

∴ 在 Symmetric Equilibrium 中  $\mathbf{t}_{ji} = \mathbf{t}_{ji}^* = \mathbf{t}_{js}$ ，因此上式可改寫如下：

$$\begin{aligned} \left( 1 - \frac{1}{2} \right) MU_f \left\{ \left[ \sum_{k=1}^2 \frac{1}{2} (\mathbf{t}_{kf} - m_k \mathbf{t}_{ks}) \frac{\partial x_k}{\partial q_j} - \frac{1}{2} m_j x_j - \frac{1}{d} (\mathbf{t}_{jf} - m_j \mathbf{t}_{js}) x_j + \frac{1}{2} \mathbf{t}_{3f} \frac{\partial x_3}{\partial q_j} \right] \right. \\ \left. + \frac{2}{d} (\mathbf{t}_{jf} - m_j \mathbf{t}_{js}) x_j + \frac{2}{d} (1+m_j) \mathbf{t}_{js} x_j \right\} = 0 \quad j = 1, 2 \end{aligned} \quad (36)$$

(A) Hoyt 認為  $MRS_{sf} = 1$  且沒有一個地方政府會產生財政外部性，始能導出最適的補助制度，在加入水平後，這樣的說法未必成立。

(B) 在  $MRS_{sf} = 1$  的情況下，中央與地方的混合稅率就如同單一政府下的稅率水準，並符合最適課稅之條件。

從中央與地方稅基完全重疊及地方稅基受限兩模型的推導中，我們可以歸結出以下論點：中央地方同時擁有課稅權時必會造成政府間的資源配置遭受扭曲，而稅基重疊的程度差異則會干擾政府的租稅決策。有鑑於此，Hoyt 希望為中央政府設計一套完善的補助措施以同時解決上述兩項問題。而在納入水平關係之後，最適補助制度依舊要使得中央與地方公共財達成最適配置（即  $MRS_{sf} = 1$ ），而兩級政府的混合稅率也必須符合最適課稅法則。不過，與原始模型不同的是，地方課稅不會對中央稅收產生財政外部性的現象已非達成最適補助制度的必要條件，因為地方政府間的租稅競爭也能抵銷此一不效率之情形。因此，補助制度僅須確保中央地方間資源有效的配置，即能完全矯正中央地方稅基差異所造成之稅收與支出兩方面的扭曲，使得整個經濟體系達到最有效率的境界。