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2013 Tax Guide for Americans Abroad & Non-Resident Aliens

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PREFACE

This Tax Guide summarizes some of the topics that are recurrent to Americans living overseas, from filing requirements to the Offshore Voluntary Disclosure Program.

The 2013 tax season presents some unique tax planning challenges, making the the need for qualified tax advice all the more essential. Following a heated Fiscal Cliff debate, Congress has recently passed the American Taxpayer Relief Act of 2012. This legislation suspends many of the Bush-Era tax cuts for individuals with taxable income in excess of $400,000, and $450,000 for married couples filing a joint return. For these taxpayers, the top marginal tax rate on ordinary income has been increased to 39.6 percent. Likewise, the top marginal tax rates on long-term capital gains and qualified dividends for these taxpayers have been increased to 20 percent. This law also expands the phase-out of certain deductions and credits for individuals with taxable income in excess of $250,000, and $300,000 for married couples filing a joint return.

In addition, the Foreign Account Tax Compliance Act of 2010 (also known as FATCA) has significantly altered tax compliance needs of Americans living abroad. FATCA requires foreign financial institutions to report the balances and certain transactions of U.S. account holders or otherwise be subject to 30 percent withholding, and imposes additional reporting requirements on U.S. taxpayers. Taxpayers who need to get back into compliance should consult a tax professional about the options available to them under the Offshore Voluntary Disclosure Program and the Streamlined Program (described on pages 7-8 of this Guide).

FATCA also imposes two additional reporting requirements on shareholders of PFICs (defined in pages 5-6). Under the new provisions, shareholders of these funds must file an annual report, even in the absence of taxable events during the year. As of the date of this Guide's publication, the IRS has not yet issued instructions on this new filing requirement. In addition, shareholders of PFICs will be required to include these funds in their annual Statement of Specified Foreign Financial Assets (form 8938) if they meet the filing requirements (see page 9).

As usual, we at Savransky Partners are ready to assist you with all of your tax planning and compliance needs.

ABOUT THE FIRM

Savransky Partners LLC is an international tax consulting firm which specializes on the tax needs of U.S. taxpayers with offshore investments and businesses. The firm offers a wide range of services, including tax preparation, US & International tax planning, negotiations with the IRS and state tax agencies, comptrollership services, and FIN48.

Filing Income Tax Returns & Information Returns

U.S. citizens and resident aliens must file income tax returns reporting their worldwide income for any year in which their gross income reaches certain filing thresholds (see "Filing Threshold Table" on page 11). This requirement also applies to U.S. taxpayers residing overseas. If you fail to file a return and a tax is due, failure-to-file and failure-to-pay penalties may accrue on your balance due up to 25 percent each. No penalties are imposed if no tax is due.

In addition to income tax returns, you may also be required to file other information returns disclosing information on your foreign bank accounts and foreign entities owned by you. On pages 9-10, we present a summary of the information returns you may be required to file and the penalties that may apply for failure to timely file these forms.

Generally, you are considered a resident alien for tax purposes if you meet either the green card test or the substantial presence test. The green card test is met when a green card is issued by the U.S. Citizenship and Immigration Services. The substantial presence test is met if you were physically present in the U.S. on at least 31 days during the current tax year, and 183 days during the last 3 years based on a special computation (see IRS Publication 519).

Taxation of Non-Resident Aliens

If you do not meet either the green card test and the substantial presence test, you will be considered a non-resident alien and taxed only on U.S. source income. Payments to non-resident aliens of fixed, determinable, annual, periodical (FDAP) income may be subject to 30 percent withholding at source, unless a lower tax rate applies based on a tax treaty. FDAP income includes compensation for personal services, rents, royalties, interest, and dividends, among other sources.

U.S. tax law provides some exceptions to this rule. Bank interest and portfolio interest paid to non-resident aliens are exempt from U.S. taxation, while interest and capital gain distributions paid by U.S. mutual funds and dividends are generally subject to 30 percent withholding. Most capital gains realized by non-resident aliens from the sale and exchange of securities are not taxable. However, if you are a non-resident alien and spend at least 183 days in the U.S. during a certain tax year, your capital gains will be subject to 30 percent withholding.

Foreign partners in a U.S. or foreign partnership doing business in the U.S. are subject to 35 percent withholding on their share of the partnership's effectively connected income for 2013. These taxpayers will be require to file form 1040NR for 2013 and claim the withholding as a credit. Except as described above, income earned by a non-resident alien which is effectively connected to a trade or business in the U.S. is generally not subject to withholding. This income, after allowable deductions, is taxed at the graduated rates that apply to U.S. citizens and resident aliens. Please contact our office if you are a non-resident alien and would like to learn more about the filing requirements and treaty benefits that may apply to you.

Reasonable Cause

No penalty will be imposed for failure to file income tax returns or information returns if you can convince the IRS that your failure to timely file was due to reasonable cause. Reasonable cause relief may be granted if you can establish that you have exercised ordinary business care and prudence in meeting your tax obligations, but have failed to comply.

The determination of reasonable cause is based on the facts and circumstances in each situation. Factors considered include your compliance history, your reasons for engaging in the non-compliant behavior, how long it took you to correct the non-compliant behavior, and whether the violation was due to circumstances beyond your control or reliance on the advice of a tax professional. In some limited cases, you may claim reasonable cause for non-compliance if you were unaware of the tax requirements and could not reasonably be expected to know of the requirements.

Reasonable cause claims are only helpful for abating civil penalties. Interest must nearly always be paid. If you need assistance determining whether you may qualify for a reasonable cause claim, please contact our office.

Israeli-American Tax Issues

U.S. taxpayers living in Israel usually face issues that are unique in their tax implications. Israeli companies provide their employees with a variety of deferred compensation arrangements, including *keren hishtalmut* (education funds), *keren pensia* (pension funds), and *bituach menahalim* (managers' insurance). These financial instruments have special treatment under U.S. tax law and in some cases must be disclosed in information returns. If you need advice on the tax treatment these items, please contact our office.

Election to include your Foreign Spouse in your Return (Section 6013)

If you are a U.S. citizen or resident alien and would like to include your non-resident alien spouse in your return, you may make an election for this by attaching a statement to your joint return for the first taxable year for which the election is to be in effect.

Section 6013 Elections allow taxpayers to claim an additional personal exemption ($3,800 in 2012) and may increase the total earned income reported, thus enabling some taxpayers to claim the child tax credit for the year. However, a major disadvantage of this election is that it subjects the foreign spouse to U.S. income taxation and reporting on all worldwide income (with the exception of self-employment taxes, which are not imposed on non-resident alien spouses making this election).

Section 6013 Elections must be made within three years from the tax return’s due date and may be revoked by the non-resident alien spouse by attaching a statement to the return for the first taxable year to which the revocation applies. Once revoked, it cannot be made again for any future year.

Foreign Earned Income Exclusion and Foreign Tax Credit

U.S. taxpayers who have a tax home in a foreign country and receive earned income (i.e. salaries and compensation for personal services) outside the U.S. are allowed to exclude up to $95,100 of this income in their 2012 U.S. tax returns. An additional exclusion of foreign housing costs is also allowed in some cases.

In order to qualify for this exclusion, you must meet either the bona fide residence test or the physical presence test. The bona fide residence test is met by establishing that you are a resident in good faith in a foreign country for an uninterrupted period that includes an entire year (Jan. 1-Dec. 31 for a calendar year return). The physical presence test is met if you were physically present in a foreign country or countries for at least 330 full days during any period of 12 months in a row.

U.S. taxpayers may also claim a credit or an itemized deduction for income taxes paid or accrued on their foreign income. If you choose to claim the exclusion, no foreign tax credit or deduction may be claimed on income that has already been excluded. However, a fractional amount of the credit may be claimed against earned income in excess of the $95,100 exclusion. The foreign tax credit may be carried back one year and carried forward for 10 years following the payment or accrual of the foreign taxes on income in a separate category that exceeds the annual limitation.

Taxpayers are encouraged to seek advanced planning in order to help them decide whether to claim the foreign earned income exclusion or not. Those wishing to revoke the exclusion in order to claim the foreign tax credit on all of their foreign earned income should attach a statement to their return for the first taxable year for which the election is to take effect. Once revoked, the exclusion generally cannot be claimed for the following 5 tax years.

Child Tax Credit and Other Credits

U.S. taxpayers living abroad may qualify for a refundable $1,000 child tax credit per child for certain dependents under the age of 17 who lived with the taxpayer most of the year. The dependents must be U.S. citizens or residents. This credit is phased out by 5 percent of your adjusted gross income in excess of $110,000 if you are married filing jointly ($55,000 or $75,000 if you are married filing separately or other filing status respectively). Taxpayers must also meet certain earned income thresholds in order to qualify for the credit (see IRS Publication 972).

Tax returns claiming the child tax credit must be filed within three years of the tax return due date. If your child born abroad qualifies as a U.S. citizen by birth and receives a Certificate of Birth Abroad from your local U.S. Consulate, you may claim this credit retroactively for years prior to the issuance of this certificate within three years of the due date. However, if your child obtained U.S. citizenship by naturalization, the IRS has taken the position that the child tax credit cannot be claimed retroactively for years prior to the child’s naturalization. If you resided outside the U.S. for more than half of the year, you will not qualify for the earned income credit.

Self-Employment Taxes

U.S. taxpayers who earn self-employment income abroad must pay U.S. Social Security and Medicare taxes at the rate of 15.3 percent in addition to foreign social security taxes, unless a Social Security agreement (often called "Totalization agreement") exists between the U.S. and the country where the income was earned. Totalization agreements eliminate double taxation in cases when a citizen of one country works in another country and is required to pay social security taxes to both countries on the same earnings. They also help fill the gaps in benefit protection for these kinds of taxpayers.

As of today, the U.S. has signed Totalization agreements with 24 countries, not including Israel (see "List of Totalization agreements" on page 8). This creates a major tax disadvantage for U.S. expatriates who work as self-employed in Israel. Many of these expatriates have set up Israeli companies and pay themselves a monthly salary in order to avoid paying U.S. social security taxes. The lack of a Totalization agreement also affects U.S. multinational companies that employ expatriate employees (working part of the year in the U.S. and part of the year in Israel), as U.S. Social Security coverage extends to U.S. citizens and U.S. resident aliens employed abroad by U.S. companies. This may result in dual social security tax liability for both the employers and the employees. Advanced planning is of the essense to avoid dual taxation. Taxpayers who own shares in an entity which is taxed as a partnership must generally pay self-employment taxes on their share of the partnership unless they are considered limited partners.

Stock Options

Stock option programs offered by foreign employers are usually considered non-statutory and not entitled to the same tax benefits as qualified programs offered by U.S. employers. If the fair market value of the options is not readily ascertainable at the time the options are granted, no income is recognized on the receipt of the option. Rather, taxpayers must recognize as salary income the value of the stock less the amount paid (often known as the "spread") in the year the option is exercised, unless the stock is not vested on that same year. If the stock is not vested when the option is exercised, income must be deferred until the vesting year. If the non-statutory stock option has an ascertainable fair market value, taxpayers must recognize as salary income the value of the option less any amount paid in the first year that the option is substantially vested.

Foreign Passive Investment Companies (PFICs)

Foreign companies owned by US taxpayers whose main activity is the production of passive income are subject to special reporting requirements and may be subject to additional tax and interest. Passive Foreign Investment Companies (PFICs) are foreign companies owned by US taxpayers in which: 1) 75 percent or more of the company's gross income is passive income (i.e. interest, dividends, capital gains, and certain rents and royalties), or 2) 50 percent or more of the company's average assets for the year are held for the production of passive income. This includes most foreign mutual funds, but may also include other types of investment funds.

Foreign Passive Investment Companies (PFICs) (Continued)

Shareholders of PFICs must file Form 8621 to report certain distributions and gains on disposition of the fund stock (see "Summary of Informational Returns" on page 9). Under default rules, current distributions of PFICs are taxed as ordinary income, while excess distributions (more than 125 percent of the average distributions of the last three or fewer years) that are allocated to prior year earnings are taxed at the highest tax rate for the ordinary income in each prior year plus interest charges. Distributions in the first year of the PFIC are always considered ordinary income.

Taxpayers also have the option of treating their PFICs as pass-through entities (similar to partnerships) by making a "Qualified Electing Fund" (QEF) election. Taxpayers making this election must include in gross income their pro-rata share of the mutual fund's ordinary earnings and capital gains for the taxable year. In order to make this election, the mutual fund must meet certain disclosure requirements that would allow the taxpayers to determine the QEF's ordinary earnings and capital gains for the year.

Shareholders of PFICs whose stock is regularly traded on certain national and foreign stock exchanges may also elect to treat such stock as mark-to-market. Under this method, taxpayers include in income each year any excesses of the fair market value of the stock as of the close of the tax year over the shareholder's adjusted basis in such stock. Taxpayers are also allowed a deduction equal to the excess of the adjusted basis of the stock over the fair market value as of the close of the tax year. This loss must be reduced by any mark-to-market gains recognized in previous years.

Tax Treaties

The United States has tax treaties with 68 foreign countries. These treaties allow residents of foreign countries reduced tax rates or total exemptions from U.S. income taxes on certain sources of income received within the U.S., and grant similar benefits to U.S. citizens or residents who receive income in a treaty foreign country.

Most tax treaties contain the Saving Clause, by which the U.S. government preserves the right to tax its citizens and resident aliens as if no tax treaty had gone into effect. As a result of this, U.S. citizens and resident aliens residing overseas in most cases cannot benefit from treaty provisions granting reduced U.S. tax rates or exemptions. Some notable exceptions to this include the treatment of Social Security and *Bituach Leumi* (Israeli National Insurance) benefits paid to U.S. taxpayers residing in Israel, which are exempt from taxation in both countries, and the treatment of annuities, which are only taxed in the taxpayer's country of residence.

In some cases, non-resident aliens doing business or receiving income in the U.S. can benefit from several provisions of tax treaties signed by the U.S., which limit or eliminate U.S. income taxes on personal services income and investment income. Please contact our office if you need specific advice on treaty benefits.

Offshore Voluntary Discosure Program (OVDP)

The IRS has opened a new voluntary disclosure initiative for taxpayers with unreported foreign income and unreported information returns (including forms 5471, FBARs, and other similar forms). If you failed to file tax and information returns in the past, this program allows you to pay penalties that may be lower than regular statutory penalties (see "Summary of Information Returns" on pages 7-8 for a summary of the penalties).

Under OVDP, taxpayers must file returns for the last eight years (including information returns) and Foreign Bank Account Reports for the same period, and pay a penalty equal to 27.5 percent of the aggregate value of all their foreign accounts and other offshore assets that are related to non-compliance for the year with the highest balance during this period plus failure to file and pay penalties. Taxpayers whose highest aggregate account balance in each of the years covered by the OVDP is less than $75,000 may qualify for a reduced 12.5 percent offshore penalty. In some limited cases, taxpayers may qualify for a reduced 5 percent penalty.

Taxpayers who applied for OVDP and find the statutory penalties to be lower than OVDP penalties have the option of opting out of the program. Once made, this election is irrevocable. Taxpayers who opt out of program must undergo a regular examination process for all the relevant years.

Once the examination under OVDP is completed, if the disclosure is determined to be complete, accurate, and truthful, the Criminal Investigation's Voluntary Disclosure Practice will provide a recommendation that the taxpayer not be prosecuted for violations up to the date of the disclosure. This also applies to taxpayers who opt out of OVDP, so long as they remain fully cooperative in providing foreign records and information as requested and no new issues are uncovered that were previously not disclosed.

Taxpayers who reported and paid tax on all of their worldwide income and only failed to file Foreign Bank Account Reports should file delinquent FBARs and attach a statement explaining why the reports are filed late. The OVDP should not be used in such cases.

Streamlined Program

The Streamlined Program is a new procedure that allows certain qualified taxpayers with unreported offshore income to get back to compliance and avoid penalties. Under this program, taxpayers file delinquent tax returns for the last three years (including information returns) and Foreign Bank Account Reports for the last six years.

The streamlined program is available to taxpayers who have lived outside the US for the last three years, did not file US tax returns for the last three years, and present low compliance risk. In deciding whether a submission is considered low risk, the IRS takes into account the taxpayers' tax liabilities for the last 3 years, their level of economic activity in the US, prior audits or investigations by the IRS, and indications of sophisticated tax planning or avoidance, among other factors. In general, absent other risk factors, if the taxpayer's returns show less than $1,500 in tax due for each of the years, they will be treated as low risk and processed under this procedure.

Streamlined Program (Continued)

Submissions that present higher compliance risk may be subject to subject to examination by the IRS for more than three years, and may be imposed failure to file and pay penalties and FBAR penalties.

This program allows taxpayers who own Canadian Registered Retirement Plans and Canadian Registered Savings Plans to seek relief for failure to timely elect deferral of retirement income by filing amended returns.

A tax professional should be consulted before applying for the streamlined program, as not all taxpayers qualify.

Special Rules for Taxpayers wishing to Expatriate

In recent years, an increasing number of Americans abroad and green card holders have tried to expatriate in order to avoid being subject to U.S. tax and reporting on their worldwide income. The process of expatriation requires appearance at your local U.S. Consulate, as wel as notification to the IRS. If you decide to relinquish your U.S. citizenship, you must file an Expatriation Information Statement (form 8854) with the IRS in order to cease being treated as a U.S. citizen for tax purposes. The same requirement applies to long-term residents who wish to surrender their green card if they were lawful permanent residents of the U.S. in at least 8 of the last 15 tax years ending with the year their long-term resident status ends.

In addition, taxpayers who expatriated after June 16, 2008, may be considered “covered expatriates,” subject to an exit tax on their worldwide assets as if the property had been sold for its fair market value on the day before the expatriation date. Any gain realized under these rules is taxable in the year of the deemed sale to the extent that it exceeds $626,000. Covered expatriates include taxpayers who had a net tax liability of more than $145,000 for the last five tax years before their expatriation date, whose net worth was $2 million or more on the date of expatriation, or who failed to certify in form 8854 that they have complied with all their federal tax obligations for 5 tax years preceding the date of expatriation.

Filing Deadlines

The deadline for filing individual federal tax returns is April 15. U.S. taxpayers residing overseas on the regular due date of their return are allowed an automatic 2-month extension to file their return and pay any amount due without requesting an extension. An additional extension to October 15 may be requested by filing form 4868 by June 15. However, any balance due must be paid by that date. Taxpayers who are out of the country as defined in the form 4868 instructions can request a discretionary additional 2-month extension to December 15.

Summary of Information Returns Based on IRS Instructions (IRS.GOV)

The following form must be filed separately by June 30 every year. It should not be attached to your U.S. income tax return:

Form TD F 90.22-1: FBAR (Foreign Bank Account Report)
Who must file? A U.S. taxpayer that has a financial interest or signature over a foreign financial account, if the aggregate value of the account exceeds $10,000 at any time during the year. If you have not filed FBARs in the past, you only need to file for the last 6 years.
Penalties: Willful civil penalties of up to $100,000 or 50 percent of the value of the account, Non-willful civil penalties of $10,000 per violation. Criminal penalties may also apply in some cases.

The following forms must be filed as part of your U.S. income tax return by the due date of the return including extensions:

Form 8938: Statement of Specified Foreign Financial Assets
Who must file? A U.S. taxpayer that has an interest in certain specified foreign financial assets with an aggregate value exceeding certain thresholds. For example, a married couple living in the U.S. and filing a joint tax return would not file Form 8938 unless their total specified foreign assets exceed $100,000 (or $400,000 if residing abroad) on the last day of the tax year or more than $150,000 (or $600,000 if residing abroad) at any time during the tax year.
Penalties: $10,000 penalty, with an additional penalty up to $50,000 for continued failure to file after IRS notification. A 40 percent understatement penalty attributable to non-disclosed assets may also be imposed.

Form 926: Return by a U.S. Transferor of Property to a Foreign Corporation
Who must file? Taxpayers who contribute cash or other property to a foreign corporation or partnership in exchange for stock in the foreign entity. Taxpayers may be liable to an additional tax from contributions of appreciated property.
Penalties: 10 percent of the fair market value of the property at the time of the transfer. This penalty is limited to $100,000 unless the failure to comply was due to intentional disregard. For tax year 2011 and onwards, a 40 percent penalty may be imposed for underpayment of tax resulting resulting from a foreign financial asset understatement.

Form 8621: Report Return by a Shareholder of a PFIC (Passive Foreign Investment Company) or Qualified Electing Fund
Who must file? U.S. persons that are shareholders in a PFIC must report certain transactions in respect of the PFIC, including distributions and gains from the disposition of its stock. A PFIC is a foreign corporation which meets either of the following: 1) 75 percent of its gross income for the year is passive income, 2) At least 50 percent of its assets produce or are held for the production of passive income.

Summary of Information Returns Based on IRS Instructions (IRS.GOV) (Continued)

Form 5471: Information Return of U.S. Persons with Respect to Certain Foreign Corporations

Who must file? A U.S. taxpayer that meets any of the following: 1) Becomes an officer in a foreign corporation owned by U.S. citizens, 2) Acquires a 10 percent interest in a foreign corporation, 3) Has control (more than 50 percent of the stock of voting power) of a foreign corporation for a period of 30 days or more during the year, 4) Owns at least 10 percent of a foreign corporation that is controlled by U.S. shareholders.

Penalties: $10,000 penalty, with an additional penalty up to $50,000 for continued failure to file after IRS notification. In addition, a 10 percent reduction of the foreign tax credit available to be claimed may be imposed, with additional 5 percent reductions for continued failure to file every three months after IRS notification. Criminal penalties may also apply in some cases.

Form 8865: Return of U.S. Persons with Respect to Certain Foreign Partnerships

Who must file? A U.S. taxpayer that meets any of the following: 1) Has control (more than 50 percent of the stock of voting power) of a foreign partnership at any time during the partnership's year, 2) Owns at least 10 percent of a foreign partnership that is controlled by U.S. partners, 3) Contributes property to a foreign partnership and owns at least 10 percent of the foreign partnership immediately after the contribution, 4) Acquires or disposes of a foreign partnership interest, thus changing the taxpayer's proportional interest in the partnership above or below 10 percent.

Penalties: $10,000 penalty, with an additional penalty up to $50,000 for continued failure to file after IRS notification. In addition, a 10 percent reduction of the foreign tax credit available to be claimed may be imposed, with additional 5 percent reductions for continued failure to file every three months after IRS notification. Criminal penalties may also apply in some cases.

Form 3520: Annual Return to Report Transactions with Foreign Trusts and Receipt of Certain Foreign Gifts

Who must file? A U.S. taxpayer that meets one of the following: 1) Is considered a Responsible Party (see Instructions to form 3520) for the creation of a foreign trust by a U.S. person, the transfer of property, directly or indirectly, to a foreign trust by a U.S. person, or the death of a U.S. taxpayer if the decedent was treated as the owner of any portion of the foreign trust under the grantor trust rules, or any portion of the foreign trust was included in the gross estate of the decedent, 2) Owns any part of a foreign trust's assets under the grantor trust rules, 3) Received (directly or indirectly) a distribution from a foreign trust during the current tax year, or a related foreign trust held an outstanding obligation issued by the taxpayer (or a related person) that the taxpayer treated as a qualified obligation (seeInstructions to Form 3520), 4) Received gifts in excess of $100,000 from non-resident alien individuals or foreign estates during the tax year, or gifts in excess of $14,139 from foreign corporations or foreign partnerships.

Penalties: The following penalties may apply for failure to timely file or if the information is incomplete or incorrect: 1) 35 percent of the gross value of any property transferred to a foreign trust for failure by a U.S. transferor to report the transfer, 2) 35 percent of the gross value of the distributions received from a foreign trust for failure by a U.S. transferor to report receipt of the distribution, 3) 5 percent of the amount of certain foreign gifts for each month for which the failure to report continues, for up to 25 percent.

Filing Threshold Table:

Filing Status	Age	Gross Income (US$)
Single	Under 65	9,750
Single	65 or older	11,200
Married Filing Jointly	Under 65	19,500
Married Filing Jointly	65 or older (one spouse)	20,650
Married Filing Jointly	65 or older (both spouses)	21,800
Married Filing Separately	Any age	3,800
Head of Household	Under 65	12,500
Head of Household	65 or older	13,950
Qualifying Widow(er) with dependent	Under 65	15,700
Qualifying Widow(er) with dependent	65 or older	16,850

Note: If you received at least $400 of gross income from self-employment, you must file a return even if your total gross income does not reach the threshholds listed above.

List of Totalization Agreements:

Country	Entry into Force
Italy	November 1, 1978
Germany	December 1, 1979
Switzerland	November 1, 1980
Belgium	July 1, 1984
Norway	July 1, 1984
Canada	August 1, 1984
United Kingdom	January 1, 1985
Sweden	January 1, 1987
Spain	April 1, 1988
France	July 1, 1988
Portugal	August 1, 1989
Netherlands	November 1, 1990
Austria	November 1, 1991
Finland	November 1, 1992
Ireland	September 1, 1993
Luxembourg	November 1, 1993
Greece	September 1, 1994
South Korea	April 1, 2001
Chile	December 1, 2001
Australia	October 1, 2002
Japan	October 1, 2005
Denmark	October 1, 2008
Czech Republic	January 1, 2009
Poland	March 1, 2009