

A Note on Reliefs for Traveling Expenses to Work

by

Matthias Wrede

University of Bamberg and Technical University of Aachen, Germany*

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Abstract

Assuming that higher traveling expenses reduce traveling time, this paper considers reliefs for traveling expenses to work when a distorting wage tax is levied. While the decision on traveling expenses would not be distorted if traveling costs were completely deductible, taxation would still not be neutral with respect to the leisure-consumption choice. Moreover, the paper shows that second-best optimum taxation requires less than complete deductibility of traveling expenses to work.

Keywords: Income taxation, reliefs, traveling expenses to work, optimum taxation

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* Matthias Wrede, Department of Economics, University of Bamberg, D-96045 Bamberg, Germany,
eMail: matthias.wrede@sowi.uni-bamberg.de

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I. Introduction

Tax rules concerning traveling expenses to work are quite different in the various industrialized countries. While traveling expenses to work are not deductible in many countries like the United States, the United Kingdom and even several continental European countries, tax allowances are granted by other countries like the Scandinavian countries and Germany [see OECD (1993), p. 37].

The main argument in favor of a relief is that workers should not be distorted by the income tax when choosing their place of work. Critics, however, argue that rather than the place of work the location of residence matters and that preferential treatment of far-off domiciles by the tax code not only reduces tax revenue but it is also inefficient.

However, this paper will not analyze tax allowances for traveling expenses to work against the background of the discussion of whether the choice of the place of work or the choice of the location of residence is causal for commuting [see, e.g., Krause-Junk (1996), Olbertz (1986), Richter and Theile (1998)]. Furthermore, equity considerations, which are discussed concerning work-related expenses by, e.g., Baldry (1998), will also be ignored. The focus will be on a particular efficiency aspect of traveling expenses.

Reliefs also affect traveling expenses if both the place of work and the domicile are given. Normally, higher traveling expenses result in less traveling time. By buying a more expensive and thus faster car and by traveling by car instead of traveling by train (or bicycle), the commuting time can be reduced. Hence, the deductibility of traveling expenses to work guarantee that the decision upon them and therefore the decision on the commuting time is not distorted by the income tax.

Since, at first sight, the neutrality regarding the traveling time says something for the complete deductibility of traveling expenses, it is the purpose of this paper to analyze in detail the tax treatment of traveling expenses to work assuming that less traveling time requires higher traveling costs.

The remaining part of the paper is organized as follows. Section two presents a model and derives the first-best efficiency conditions. Section three characterizes the market equilibrium and section four develops a second-best tax rule. Finally, section five concludes.

II. Traveling expenses and efficiency

The model considers a one-person economy where the individual derives utility from private consumption C and leisure F . Preferences are represented by a well-behaved utility function $U(C, F)$. \bar{F} indicates the total time endowment and L the working time in the production of goods. Furthermore, it is assumed that the individual has to spend some time T to travel from home to the location where production takes place. Labor, leisure and traveling time add up to the total time endowment.

Two goods are produced in the economy. One good can be either used as private consumption good C or without additional costs as public good G . The other good X covers the traveling expenses to work, which are not exogeneously given. At least to some extent, they are used for reducing traveling time. Hence, the more X is used by the worker, the less traveling time is needed: $T = T(X)$, where $T' < 0$ and $T'' > 0$.

In order to simplify the analysis, a linear one-factor technology with fixed technical coefficients is assumed. Measured in units of time, the unit costs of the first and the second good are given by $1/a_C$ and $1/a_X$, respectively. While L_C denotes labor in the production of C (and G), L_X denotes labor in the production of X .

If some quantity G of the public good is required, the first-best optimum is the solution of

$$(1) \quad \begin{aligned} & \text{Max}_{C, F, L, X, L_C, L_X} U(C, F) \\ \text{s.t.} \quad & C + G = a_C L_C, \\ & X = a_X L_X, \\ & \bar{F} = F + L + T(X), \\ & L = L_C + L_X, \end{aligned}$$

where the first two constraints describe the production technology, the third condition is the time constraint, and the fourth condition covers the division of labor.

On the one hand, an interior solution is characterized by

$$(2) \quad \frac{U_F}{U_C} = a_C.$$

The marginal rate of substitution between leisure and consumption is equal to the marginal rate of transformation between leisure and consumption, i.e., the marginal productivity of labor in the consumption good sector.

On the other hand, efficiency requires

$$(3) \quad -a_X T'(X) = 1.$$

The amount of saved traveling time produced by one additional unit of working time in the production of X should be equal to its opportunity costs.

III. Traveling expenses and labor income taxation

Suppose that lump-sum taxes are unavailable and that the public good is financed by a linear labor income tax. Suppose further that traveling expenses to work are at least partially deductible. Denote the producer prices of goods and labor by p_C , p_X , and w , respectively. The wage tax rate is indicated by τ . If a fraction δ of the traveling expenses is deductible from the tax base of the personal income tax such that the government effectively subsidizes traveling expenses at a rate

$$(4) \quad \theta = \tau\delta,$$

the government budget constraint can be written as

$$(5) \quad \tau wL - \theta p_X X = p_C G.$$

The household sells labor and buys both types of goods at prices net of taxes and tax reliefs.¹ Therefore, the utility maximizing household solves

¹ Because of the technology, profit income is absent.

$$(6) \quad \begin{aligned} & \text{Max}_{C,L,X} U(C,F) \\ \text{s.t.} \quad & C = \frac{(1-\tau)wL - (1-\theta)p_X X}{p_C}, \\ & F = \bar{F} - L - T(X). \end{aligned}$$

Rearranging the first-order conditions yields

$$(7) \quad \frac{U_F}{U_C} = \frac{(1-\tau)w}{p_C} \quad \text{and} \quad -T' = \frac{(1-\theta)p_X}{(1-\tau)w}.$$

The marginal rate of substitution between leisure and consumption is equal to the real wage net of the wage tax. The marginal productivity of time sparing traveling expenses is equal to the relative price of X net of taxes and reliefs.

If markets are competitive, an equilibrium where profits

$$(8) \quad \Pi_C = (p_C a_C - w)L_C \quad \text{and} \quad \Pi_X = (p_X a_X - w)L_X$$

are zero is characterized by

$$(9) \quad p_C a_C = w \quad \text{and} \quad p_X a_X = w.$$

In the remaining part of the paper, the price of the consumption good C will be normalized to some fixed positive value p_C . If the price of C is given, the equilibrium price of X and the wage rate w are determined by the technical coefficients. Hence, all producer prices are constant.

Combining the first-order conditions of the utility-maximization problem and the profit-maximization problem leads to

$$(10) \quad \frac{U_F}{U_C} = (1-\tau)a_C \quad \text{and} \quad -a_X T' = \frac{1-\theta}{1-\tau}.$$

In general, both efficiency conditions (2) and (3) are violated. However, if traveling expenses were completely deductible, i.e., if

$$(11) \quad \theta = \tau \quad \text{or equivalently} \quad \delta = 1,$$

one of them would be fulfilled. Deciding upon traveling expenses, the household would take the real opportunity costs into account. Nevertheless, the leisure-consumption decision would be still distorted.

Since the main theorem of second best theory suggests that counting efficiency conditions is, in general, misleading, the advantage of complete deductibility of traveling expenses is questionable. In order to discuss the merits and demerits of complete deductibility, a standard second-best-optimum-taxation approach has to be undertaken.

IV. Traveling expenses and second-best-optimum taxation

Utility maximization of the household generates the labor supply function $L((1-\tau)w, (1-\theta)p_x)$, the demand function $X((1-\tau)w, (1-\theta)p_x)$, and the indirect utility function $V((1-\tau)w, (1-\theta)p_x)$. Since all producer prices are constant, p_C is suppressed. Using the first-order conditions of the utility maximization problem, one easily verifies

$$(12) \quad \frac{\partial X}{\partial(1-\tau)w} = \frac{(1-\theta)p_x}{(1-\tau)^2 w^2 T''} > 0 \quad \text{and} \quad \frac{\partial X}{\partial(1-\theta)p_x} = -\frac{1}{(1-\tau)w T''} < 0.$$

The optimization problem of the government is

$$(13) \quad \begin{aligned} \text{Max}_{\tau, \theta} \quad & V((1-\tau)w, (1-\theta)p_x) \\ \text{s.t.} \quad & p_C G - \tau w L((1-\tau)w, (1-\theta)p_x) + \theta p_x X((1-\tau)w, (1-\theta)p_x) = 0. \end{aligned}$$

The solution can be described by

$$(14) \quad \begin{aligned} \frac{\tau w}{L} \frac{\partial L}{\partial(1-\tau)w} - \frac{\theta p_x}{L} \frac{\partial X}{\partial(1-\tau)w} &= \frac{\mu - \lambda}{\mu}, \\ -\frac{\tau w}{X} \frac{\partial L}{\partial(1-\theta)p_x} + \frac{\theta p_x}{X} \frac{\partial X}{\partial(1-\theta)p_x} &= \frac{\mu - \lambda}{\mu}, \end{aligned}$$

where μ is the Lagrange multiplier associated with the government budget constraint and λ is the marginal utility of income. Using the properties of the household utility maximum and rearranging yields

$$(15) \quad \frac{\theta}{\tau} = -\frac{(1-\tau)^2 w^3 L X T''}{p_x p_C C} \left(\frac{1}{L} \frac{\partial L}{\partial(1-\tau)w} + \frac{1}{X} \frac{\partial L}{\partial(1-\theta)p_x} \right).$$

This formula can be used to derive the following two main results of the paper. The elasticities of labor supply are

$$(16) \quad \varepsilon_{L,(1-\tau)w} = \frac{\partial L}{\partial(1-\tau)w} \frac{(1-\tau)w}{L} \quad \text{and} \quad \varepsilon_{L,(1-\theta)p_X} = \frac{\partial L}{\partial(1-\theta)p_X} \frac{(1-\theta)p_X}{L}.$$

Proposition 1: *Traveling expenses to work shouldn't be deductible at all, i.e., $\theta = \delta = 0$, if*

$$(17) \quad \frac{\varepsilon_{L,(1-\tau)w}}{\varepsilon_{L,(1-\theta)p_X}} = \frac{L}{XT'}$$

is fulfilled.

Hence, non-deductibility of traveling expenses to work is optimal only under very special circumstances.

Calculating the partial derivatives of the labor supply function and using U_{LL}^2 , which is the second partial derivative of the utility function with respect to labor after inserting the constraints, i.e., of $U\left(\frac{[(1-\tau)wL - (1-\theta)p_X X]}{p_C}, \bar{F} - L - T(X)\right)$, one is able to derive an illuminating formula for the subsidy:

$$(18) \quad \theta = \tau + \frac{\tau(1-\tau)^3 w^3 XU_C T''}{p_X p_C^2 C U_{LL}}$$

Since the second-order conditions require $U_{LL} < 0$, this formula proofs the following proposition.

Proposition 2: *Traveling expenses to work should never be deducted completely from the tax base of the labor income tax, i.e., $\theta = \tau$ or equivalently $\delta = 1$ are never optimal.*

The economic explanation for that result is straightforward. If traveling costs were completely deductible from the tax base, the choice of traveling expenses would be efficient, but due to the high wage tax rate, the leisure-consumption choice would be

² $U_{LL} = \left(p_C^2 U_{FF} - 2p_C(1-\tau)wU_{CF} + (1-\tau)^2 w^2 U_{CC} \right) / p_C^2$

heavily distorted. Introducing a small distortion of traveling expenses results in welfare losses which are much smaller than the welfare gains from reducing the large distortion in the leisure-consumption decision.

V. Concluding remarks

This paper considered reliefs for traveling expenses to work in the presence of a distorting wage tax. The focus of the analysis was neither on the choice of the locations of work and home nor on the distance between them. Taking the view that higher traveling expenses reduce traveling time, the aim was whether deductibility increases traveling expenses to an inefficient amount.

It turns out that the relationship between traveling time and working time is of particular importance in answering this question. While the decision on traveling expenses and, therefore, the decision on traveling time would not be distorted if traveling costs were completely deductible, taxation would still not be neutral with respect to the leisure-consumption choice.

Using a standard second-best optimum taxation approach, it has been shown that non-deductibility of traveling expenses to work is optimal only under very special conditions and, even more importantly, that second-best optimum taxation requires less than complete deductibility of traveling expenses to work.

The analysis is of consequence to the treatment of traveling expenses to work by the income tax law, for instance in Germany. In Germany, the necessary cost of transportation between the home and the place of work are deductible. However, since 1955, only a specific amount per km (the so called „Kilometerpauschale“) times the distance between the home and the place of work is deductible from the income tax base if a car is used. The deductible amount per km, which was 0,50 DM in 1955, was reduced to 0,36 in 1967 and has been increased since 1989 up to 0,70 DM in 1994.

Since the result of this paper was that traveling expenses to work should be only partially deductible from the tax base, the deductible amount per km should be less than the complete cost per km. The analysis supports, therefore, the existing treatment of traveling expenses to work by the German income tax law. However, if the opportunities

of tax evasion are taken into account the paper backs the proposal of the income-tax-reform commission led by P. Bareis which proposed in 1994 a fixed deductible amount per km (0,20 DM) irrespective of the means of transportation (the so called „Entfernungspauschale“) [see Einkommensteuer-Kommission (1994)] .

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