

????????? ??? ?????????????? (????????? ??????)

??? 20?? ??????? 2013 (\*)

«???? ??????? ??? – ?????? 4, ??????????? 1 ??? 2 – ?????? ??? “?????????????  
?????????????” – ?????? ??? ????? ?????? – ?????????????? ?????????????? ??????????  
????????????? ??? ? ?????? ?????? ???? ?? ?????? ?????????????? ?? ?????? ?????? –  
????????? ??? ?????? – ??? – ?????? ?????????? ?????? ?????? ?????????? ?????? ???  
????? ??? ??????????»

???? ??????? C-219/12,

?? ?????????? ?? Verwaltungsgerichtshof (???????) ?? ??????? ?? 29?? ?????? 2012, ? ???  
?????? ?? ?????????? ?? 9 ????? 2012, ??? ?????? ?? ?????

**Finanzamt Freistadt Rohrbach Urfahr**

????

# **Unabhängiger Finanzsenat Außenstelle Linz,**

????????????? ???:

Thomas Fuchs,

?? ?????????? (????????? ????),

?????????? ??? ??? R. Silva de Lapuerta, ??????? ????????, ?. ??????, J.-C. Bonichot, A. Arabadjiev (???????) ??? J. L. da Cruz Vilaça, ????????,

## ?????? ??????????: E. Sharpston

?????????: A. Calot Escobar

????????? ???? ???? ?????????? ????????????,

????????????? ???? ???? ?????????????? ???? ???? ????;

= ?????????? ????????, ?????????????? ??? ??? C. Pesendorfer.

— ? ?????????? ?????????? ?????????????? ??? ??? T. Henze ??? ??? K. Petersen.

- ? ?????????? ??????? ?????????????? ??? ??? C. Soulay ??? ??? B.-R. Killmann

????????????? 2013,  
22222222 222 22222222

222222

1 H ??????? ?????? ?????????????? ?????????? ?????? ??? ??????? ??? ?????? 4 ???  
????? ??????? 77/388/E?? ??? ??????????, ??? 17?? ??? 1977, ??? ?????????? ???  
????????? ??? ?????? ?????, ??? ?????? ?? ??? ????? ?????? ?????? ?????? – ???  
????? ??? ????? ?????????????? ????: ?????????? ?????????? ??? (?? ????. ????. 09/001, ?. 49),  
????? ??? ????? ?????????????? ??? ??? ?????? 95/7/?? ??? ??????????, ??? 10?? ??????  
1995 (?? L 102, ?. 18, ??? ?: ??? ?????).

2 ? ?????? ??? ?????????? ??? ??????? ???????? ?????? ??? Finanzamt  
Freistadt Rohrbach Urfahr (???: Finanzamt) ??? ??? Unabhängiger Finanzsenat Außenstelle  
Linz, ??????? ?? ??? ?????? ??? ????? ?????????????? ??? (???: ????) ???  
????????????? ??? ??? ?????? ??? ????? ?????????????? ?????? ?????????????? ??? ???  
?????????.

?? ?????? ???????

?? ?????? ??? ??????

3 ?? ??? 2 ??? ????? ??????, ??? ??????? ??? ????? || ?????, ? ??????  
????????? «????? ??????», ?????? ?? ???:

«???? [??] ??????????:

1. ?? ?????????? ?????? ??? ?? ?????? ??????????, ??? ?????????????????? ??  
????????? ?????? ??? ?????????? ??? ?????? ??? ?????????? ??? ?????, ??? ?????? ??? ??  
????????? ??? ??????

[...]».

4 ?? ????? 4, ?????????? 1 ??? 2, ??? ????? ?????? ??????:

«1. ?????????? ?? ?????????? ??? ?????? ??? ?????????????? ????, ??? ?????? ?????????? ???  
?? ?????????? ????, ??? ??? ?????? ?????????? ?????????????? ??? ?????????? ???  
????????? 2, ?????????? ??? ?????????? ??? ?????? [?] ??? ?????????? ???  
????????????? ????.

2. ?????????? ??????????????, ??? ??? ?????? ??? ?????????? 1, ?????? ??? ??  
????????????? ??? ??????????, ??? ?????? ? ??? ?????????? ??????????,  
????????????? ??? ??? ?????????????? ??? ?????????? ?????????? ??? ?????????????? ???  
????? ??? ??? ?????????????? ??? ?????????? ?????????? ??? ?????????? ???  
????. ?? ?????????? ?????????? ?????????? ?????? ? ?????????? ?????????? ? ?????  
?????, ??? ??? ????? ?????? ?????????? ?????? ?????? ?????????? ?????????? ? ??????»..

5 ??? ???? 5, ?????????? 1 ??? 2, ??? ????? ??????:

«1. ?? “????????? ??????” ?????????? ? ?????????? ??? ?????????? ?? ?????????? ??????  
????????? ????.

2. ?????????? ?? “????????? ?????” ?? ?????????? ????, ?? ??????????, ? ?????????, ?? ??????  
??? ?????????? ??????».

6 ?? ????? 17 ??? ????? ??????, ??? ?????????????? ?? ?? ?????? 28?? ????, ????  
?? ????:

«1. ?? ??????? ???? ?????? ??????? ???? ?? ?????, ??? ???? ?????? ???? ??????? ????  
?????? ?????.

?) ??? ??????????? ? ?????????????? [??] ??? ????? ??? ??? ?????????????? ? ??????????? ??  
??? ??????????? ??? ??? ??? ?????????? ??? ??? ?????????????? ? ??????????? ?? ???  
?????????? ??? ??? ????? ?????????? ??? ???

[...]».

?? ?????????? ??????

7      ?? ?????? 2, ??????????? 1, ??? ?????? ??? ?????? ?????? ?????? ?????? 1994  
(Umsatzsteuergesetz 1994, *BGBI.* 663/1994), ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
?????? ??????, ??? ?????:

? ?????????? ??? ??????? ?????? ??? ?? ?????????????????? ???????

8 ? T. Fuchs ??????? ?? ??????????? ?? 2005 ?? ??????????? ??????? ?? ?????? ??  
 ??? ?????? ?? ?? ??????????????? ?? ??????? ???????, ??? ?? ?? 38 367,76 ????.  
 ??? ?? ??????? ?? ?? ??????? ??????? ??????? ??????? 19 020 ????.

10      ????. ????. ??????? 2005 ??? 2008, ? T. Fuchs ?????????? 44 600 kWh ??? ?????? ?????  
??? ?? ?????? ??? ?? ??????? ??? ?????????? ??? ?????????????? ????. ?????????? ??????? ??? ?????? 11 156  
kWh ??? ?????????? ?????????? 8 645 kWh. ????????, ?????????? ??? ?????? ?? ?????? ?? ??????????  
????????? ??? 19 801 kWh ??? ?????? ?????????? ?? ?? ?????????????? ?????????????? ???.

11 ???????, ??????? ?????????? ??????? ???????????????, ??? ??????????? ??? ?? ????  
101 ??? ?????????? ??????????? ??? ???????????, ?? Verwaltungsgerichtshof ???????????,  
?? ??????? ??? 10?? ??????????? 2013 ? ????? ??????? ??? ??????????? ??? 28  
?????????? ??? ????? ?????, ??????????? ?? ??????????? ??? ??? ???????????  
?????????? ??? ???' ??? ????? ?????????? ???????????, ??? ?? ??????????? «?????????»  
????????? ??????? ??????? ? ??????? ??? ??????? ??? ?? ??????? ??????? ??? ??

????????? ??????? ??? ??? ??????? ????? ?? ??????? ??? ??????????? ??? ??????????? ??? ??????????? ???  
??????.

12 ? T. Fuchs ??????? ??? ?????????? ??? ?????? ??? 6 394,63 ??? ?? ?????????? ?? ??  
??? ?? ?????? ??? ?? ?????? ??? ?? ????? ?????????????? ??????????.

13 ?? Finanzamt ??????? ??? ? T. Fuchs ??? ???????? ?? ??????? ??? ??? ??? ??? ???????  
????? ? ?????????????? ??? ?????????????? ?????????????? ??? ??? ?????????? ??????  
????????? ??? ??????????????. ? T. Fuchs ?????? ??????? ??? ??? ??? ?????????? ???  
????? ??? Unabhängiger Finanzsenat Außenstelle Linz ?????????????? ??? ??????  
????????? ?????????????? ??? ??? ?????? ??? ?????? 4, ?????????? 1 ??? 2, ??? ???  
?????.

14 ?? Unabhängiger Finanzsenat Außenstelle Linz ??????? ??? ??????? ??? ?? Finanzamt  
?????? ?? ?? ??????? ?? ?? ??? ?????????? ??? ??????? ??? Verwaltungsgerichtshof.

15     ???, ???, ???????, ?????, ?? Verwaltungsgerichtshof ?????????? ?? ?????????? ??  
??????, ??, ?????????? ??, ??, ??, ???????, ??, ??, ?????????? ??, ??, ?????????? ??, ??, ??????????  
?????:

«???????? ? ?????????????? ????? ?????????????? ?? ?? ?????? ?????????????? ??????????????, ??  
????? ?????? ?????????????? ??? ? ?????? ?????? ??? ?????????????? ?? ???????  
?????????, ??? ??? ????? ?????????? ?????????????? ??? ?????????????? ?????????????? ?????????????? ???  
????????? ???, ??? ? ?????? ?????? ?????????? ?????????? ??? ?? ?????????? ??? ?????? ???  
????? ?????????? ??? ? ?????? ?????? ?????????? ??? ?????????????? ??? ??? ?????????? ??????????  
??? ? ?????????????????? ?? ?? ??? ?????? “????????? ??????????????” ?????? ???  
????????????? ?? ?????????????? ??? ??? ?????? ??? ?????? ??? ?????? 4 ??? [????? ??????];»

???? ???? ?????????????????? ??????????????

16      ????? ?? ?????? 4, ??????????? 1, ??? ????? ???????, ??????????? ?? ?????????????? ???  
????? ?????????????? ????, ???? ???? ????? ??????? ??? ?? ?????????????? ???, ??? ???? ???  
????????????? ?????????????? ??? ?????????????? ??? ?????????????? 2 ??? ????? ????, ????.  
????????? ??? ?? ?????????????? ??? ?????? ??? ?? ?????????????? ??? ?????????????? ????.  
? ?????? ??? ?????????????? ?????????????? ?????? ??? ?????? 4, ??????????? 2, ??? ??????  
????????? ??? ?????????????? ??? ?????? ??? ?????????????? ??? ???????????, ??? ?????????? ???  
????????? ??????????, ?????????? ?? ?????? ??? ?????????????? ??? ?????????????? ??? ??????????  
????????? ? ?????? ?????? ??? ?????? ??? ?????? ?????????? ?????? ?????? ?????????? (??.  
????????? ??? 26?? ??????? 2007, C-284/04, T-Mobile Austria ?.??., ??????? 2007, ?. I-5189,  
????? 33, ?????? ??? C-369/04, Hutchison 3G ?.??., ??????? 2007, ?. I-5247, ?????? 27).

17      ????? ?????? ?????????? ??? ??????????????, ? ?????????? ??? ?????????? ??? ??????????????  
????? ??? ?????? ??? ?????????????? ?????????????????? ?????? ??? ?????? ??? ?????? ??? ??????  
????????? ??? ?????????? ? ??????? ??? ?????????????? ?????????????????? ??? ???  
????????????? ??? ?????????? ???, ??????? ? ?????????????? ??? ????? ?????????? ??? ??????????,  
????????? ??? ?????? ??? ?????????????? ??? (??. ?????????????? ??? ?????????? T-  
Mobile Austria ???, ????? 35, ????? ??? Hutchison 3G ???., ????? 29).

18 ?? ???????????, ? ??????????? ??? ?????? ?????? ?????? ?????? ???  
????????? ??? ??????????? ?????? ?????? ?????? ?????? . ? ??????????? ???  
????????? ?? ?????????? ??? ?????? ??? «????????? ?????? ?????? ??????», ??? ??????  
??? ??? 4, ??? ?????? 2, ??? ?????? ???, ??? ?????? ?? ??? ??? ??? ?????? ???  
????????? ??????.

19 ?? ?????? ??? ??? ??? ?????? ?????? ?????? ?????? ?????? ??????  
????????? ?????? ?????? ?????? ?? ?????? ?????? ?? ?????? ?????? ?????? ??????  
??? ?????? ??? ?????? ?????? ?????? ?????? ??????, ?????? ??? ??????, ????, ? ???  
??? ?????? ?????? (?. ?????? ??? 19?? ?????? 2012, C-263/11, R?dlihs, ??? 33).

20 ?? ??????? ??? ?????? ?????, ??????, ?? ?????? ?? ?????????? ?????????????? ??? ?? ?  
????????? ?????????? ?? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??? ?? ?????? ??  
????????? ?? «????????? ?????? ?????? ??????» ??? ?? ?????? ??? ?????? ?????? ???.  
????? ??? ?? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??????  
????? ???, ??? ?? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ??????  
????????? ?????? ?????? ???, ??? ??????, ??? ?? ?????? ?????? ?????? ?????? ?????? ??????  
????????? . ???, ??????, ?? ?????? ?????, ?? ?? ?????? ?????? ???, ?????? ?????? ???  
????????? ??? ?? ?????? ??????, ?? ?????? ?? ?????? ?? ?????? ?? ?????? ??? ??????  
??? ?? ?????? ?????? ?????? ?? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??????  
????? ??? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? (?. ??????  
??? 26?? ?????????? 1996, C 230/94, Enkler, ?????? 1996, ?.I 4517, ????? 27, ??? R?dlihs,  
????????? ???, ??? 34).

21 ??? ?????? ??? ?????? ???, ? ?????? ???, ??? ?????? ???, ??? ?????? ???, ???  
????? ? ?????? ???, ??? ?????? ???, ??? ?????? ???, ??? ?????? ???, ??? ?????? ???, ???  
??? ?? ?????? ???, ??? ?????? ???, ??? ?????? ???, ??? ?????? ???, ??? ?????? ???, ???  
????? ??? ?? ?????? ???, ??? ?????? ???, ??? ?????? ???, ??? ?????? ???, ??? ?????? ???, ???  
????????? ???, ??? ?????? ???, ??? ?????? ???, ??? ?????? ???, ??? ?????? ???, ???, ???  
????????? ?????? Enkler, ????? 28, ??? R?dlihs, ????? 35).

22 ??????, ?????????? ? ?????????? ??? ?? ?????? ???, ??? ?????? ???, ???  
????? ???, ?????? ?? ?????????? ?? ?? ?????? ???, ??? ?????? ???, ??? ?????? ???, ???  
????????? ?????????? ???, ??? ?????? ???, ??? ?????? ???, ???, ?? ?????????? ???  
????? ??? ?????????? ???, ??? ?????? ???, ??? ?????? ???.

23 ??? ????, ????, ?? ?????? ??? ?????? ???, ??? ?????? ???, ??? ?????? ???, ???  
????????? ?????????? ???, ??? ?????? ???, ??? ?????? ???, ???, ??? ?????? ???, ???  
????? ???, ??? ?????? ???, ??? ?????? ???, ??? ?????? ???, ??? ?????? ???, ???  
?????????.

24 ??????, ??? ?????? ???, ??? ?????? ???, ??? ?????? ???, ??? ?????? ???, ???, ?  
????????? ??? ?????? ???, ??? ?????? ???, ??? ?????? ???, ??? ?????? ???, ??? ?????? ???,  
????????? , ??? ?????? ???, ??? ?????? ???, ??? ?????? ???, ??? ?????? ???, ???, ???  
????????? ???, ??? ?????? ???.

25 ???, ??? ?????? ???, ??? ?????? ???, ??? ?????? ???, ??? ?????? ???, ??? ?????? 4, ??? ?????? 1, ???  
????????? ???, ??? ?????? ???, ??? ?????? ???, ??? ?????? ???, ??? ?????? ???, ???, ???  
????? ???, ??? ?????? ???, ??? ?????? ???, ??? ?????? ???, ??? ?????? ???, ???, ???  
????????? ???, ??? ?????? ???, ??? ?????? ???, ??? ?????? ???.

26 ?????? ?? ?????? ???, ??? ?????? ???, ??? ?????? ???, ??? ?????? ???, ??? ?????? ???, ???

????????? ?????????? ?????????? ? ????? ??????????????? ??? ?????? ?????? ????????????, ??????  
?? ?????? ?????? ??? ? ?????????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???.

27 ????????, ??? ?????????? ??? ??? ?????? ?????????? ??? ??????????????, ? ??????? ??????????  
??? ??????, ? ?????? ?????? ?? ?????? ??? 1? ?????? 2005, ?????? «?? ??????  
?????????». ?????????? ??? ? ?????????????? ??? ?????????????? ?????? ?????????? ???  
??????, ?????????? ??? ? ?????????? ??? ? ?????? ?????????? ?????????? ??? ?????? ??? ??  
?? ??? ?????????? ??? ?????? ??? ?????? ?????????? ??? ??? ???????????. ????????, ??  
????? ??? ?????????? ??? ?????????????? ?? ?????????????? ??? ?? ??? ?????? ?????? ??????????  
????? ??? ?????? ??? ?????? 4, ?????????? 2, ??? ?????? ??????.

28      ????? ?????? ??? ?? ??????????????? ???????? ????? ???? ?????? ?????????? ?????? ???  
????? ??????? ?????????? ???????? ? ?????? ?????????? ??? ?????? ??? ?????? ?? ?????????? ??????  
????????? ??????????, ?????????? ? ?????????? ??? ?????????? ??? ?????????? ?? ??????????????  
????????????? ??? ?? ?????? ?????? ??? ? ?????????????? ?????? ?????????? ??? ?????? ???  
«????????? ??????????», ??? ?????? ?????????? ??? ?????? 4 ??? ?????? ??????.

30 ??????????????, ?????? ?? ??????????? ???, ?? ??????????, ????? ?????????? ??? ??  
?????? ????? ??????????, ???? ??? ?????? ?????????????????? ??? ?????????? ???????????,  
??????, ? ?????????? ?????????? ?????????? ?????????? ?????????? ??? ?????? ???, ??????????, ?  
????????? ?????? ??? ?????????????? ??? ?????????? ?????????? ??? ?????????????????? ?? ?? ???  
?????. ???? ?????????? ?? ?????? ??????????, ?????? ?????????? ??? ??????  
????????? ?????????? ?????????? ??? ?????? ?????????? ?? ?? ??????, ?????? ?????? ?  
????????? ??? ? ?????????? ??? ?????? ?????????? ??????, ?????? ??? ??????????  
?????????, ???? ?? ?????????? ??? ??? ?????? ??? ??? ?????? ??? ?? ??? ?????? ??? ?? ??????.

31     ????? ??? ??????????? ??????, ?????? ?? ?????? ?????? ??? ? ??????????????? ??? ???????????  
????? ???????? ?????????? ??????????, ???? ? ?????? ?????? ??? ?????? ??? ?????? ??? ??????,  
????? ?????????? ??? ??? ??? ?????? ?? ??? ?????? ? T. Fuchs ??????? ?????????? ?????????? ???  
?? ?????? ??? ??? ??????? ??? ?????????? ??? ??? ??? ???, ???????, ? ?????? ?????? ???  
????????? ??? ??????????, ??????, ??? ?????? ??? ??????????????, ???????, ??? ??????  
?????? ??? ??? ?????? ??? ?????????????? ??? ?? ??? ????? ?????????????? ?????????? ??  
????????? ??????????????.

32 ???????, ?? ???? ?????? ?? ???? ?????? ?? ???? ?????? ?? ???? ?????? ?? ???? ??  
????? ?? ???? ?????? ?? ???? ?????? ?? ???? ?????? ?? ???? ?????? ?? ???? ?????? ??  
????? ?????? ?? ???? ?????? ?? ???? ?????? ?? ???? ?????? ?? ???? ?????? ?? ???? ??  
?? ???? ?????? ?? ???? ?????? ?? ???? ?????? ?? ???? ?????? ?? ???? ?????? ?? ???? ??  
T. Fuchs ?? ???? ?????? ?? ???? ?????? ?? ???? ?????? ?? ???? ?????? ?? ???? ??, ?? ???? ??, ?  
????? ?????? ?? ???? ?????? ?? ???? ?????? ?? ???? ?????? ?? ???? ?????? ?? ???? ?? ???? ?? ???? ??  
??????

33      ???????, ??????, ??? ?????????? ??? ?? ???? 28 ??? ?????? ??????????, ? T. Fuchs  
????? ?????????? ?????????????? ??? ?? ???? 4, ?????????? 2, ??? ????  
????? ??? ?? ?????????? ??? ???? ?????????? ??? ?????? ?????? ??? ????  
?????????, ? T. Fuchs ?????? ?? ?????? ?? ?????????? ??? ?????? ??? ?????? ??? ?????? ???  
????????? 1 ?????? ??? ??????.

34 ??????????, ??? ?????????? ?? ? ?????????? ??? ?????????? ?? ? ?????????? ??  
?????? ??????????, ? T. Fuchs ?????? ??? ?????????????? ??? ?? ??? ?? ?? ??  
?????? ?? ? ?????????? ?? ? ?????????? ??? ?? ?????????? ??? ?? ???? ?? ???? ??  
????????? ?? ? ? ?????????? ??? ?? ?????????? ??? ?? ???? ?? ???? ?? ???? ??  
?????. ???????, ?????, ?? ?????? ??? ?????? ??? ?????? ?????? ?????? ??????????  
?????? ?????????????? ??? ?????????? ??? ?? ??? ?????? ?????? ?????? ??????  
????????? ????????

36 ??????? ??????? ?? ?????????? ???, ??? ???? ?? ??????? ??? ?????????? ??? ???????  
??????, ??? ???? ?????? ? ??????? ??? ????? ?? ??? ??? ?????? ?? ?????? ?????????? ??  
????? ? ??? ?????????? ??? ?????????????? ? ?????????????? ??? ?????? ??? ???? ?????? ???  
????????????? ??? ?????????????? ????. ? ??????? ??? ?????? ??? ?????? ??? ?????? ???  
????? ??? ??????? ??? ?????? ??? ?????? ??? ??????. ??? ? ???? ???? ? ? ? ??????????  
????????????? ??? ?????????????? ??? ?????????????? ??? ??????? ??? ?????? ??? ?????????? ???  
??? ??????, ?????????? ? ??????? ??? ?????? ??? ?????? ??? ?????? ??? ??????, ??? ?????? ???  
????????? (?. ?????????? ??? 30?? ?????? 2006, C-184/04, Uudenkaupungin kaupunki,  
?????? 2006, ?. I-3039, ??? 24, ??? ???? 14?? ?????????? 2006, C-72/05, Wollny, ???????  
2006, ?. I-8297, ??? 20).

37 ?????? ??? ??????? ????????, ??? ?????????? ??????? ??????? ?? ?????? ? ??????? ???  
?? ?????? 4, ?????????? 1 ??? 2, ??? ????? ?????? ?????? ??? ?????? ??? ?????? ??? ? ??????????  
????????????? ?????????? ?? ?????? ?????? ?????????????? ?????? ? ?????? ?????? ???  
????????????? ?? ?????? ?????? ?????? ??? ?????? ?????????? ?????? ???, ??????, ? ?????? ???  
????????? ?????????? ?????????? ?????? ?????? ?????????? ?????? ?? ?????? ?????? ??????????  
??? ?????????? ?????? ??? ?????????? ?????? ?????? ?????? ??? ?????? ??? ?????? ?????? ??????  
??? ? ?????????? ???, ??? ?????? ?????? ???, ???????, ? ?????????? ??????  
????????? ??? ?????? ??? ?????????? ??? ?????? ?????? ?????? ?????????? ?????? ??????  
????? ?????? ??? «????????? ?????? ??????????????», ??? ?????? ?????? ??? ??????

???? ???? ?????????????? ????????

???? ???? ?????? ??????, ?? ?????????? (???????) ??????????:

?? ?? 4, ?????????? 1 ?? 2, ??? ????? ?????? 77/388/??? ??? ??????????, ???  
17?? ??? 1977, ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ???,  
????????? ?? ??? ????? ?????? ?????? ?????????? ? ?????? ?????????? ?????? ??????????????  
?????: ?????????? ?????????? ???, ??? ?????? ?????????? ??? ??? ??????  
95/7/?? ??? ??????????, ??? 10?? ?????? 1995, ??? ??? ?????? ??? ?  
????????? ?????? ?????????? ?????????? ?? ?????? ?????? ?????????????? ??? ?  
????? ?????? ??? ?????????? ?????? ?????????? ??? ?????????? ?????? ?????????? ???  
????, ??????, ? ?????? ??? ?????????? ?????? ?????????? ?????????? ?????? ??????  
????????? ??? ?? ?????? ?????? ?????? ??? ?????????? ?????? ?????????? ??? ??????????  
????????? ??? ?? ?????? ?????? ?????? ??? ?????????? ?????? ?????????? ??? ?? ???

? ??????? ???, ????????, ? ?????????? ??????? ?????????? ??? ??????? ??  
????????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ???  
«????????? ?????? ??????», ??? ?????? ?????? ??? ?? ?????? ???.

(?????????)

\* ?????? ??????????: ? ????????.