

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

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

MICHAL BOBEK

??? 5?? ??????????? 2018 (1)

?????? C?552/17

Alpenchalets Resorts GmbH

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Finanzamt München Abteilung Körperschaften

[?????? ?? Bundesfinanzhof

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

?? ?? ??????? ??????????? ???????]

«?????????????? ?????????? – ????? ?????????????? ?????? (???) – ?????? ?????????? ??? ??? ??  
?????????? ??????? – ????? ?????????? – ?????? ?????????? ?????? ?????????? ?????????? – ??????  
?????????? ??????? – ?????????? ??? ?????? ?????????? – ?????????? ?????? ?????????? – ?????????? ???????????  
?????????? – ?????????? ?????????? ?? ?????????? ??? ?????????? ?????? ?????????? ??? ??????????  
?????????»

## I. ????????

1. ? Alpenchalets Resorts GmbH ??????? ?????????? ??? ??? ?????????? ??? ??  
????????? ??? ?????????? ??? ?????? ?????? ??? ?? ?????????? ??????. ??? ??? ??? ??? ??  
??????, ?? ?????????? ? ?????????? ??? ?????????? ?????? ?????????? ?????????? ???????, ???  
???? ??? ?????????? ??? ?????????? ???, ?? ?????????? ?????????? ???????, ??????????  
????????? ??? ???????.

2. ?????? ??? ? ?????????? ?? ?????????????? ?? «????????? ??? ?????????? ??? [??]  
????????? ??????» ??? ??? ?????? ??? ?????? 2006/112/?? (2) (?? ???: ?????? ??  
?? ??); ?? ?????????? ?????? ?????? ?????? ??? ?????? ?????? ?????? ??? Bundesfinanzhof  
(????????????? ?????????? ?????????? ???????, ???????), ?? ?????? ?????? ?? ?????? ??? ?  
?????? ?????? ?????? ?? ?????????????? ?? ?????????? ??? ?????????? ??? ?????????? ??? ??????????  
????????, ??? ??? ???, ??? ?????? ??? ??? ?????? ?????? ??? ?????? (???, ??? ??????????  
??????) ?????? ?? ?????????? ? ?????????? ?????????? ?????????? ??? ?????????? ??? ?????? ??  
????????? ?? ?? ??????? ?????? ??? ?????????? ??????????.

3. ?? ??? ??????? ?????? ?????????????? ??? ?????????? ?? ?????????? ??? ?????????? ??

?????????????? ?? ?? ??????? ?????????????? ?? «?????????? ?? ??????????? ?? ?? ????????????,  
?????????», ?????????????? ???? ?? ??????? ?? ?????????????? ?????????? ???????????????,  
???? ??????, ??? ?????????????? ???? ??? ?????????? (????? ??? ?????? ?????????????? ????  
?????????). ????????, ?????????? ???? ?? ?????????? ?? ?????????? ??? ?????????????? ????  
??? ??????? ?????????? ???? ?????????????? ???? (???, ???? ?? ??? ?????? ????  
????????? ??? ????? (??????, ?? ?????????? ??????), ???? ?? ??? ?????? ??? ?????????? ??????????  
???.

## II. ?????? ???????

### 1. ?????? ??? ??????

4. ??? ? ?? ????? 98, ??????????? 1, ??? ??????? ??? ?? ??, ?? ?????? ????????????????  
????? ??? VIII ??? ?????????? «??????????», ?? ?????? ??? ?????? ?? ??????????? ??  
?????????? ???? ? ??? ?????????? ??????????. ?????? ??? ?????? 98, ??????????? 2, ????  
??????, ?? ?????????? ?????????? ?????????? ?????? ??? ?????????? ?????? ??? ??????  
????????? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ??????  
??? ???.

5. ?? ?????? 12, ??? ?????????? ???, ??? ?????? ??? ?? ???, ??? ?? ??????????:

«[?] ??????? ?? ?????????? ??? ?????????? ???, ?????????????????? ??? ??????  
?????????? ??? ?????????? ??? ??? ?????????? ??? ?????? ?? ?????????? ? ?? ?????????? ???  
?????????..»

6. ?? ????? 306 ??? ?????? ??? ?? ?????????? ??? ?????? ??? ?????? ??? ?????? XII, ? ??????  
?????????? «?????? ??????????» ???, ?????? ??? ?????? ??? ??????, ??? ?????????? 3 – «??????  
????????? ??? ?????????? ??? ??????». ?? ?????? 306, ?????????? 1, ??? ?????? ??? ??  
???, ?????? ?? ????:

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

?? ?????? ?????? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ???????, ?? ?????? ???????  
?????????? ?? ?????????? ??? ??? ?? ?????? ?????????? ??? ?????? ?????????? ??? ??????? ?? ???  
????????? ??? ??? ???, ?? ?????? 79, ?????? ????, ?????????? ????.»

7. ?? ?????? 307 ??? ?????? ??? ?? ??? ?????? ?? ????:

«?? ??????? ??? ?????????????? ??? ?? ?????????? ??? ?????? ??? ?????? ??? ?????????? ???  
????????? ?? ??? ?????? ??? ?????????? ??? ?????? 306 ?????????? ??? ?????? ????.

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

8. ?? ?????? 308 ??? ?????? ??? ?? ??? ?????? ?? ????:

«?? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? 226,

?????? 8, ?? ?????????? ??????? ??? ??????????? ???????, ??????? ? ??????? ??????? ??????? ???  
????????? ??? ????? ?? ?????????????? ??? ??? ?????????? ?????? ??? ??? ??? ??????????????  
?????? ?? ?? ????? ?????????????? ?? ?????????? ?????????? ??? ?????????????? ?????? ???  
?????? ?????????? ??? ?????????????? ??? ?????????? ?????? ?????????????? ?????? ???, ??? ??  
????? ??? ? ?????????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ????.»

## 2. ?????? ????????

9. ??? ?? ????? 12, ?????????? 2, ?????? 11, ??? Umsatzsteuergesetz (????? ??? ??  
????? ?????? ????????, ??? ?: UStG), ? ?????? ?????????? ?? ??????? 7 % ??? ??  
????????? ??????:

«[?]????????? ?????? ?????????? ? ?????????????? ?? ?????? ?????????????? ?????????????? ???  
??? ?????? ?????????? ????????????, ?????? ??? ?????????? ?????????? ?????? ?? ??????  
????????????? ??????????????. ?? ?????? ?????? ??? ?????????????? ?? ?????? ??? ??  
????????????? ?????? ??? ?????? ??? ????????????, ?????? ??? ?? ?? ?????? ????  
????????????? ??? ?? ???????.»

10. ??? ?????? ??? ?????????? ??? ?????????????? ??????????????, ?? ?????? 25, ?????????? 1,  
??? UStG, ?????????? ?? ????:

«?? ?????????? ?????????? ??????? ??? ?? ?????? ?????????????? ?????? ??????????????  
????????? ?? ?????? ??? ?????????????? ??? ?? ?????????? ??? ?????????? ??? ???????????,  
??? ?????? ??? ? ?????????????? ??? ?????? ??? ?????????? ?????? ?????? ??? ??????????  
??? ?????????? ??? ?????? ??? ?????????? ??? ?????????? ?????? ?????????? ?????????? ???.  
????????? ??? ??? ?????????????? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ???  
????? ??????????. ??? ? ?????????????? ??? ?????? ??? ?????????? ??? ?????????? ???, ???  
????? ?????? ??? ???????, ?????? ?????? ??? ???????, ?????? ?????????? ?? ?????? ??? ?????? ????  
????? ?????????? ??? ?????? ??? ???????, ??? ?????? ??? ???????, ??? ?????? ??? ?????? ????  
????? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? 3a, ?????????? 1. ?? ??????????  
????????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????  
?????, ??? ??? ?????? ?????????? ??? ?????? ??? ?????? ??? ???????????.»

11. ?? ?????? 25, ?????????? 3, ??? UStG ?????? ?? ????:

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

## III. ?????????? ??????????, ?????????? ??? ?????????????? ??????????

12. ?? 2011, ? ?????? Alpenchalets Resorts (????????????? ??? ?????? ??????, ??? ???:  
?????????????) ?????? ?????????? ??? ???????, ??? ??????? ??? ?????? ??? ?????? ??? ??  
????????? ???, ??? ???????, ??? ???????, ??? ???????, ??? ?????? ???, ?? ??????? ??????? ??  
????????? ??????. ???? ??? ?????? ??? ?????? ?????? ?????? ???????, ?? ??????? ?????? ??????? ??  
????????? ? ?? ?????????? ??? ?????? ?????? ?????? ???????, ??? ?????? ?????? ??? ??  
????????? ???????, ??? ?????? ?????? ?????? ?????? ???????, ??? ?????? ?????? ??? ??  
????????? ???????, ??? ?????? ?????? ?????? ?????? ???????, ??? ?????? ?????? ??? ??  
????????? ???????, ??? ?????? ?????? ?????? ?????? ???????, ??? ?????? ?????? ??? ??.

13. ? ?????????????? ?????????? ??? ?????????? ?? ?????? ??? ?????? ?????? ?? ???? ???????  
??? «????????????? ??? ?????????? ??????», ? ?????? ?????? ??? ?????? ??????????????  
????????? ?????? ??? ?????? 25 ??? UStG ??? ?????????? ??? ?????? ??????????????  
??????????. ?? ?????????? ??? 6?? ????? 2013, ? ?????????????? ?????? ???  
????????????????? ??? ?????? ??? ?????? ?????? ?????? ?????????????? ??????????????.  
?? ?????? ??? ?????????? ??? ?? Finanzamt München Abteilung Körperschaften (???????)  
????????? ?????? ?????? ??????, ??????, ??????) (????? ??? ??????????????  
?? ?????? ???).

14. ? ?????????? ??? ?????? ?????????????? ? ?????????????? ?????????????? ??? ??  
Finanzgericht (????????????? ?????????????? ??????????, ?????????) (??? ????: ??????????????  
?????????). ?? ?????????? ??? ?????? ??? ?????? ?????? ?????????????? ?????????? ???  
????????? ? ?????? ??? «????????????? ??? ?????????? ??????», ?????? ??? ?????? 25 ???  
UStG, ??? ?????? ??? ?????????? ??? ?? ?????? ??? ?????? ?????????? ??? ?????????? ???  
?? ?? ?????? 26, ??? ?????? ?????? ??? ?????????? 77/388/??? (3) (??? ????: ??? ?????)  
??? ??? ?????? ??? ??? ?. ?????????? ?????? ??? ??? ?????? ?????? ?? ?????????? ?  
????????? ?????????? ??????????, ?????? ? ?????? ?????????????? ?????????? ??????????  
?? ?????? 25 ??? UStG ??? ?????????????? ??? ?????? ?????? ??? ?????????? ?????????? ???  
????????? ?????????? ?? ?????? ?????????????? ??? ?????? 12, ?????????? 2, ??? UStG.

15. ? ?????????????? ?????? ?????????? ??? ?????? ??? ?????????? ?????? ?????? ???  
Bundesfinanzhof (????????????? ?????? ?????????? ??????????), ???? ??? ??????????  
??????????. ?? ?????????? ??? ?????? ?????? ??? ?? ??????????, ?? ??? ?????? ???  
????????? ??? ??? ?????????? Van Ginkel (4), ?????????? ?? ?????????? ?????????? ???  
????????? ?????????? ??? ?? ?????????? ?????? ?? ?????????? ?????????? ?? ??????  
????????? ??? ?????? ?????? ??? ?????? ?? ?????????? ?????? ?????? ?? ?????????? ???  
????????? ??? ??? ?????? ?????????? –????? ?????????? ??? ?????????? ?????????? ?? ??????  
????????? ?????????? ??? ? ?????????? ??? ?????? ?????????? ??? ?? ?????????? ???  
????????? (5), ?????????, ?????????? ??? ?????? ? ?????????? ??? ?? ?????? ??  
????????? ??? ?? ?????? ??? ?????????? ?????? ?????? ?????????? ??? ?? ??????????  
????????? ??????????, ?????????? ?????? ?????? ? ?????????? ??? ?? ?????????? ???  
????????? ?????????, ?????????? ?????? ?????? ?????? ?????? Ludwig (6). ??????,  
????? ??? ??? ?????????? ??? ?????? ?????????? ??? ?????? ?????? ??????????, ?? ??????  
????????? ??? ?? ?????????? ??? ?????? ?? ?????????? ??? ?????? ?? ?????? ?????? ??  
????????? ?????? ??? ??? ?????? ?????? ??? ?????? (?? ??????????, ??? ??????????  
????????? ??? ?????????? ??? ?? ?????? ?????????? ??? ?????? ?????????? ???).

16. ?? ?????? ?????????? ???, ??? ? ?????? ??? ?????? ??? ?????? ??? ?????? ??????  
????? ???????, ?????? ??? ?????????? ??? ? ?????? ?????? ??? ?????? ??? ??????  
????????? ??? ?? ?????????? ???????, ? ?????????? ??? ?? ?????? ?? ?????????? (??  
?????????) ???? ??? ?? ?????????? ??? ?????????? ?????? ?????? ??? ?????????? ???  
????????? ??? ??? ?????? ?????????? ?????????? ??? ?????? ?????? ??? ?????????? ???  
????????? ??? ?????????? ??? ?????????? ??? ?????? ?????? ?? ?????????? ??? ??????  
????????? ??? ?????????? ??? ? ?????????????? ?? ?????????? ??? ?????? ??? ??????  
??? ?? ??????.

17. ??' ?????? ??? ???????????, ?? Bundesfinanzhof (????????????? ??????????)  
????????? ?? ?????????? ?? ?????????? ??? ?????? ??? ?????? ??? ?????????? ??  
????????? ????:

«1. ?????? ? ?????? ??? ?????????? ??? ?????? ?????? ??? ?????? ?????? ?????????? ??????????  
?? ?????? ?????? ??? ?????? ?????????? ??? ?????? ?????? ?????? ?????? ?????????? ???,  
????????? ??? ?????????? ??? ?????????? ??? ?????? ?????? ??? 12?? ??????????

1992, Van Ginkel (C?163/91, EU:C:1992:435), ??? ?????? ?????????? ??? ??????????????  
?????????, ??? ?? ???? 306 ??? [?????? 2006/112];

2. ??? ?????????? ?????????? ??? ?????????? ??? ?????? ??????: ??? ?????? ?????? ? ??????  
??? ?? ??? ??????, ??? ?? ??? ?????? ?????????? ??? ?????????? ??????, ??? ??  
????? 306 ??? [?????? 2006/112], ??? ??? ?????? ?????????? ?????????? ???  
????????? ??? ?????? ?????? ?????????? ???, ??? ?? ??? 98, ?????????? 2, ???  
[?????? 2006/112], ?? ?????? ??? ?? ?????? ???, ??? 12;»

18. ?????? ?????????? ?????????? ??? ?????????? ??? ? ?????????? ??????????, ???  
??? ? ?????????? ??????. ? ??????????????, ? ?????????? ?????????? ??? ? ??????  
????????? ?????????? ??? ?????????? ??? ?????? ??? ??' ?????????? ??????????, ? ???  
????????? ??? 11 ?????? 2018.

#### IV. ??????

19. ? ?????????? ??? ?????? ?????????? ??? ?????? ? ????. ??? ????? A, ?? ?????? ?????? ??  
????? ?????? ??? ?????????? ??????????, ?? ?????? ??? ?????? ??? ?????,  
????????? ?? ?????? ??? ?????? ?????? ?????? ??? ?? ?????????? ??????????, ?????? ??  
????????? ??? ?????????? ??? ?????????? ??? ?????? ??????. ??? ?????? ? ??? ?? ?????????? ???  
????????? ?????????? ??? ?????????? ??????????, ?????????? ??? ?????????? ???  
????????? ? ?????? ?????????? ??? «????????? ??? ?????????? ??? ?????????? ??? ?????? ???  
????????? ?? ?????? ?????????? ??? «????????? ??? ?????????? ??? ?????????? ??? ?????? ???  
????????? ?? ?????? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ???.

#### 1. ????? ??????: «????????? ??? ?????????? ??? ?????????? ??? ?????????? ???»

20. ??? ??? ?????????? ?????????? ??? ?????????? ??? ?????????? ??? ?? ?????? ?????????? ???  
?? ?????????? ?????? (?? 1), ?? ?????? ??? ?????? ?????????? ??? ?? ??????  
????????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????????? ??? ?? ??????????  
????????? ??????. ?? ?????????? ??? ???????????: ??????, ??? ?????? ? ??????????????  
????????? ??? (?? 2)? ???, ??????, ? ?????????? ?????? ??? ?? ?????? ??? ??????????  
??? ?? ?????????? ??? ?????? ??? ?????? ??? ?? ?????? ??? ?????????? ??? ?? ??????????  
????????? ??? ?????? ??? «bought-in» ?????? (?? ?????? ?????????? ??? ??????) [??  
???, ?????? ?? ?? ???????????: ?????? ??? ?????? ? ?????????? ??? ??????] ??????  
???? ?? ??? ?????????? ?????????? ??? ?? ?????? ??? ?????? (?? 3). ? ?????? ??? ??????  
????????? (? ??? ?????? ???) ?????? ??? ?? ??? ??????????, ?? ?????? ???  
????????? ??? ? ?????????? ??? ?? ?????? ??? ?????????? ??? ?????? ??? «????? ????  
????????? ??? ?????? ???» (?? 4).

#### 1. ??????: ?????? ?????????? ?????????? ??? ??????????;

21. ?? ??? 306, ?????????? 1, ??? ??????, ??? ?????? ??? ?? ?????????? ??? ?? ??????????  
?? ?? ?????? ?????????? ??? ?? ?????????? ?????????? ?????????? ??? «????????? ???  
????????? ?????? [...] ??? ?? ?????? ??? ?? ?????????? ????? ?????????? ??? ?????? ???  
????? ??? ?????????? ??? ?????? ?????????? ???, ??? ??? ?????????? ??? ?????? ???  
????????? ??? ?????? ??? ?????? ?????? ?????? ??? ?????????? ??? ?????? ???  
????????? ??? ?????? ???». ????????, ?? ?????? ?????? ??? ?????? ?????? ?????? ???  
?? ?????? ??? «????????? ??????, ?? ?????? ?????? ?????????? ??? ?????? ???  
[...]».

22. ?? ?? ??????, ?? ?????? ???, ?? ?????????? ???, ?? ?????????? ??? ?????? ?????????? ???  
?????????????: (i) ?? ?????????? ?? ?????? ??? ?????? ??? (ii) ?? ?????????? ???  
????????? ?????? ??? ??? ?????? ?????????? (iii) ?? ??? ?????? ??? ?????????? ???

??????, ??? ?????????????? ??????? ?????????????? ??? ? ?????? ?????????????? ???????  
?????? ??? ??????? ?????????????? ??? ??????: ? ????? «??????? ??? ?????? ???» ???  
????????? ?? ??????? ?????????? ??? ?? ????? «?? ??? ??????? ?? ??????????» (7).

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

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

25. ???, ?? ??? ?????? ?????? ? ??????? ? ??????? ?????????? ??? ?????? ??????? ???  
?? ?????????? ??? ??????? ?????? ?? ?? ??? ?????? ?????? ?????? ?????? ??????????  
????? ?????? ? ??? ?? ?????? ?????????? ??? ?????????? ??? ?????????? ?????? ?????? ???  
????????? ? ?????? ???????, ??? ?? ?????? ??? ?????????? ?????? ?????? ?????? ???  
????? ?????????? ?????? ?? ?????? ??????. ?? ??? ?????? ?????? ?? ?????????? ?? ?????? ??????  
??????, ?????????? ?? ??? ?????????? ?????????? ?????????? ??? ?????????? ??? ?????? ??????  
????????? ?????? ???????, ??? ?? ?????? «?????????????» ??????????;

## 2. ? ?????????? ??????? ?????????? ??? ??? ??????????

26. ? ?????? ??????? (?????)????????? ??? ?????????? ??? ?????????????? ???  
????????? ??? ??????? ??? ??????? ?????????? ??? ?????????? ??? ?????????? ???, ? ??????  
????????? ??? ?????? Van Ginkel (8), ?????? ??? ?????? Star Coaches (9) (???.). ?  
????????? ??? ?????????? ??? ?????? Star Coaches, ? ?????? ?????????? ???  
????????? ?????? ?????????? ??? ?????? ?????????? ??? ?????? ?????????? ???  
????????? ??? ?? ??? ?????? ??? ?????? ??? ??? ??? ?????? ??? ?????? ??? ?????? ???  
????????? (???.). ??? ?????? ?????? ??? ?????? ??????, ???, ??????, ? ?????? ?????? ???  
????? ??? ?????????? ?????? ??? ?????? ?????? ??? ?????? ?????????? ??? ?????? ?????????? ???  
????????? (???.). ??????, ? ??? ?????? ?????? ??? ?????????? ??? ?????? ??? ?????? ???  
????????? ?????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
??? ?????????? ??? ?????????? -????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
??? ?????? ?????? ??? ?? ?????????? ?????? ??? ?????? ??? ?????? ??? ?????? ???, ???  
????????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? «in-house» ?????? [? ????  
????????? ??? ?? ??? ?? ?????? ??? ??????????, ??? ???, ?????? ??? ?? ?? ???????????: ?????? in-  
house ? ?????? in-house) (???.).

### 1) **Van Ginkel ??? Star Coaches**

27. ??? ?????? Star Coaches (10), ? ?????? ??????? ??? ??? ?????? ??????????  
????????? ??? ?????? ?? ??? ?????? ?????????? ?????????? ??? ?????????? ??? ?????????? ??  
????????? ??? ?????? ??? ?????? ?????????? ??? ?????? ??? ?????????? ??? ?????? ???  
????????? ? ?????? ?????? (???.) ??? ?????? ?????? ??? ?????? ??? ?????? ???  
????????? ?????? ?????? ??? ?????? (11). ??? ?????? ?????? ??? ?? ?????????? ???  
????????? ?????? ??? ?? ?????????? ?????? ??? ?????? ??? ?????? ??? «?? ?????????? [??  
?????] ?????? [??] ??????» (12). ?? ?????????? ?????? ??? «[?]?? ?????????? ??  
????????? ??? ?????? ?????? ??? ?????? ?????????? ??? ?????? ?????? ??? ?????? ???  
????????? [...] ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? 306 ??? ??????  
??? ???». ??? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
?? ?????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ???

????????? ??? ?? ??????? ???? ?? ??????? ?????????? ?? ??????? (13).

28. ??? ?? ?????????? ?? ??? ?? ??????????, ?? ?????????? ?????????? ???  
????????? ??? ?? ??????? Van Ginkel (14). ??????, ??? ?? ??????????  
????????? ??? ?? ?????????? ?????? ?????? ?????? ?????? ?? ?????????? ???  
????? ?????? ??? ?? ?????????? ?????? ?? ?????????? ?????? ????. ?? ??? ?? ??????  
Van Ginkel, ?? ?????????? ??? ?? ?????? ??? ?? ?????? ??? ?? ?????????? ??????  
????????? ??? ?? ?????? ?????????? ?????? ?????? ??? ?? ?????? ??? ?? ?????????? ???  
????????? ??? ?? ?????? ?????????? ??? ?? ?????????? ?????? (15). ?????? ??????????  
?? ??? ??????????, ?? ?????????? ?????? «? ?????????? [??] ?? ??????????  
????????? ??????, ?? ??? ?? ?????? ?????? ?????, ?? ??? ?? ?????? ?????? [??] ??????  
?????????, ?? ??? ?? ?????? ?? ??????????, ?????? ??? ?? ?????? ??? ?? ??????????  
????????? ??? ?? ?????????? ??? ?? ?????????? ?? ??? ?? ?????? ?? ?????????? ??? ?? ??????????  
????????? ??? ?? ?????? ?????????? ??? ?? ?????????? ??? ?? ?????????? ??? ?? ??????????» (16).

29. ???, ??? ????? Van Ginkel, ?? ?????????? ?????????? ?????? ??? ?? ??????  
????????? –???, ?????? – ?????? ??????. ?? «????????? ??????» ??? ?? ???  
«????????? ??? ??????» ?????????? ?? ?????????? ??????. ??? ?????????? ???  
????????? ?????????? ??? ?????? ?????? ??????. ?????????? ?? ?????????? («?????») ???  
?? ?????????????? ??? ?? ?????????? ??? ?? ??????????.

30. ??? ????, ? ?????? Star Coaches ??? ?? ??? ?????? ?????????? ??? ??  
????????? ?? ??? ?? ?????, ?????????? ??? ?? ?????? ??? ?? ?????? ?????????? ?? ??? ?? ??????  
?? ?? ?????????? ?? ?????? ??? ?? ?????? ??? ?? ?????? ??? ?? ?????? ??? ??  
????????? ??? ?? ?????????? ??' ?? ?? ?????? ??? ?? ?????? ?????? ?????????? ??? ??  
?????????. ???, ? ?????? Star Coaches ???????, ??? ?????, ?? ?????? ??? ??  
????????? ??? ?? ???????, ?? «????? ??????????». ? ?????????? ??? ?? ?????????? ???  
????? ?????????? ?? ?????????? ?????????? ??? ?? ??? ?? ?????????? ?????????? ??  
????? ?? ?????? ??? ?? ?????? ??? ?? ???????, ??? ?? ?????? ??? ?? ??????, ??? ??  
??, ?? ?????????? ?? ??? ?? ?????????????? ??? ?? ?????????? (17).

2) ?? ?????? ??? ?? ?????? ??? ?? ?????? ?????????? ??? ?? ?????????? ??????????

31. ??????, ?????? (?? ??????? ?? ?????????? ???) ? ?????????? ???  
????????? ??? ?????? Star Coaches ??? ??????????, ????????, ??? ?????????? ??  
????????? ?????? ?? ?????? ??? ?????? 306 ??? ?????? ??? ?? ????. ? ?????????? ???  
????????? ?? «????????? ?????? ??? ?????? ?????????? ??? ?????????????? ???  
????? ?????????? ??? ?? «????? ??????». ??? ?????????? ??? ?? ?????????? ??? ??  
????? ??? ?????????? ??? ?? ?????? ??? ?? ?????? ??? ?? ?????? ??? ?? 307 ???  
????? ??? ?? ???, ??? ?????????? ??? ?? ?????? ??? ?? ?????? ??? ?? ?????? ??? ??  
????????????? ??? ?? ?????????? ??? ?? ?????? ??? ?? ?????? ??? ?? ?????? ??? ??  
????????? ??? ?? ??????.

32. ??? ? ?????? ??? ?????????? ?????? ?????????? ?????? ?? ?????????? ???  
????????? ??? ?? ??????. ?? ??? ?? ?????????? ?????? ??? ?? ?????????? ??? ??  
????? ?? ?????? ??? (?? ??? ?? ?????? ?????????? ??? ?? ?????? ??? ?? ?????? ??? ??  
?? ?? ?????????? ???) ??? ?????? ?????? ?????????? ?????????? ??? ?? ??? ?? ??? ??  
????? ?????????? ?? ?????? ??? ?????? (18). ??????, ?? ?????? ??? 2002, ? ???  
????????? ??? ?????????? ???, ?? ???, ??? ?????? ???, ? ?????? ?????? ??? ??  
????????? ??? «????????? ??? ?? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ??  
????????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?? ?????????? ??? ??  
????????? ??? ?? “?????” ?????? ??? ?????????? ??? ?????????? ??? ?? ?????????? ??? ??  
[...]. ? ?????? ??? ?????? ?????? ??? ?? ?????? ??? ?????? ?????????? ??? ?? ??????????

??? ?????? ??? ??? ??????? ??? ?????????????? ?????????????? ??? ?? ????????????, ???  
??? ??????????? ??? ?????????? ??? ??? ??? ??? ???????????, ?????????? ?????????? ???  
??? ??????????? ???, ?? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ???» (19).

33. ????, ?? ?????? ??? ?? ??? ?????? ?????? ?????????? ?????????? ??? ?????????? ??? ?  
????????? ?????? ?????????? ?????????? ?????? ?? ?????? ??? ?????? ??? ?????????? ??? ??  
????????? ?????????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ??????  
??????, ?? ?????????? ??? (20).

34. ???, ??? ??????, ?? ?????????? ?????????? ?????????? ??? ?????????? ??? ???? ?  
????????? ??? ?????????? ?????????? ?????????? ?? ?????? ?????? ??? ?????? ?? ??????  
????????? ??? ?? ?????????? ?????????? . ???????, ?? ?????????? ?????? ??? ?? ??????????  
??? ?????????? ??? ?????????? ?????????? ??? ?????? ?????? ?????????? ?????????? ???,  
??????, ??? ?????????? ?????????? , ?????? ??? ?????? ?? ?????????? ??? ??? ??????  
????????? . ?? ?????????? ?????????? ??? ?????? ?????? ?????????? ??? ?????? ??????????  
????????? ?? ??? ??? ?????? ?????? , ?? ????? ?????? ??? ?????? ??? ?????? ??? ??? ??????  
????????? ??? ??? ?????? ??? ?????????? , ??? ?????? ?????????? ??? ?????? ??? ??????  
????????? ??? ?????? ?????? ?????????? , ?????? ??? ?????????? ??? ?????? ??? ??????  
????????? ??? ?????? ?????? ?????????? , ?????? ??? ?????????? ??? ?????? ??? ?????? (21).

35. ????, ??? ?????? ??? ?????? ??? ?????? ?????????? , ?? ?????? ?? ?????????? ??? ?  
????????? ?????????? ??? ?????? ?????? ?????? ??? ?????? ?????? , ?????????? ???  
????? ??? ??? ?????????? ?????? ??? ?????? Van Ginkel ??? ??? ?????????? Star  
Coaches. ??? ? ?????? ??? ??????????; ?????? ??????????; ?????? ?????????? ???  
????????? ? (?????????) ?????????? ?????????? , ?????? ?????????? ?????? ??? ???  
?????????; ?????? ? ?????? ?????????? ??? ??????; ?? ?????? ?????????? ??? ???  
????? ???; ? ?????? ? ?????? ??? ??????; ?????? ?????? ?????????? ??? ??? ??'  
????????? ?????? ? ?????? ?????? ?????????? , ?????? ?????? ?????? ?? ??? ?????? (??)  
2015/2302 ??? ?? ?????????? ?????? (22), ? ?????? ?? ?????? , ??? ?? ?? ???, ??  
????????? ?????? ?????????? ?????? ?????? ?????? ?????? (23), ??? ??????  
????????? ??? ??? ???? ?????? (24).

3) ?????? ??? ?????????? ??????

36. ??? ?????? ??? ?????? ??? ???? ?????? ?????? ?????? ?????????? ?????????? ???  
????????? ?????? ?????? ??? ?????? ?????? ??? ?????? ?????? ?????? ?????? ??? ??  
????????? ?????? , ??? ?????? ?????? ?????? ?????? ? ?????? ?????? ?????? ?????? ???  
????????? ?????? , ? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ??????.

37. ??? ?????? ??? ?????? ?????????? ?????? , ?? ?????? ??????????  
????????? ?? ?????? ?????? ?????? ??? ?????? ??? ?????????? ?????? ??? ?????? ???  
????? Ludwig (25). ? ?????? ?????? ?????? ?? ?????? ??? ?????? ?????? ?????? ??? ??????  
??? ?????? ?????? ?????? ??? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ???  
????? ?????? ?????? , ?????? ?? ?????? ??? ?????? ?????? ?????? ?????? ?????? ??????  
????????? ?????? ?????? ???, ?? ?????? , ?? ?????? ?????? ??? ??? ??? ?????? ???  
????? 13?, ?????? ??, ?????? 1, ??? ?????? ??????.

38. ?? ?????????? ?????? «[?]?? ?????? ?????? ?????????? ?????? ?????? ?? ??????  
????????? ??? ?????????? ??? ??? ? ?????? ??? ?????? ?????? ??? ?? ?????? ?????? ??  
????????? ?????? ??? ?????? ?? ?????? ?????? ?????? ?????? ??? ?? ?????? ?????? ??  
????????? ?????? ??? ?????? ???, ?????? ?????? ?? ?????? ?????? ?? ?????? ?????? ??  
????????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?? ?  
????????? ?????? ??? ?????? ?????? ?? ?????? ?????? ?????? ?????? ?????? ?????? ?? ?  
????? ?????? ??? ?????? ?????? , ?? ?????? ?????? ?????? ?????? ?????? ?????? ??????»

(26). ?? ?????????? ?????????? ?????????? ??? «????????? ??? ?????? ?????? ?????? ???  
?????? ?? ?????? ??? ? ?????????? ?????? ?????? ?????? ??? ?????? ?????? ???,  
?????????, ??? ? ?????????? ?????? ?????? ?????? ??? ?????? ??? ? ??????????  
????????? ???, ?? ??????, ??? ?????? ?????? ?????? ??? ?????? ??? ???? ??  
????? ??????. ??? ?????? ?????? ?? ?????? ?? ?????? ?????? ?????? ?????? ?????? ?????  
??? ?????? ??' ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ??? ??  
????????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? » (27).

39. ?????? ? ?????? Ludwig ?????? ??? ?????? ?????????????? ??????????,  
????????????? ??? ? ?????? ?????? ?????? ??? ?????? ?????????? ?????????? ??? ??  
????????? ??? ? ?????????? ??? ?????????? ?????? ??? ?????? ?????????? ??? ??  
????????? ??????. ??? ?????? Madgett ??? Baldwin (28), ??? ?????????? ??????????  
????????? ?????? ?????? ?????? ?????? ??? ?????? ?????? ??? ?????? ?????? ?? ??  
????????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ??? ??  
????????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ???  
????????? ??? ?????? ?????? ?????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ???  
????????? ?????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ???  
????????? ?????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ???  
????????? ?????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ???  
????????? ?????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ???  
????????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ???  
????????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ???  
????????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ???  
????????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ???  
????????? ?????? ??????.

40. ??????, ? ?????? ??? ?????????? ?????????? ??? ?????? ??? ?????? ??????????  
??? ?? ?????????? ?????? ?????????? ?????????? ?????? ??? ?? ?????????? ??? ?? ??????  
Ludwig??? ??? ?????? ??? ?????? ??? ?????? ISt (29). ? ?????? ?????? ??????  
????????? ? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??????????????  
«?????» ??? «?????», ??? ?????? ?????????? ?????? ?????? ?????? ?????? ???  
????????? ??? ?????? ?????? ?? ?????? ?????? ??? ?? «?????????» ?????? ???  
????????? ? ISt ??? ?????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ?? ?? ??????  
?? ?????? ?????? in-house (30). ?? ?????? ?????? ?????? ??? ?????? ??? ?????? ??? ??  
????? ??? ?????? ?? ?????? ?????? ?????? ?????? ??? ?????? ???, ???' ??????,  
«????? ?????? ?????? ??? ?????? ???' ?????? ???, ??? ?????? ??? ?????? ??? ?????? ???  
????? ?????? ??? /? ? ?????? ???». ??????, ?? ?????? ??? ?????? ??? ?????? ???  
????? ??? ?????? «?? ?????? ??? ?????? ??? ?? ?????? ?? ?? ?????? ??? ?????? ???  
????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? [...]» (31).

41. ??????, ? ?????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ???  
????????? ?????? ??? ?????????? ?????? ??? ?????? ?????? ?????? ??? ?? ??????????  
????????? . ??? ?????????? ?????? ?????? ?????? ??? ?????? ?????? ??? ?? ??????  
(?? ?????? ??? ?? ??? ?????? in-house) ?????? ??? ?? ?????? ?????? ?????? ??? ??  
????????? ?????? . ??? ??? ?????? Madgett ??? Baldwin ??? ISt ?????? ??? ??  
????????? ??? ?????? ?????? ?????? ?????? ?????? ??? ?????? ??? ?? ?????? ???  
????????? ?????? ??? ?????? ?????? ?????? ??? ?????? ??? ?????? ??? ?? ?????? ???  
????????? in-house.

42. ??? ??????, ?????????? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
????? ??? ?????????? ?????? ??? ?????? ?? ?????? ?? ?????????? ??? ?????????? ???  
????? ??? «????????? ?????? ??????» ??? ?? ?????? ?????? ??? ?????? ??? ??  
????????? ?????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ??? ?? ??????  
??? ??? ?????? in-house. ? ?????? ?? ?????? ?????? ?? ?????? ?????? ?? «?????»  
?????» ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???

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

43. ?? ??? ????????, ?? ?????????? ??????? ??????? ?? ?????? ??????? ??????? ??????? ????????.  
??? ??????? ?????????? ?? ?????? (?????????????) ?????????????? ???????, ??? ?? ???  
?????? ?? ?????????? ?? «????????? ??????», ?????? ??? ????? ?? ????????  
?? ?????????? ?? ??? ?? ??? ?????????? ?? ?????????? ?? ???????, ???  
?????????????, ?????????? ???????, ? ?????? ??? ????? ?????????? ??????? ??????? ??  
?? ?????????? ??????? ?? ?????? ??? ?????? ?????? ?????? ??????? ?? ??????? ??  
????????? ?? ?????? ??????. ??? ?????? ??? ?????? ?? ?????? ?? ?????? ?????? ??  
?????? ?? ?????? ??????, ??? ?????? ??? ?????? ?????? ??????? ?? ?? ?????? ??????? ??  
?????????, ? ?????????? ?????????????? ??? ?????? ?????? ??????? ?? ?????????? (32).

44. ??? ??? ?? ??? ?????? ?????? ?????????? ?????? ?? ??????????????, ??? ?? ????????  
?????? ?? ?????????????? ?? ?????????? (?? ??????????) ??????? ??????????  
????????? ?? ?????? ??????? ?? ?????????? ?? ?? (????????????? ???????) ??????????  
????????? ?? ?????????? ??????? ?? ?????????? ?????????? ?? ?? ?????????? ???????  
?????????. ??? ?????????? ??????? ?? ?????????? ?????????? ?????????? ?? ?? ?????????? ???????  
?????????. ???, ?? ?????????? ?????? ?????? ?????? ??? ?????????? ?? ?? ?????? ??? ?????? ???  
???? ?????????? ??' ?????? ??? ??????, ??? ?????? ?????????? ?????????? ?? ?????????? ??  
????????? ?? ??????? ???, ???????, ?????????? ?? ?????????? ?????????? ?????????? ??  
????????????? ??? ?????? ??? ?????? ?? ?????? ?? ?????? ?????? ??? ??, ??? ??????????????  
?????????, ?????????? ?????? ?????? ?????? ?????????? ?????????? ?????????? ??? ??????????. ??  
????????????? ??? ?? ?????????? ?????? ??? ?????? ?? ?????? ??? ?????? ?????? ???  
????????????? ??? ?????? ?????????? ??????, ?????? ?????????? ??? ?????????? ??? ?????????? ???,  
????????? ??? ?????? ?????????? ??????????. ?, ??????????, ??? ?????????? ?? ??????????  
????? ?? ??? ?????? ?????? «????????? ?????? ?? ?????? ???» ?? ???????  
?????????, ?????????????? ?????? ?????????? ?????? ??? ?????? ?????? «??? ??????????  
????????? ??? ?????? ?????? ?????? ??? 15?? ?????». ?? ?????????? ??? ?????? ??? ??????????  
?????????, ? ?????????? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??????????  
????????? ?? ?????? ??? ?????? ?????????? ??? ??????.

45. ???, ??? ?? ??? ?????? ???????, ??? ?? ??? ?????? ?????????? ??????? ?????? ??????? ??  
????????????? ??? ?? ??? ?????? ???????, ??? ?? ??? ?????? ?????????? ?? ??????? ??  
??????????, ??????? ?? ??? ?????????? ?????? ??? ?????? ?????? ?????????? ?????????? ??? ??  
?????????? ?????? ??? ??????.

46. ???????, ?????????? ??? ?????????? ?? ?????? ?????????? «????????? ???  
?????????» ??? ?????? ??? (????????? ??? ?????? ?????? ?????????? ??? ?????? ???  
????????? ???). ??????, ??? ??' ?????????? ???????, ?? ?????? ?????? ?????????? ??  
????? ?? ?????????? ??? ?????? ?????????? ?????? ?? ?????? ?? ?????? ?????? «????????? ???  
?????????» ??? ?????? ?????? ?????????? ??? ?????? ??? ?????? ???, ?? ?????? ???, ?? ?????? ???  
????? ?????? ??? ??????.

47. ??? ?? ??? ?????? ?????? ??? ? ?????? ?????????? ??? ?????????? ???  
?????????? ??? ?????? ??? ?????? ?????? (????? ??? ?????? ??? ?????? (33)),  
?? ??????? ?????? ??? ?????? ?????? ??? ?????????? in-house. ??? ?? ?????? ???  
????????? ??? ?????? ??? ?????????? ??? ?????? ?????? ??? ?????? ?????????? ? ?????? ??????????  
?????????: ?? ?????? ??? ?????? ?????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ?????? ??  
????????? ?????????? ??? ?????? ?????? ?????????? ??? ?? ?????????? ?????? ??? ?????? ???  
????? ?????? ???????, ?????? ??? ??? ?? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ???,  
????? ?????? in-house (34). ?? ?????? ??? ?????? «????? ??????????».

48. ??? ??????? ?????? ?????? ??? «?????» ??????, ?? ?????????? ?????? ?????? ??????????  
????????????? ??? ?????? ?????? ?????????? ?? ?????????? ?????? ??? ?????????? ???  
????? ??? ??? ?????????? in-house (35), ?????????? ??? ?????? ?? ?????? ??? ?????????? ???  
????? ?????? ?? ?????? ??? ?????????? ??? ?????????? ?????? ??? ?????????? ???  
????? 306 ??? ?????? ??? ??? ???.

49. ?? ?????????? ?????????? ??? ?????? ??? ?????? ??? ?????????? ??? ??????????????  
????? Madgett ??? Baldwin (36) ??? ??? ?????????? ?????????????? ?? ??? ??????????  
Kozak ??? MyTravel. ? ?????? Kozak ?????????? ?????????? ?????? ??? ?????????? ???,  
????????? ??? ?????? ??? ?????? ?????????? ?????? ??? ?????????? ?????? ???, ?????????? ???  
? ?? M. Kozak ??????????????, ??? ?????? ??? ?????????? ?????? ???, ?????????? ???  
????? ??? ?????????? ??? ?????? ??? ??????. ?? ?????????? ??? ?????? ??? ??????????  
??? ?????? ?????????? ??? ?????? ??? in-house ?????? ?????????? ?????????? ??????????  
????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ???, ?? ?????????? ???  
????? ??? ??????, ??? «????? ?????? ?????? ??????» ??? ??? ?????? ??? ?????? 307 ???  
308 ??? ?????? ??? ??? (????? ?????? ?? ?????? ??? ?????? ??? ?????? ??????????)  
?????????). ?? ?????????? ?????????? ??? ?????? ??? ?????? ??? ?????? ?????? ???  
????????? ??? 306 ??? ?????? ??? ??? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
????? ??? ?????? ??? ?????????? ?? ?????? ?????????? in-house (37). ??? ??? ??????  
????? , ? ?????? MyTravel ?????? ?????????? ???? ?????? ?????? ?????? ?????? ???  
????????? ??? ?????? ?????????? ??? ?????? ??? in-house ?????? ?????????? ?? ??????????  
????????? ?? ??? ?????? ?????? ??? ?????? ??? ?????? ???, ??? ?????????? ??? ?????? ???  
????????? ??? ?????? ??? ?????? in-house (38).

50. ?? ?????????? ?????? ?????????????? ???, ??? ?????????????? ?? ??????????  
????????? ??? ?????? ??? ?????? ?????????? ??? ?????? ?????????? ??? ?????? ???  
????????? ??? ?????? ?????? ??? ?????? ?????? ?????? ??? ?????? ?????????? ???  
????????? , ??? ??? ?????? ??? ?????? ?????? ?????? ?????? ??? ?????? ???  
????????? ?????? ?????????? ?????? ?????? ?????? ?????? ??? ?????? ?????????? ???  
????? in-house. ? ?????? ??? ?????? ?????? ?????? ??? ?????? ?????????? ???, ??? ??  
????????? ??? ?????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ?????????? ???  
??? ?????????? ??? ?????????? in-house. ??? ?????? ?????? ?? ?????? ??? ?????????? ???  
??? ?????? ??? ?????? 307 ??? ?????? ??? ???, ??? ??? ?????? ??? ?????????? ??? ??  
????????? ??? ?????? ??? ?????? ??? ?????? ???.

51. ?? ???, ??? ?????? ??? ?????? ??? ?? ?????? «??? ??????/in-house» ??????????  
????? ???, ??? ?????? ??? ?????? ?????????? ?????????? ???, ??? ?? ?????? ???  
????? ?? ?????????? ??? ?????? ?????? ?????? ??? ???, ???, ???, ???, ???, ???,  
????? ??? ??? ?? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ??????  
????????? ??? ?? ?????? ??? ?????? ???, ?? ?????? ?? ?????????? ??? ?????? ???  
????? (????? in-house) ?? ?????? ???, ?? ?????, ?????? ??? ?????? ?? ?????? ???  
????? ??? ?????? ???.

52. ?? ???, ??? ?????? ??? ?????? ??? ?? ?????? ??? ?????? ?????? ??? ?????? ???  
??? ?????? Star Coaches, ?????? ?? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
????????? , ?????? ??? ?????? ??????, ?????????? ?? ??? ?? ???, ??? ?????????? ??  
????????? ?? ?????? ?????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ???  
????????? ??? ?????? ?????? (?? ??? ?????? ??? ?????? ?????? ??? ?????? ???)  
????????? ??? ?????? ??? ?????? ?????? ??? ?????? ?????? ?????? ??? ?????? ???  
????????? ??? ?????? ??? ?????? ?????? ??? ?????? ??????/??? ??????/????? ???  
??? ?????? ??? ?????? ?????? ??? ??????/??? ??????/????? ???.

? ??????????/????????? (?????? ???? ?????????? ??? ?????????? ?????? ?????????? ?????? ?????????? ? ????????)  
??? ??? ????), ??? ??? ? ?????? ?????? ??? ????? (?????? ??? ?????????? ?????? ?????????? ????),  
????? ??? ???? «?????» ??? ?????? ?????? ??? ?????????? ? ?????????? «?????»  
????, ?? ????, ?????? ??????, ?????? ?????????? ?? ??????????.

3. ??? ?????? ?????????? ??? ?????? (?????????????) ?? ?????? ??????;

53. ??????, ??????, ??? ?????????? ??????????. ??????????, ?? ?????? ??? ????  
????????? ?? ?????? ??? ??????: ??? ?????????? ??? ??? ?????????????? ??? ??????, ??  
????????? ?? ?????????? (?? ????) ??? ?????? ?????????? ??? ?????? Van Ginkel  
(39), ??? ?????? ??? ?????? ?? ?????? ?? ?????? ??? ?????? ?????? ??? ?????? Star Coaches  
(40). ????, ? ?????? ??? ?????? ?????? ?????? Van Ginkel ?????????? ?? ??????: ?  
????? ??? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????????? ? ?????????? ??  
????????? ??? ?????? ?????? ??? ?????????? ??? ?????? ?????? ?????????? ??????, ?????? ??? ?????? ???  
?????????, ?? ?????? ?????? ?? ?????????? ?????? ??????, ??? ?????? ?????? ?? ?????????? ???  
??? ?????? ?? ?? ?????????? ??? ?????? Van Ginkel, ?????? ?? ??? ?????????? ???  
????????? ?????? ?????? ?????? ?????? ?????? ??????, ??? ?????? ??? ?????? ?????? ??????????,  
????????? ?????? ?????? ??? ?????? ??? ?????? ?????? ?????? ?????? ?????? 2018 (41).

54. ??????, ?? ?????? ??????????????, ? ?????????? ????, ??? ?????? ??  
????????? ?? ??? ?????? ?? ?????????? ??????????, ?????? ?? ??? ??????????????  
?????????: ?? ?????????? Madgett ?? Baldwin, Kozak ?? MyTravel ?????????????? ??  
????????? ?? ??? ?????? «????? ??????» ??? ?????? ??????, ??? ??? ?????????? ??? ?  
????????? ?? ??? ?????? ?? ??????, ??? ?????? ?? ??? ?????? Minerva (42). ???  
????????, ?? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????????? ??? ??????  
????????? ?? ??? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ??? ??????, ??? ???  
????????? ?? ??? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ??? ??????  
????, ?? ?????? ??? ?????????? ?????? ?????? ?????? ?????? ?????? (????? ??? ??????  
???? in-house) ?????? ???????. ??????, ??? ?????? ??? ?????? ?? ?????? ??? ?????? ?, ????  
????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ??? ??????.

55. ??????, ??? ?????? ?????? ?? «????????? ??? ??????», ?? ?????? ??????????  
????????, ??? ??? ?????? ??? «?????» ??? ?????? ?????????? ??? ?????? ?? ?????????? in-  
house. ??????, ??? ?????? ?????? ??? ?????? «??? ??? ?????? ?????? ???  
?????» ?????? ??? ?????? ?????? ?? «?????» ?????????? ??? ?????? ??? ??????????  
????????? ?????? ?????? ?????? ?? ?????? ?????? ?????? ?????? ??? ?????? ???  
????????? in-house, ?????????? ??? ?????? ?? ?????? ?????? ?????? ?????? ??????????  
????????? (43). ??? ?????? ?????? ??? ?????? ?? ?????? ?????? ?? ?????? ?? ?????? ??? ??????????  
????? ??? «????????? ??? ??????» (????? ?? ??? ?????? ?? ?????? ??? ??????????  
????? ??? ?????? ??? ?????? ?????? ??? ?????? (44)).

56. ??? ??' ??? ??, ?????????? ?? ?????? ?? ?????? ??? ?????? (?? ??????)  
????? ??? ?????? ?????????? ??????????, ??' ??? ?? ?????? ??? ??????????, ?? ?????? ??  
???? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?? 1992 ??  
????????? ?? Van Ginkel. ?? ??? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ???,  
??? ?????? ??????, ? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ???  
????????? ?????? ?????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ???  
????????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ???  
????????? ??? ?????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ???  
????????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???

????? ?? ??????????? ??????? (?????????? ?? ?????? ?? ???????????, ?? ???????????  
?? ????????, ?? ????????, ?? ??????????? ?? ??????????? ?????/? ?? ???????????  
???????, ???.), ????, ?? ????, ??????????? ??? ?? ??????????? ???.. ?? ??? ??? ?? ??????  
? ??????? ? ?? ??????? ??? ??????????? ??????????? ??? ??????????? ????????.  
????? ????, ??? ??? ??????? ?? ??????????? ??? ??????? ??? ??????? ??? ?? ??? ??????  
??????.

57. ?? ???????, ?? ??????????? ??????????? ??? ?? ?????? ?? ?????? ??????????? ?  
?????? «??? ??????? ?? ??????? ???», ????, ?? ??????????? ??????????? ??? ???????  
?????????? ?? ??????? ?? ??????????? ??????????? ??? ?????? ??? ?? ?????? ???????????  
???? ??????? ??????? ??????????? ???, ????, ?? ??????????? ? ??????????? ???????????  
?????????? ?? ??????? ?? ?? ?? ??????? ??????????? ?? ??????????? ? ??????????? ???????  
?? ??????? ???????, ?? ??????? ???????.. ??? ??????? ???, ?? 1992, ? ??????  
«?????????? ??? ???????» ??? ??? ??????????? ??????? (???? ??????????? ????  
??????????), ?? 2018 ??? ??? ??????????? ??? ???????????.

4. ? ??????????? ??????????? ??? ?????? «??? ??? ??????????? ??? ??????»

58. ??? ?? ?????? 306 ??? ??????? ?? ?? ?? ??????? ?? ??????????? ??? ???????????  
?????????? ???????, ??????????? ??????? ??? ??????? ?? ??????????? ? ??????????? ???????????  
???? ???????, ?? ??????????? ??????? ??? ??????? ?? ??????? ??? ??????? ??????????? ???  
?????????? ??? ???????.

59. ?? ??????? ???????????, ?? ??????? ??????????? ??? ??????????? ??? ??????? ??  
?????? ?? ??????? ??????????? ??? ?? ??????????? ??????? (45). ??????,  
?????????????? ??? ??????????? ??????????? ??????? ??? ??????? ??????????? ??????? (46).  
??????, ?? ??????? ??? ??????????? ??????? ??? ??????? ??????? ??? ?? ??????????? ???  
?????????????? ??????? ??? ?? ??????? ?? «?????????? ??? ??????? ??? ??????? ??? ??????? ???  
??? ??? ??????? ??? ??????? ???» (47).

60. ???????, ??? ??????? ??????? ??? ?????? ?? ??????? ??? ??????? ? ???????????  
?????? ?? ?? ??? ??????? ??????? ??? ??????, ?? ??????? ?? ??????????? ??? ???????????  
?? ?? ??????? ??????? ??? ?? ???????.

61. ??????, ??????? ??????? ??????? ??????????? ??? ??????? ?? ??????? ??? ???????  
?????????? ??? ??????, ??????? ??????????? ?? ?? ??????? ??????????? ? ?? ??????????? ???  
?? ??? ???, ???????, ?? ?? ??????????? ??????? ??? ??????? ??? ??????? ??? ??? ??? ??? ??  
?????? (48), ?? ??????? ?? ??????? ??????? ??? ?? ??????? ??????? ?? ??????????? ??? ???????  
?????????? ??? ?? ??????????? ???????.

62. ??????, ??? ??? ??????????? ??? ??????????? ??????????? ???, ??????????? ???  
?????????? Star Coaches (49), ?? ???????????, ??? ???????????????, ?????????? ??????????? ?  
?????????? ?? ??????? ??????????? ?? ??????? ??????????? ??????????? ??????????? ??  
?????????? ??? ??????????? ?? ??? ??????????? ??????????? ??????????? ??? ??????. ??????????? ???????,  
? ??????????? ??? ??????????? ??????????? ??? ??????????? ??????????? ???????????, ??? ??????????? ??  
?????????? ??? ??? ??????? ??????. ????? ??????? ??? ?????? ??? ?????? ??? ??????? ??? ???????????  
?????????? (?? ???????) ??? ??? ?? ??????? ?? ?? ??????????? ???????????.  
??????, ?? ??????????? ??? ??????? ??? ??????????? ??????????? (??????, ??  
?????????? ?? ??????????? ??????????? ?? ??????? ??????????? ?? ??????????? ?? ??????? ??? ??  
??? ??????? ??????? ??????????? ??? ?? ??????? ??????????? ??? ??????? ??????????? ??? ?? ??  
?????????? ??? ??????????? ??? ??????? ??????????? ??? ??????????? ??????????? ??? ?? ??  
?????????? (50). ? ??????????? ?? ??? ??????? ??????? ??? ?? ??????????? ??? ???????????, ???'

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

63. ????????, ?????????????? ?????? ??? ?????????????? ??? ?????????? ??? ?????? ?????????? ???  
??????????, ? ????????, ?????????? ?????? ??? ?????????? ??? ?????????? ?????? ?????? ??????  
??????????, ?? ?????? ?????????? ?? ?????? ?????????? ??? ?????? ?????? ??? ?????????? ?????? ??,  
????????? ?????????? ??? ?? ?????? ?????????? ??? ?????? ?????? ?????? ??? ?????????? ?????? ??,  
????????? ?????????? ??? ?? ?????? ?????????? ??? ?????? ?????? ?????? ??? ?????????? ?????? ??,  
????????? ?????????? ??? ?? ?????? ?????????? ??? ?????? ?????? ?????? ??? ?????????? «?????»  
(????? ?????? ??? in-house) ??????????. ?????????, ??? ?????? ?????????? ?????? ?????? ??????  
?? ?? ?????????? ?????????? ??? ?????? ?????? ?????? ??????????/????? ?????????? ?????? ??, ??? ??,  
????????? ?????? ?????? ?????????? ? ?????? ?????????? ?????? ?????? ??? ?? ?????????? ??,  
?????, ?? ???????????, ? ??????? ??? ?????????? ??? ?????????? ??? ?????? ?????? ??????  
?? ?? ?????????? ?????????? ??? ?????? ?????? ??? ?????????? ??? ?????? ?????? ?????? ???.

64. ?? ?????????????? ?? ??? ?????? ?? ?????? ?????? ?????? ??? ?????????? ??? ??????  
????????? ?????? ?????? ?????????? ??? ?????? ?????? ?????? . ?? ??? ?????? ??? ?????? ?????? ?????? ??????  
?? ?????????? ??? ?? ?????? ?????? ?????? ??? ?????? ?????? ?????? ??? ?????????? ???  
????????? ?? ?????? ??? ?????????? ?????? ?????? ??? ?????? ?????? ??? ?????? ?????? ???  
«????????? ??????» . ??????????, ? ?????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ??????  
????? ?????????? ?????? . ?????????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ??????  
????? ?? ?????? ??? ?????? (????? ? ??????????) ?? ?????? ?? ?????? ??? ??????  
????? ???????, ??? ?????? ??? ?????? Star Coaches ??? ?? ???????.

65. ??? ?? ????????, ????????, ?? ??????. ???, ?? ??? ?????? ?????? ?????? ???,  
????? ?????? ?????? ?? ?????????? ??? ?? ?????????? ??? ?????? ?????? ??? ?????? ??? ?? ???  
????? ????????, ????????, ???????, ??????, ??? ?????? ??? ?????? ?? ?????????? ??? ????????, ??????  
?? ?????? ????????, ?? ?????? ??? ?????? ?????? ?????? ?????? ??? ?????? ?????? ???, ??  
????? ?????? ?? ?????????? ???, ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? , ? ??????  
????? ??? ?????? ??? ?????????? ??? ?????? ?????? ?????? ??? ?????? ?????? ?????? ??? ?? ??????  
????? ?????? ?????? ??? ?????? ?????? ?????? ??? ?????? ?????? ??? ?? ?????????? ?????? ?????? ???  
????? ?????? ?????? ??? ?? ?????? ?????? ?????? ?????? ?????? ??? ?????? ??? ?????? ?????? ?????? . ?  
????? ?????? ??? ?? ?? ?????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ??? ?????? ?????? ?????? ???  
????? ??? ??? (51).

66. ??? ?? ?????? ??? ????????, ?? ?????????? ??? ?????? ?????? ?????? ??? ??????  
????????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ?????? , ?????? ??? ?? ?????? 306  
??? ?????? ??? ?? ??? ?????? ?? ?????????? ??? ?????? ??? ?????? ??? ?? ?????? ?????? ???  
?? ?????????? ??? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ?????? ???  
????? ??? ?????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??? ?? ???  
????? ??? ??? ??????.

2. ?????? ??????: ?????????? ?????? ??? ?????????? ??? ?????????? ??? ??????????  
????? ??? ?? ?????????? ??????;

67. ?? ?? ?????? ?????? ???, ?? ?????? ?????????? ??? ?????? ?? ?????????????? ??? ?  
????????? ??? ?? ?????????? ??? ?????? ?????? ?????? , ?????? ?????????? ??? ?? ??????????  
????????? ??? ?????? ?????? ??? ?? ?????? ?????? ?????? , ?????? ?? ?????????? ??? ??  
????????? ?????? ?????? ?????? ??? ?????? 98, ?? ?????????? ??? ?? ?????????? ??? ??  
??? ?????? ??? ?? ????. ?? ?????? ??? ?????? ?????? ?????? ?????? ??? ?????? ?? ?????? ??? ??  
????? ?????????? ??? ?????? ??? ?????? ?????? ??? ?????????? ??? ?????????? ???.

68. ? ?????????????? ?????????? ??? ??? ?????? ?????? ?????? ??? ?????? ??????????  
??????. ? ?????????? ??? ? ?????????? ?????? , ?????? ??? ?????? ?????? ?????? ??????  
?????. ?????????? ??? ? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ??????

? ?????????? ??? ? ??, ??????, ? ?????????????? ?????????????? ?????????? ???  
????????????? ??? ? ?????????? ??? ?????????? ?????? III ??? ?????? ??? ? ??, ??? ? ???? ? ?  
????????? , ? ?????????? ??? ?????????? ?????????? ?????? ?????? ??? ? ???? ? ?  
????????????? , ? ?????? ?????? ?? ?????? ?????? ?????? ??????. ? ?????????? ??????????  
????????????? ??????, ?????????????? ?? ?????? ?????? ?????? (52), ??? ? ? ?????? ?????????? ??  
????????? ?????????? ?????????? ?????? ?? ?????????? ?????.

69. ? ?????????? ?? ??? ?????????? ??? ??????. ? ?????????? ?????????? ??????????????  
?? ?????? ?? ?????? ?????????? ?????? ?????????? ??? ? ?????? ?????? ?????? ??????  
????????? ??????.

70. ???? ?????????? ??? ?????????? ??? ?????? ??? ?????????? ??????????, ?????? ??? ??????  
307 ??? ?????? ??? ??? ?, ?? ?????????? ??? ?? ?????????? ?????? ?????????? ??????????  
????????? ?????? ?????? ?????? (53). ?????? ?????????? ?????? ??? ??????????  
????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????????? ??? ? ? ??????????  
????????? ???.

71. ??? ?????????? ??? ? ?????? ?????????? ??? ? ?????????? ?????????? ?????????????? ??  
?? ?????????? ? ?????? ?????????? ??? ?????? ??? ?????? ?????? (????? ?????????? ??? ??  
????????? ??? ? ? ??????), ? ?????? ??? ?????? ?????? ?????????? ??? ? ? ??????????  
????? ?? ?????????? ??? ?????? 306 ??? ?????? ??? ??? ?, ??? ?????? ?????? ???  
????????????? ?? «????????? ??????». ?? ??? ??????, ??' ?? ?????? ??  
????????????? ?????? ?????? ?????? ?????????? ?????????? ?? ?????????????? ??? ??????  
????????? ?? ?????????? ??????, ??? ?????? ?????? ?????? ??? ? ??????????  
????????????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??? ?  
????????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??? ? ??????.

72. ?? ?????????? ??? ??????, ?? ?????????? ??? ?????????? ??? ?????????????? ???  
????????? III ??? ?????? ??? ??? (?? ?????? ?????????? ?? ?????? 98 ??? ??????  
????????? ), ??? ?????????????? ?? ?????????? ??? ?????????? ?? ?????????? ??????????  
????? ??? ??????, ??? ?????? 12, ?????????? «? ?????? ?? ?????????? ??? ??????????  
?????, ?????????????? ??? ?????? ?????? ?????????? ??? ?????? ??? ? ?????????? ???  
????????? ? ?? ?????? ??? ??????».

73. ??? ??????, ??? ?????? ?? ?????? ??????????, ? ?????????? ??? ??????????  
????????? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??????????  
????????? ?? ??? ?????? ?????? ??? ?????? ?? ?????????? III ??? ?????? ??? ? ???? ??? ?  
????? ??? ?????? ?????????? ??? ?????? ?????? ??? ?????? ?????? ??? ? ??????????  
?????????.

74. ???????, ?? ?????? ?????????? ?????????? ??? ? ?? ?????????? ??? ??????????  
????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ??????  
????? ?????? ?? ??? ?????? ??????????, ?????????? ?? ?????????? ??? ?????????? ???  
?????????.

75. ?????????? ??? ?????????? ?? ?????? ?????????? ?????? ?????? ??????????  
????????? ???????, ??? ??? ?????? «??? ?????? ?????????? ??? ??????», ?? ??????  
????????????? ?????????? ?????????? ??? ?????? ??? ?????? ??? ?????? ?????? (??????,  
????? ?? ?? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????  
????????? ? ???).

76. ??????, ?? ?????????? ??? ?????? ??? ?????? ???, ?????? ??? ?????? ??? ? ???? ???  
????????? ??????????. ??? ? ?????? ?????? ?????????? ??? ? ?????????? ?????? ???

???? ?????????????? ?? ??? ??????????? ??????, ??? ?? ?????? ?? ?????? ?? ?????? ?? ?????? ???????????  
?????? ??????????. ??????? ??????? ??????? ?? ??? ???????????, ????????, ?? ??????  
????????? ?? ??? ????? ??????? ?? ??????? ?? ??????? ?????? ?????? ?????? ?? ?????? ??  
??????????, ????? ?? ??? ?????? ?????????? ?? ??????? ?????? ?????? ?????? ?? ?????? ??  
??????, ? ??????? ?? ??? ?????????? ?????????????? ?????? ?? ??????????? ?????? ??  
????? ?????????? ?? ??? ????? ???????????, ??????, ??? ?? ?????????? (?? ? ?????? ??  
????????? ??????? ??????????) ???, ???????, ??? ?????????? ?????????? ?? ?????? ???????  
??? ?????? ?? (54).

77. ??? ?? ?????? ??? ???????, ?? ?????????? ??? ?? ?????? ?? ?????? ?? ??????? ??????????????  
?????? ????? ?? ??? ?? ????? 98 ??? ??????? ?? ??? ??, ?? ?????????? ?? ?? ?????????? III,  
?????? 12, ??? ????? ???????, ?????? ?? ?????????? ?? ??? ?? ?????? ?? ?????? ?? ?????? ??  
????????? ?? ??? ?????????? ?? ?????? ?????????? ?? ??? ?? ?????????? ?? ?????? ?? ?????? ??  
?????? 306 ?? . ??? ????? ???????, ??? ?????? ?? ?????????? ?????????? ?????????? ??????????  
????????? ?? ??? ?????? ?????????? ??????????.

V. ??????

78. ??? ?? ?????? ??? ???????, ??????? ?? ?????????? ?? ?????????? ?? ?????????? ??  
Bundesfinanzhof (????????????? ???????????, ??????????, ?????????) ?? ??????????:

1. ?? ????? 306 ??? ??????? 2006/112/? ?? ???????????, ?? 28?? ?????????? 2006,  
?????? ?? ?? ????? ??????? ????? ?????????????? ?????, ?????? ?? ?????????? ?? ?? ???  
?????? ?? ?? ?????? ?????????? ?? ?? ?????????? ?????? ?????????? ?? ?? ?????????? ?? ?? ???  
????????? ?? ??? ????? ?????????? ?? ?? ?????? ?????? ?????? ?????????? ?? ?? ???????, ?? ?? ???  
????????? ?? ??? ?????????? ?? ?? ?????? ?????? ?????? ?????? ?????????? ?? ?? ???????.

2. ?? ????? 98 ??? ??????? 2006/112, ?? ?????????? ?? ?? ?????????? ??, ?????? 12, ??  
?? ??? ???????, ?????? ?? ?????????? ?? ?? ?????? ?? ?? ?????? ?????? ?????????? ??  
????????? ?? ?? ?????? ?????????? ?? ?? ?????????? ?????? ?????? ?????? 306 ?? .  
?? ?????? ???????, ??? ?????? ?? ?????????? ?????????? ?????????? ?????????? ?????????? ??  
??? ?????? ?????????? ??????????.

1 ?????? ?? ??????????: ? ??????.

2 ?????? ?? ??????????, ?? 28?? ?????????? 2006, ?????? ?? ?? ?????? ?????? ??  
????????????? ?? (?? 2006, L 347, ?. 1).

3 ?????? ?? 17?? ?? 1977, ??? ?????????? ?? ?? ?????????? ?? ?? ?????? ?? ??  
????????? ?? ?? ?????? ?????? ?????? - ?????? ?????? ?? ?? ?????????? ?????? ?????????? ???:  
????????? ?????????? ?? (?? ??. ???. 09/001, ?. 1).

4 ?????? ?? 12?? ??????? 1992, Van Ginkel (C?163/91, EU:C:1992:435).

5 ?????? ?? 9?? ?????????? 2010, Minerva Kulturreisen (C?31/10, EU:C:2010:762,  
?????? 21 ??.), ??? ?????? ?? 1?? ??????? 2012, Star Coaches (C?220/11, EU:C:2012:120).

6 ?????? ?? 21?? ??????? 2007, Ludwig (C?453/05, EU:C:2007:369, ????? 19).

7 ??????, ?? ?????? ?? ?????????? ?? ?? ?????? ?? ???????????, ??? ??????  
????????????? ?? ?? 306 ??? ??????? ?? ?? ??? ?? ?? ?????? ?????????? ?? ?? ??????  
????????? ?? ?? ?????? ?????????? ?? ?? ?????????? ?? ?? ?????????? ?? ?? ??????????  
????????? ?? ?? ?????? ?????????? ?? ?? ?????????? ?????? ?????????? ?? ?? ??????????  
????????? ?? ?? ?????? ?????????? ?? ?? ?????????? ?????? ?????????? ?? ?? ??????????

?????????? ?? ??????. ????, ????, ?????? 12?? ???????? 1992, Van Ginkel, ?? ??????????, ???' ????, ?????? ??? ? ???????? «?? ?????????? ?????? ???» ?????????? ?? ? ???? ?????? ?????? ?????? 26 ??? ????? ?????? ?????? ?????? ??? ?????????? 1 ??? ?????? ?????? ?????? ??? ?????? ?????? ?????? ??? ? ?????????? ?????? ??? ? ?????????? ?????? ?????? ??? ?????? ??? ? ?????? (C?163/91, EU:C:1992:435, ????? 21): «? ?????????? ??? ?????????? ?????? 26 ??? ????? ?????? ?????? ?????? ??? ?????? 13?? ?????? 2014, Jetair ??? BTWE Travel4you (C?599/12, EU:C:2014:144, ?????? 54 ??? 55), ??? ?????????? ??? ?????? ?????????? M. Poiares Maduro ??? ?????? Ist (C?200/04, EU:C:2005:394, ?????? 35). ?????? ?????? ?????? 44, 50, 54, 56, ?????????? 1, ?????? ???, ??? 153 ??? ?????? ??? ??? ??? ?????????? ?? ?????????? ? ?????????? «? ?????? ?????? ??? ??? ??? ?????? ??? ?????? ?????? ?????? 306, ?????????? 1, ?????? ??????, ??? ?????? ??? ??? ??? ???, ??? ?????? («????????? ??? ?????? ???») ?????????? ??? ?????? ?????? ??? ??? ?????? ?????? ??? ?????? ?????? ?????? ??? ?????? ??????.

8 ?????? ??? 12?? ???????? 1992, Van Ginkel (C?163/91, EU:C:1992:435).

9 ?????? ??? 1?? ?????? 2012, Star Coaches (C?220/11, EU:C:2012:120).

10 ?????? ??? 1?? ?????? 2012, Star Coaches (C?220/11, EU:C:2012:120).

11 ??? ??? ??????, ?????????? ?????? ??? ? ?????????? ?????? ?????? ?????????? ?????????? ?????????? ??? ?????? in-house. ??????, ?????? ?? ?????? ????? ?????????? ??? ?????? ??? ?????????? ?????? ??? ?????? ??? ?????? ?????? ?????? ??? ?????? ?????? ?????? ??? ?????? ?????? ?????? ??? ?????? ?????? ?????? ??? ??????.

12 ?????? ??? 1?? ?????? 2012, Star Coaches (C?220/11, EU:C:2012:120, ?????? 22 ??? 23).

13 ?????? ??? 1?? ?????? 2012, Star Coaches (C?220/11, EU:C:2012:120, ?????? 22 ??? 23).

14 ?????? ??? 12?? ???????? 1992, Van Ginkel (C?163/91, EU:C:1992:435). ?????? ??? 22?? ???????? 1998, Madgett ??? Baldwin (C?308/96 ??? C?94/97, EU:C:1998:496, ????? 18).

15 ?????? ??? 12?? ???????? 1992, Van Ginkel (C?163/91, EU:C:1992:435, ?????? 22 ??? 26).

16 ?????? ??? 12?? ???????? 1992, Van Ginkel (C?163/91, EU:C:1992:435, ????? 24), ? ?????? ?????????? ??? ?????? ??? 26?? ?????????? 1992, Hacker (C?280/90, EU:C:1992:92), ??? ?????? ??? ?????? ??? ?????? ??? ?????? 16 ??? ?????? ??? ?????? ??? ?????? ??? 27?? ?????????? 1968, ??? ?? ?????? ?????????? ??? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? (??? ????: ?????? ??? ??????) (?? 1982, L 388, ?. 7).

17 ?????? ??? ?????? ?????????? ?? ??? ?????? ??? 9?? ?????????? 2010, Minerva Kulturreisen (C?31/10, EU:C:2010:762). ??? ?????? ???, ?? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????.

18 ?????? ??? ????????, ?? ?????? *Study on the review of the VAT Special Scheme for travel agents and options for reform*

», ??????? ???????, TAXUD/2016/AO-05, ??????????? 2017 (????????????? ??? ??????????? ??? ??????????? ??????????? ??????????? ???????????), ?. 26, ?????? 3.2.

19 ??????? ??????? ??? ???????????, ??? 8?? ??????????? 2002, ??? ??? ???????????  
??? ??????? 77/388/??? ??? ????? ?? ?????? ??????? ??? ??? ?? ?????????? ???????,  
COM(2002) 64, ?????? (?? 2002, C 126E, ?. 390). ? ??????? ??? ??????????  
?????????????, ?. ??????? ?????????? ??? ?????????? ?? ??????? ??? ?????? ???  
????????? (?? 2014, C 153, ?. 3). ?. ?????? ??? ?????????? ?????? ??? ??????????  
2002/0041 (CNS), ?????? ?? «??? – ?????? ??????? ??? ?? ?????????? ??????»  
(17567/09).

20 ??., ????????, ???????? ??? ??? ?????? Skarpa Travel (C?422/17, EU:2018:XXX, ?????? 30 ??? 33).

21 ?????????? ?? 12?? ?????????? 1992, Van Ginkel (C?163/91, EU:C:1992:435, ?????? 13  
??? 14), ??? 22?? ?????????? 1998, Madgett ??? Baldwin (C?308/96 ??? C?94/97,  
EU:C:1998:496, ????? 18), ??? 19?? ?????????? 2003, First Choice Holidays (C?149/01,  
EU:C:2003:358, ??????? 23 ??? 24 ??? ??? ?????????????? ??????????), ??? 9?? ??????????  
2010, Minerva Kulturreisen (C?31/10, EU:C:2010:762, ??????? 17 ??? 18 ??? ???  
?????????? ????????, ??????? ??? 1?? ??????? 2012, Star Coaches (C?220/11,  
EU:C:2012:120, ????? 19), ?????????? ??? 25?? ?????????? 2012, Kozak (C?557/11,  
EU:C:2012:672, ????? 19), ??? 26?? ?????????? 2013, ??????? ??? ?????? (C?189/11,  
EU:C:2013:587, ????? 58), ??? ??? 16?? ?????????? 2014, Ibero Tours (C?300/12,  
EU:C:2014:8, ????? 25). ??., ??????, ??????? ??? 8?? ?????????? 2018, ??????? ???  
????????? (C?380/16, ?? ??????????????, EU:C:2018:76, ??????? 41 ??? 42 ??? 48).

22 ??????? ??? ??????????? ?????????????? ??? ??? ???????????, ??? 25?? ?????????? 2015,  
?????? ?? ?? ?????????? ??????? ??? ??? ?????????????? ??????????????  
?????????????, ? ????? ?????????? ??? ?????????? (?) 2006/2004 ??? ??? ??????  
2011/83/?? ??? ?????????? ?????????????? ??? ??? ?????????? ??? ?????????? ??? ??????  
90/314/??? ??? ?????????? (?? 2015, L 326, ?. 1).

23 ? ??????? 2015/2302 ?????? ??? ????? 3, ?????????? 2, ??? ?? «??????» ??????? ?  
????????? ?????????? ??? ?????????? ?????? ?????????????? ?????? ?????????? ?????? ??? ???????  
??? ?????? ??????? ? ??? ????? ??????. ????????????, ??? ????? 3, ?????????? 1, ??  
«????????? ??????» ??????? «?) ? ??????? ???????, ?) ? ?????? ?????????? ???  
??? ??????? ?????????? ??? ?????? ??? ??????? ?????? ??? ??? ?????????? ??? ???????  
?????????, ?) ? ??????? ?????????? [...] ??? ?) ?????? ?????? ?????????? ??? ???????  
??? ?????? ?????????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ???????  
??, ?? ? ??».

24 ???. ?????????? ??? 11?? ???????????? 1999, AFS Intercultural Programs Finland (C?237/97, EU:C:1999:69), ??? ??? 13?? ?????????? 2005, C?200/04, ISt (C?200/04, EU:C:2005:608, ??????? 30 ??? 33). ??., ??????, ?????????? ??? ??????? ?????????? ?????????? ? Poiares Maduro ????. ??????? ISt (C?200/04, EU:C:2005:394, ?????? 33).

25 ??????? ?? 21?? ??????? 2007, Ludwig (C?453/05, EU:C:2007:369).

26 ??????? ??? 21?? ??????? 2007, Ludwig (C?453/05, EU:C:2007:369, ????? 17). ??  
?????????? ?????????? ??? ?????? 2, ?????????? 1, ??? ????? ???????, ??? ?????????? ??? ?  
????????? ?????? ? ? ?????? ?????????? ??? ?????????????????? ?? ?????????? ?????? ???  
????????? ??? ?????? ??? ?????????? ??? ?????? ??? ? ?????? ?????? ?? ??? ?????? ???  
????????? ?? ??? . ? ?????? ??? ?????????????? ?????? (???? ?????? ??? ??????)

?????????) ??? ???? 2, ?????????? 1, ??????? ??, ??? ??????? ??? ??? ???.

27 ??? ???? ??? 21?? ?????? 2007, Ludwig (C?453/05, EU:C:2007:369, ?????? 18 ??? 19 ??? ??? ????? ?????????? ???????).

28 ??? ???? ??? 22?? ???????? 1998, Madgett ??? Baldwin (C?308/96 ??? C?94/97, EU:C:1998:496).

29 ??? ???? ??? 13?? ???????? 2005, ISt (C?200/04, EU:C:2005:608).

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

31 ??? ???? ??? 13?? ???????? 2005, ISt (C?200/04, EU:C:2005:608, ?????? 26 ??? 29).

32 ??., ????, ????, ??? 20?? ?????? 2013, Newey(C?653/11, EU:C:2013:409, ?????? 41 ??? 45), ? ????, ??????, ?????? ????, ??? ?????? ??? «?????? ??????» ??? ?? ??????, ?? ?????????? ???????????, ? ?????????? ?????????? ?? ?????? ?????? ??? ?????? ??? ?????????? ??? ?? ?????????? ?????? ??? ?????????? ?????? ??? ?????????? ?????? ??? ?????????? ?????? ??? ?????????? ?????? ??? ?????????? ?????? ??? ?????????? «?????????» ??? ?????????? ??? ??????.

33 ??? ?? ??????? ??? ?? ?????? ?????? ??? ?????? ???. ???. ?????? 55 ??? 56 ??? ??????? ???????.

34 ??? ?????? ??? ?????? ??? 22?? ???????? 1998, Madgett ??? Baldwin (C?308/96 ??? C?94/97, EU:C:1998:496) (in-house ?????? ??????? ?? ?????? ?????????? ??? ??????), ??? 6?? ???????? 2005, MyTravel (C?291/03, EU:C:2005:591) (????? ?????? ????, ?? in-house ?????? ???????), ??? ??? 25?? ???????? 2012, Kozak (C?557/11, EU:C:2012:672) (????? ?????? ??? in-house ?????? ??????). ? ??????? ??? ??????? ?????????? ??? ?????? ??? ?????? Minerva, ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? (????? ??? 9?? ???????? 2010, Minerva Kulturreisen, C?31/10, EU:C:2010:762). ??????, ?? ?????????? ??? ?????? ??? ?????????? ?????? ?????? ??? ?????? ?????? ?????????? ??? ?????? ??? 1?? ?????? 2012, Star Coaches (C?220/11, EU:C:2012:120) (????? ??????? ??? ??????).

35 ??? ??? ?? ? ??????? ??? ?????? ??? ?????? ?????? ?????????? ??? ?????? ?? ?????? ?? ??? ??????? in-house, ??? ?????????? ??? ?????? ?????? ??? 22?? ???????? 1998, Madgett ??? Baldwin (C?308/96 ??? C?94/97, EU:C:1998:496), ??? ??? 13?? ???????? 2005, ISt (C?200/04, EU:C:2005:608).

36 ??.. ?????? 39 ??? ??????? ?????????? ????. ??? ?????? ??????, ?? ?????????? ??????? ?????? ?????? ?????????? ??? ?????? ?? ?????? ?????????? ??? ?????? ?? ?????? ?????????? ??????.

37 ??? ???? ??? 25?? ???????? 2012, Kozak (C?557/11, EU:C:2012:672, ?????? 25 ??? 26).

38 ?????? ??? 6?? ???????? 2005, MyTravel (C?291/03, EU:C:2005:591, ?????? 41).

39 ??????? ??? 12?? ?????????? 1992, Van Ginkel (C?163/91, EU:C:1992:435).

40 ??????? ??? ???????????? ??? 1?? ?????? 2012, Star Coaches (C?220/11, EU:C:2012:120).

41 «[?] ??????? ??? ???????? ??? ?? ?????????? ?????? ?? ??? ??????? ?????? ??????? ???????, ?????? ?????? ?? ?????????????? ?????????? ????? ?????????? ??? ?????????? ?? ???? ?????? ?? ?????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ». ?????? ??? 12?? ?????????? 1992, Van Ginkel (C?163/91, EU:C:1992:435, ??? 24), ? ????? ?????????? ??? ?????? ??? 26?? ?????????? 1992, Hacker (C?280/90, EU:C:1992:92), ? ?????, ???, ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ??? 16 ??? ?????????? ??? ??????????.

42 ??? ???, ? ??????? ??????? ??? ?????? ?????? ?????? ?????? ??? ?????? ??? ?????????? ??????? ?? ?????? ???? Star Coaches, ??? ?? ?????????? ?????????? ??? ?????? ??? ?????? ??? ?????????? ?????????? ??? ?????????? ???.

43 ??? ?????????? ??? ?? ?????????? ??? ?????????????? ??? ?????????????? ??????????, ?. ?????? 48 ??? 51 ??? ?????? ??? ??????????.

44 ???. ?????????? ??? 22?? ?????????? 1998, Madgett ??? Baldwin (C?308/96 ??? C?94/97, EU:C:1998:496, ?????? 39 ??? 47), ??? ??? 6?? ?????????? 2005, My Travel (C?291/03, EU:C:2005:591, ?????? 22 ??? 41).

45 ???. ?????? 6 ??? 8 ??? ??????? ??????????. ?? ????? 306 ?????????? ?????? ?? «????????? ?????? ??? ?????? ??????????», ??? ?????????? ??????.

46 ??., ?????? 31 ??? 35 ??? ??????? ??????????.

47 ???. ?????????? ??? 22?? ?????????? 1998, Madgett ??? Baldwin (C?308/96 ??? C?94/97, EU:C:1998:496, ?????? 5 ??? 34), ??? 19?? ?????? 2003, First Choice Holidays (C?149/01, EU:C:2003:358, ?????? 22), ??? 9?? ?????????? 2010, Minerva Kulturreisen, (C?31/10, EU:C:2010:762, ?????? 16), ??? ??? 25?? ?????????? 2012, Kozak (C?557/11, EU:C:2012:672, ?????? 20 ??? ????? ?????????????? ??????????).

48 ???. ?????? 21 ??? 23 ??? ??????? ??????????.

49 ?????? ??? 1?? ?????? 2012, Star Coaches (C?220/11, EU:C:2012:120).

50 ?????? ??? 22?? ?????????? 1998, Madgett ??? Baldwin (C?308/96 ??? C?94/97, EU:C:1998:496, ?????? 19).

51 ???. ?????? ??? ?????????? ??? ??? ?????? «*Study on the review of the VAT Special Scheme for travel agents and options for reform*», ?????? ??????, ?????????? 2017 (?????????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ??????????), ?. 11.

52 ?????? ??? 9?? ?????? 2017, Oxycure Belgium (C?573/15, EU:C:2017:189, ?????? 25 ??? ??? ?????????????? ??????????).

53 ???. ?????? 50 ??? ??????? ??????????. ??., ?????, ?????? ??? 27?? ?????????? 1992, ??????? ??? ?????? (C?74/91, EU:C:1992:409, ?????? 16).

54 ?? ??????? ?? ???????????, ???' ???????, ??? ?? ?????????? ??? ?????? ???  
?????????? ?????????? ??? ?????????? ?? ?????? ?????????? ??? ?? ??????????  
?????????? ?????? ?? ?????? ?????? ?????????? ??? ?? ?????????? ?????????? ???  
?????????? ?? ?????? ??? ?? ?????????? ??? ?? ?????????? ??? ?? ?????????? ???  
?????????. ?. ?????? ??? 27?? ???????? 1992, ???????? ??? ?????????? (C?74/91,  
EU:C:1992:409, ?????? 16 ??? 26).