

Table of Contents

<i>Table of Cases</i>	ix
<i>Table of Legislation</i>	xxi
<i>List of Abbreviations</i>	xxviii
1. General Introduction	1
1. Motivations for the Study	1
2. The Scope of and Terminology Used in the Study	11
3. The Method and Plan of the Study	16
2. Territorialized and Internationalized Arbitration Tribunals	19
1. Introduction	19
2. Features of the Arbitral Process	20
3. Territorialized Tribunals	23
4. Internationalized Tribunals	44
5. General Conclusions	59
3. Choice-of-Law Rules	61
1. Introduction	61
2. The Linkage Between <i>Lex Arbitri</i> and Choice-of-Law Methodology	62
3. Choice-of-Law Rules	67
4. General Conclusions	103
4. The Scope of the Arbitration Agreement: Claims and Counterclaims of a National and/or International Nature	105
1. Introduction	105
2. Characterization: The National or International Nature of Claims	106
3. The Scope of the Arbitration Agreement: National and/or International Claims	112
4. Counterclaims by Host States	128
5. General Conclusions	154
5. The Primary Applicability of National Law and the Role of International Law	157
1. Introduction	157
2. Reasons for the Primary Applicability of National Law	158
3. The Role of International Law when National Law Primarily Applies	181
4. General Conclusions	211
6. The Primary Applicability of International Law and the Role of National Law	213
1. Introduction	213
2. Reasons for the Primary Applicability of International Law	213
3. The Role of National Law when International Law Primarily Applies	240
4. General Conclusions	269

7. Concurrent Application of and Reference to National and International Law in Case of Consistency	271
1. Introduction	271
2. Arbitral Practice	275
3. General Conclusions	293
8. Concluding Observations	295
 <i>Index</i>	 303