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Regulations on tax treatment of cloud computing; OIRA review completed

OMB's Office of Information and Regulatory Affairs (OIRA) reported it has completed review of proposed regulations concerning the tax treatment relating to cloud computing and other computer-related transactions (sources inside or outside the United States).

According to the [OIRA website](#), the review was completed on July 10, 2019. Treasury regulations that are identified as "major" regulations are subject to review by OMB's OIRA before being issued, pursuant to Executive Order 13771. Treasury and the IRS now will be expected to release these proposed regulations, but the timing of release is uncertain.

The proposed regulations are identified as follows:

- [**RIN: 1545-BM41:**](#) *Characterization of certain cloud transactions*

A brief description of these regulations, as provided on the OIRA website, is:

This regulation will provide guidance for characterizing certain cloud computing and certain other transactions (including computer programs and other digital content) for purposes of chapter 1, subchapter N of the Internal Revenue Code.

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