



MULTISTATE TAX COMMISSION

### **Uniformity Committee Meeting**

Thursday, November 5, 2020

2:00 P.M. – 5:00 P.M. Eastern

(Held via Video Conference)

### **Report on Uniformity Developments**

Helen Hecht, Uniformity Counsel

**NOTE:** Developments related to *Wayfair*/marketplace implementation and to the MTC's Model for Reporting Federal Adjustments will be provided with those separate agenda items. In addition, we invite state representatives to provide information on any developments of interest in their states as part of the committee's roundtable.

#### **Combined Filing**

The Finnigan alternative to our combined filing model statute is still awaiting responses to the Bylaw 7 survey. If you have not sent in your survey, we need it in order to proceed.

#### **Practices under P.L. 86-272**

The proposed revisions to the Statement of Information Concerning Practices of Multistate Tax Commission and Signatory States under Public Law 86-272, approved by this committee, was submitted to a public hearing on August 5. We expect the hearing officer, Robert Desiderio, Esq., to submit his report at the Executive Committee meeting on November 20, 2020.

#### **Market-Based Sourcing**

The OECD published its preliminary work on taxing the digital economy in its Reports on the Pillar One and Pillar Two Blueprints, on October 12, 2020. The report on Pillar One would adopt formulary apportionment for certain income and would use a market-based sourcing approach with a hierarchy of sourcing rules that are similar, in many ways, to the rules states have adopted. The OECD is currently seeking input on its preliminary proposals.