

# **International Taxation of Cloud Computing**

Permanent Establishment, Treaty  
Characterization, and Transfer Pricing

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# Table of Contents

Acknowledgements .....	XIX
List of Abbreviations .....	XXI
Bibliography .....	XXXIII
<b>Part I: De Lege Lata .....</b>	<b>1</b>
Chapter 1: Introduction .....	3
Chapter 2: Cloud Computing .....	5
Section I Basics .....	5
Section II Typical Fact Patterns .....	9
§ I. Introduction .....	9
§ II. Case Study A: Cloud Provider .....	9
§ III. Case Study B: Cloud Customer .....	10
Section III Types of Transactions .....	13
§ I. Introduction .....	13
§ II. Taxonomy .....	14
§ III. Commentary .....	16
Section IV Parties to Transactions .....	19
§ I. Introduction .....	19
§ II. Cloud-Specific Transactions with a Centralized Provider .....	22
A) Cloud-Specific Pricing .....	22
B) Risks .....	25
§ III. Transactions within a Decentralized Cloud Provider .....	27
A) Introduction .....	27
B) Software Development Team .....	28

C)	Hardware Operation Team .....	29
D)	Intellectual Property Rights Company .....	32
E)	Real Estate Company .....	35
Section V	Summary.....	37
Chapter 3:	Current International Taxation Rules .....	39
Section I	Permanent Establishments .....	39
§ I.	Introduction.....	39
§ II.	General Definition of Permanent Establishment.....	42
A)	Introduction .....	42
B)	Place of Business Test .....	43
1)	Introduction .....	43
2)	Tangible Nature of a Place of Business .....	44
3)	Right of Use ("at disposal") .....	44
a)	Introduction .....	44
b)	Negative Definition.....	48
i)	Legal Right.....	48
ii)	Association with Other Permanent Establishment Tests.....	48
iii)	Association with Other Types of Permanent Establishments .....	51
iv)	Mere Presence.....	52
4)	Conclusion on the Place of Business Test .....	53
C)	Fixation Test .....	53
1)	Introduction .....	53
2)	Geographical Link.....	54
3)	Duration.....	54
a)	Required Minimum Period of Time .....	55

b)	Non-temporary Nature .....	56
4)	Conclusion on the Fixation Test .....	57
D)	Business Activity Test .....	57
1)	Introduction and General Features of Business Activity .....	57
2)	Functional Integration (“through which”) .....	60
3)	Attribution of Activity (“of an enterprise”).....	64
a)	Introduction.....	64
b)	Standard Case: Personnel .....	65
c)	Subcontractors? .....	66
d)	Conclusion on the Attribution of Activity .....	69
4)	Conclusion on the Business Activity Test .....	69
E)	Preparatory or Auxiliary Activities Exception .....	70
1)	Introduction .....	70
2)	List of Examples .....	71
3)	General Criterion .....	73
4)	Anti-avoidance Rules.....	75
5)	Conclusion on the Activities Exception.....	76
F)	Conclusion on the General Definition .....	77
§ III.	Dependent Agent Permanent Establishment .....	77
A)	Treaty Definition .....	77
B)	Person.....	80
C)	Authority to Conclude Contracts in the Name of the Enterprise .....	81
1)	Literal Meaning of Pre-BEPS Art. 5(5) MOECD ...	81
2)	“Commissionnaire” Arrangements and Similar Schemes.....	83

3)	BEPS Action 7 .....	84
4)	Economic Interpretation of the Pre-BEPS Art. 5(5) MOECD .....	88
5)	Summary.....	91
D)	Exclusion of Independent Agents .....	91
1)	Introduction .....	91
2)	Independence of the Agent .....	92
3)	Acting in the Ordinary Course of the Agent's Business .....	94
4)	BEPS Action 7 .....	95
5)	Summary.....	97
E)	Habitual Exercise.....	97
F)	Preparatory or Auxiliary Activities Exception .....	99
G)	Conclusion on Dependent Agent Permanent Establishments .....	99
§ IV.	Services Permanent Establishment.....	100
§ V.	Substantial Equipment Permanent Establishment .....	101
§ VI.	Swiss Domestic Permanent Establishment.....	102
A)	Introduction and Scope of Application .....	102
B)	Basics and Legislative History.....	103
C)	Comparison with the MOECD General Definition .....	105
D)	Comparison with a Dependent Agent Permanent Establishment.....	107
E)	Summary.....	110
§ VII.	Conclusion on Permanent Establishments .....	111
Section II	Treaty Characterization.....	113

§ I.	Introduction .....	113
§ II.	Income from Immovable Property .....	114
A)	General Features.....	114
B)	Immovable Property.....	115
C)	Accessories to Immovable Property.....	117
D)	ICS Equipment .....	118
E)	Summary .....	119
§ III.	Royalties.....	120
A)	General Features.....	120
B)	Definitions .....	121
1)	Royalties.....	121
2)	Copyright.....	122
3)	Know-How .....	122
C)	Summary .....	124
§ IV.	Capital Gains.....	124
§ V.	Technical Services.....	125
A)	General Features.....	125
B)	MOECD .....	128
C)	UN Model.....	128
D)	Law of the Source Jurisdiction.....	129
E)	Summary .....	130
§ VI.	Business Profits .....	130
§ VII.	Summary of Treaty Characterization .....	132
Section III	Transfer Pricing .....	135
§ I.	Introduction .....	135
§ II.	Associated Enterprises.....	137

§ III.	Arm's Length Principle .....	138
§ IV.	Comparability Analysis.....	140
§ V.	Transfer Pricing Methods .....	141
A)	Introduction .....	141
B)	Comparable Uncontrolled Price Method.....	142
C)	Cost-Plus Method .....	142
D)	Transactional Net Margin Method .....	144
E)	Transactional Profit Split Method .....	147
F)	Summary on Transfer Pricing Methods.....	149
§ VI.	Swiss Legal Basis for Initial Adjustment .....	150
A)	Introduction .....	150
B)	Commercial Accounts.....	150
C)	Corrective Rules and Adjustments.....	151
D)	Connection with Profit Attribution to Permanent Establishments .....	152
§ VII.	Summary of Transfer Pricing.....	154
Section IV	Summary of the Relevant Rules .....	157
Chapter 4:	Application to Cloud Computing .....	159
Section I	Permanent Establishment .....	159
§ I.	General Definition of Permanent Establishment	159
A)	Introduction .....	159
B)	Case Study A: Cloud Provider .....	162
1)	Introduction .....	162
2)	Place of Business Test .....	163
3)	Fixation Test .....	165
4)	Business Activity Test.....	166
a)	Introduction .....	166

b)	General Features .....	166
c)	Functional Integration ("through which").....	166
d)	Attribution of Activity ("of an enterprise") ....	168
e)	Conclusion on the Business Activity Test.....	169
5)	Exception of Preparatory or Auxiliary Activities	169
a)	Introduction.....	169
b)	Lists of Examples .....	170
c)	General Criterion.....	172
d)	Conclusion on the Exception of Activities ....	174
6)	Conclusion on Case Study A: Cloud Provider ...	174
C)	Case Study B: Cloud Customer.....	175
1)	Introduction .....	175
2)	Place of Business Test .....	175
a)	Introduction.....	175
b)	Tangible Nature of the Place of Business.....	175
c)	Right of Use ("at disposal") .....	177
i)	Introduction.....	177
ii)	Right of Use in the Context of E-commerce .....	177
iii)	Critical Appraisal .....	179
iv)	Application to Cloud Computing .....	182
v)	Possible Answer No. 1: Cloud Customers Have a Right of Use over the Physical Server .....	183
vi)	Possible Answer No. 2: Cloud Customers Have No Right of Use over the Physical Server .....	185
d)	Conclusion on the Place of Business Test....	188

3)	Fixation Test .....	188
a)	Introduction .....	188
b)	Execution of Virtual Servers Shared Between Different Items of Physical Infrastructure	189
c)	Interruptions .....	190
d)	Conclusion on the Fixation Test.....	191
4)	Business Activity Test.....	192
a)	Introduction .....	192
b)	General Features of the Business Activity.....	192
c)	Functional Integration ("through which") .....	193
d)	Attribution of Activity ("of an enterprise").....	194
e)	Conclusion on the Business Activity Test .....	195
5)	Exception of Preparatory or Auxiliary Activities	195
a)	Introduction .....	195
b)	Lists of Examples.....	195
c)	General Criterion .....	196
d)	Anti-avoidance Rules.....	197
e)	Conclusion on the Exception of Activities.....	199
6)	Conclusion on Case Study B: Cloud Customer..	199
D)	Conclusion on the Application of the General Definition.....	200
§ II.	Dependent Agent Permanent Establishment.....	200
A)	Introduction .....	200
B)	Person .....	200
C)	Authority to Conclude Contracts in the Name of the Enterprise .....	203
1)	Literal Meaning of Pre-BEPS Art. 5(5) MOECD..	203

2)	BEPS Action 7 .....	204
3)	Economic Interpretation of Current Art. 5(5) MOECD .....	206
D)	Exclusion of Independent Agents .....	207
E)	Habitual Exercise .....	209
F)	Exception of Preparatory or Auxiliary Activities .....	210
G)	Conclusion on the Application of the Dependent Agent Permanent Establishment .....	210
§ III.	Services Permanent Establishment .....	211
§ IV.	Substantial Equipment Permanent Establishment .....	211
§ V.	Swiss Domestic Permanent Establishment .....	212
A)	Introduction .....	212
B)	Case Study A: Cloud Provider.....	213
1)	Introduction .....	213
2)	Place of Business Test .....	213
3)	Fixation Test.....	214
4)	Business Activity Test and Exception of Preparatory or Auxiliary Activities .....	214
5)	Conclusion on Case Study A: Cloud Provider ...	215
C)	Case Study B: Cloud Customer.....	216
1)	Introduction .....	216
2)	Place of Business Test .....	216
3)	Fixation Test.....	217
4)	Business Activity Test and Exception of Preparatory or Auxiliary Activities .....	217
5)	Conclusion on Case Study B: Cloud Customer .	218

D)	Conclusion on the Application of the Swiss Domestic Permanent Establishment .....	218
§ VI.	Conclusion on the Cloud Computing Permanent Establishment .....	219
Section II	Treaty Characterization.....	221
§ I.	Introduction.....	221
§ II.	Income from Immovable Property.....	223
A)	Transactions .....	223
B)	Data Center as Immovable Property .....	225
C)	Server as a Constituent Part.....	225
D)	Server as an Accessory.....	227
E)	Server as ICS Equipment .....	228
F)	Conclusion .....	231
§ III.	Royalties .....	232
A)	Copyright .....	232
1)	Introduction in the Context of E-Commerce.....	232
2)	Cloud Computing Transactions at Issue .....	235
3)	Distinction from Software Code Transmission .....	238
4)	Conclusion .....	240
B)	Know-How.....	240
C)	Conclusion .....	242
§ IV.	Capital Gains .....	243
§ V.	Technical Services .....	245
A)	OECD and UN Model .....	245
B)	Law of the Source Jurisdiction .....	248
§ VI.	Business Profits .....	249
A)	General Considerations.....	249

B)	Summary .....	250
§ VII.	Conclusion on Treaty Characterization .....	252
Section III	Transfer Pricing .....	255
§ I.	Introduction .....	255
§ II.	Comparability Analysis .....	256
A)	Cloud-Specific Transactions with a Centralized Provider .....	256
B)	Transactions within a Decentralized Cloud Provider .....	258
1)	Between the Software Development and Hardware Operation Teams.....	258
2)	Between Software Development Team and Intellectual Property Rights Company.....	262
3)	Between Hardware Operation Team and Real Estate Company.....	263
C)	Conclusion on the Comparability Analysis.....	264
§ III.	Choice of Transfer Pricing Method .....	265
A)	Introduction .....	265
B)	Comparable Uncontrolled Price Method .....	265
C)	Cost-Plus Method.....	266
D)	Transactional Net Margin Method.....	270
E)	Transactional Profit Split Method .....	272
§ IV.	Conclusion on Transfer Pricing .....	274
Chapter 5:	Conclusion De Lege Lata .....	277
<b>Part II: Are the Current Rules Appropriate?</b> .....		<b>279</b>
Chapter 1:	Introduction .....	281
Chapter 2:	Ottawa Principles of Taxation .....	285
Section I	Effectiveness and Fairness.....	285

Section II	Certainty and Simplicity .....	289
Section III	Flexibility .....	295
Section IV	Neutrality .....	301
Section V	Efficiency .....	303
Section VI	Summary.....	305
Chapter 3:	Prior Work .....	307
Section I	Introduction .....	307
Section II	Modification of the OECD COMMENTARY .....	311
Section III	PE Report .....	315
Section IV	TP Report.....	319
Section V	Example in BEPS Action 1 .....	323
§ I.	Problem .....	323
§ II.	Risk Level .....	325
§ III.	Connection with Cloud Computing .....	332
§ IV.	Conclusion on BEPS Action 1 .....	334
Section VI	Summary of Prior Work .....	335
Chapter 4:	Application to Cloud Computing .....	337
Section I	Introduction .....	337
Section II	Effectiveness and Fairness .....	337
§ I.	Introduction.....	337
§ II.	Permanent Establishment .....	339
A)	Manipulation of the Location of Virtual Servers	339
1)	Problem .....	339
2)	Connection with Cloud Computing.....	340
3)	Risk Level.....	341
4)	Conclusion .....	342

B)	Avoidance of Permanent Establishment Status Through Lack of Personnel .....	344
1)	Problem.....	344
2)	Connection with Cloud Computing .....	345
3)	Risk Level .....	345
4)	Conclusion.....	346
C)	Avoidance of Permanent Establishment Status Through Outsourcing .....	347
1)	Problem.....	347
2)	Connection with Cloud Computing .....	348
3)	Risk Level .....	350
4)	Conclusion.....	351
§ III.	Avoidance of Withholding Taxes .....	352
A)	Problem.....	352
B)	Connection with Cloud Computing .....	352
C)	Risk Level .....	353
D)	Conclusion.....	354
§ IV.	Transfer Pricing.....	354
A)	Difficulty of Valuing Intangibles .....	354
1)	Problem.....	354
2)	Connection with Cloud Computing .....	356
3)	Risk Level .....	359
4)	Conclusion.....	361
B)	Effects of Cost Savings on Transfer Pricing ....	361
1)	Problem.....	361
2)	Connection with Cloud Computing .....	362
3)	Risk Level .....	362

4)	Conclusion .....	363
C)	Shifting of Business Functions to Low-Tax Jurisdiction .....	363
1)	Problem .....	363
2)	Connection with Cloud Computing.....	364
3)	Risk Level.....	366
4)	Conclusion .....	368
§ V.	Enforcement.....	368
A)	Problem .....	368
B)	Connection with Cloud Computing.....	369
C)	Risk Level.....	370
D)	Conclusion .....	371
§ VI.	Conclusion on Effectiveness and Fairness .....	372
Section III	Certainty and Simplicity .....	375
§ I.	Introduction.....	375
§ II.	Permanent Establishment .....	375
§ III.	Treaty Characterization .....	377
A)	Significance in General .....	377
B)	Application to Cloud Computing.....	379
§ IV.	Transfer Pricing.....	382
A)	Introduction .....	382
B)	Data Centers .....	383
C)	Intangibles .....	384
D)	Remote Control and Automation .....	386
E)	Choice of Method .....	387
§ V.	Future Tax Policy .....	390
§ VI.	Conclusion on Certainty .....	391

Section IV	Flexibility .....	393
§ I.	Introduction .....	393
§ II.	Absence of Physical Presence .....	394
A)	Problem.....	394
B)	Technological Advancements .....	396
C)	Tax System Inflexibility.....	397
D)	Conclusion.....	400
§ III.	Disintermediation and Outsourcing .....	400
A)	Problem.....	400
B)	Tax System Inflexibility.....	402
C)	Technological Advancements .....	402
D)	Conclusion.....	402
§ IV.	Automation and Remote Control .....	403
A)	Problem.....	403
B)	Tax System Inflexibility.....	403
C)	Technological Advancements .....	405
D)	Conclusion.....	406
§ V.	Empirical Evidence of Flexibility Issues .....	407
§ VI.	Conclusion on Flexibility .....	410
Section V	Neutrality.....	413
§ I.	Between Cloud Computing and Brick-and-Mortar Businesses .....	413
§ II.	Between Similar Cloud Computing Businesses	414
§ III.	Specific Areas of Application .....	414
A)	Introduction .....	414
B)	Permanent Establishment.....	415
C)	Treaty Characterization .....	416

D)	Transfer Pricing.....	416
§ IV.	Conclusion on Neutrality .....	417
Section VI	Efficiency.....	419
Section VII	Provisional Conclusion.....	421
Section VIII	Comparison with Prior Work .....	423
Chapter 5:	Conclusion on Appropriateness .....	425
<b>Part III: <i>De Lege Ferenda</i></b> .....		<b>427</b>
Chapter 1:	Introduction.....	429
Chapter 2:	Recommendations .....	431
Section I	General Considerations.....	431
Section II	Transfer Pricing.....	435
§ I.	General Idea .....	435
§ II.	Implementation .....	436
§ III.	Justification .....	438
A)	OECD Interpretation of the Arm's Length Principle .....	438
B)	Overview on the Consequences of a New Interpretation.....	441
C)	Interchangeable Forms of Cross-Border Human- Machine Interaction .....	443
D)	Remuneration for Direct Human Activity .....	447
E)	Application to Subsidiaries .....	451
F)	Applicability to a Virtual Permanent Establishment .....	452
1)	Introduction .....	452
2)	Applications of the Proposed Interpretation.....	453
3)	Related Work.....	455
4)	Conclusion .....	456

G)	Summary of the Justification.....	457
§ IV.	Examples .....	458
§ V.	Alternative .....	463
§ VI.	Connection with Cloud Computing.....	465
§ VII.	Conclusion.....	467
Section III	Permanent Establishment.....	469
§ I.	Abolition of Right of Use.....	469
A)	General Idea .....	469
B)	Implementation.....	469
C)	Justification .....	470
D)	Connection with Cloud Computing .....	473
E)	Conclusion.....	475
§ II.	Positive Meaning of Right of Use.....	476
A)	General Idea .....	476
B)	Implementation.....	476
C)	Justification .....	477
D)	Connection with Cloud Computing .....	478
E)	Conclusion.....	479
§ III.	Concretization of Essential vs. Auxiliary .....	479
A)	General Idea .....	479
B)	Implementation.....	480
C)	Justification .....	481
D)	Connection with Cloud Computing .....	484
E)	Conclusion.....	485
§ IV.	Independence vis-à-vis On-Site Personnel.....	486
A)	General Idea .....	486

B)	Implementation .....	486
C)	Justification .....	487
D)	Connection with Cloud Computing.....	488
E)	Conclusion .....	489
Section IV	Treaty Characterization.....	491
§ I.	Reducing Withholding Tax Compliance Costs...	491
A)	General Idea .....	491
B)	Implementation .....	491
C)	Justification .....	493
D)	Connection with Cloud Computing.....	493
E)	Conclusion .....	494
§ II.	Adapting Income from Employment.....	494
A)	General Idea .....	494
B)	Implementation .....	495
C)	Justification .....	496
D)	Connection with Cloud Computing.....	499
E)	Conclusion .....	500
Section V	Summary of the Present Recommendations.....	501
Chapter 3:	Avenues of Further Research.....	503
Section I	Introduction .....	503
Section II	Other Aspects of Tax Law .....	503
Section III	Other Fields of Legal Study .....	507
Section IV	Quantitative Research.....	509
Section V	Conclusion on Further Research.....	511
Chapter 4:	Summary of the International Taxation of Cloud Computing .....	513