



January 6, 2020

Submitted via the Federal eRulemaking Portal: <http://www.regulations.gov>

Mr. Joseph Barloon
General Counsel
Office of the United States Trade Representative
600 17th Street NW
Washington, DC 20508

Subject: Docket Number USTR-2019-0009 Notice of Determination and Request for Comments Concerning Action Pursuant to Section 301: France's Digital Services Tax

Dear Mr. Barloon:

The Computing Technology Industry Association (CompTIA) is a leading voice and advocate for the \$5 trillion global information technology ecosystem; and the more than 50 million industry and tech professionals who design, implement, manage, and safeguard the technology that powers the world's economy. Through education, training, certifications, advocacy, philanthropy, and market research, CompTIA is the hub for advancing the tech industry and its workforce. Thank you for the opportunity to provide comments pursuant to Docket No. USTR-2019-0009 on the Administration's report with respect to the Digital Services Tax (DST) implemented by the Government of France.

CompTIA supports USTR's conclusion in its *Report on France's Digital Services Tax* including its determination that France's DST is unreasonable, discriminatory, and burdens and restricts U.S. tech companies. USTR found that the DST's retroactive nature violates well-established international tax norms and creates uncertainty for U.S. companies. Furthermore, USTR determined that DST violates the national treatment principle by taxing companies on worldwide revenue instead of income. France's DST deliberately discriminates against the U.S. tech sector which has invested billions of dollars into France's economy and has contributed to mutually beneficial economic growth and development. These findings reflect the comments CompTIA filed as well as oral testimony provided at a public hearing on August 19,

2019. CompTIA is pleased to see that the Report cites CompTIA's filing on five occasions.

USTR's findings are timely given the uptick of the proposed digital services taxes from various other European countries such as the Austria, Canada, the Czech Republic, Italy, as well as Turkey the United Kingdom. While CompTIA supports the Administration's efforts to combat the DST, we also urge the Administration to continue to work on a multilateral solution at the Organization for Economic Cooperation and Development (OECD) to address the tax challenges derived from the digitization of the global economy. The U.S. continues to lead the global economy through its innovation and commitment to open markets, and therefore, should help write the tax rules reflective of U.S. values.

Respectfully submitted,

A handwritten signature in cursive script that reads "Stefanie Holland".

Stefanie Holland
Vice President, Federal and Global Policy
CompTIA
322 4th Street NE, Washington, DC 20002