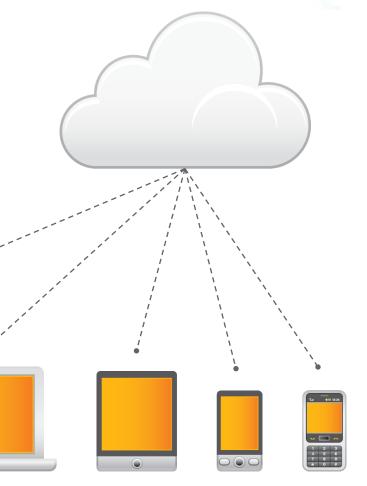


What is "Cloud Computing"?

"...a model for enabling ubiquitous, convenient, on-demand network access to a shared pool of configurable computing resources that can be rapidly provisioned and released with minimal management effort or service provider interaction."

 National Institutes of Standards and Technology











AT&T Cloud-based, On-demand Solutions Meet Customer Needs

Improve My Productivity

 Real time collaboration across employees, partners, customers



Requirements for applications to work across devices

Reduce My Cost

- Low storage and server utilization in non-peak periods
- Desire to pivot from Capex to Opex

Remove the Complexity

- Simplification due to limited IT staff down market
- End-to-end ownership vs. multi-vendor service integrations

Demand to mobilize and virtualize assets, applications and activities



- Off-premise
- On-demand
- Easy to Use
- Web-enabled
- Device Agnostic
- Tiered Support









Cloud Deployment Models Transfer Responsibility

Customer
Management Responsibility

Service Provider Management Responsibility

Software as a Service	Application	
	Database	
	Operating System	
	Servers	
	Storage	
Platform as a Service	Application	
	Database	
	Operating System	
	Servers	
	Storage	
Infrastructure as a Service	Application	
	Database	
	Operating System	
	Servers	
	Storage	







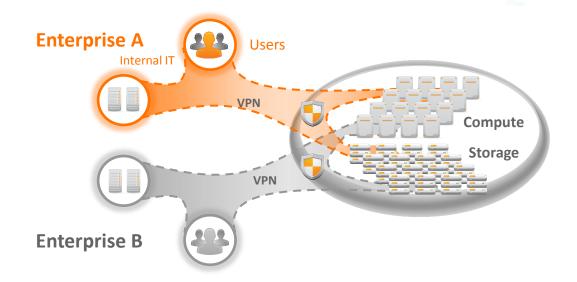


Cloud Deployments:

Infrastructure as a Service

AT&T Synaptic Storage and AT&T Synaptic Compute

- Benefits
 - Reduced capital costs
 - Increased flexibility
 - Meet dynamic demand for applications
- AT&T Difference
 - Combine network + IT resources for greater control
 - Network based security



What is Infrastructure as a Service?

- Storage and Computing resources delivered via the network.
- Provision easily and immediately via a portal.
- Turn on and turn off resources as-needed.
- Pay for only what you use.









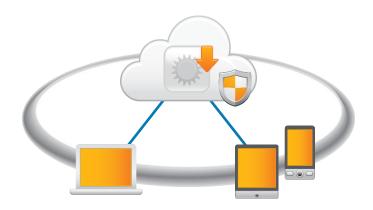
Cloud Deployments:

Platform as a Service

AT&T Platform as a Service

- Benefits
 - Quickly launch applications
 - Automate business processes
 - Meet needs of users
- AT&T Difference
 - Broad portfolio of complementary services like mobility and networking.
 - Stability, scalability, performance and global reach





What is Platform as a Service?

- Complete, ready-made technology stack.
- Standardized infrastructure on which you can deploy applications.
- Scale up as you draw more users.
- Pay per user, per month.









Software as a Service

AT&T Workforce Delivered & Siebel® Case Management

AT&T Today

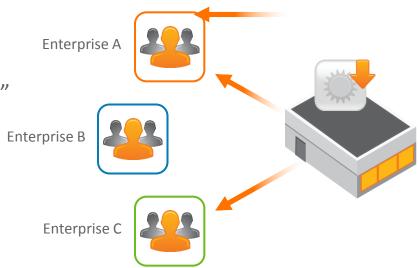
- Software on shared infrastructure
- Subscription licenses offered on a "term" basis for certain applications
- Initial upfront payment for hardware
- Per user, per month fee thereafter for certain applications

AT&T Tomorrow

- One application instance deployed in AT&T IDC
- Multiple organizations access and use the application.

Benefits

- Lower total cost of ownership for applications
- Easy access for distributed workforces
- Reduce time to deployment



Software as a Service?

- Full software functionality
- One software instance delivered to multiple customers over the Internet
- At term end, customer has no access to application.
- Pay per user, per month.



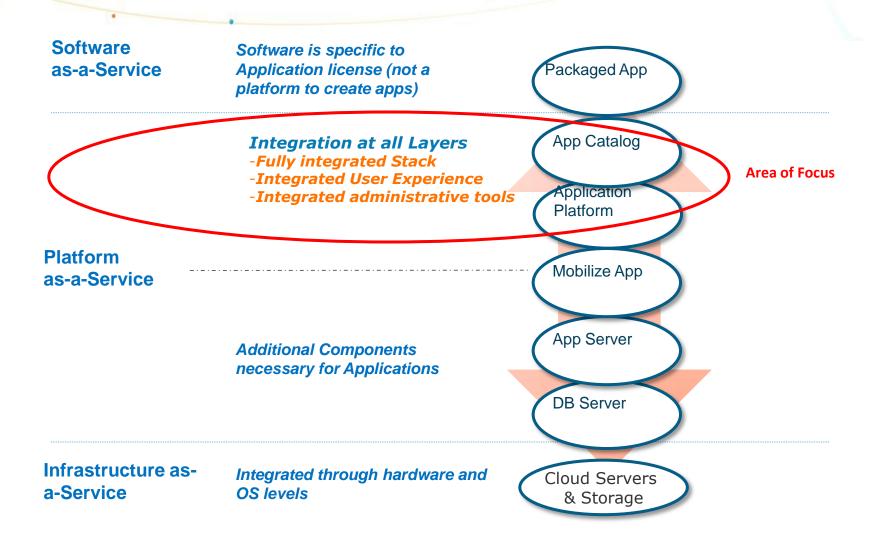








Cloud Continuum







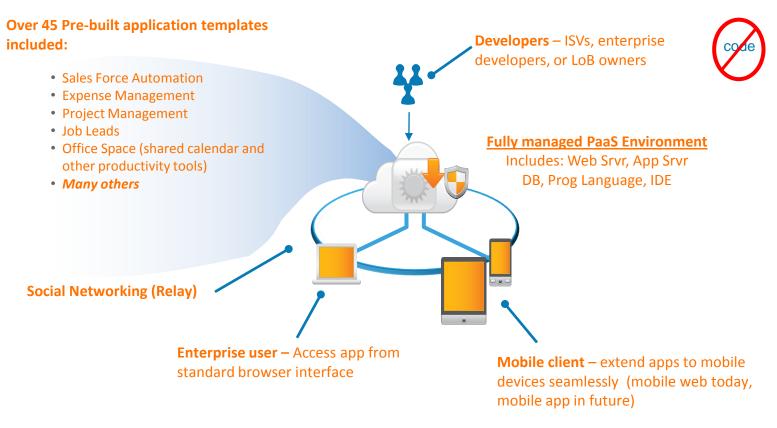




AT&T Platform as a Service

Quickly build and run your applications in the cloud

Create <u>business productivity</u> apps without writing a single line of code



Flexible * Secure * Expansive * Efficient

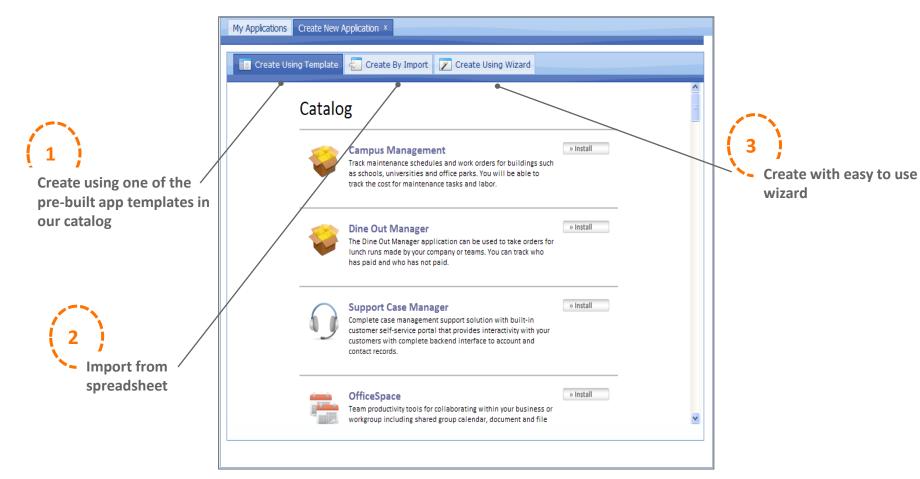








3 Easy Ways to Build an Application











DEMO TIME









PaaS Demo with Web Interface

In store survey Web App on **AT&T PaaS** Operations VP Fill out survey for a super discount Sign on retailer shelf Scan Bar Code Fill out Survey Receive Coupon via SMS

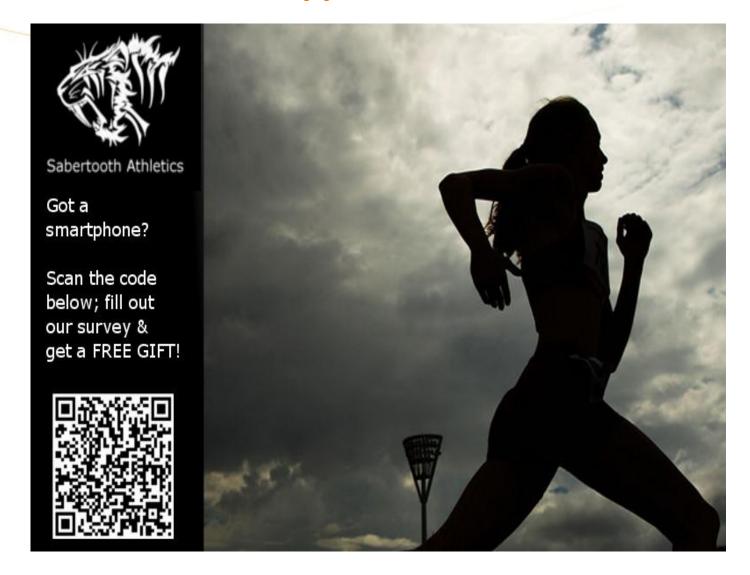








Saber Tooth Athletic Apparel



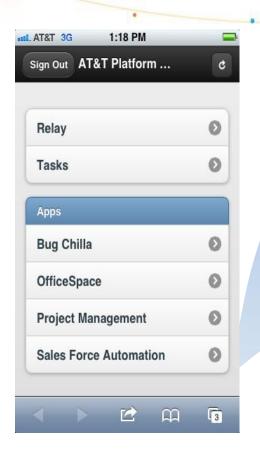


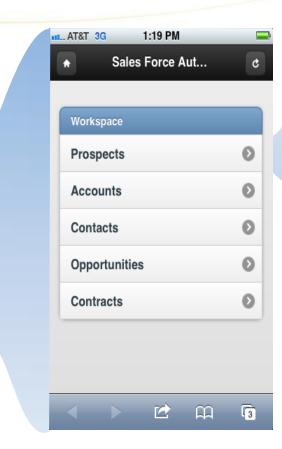






Mobile Web Interface







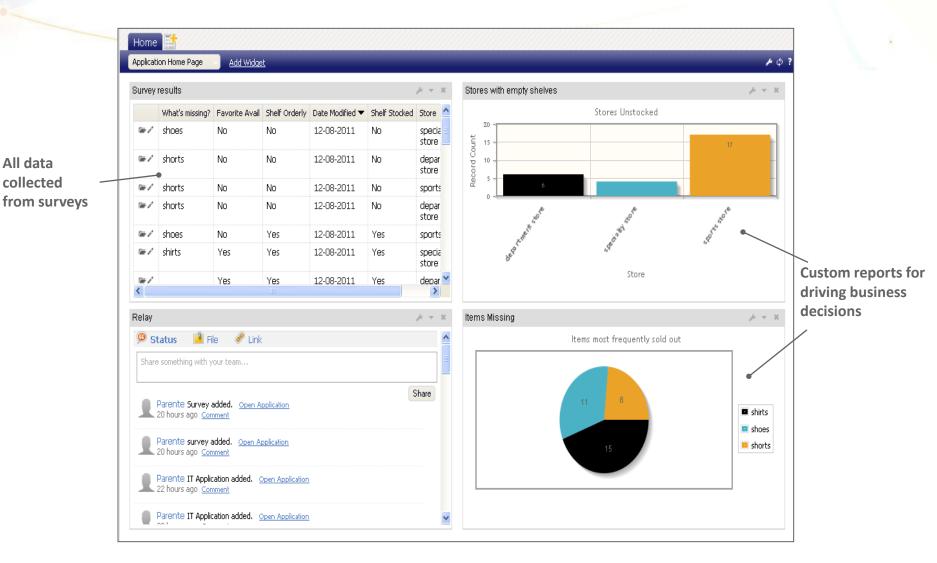








Real Time Reporting to drive Business Intelligence











All data

collected

Rethink Possible®







Demo Instructions

- 1) Have customer use AT&T QR-Code Scanner to scan the QR-Code on the ad on previous slide
- 2) Ask them or you fill-out the Survey to get a Coupon Code
- 3) Log-in to PaaS: https://paas1.attplatform.com/
 User ID: rt7186 PW: CHIlet3U
- 4) Show the record the customer just entered on the Top Right panel (All Survey).. You can click on each record to see the discount code (Record ID), customer information, etc.
- 5) Show the automatically generated Analytic reports on the Left panels
- 6) Talk about how we created this demo in less than 3 hours









Tax Policy Challenges for Cloud Based Services









Characterization

- No Clear Tax Treatment What is the service?
 - Software delivered electronically versus access
 - Data Processing Service
 - Computer Service
 - Information Service
 - Lease of Tangible Personal Property
 - Communication Service
 - Ancillary Service
 - Storage Services Does ITFA apply?
 - Not Enumerated Taxable Service









Characterization (cont'd)

- Why does characterization matter . . .
 - Determining taxability states have different definitions
 - What use based exemption may be applicable
 - Resale, Manufacturing, R&D, etc.
 - What state properly asserts that tax sourcing









Sourcing

- Where is the service taxable?
 - Server Location
 - Contracting Address
 - Billing Address
 - User Location potentially multiple locations
 - Duplicate taxation of the same transaction
 - User not always purchaser









Nexus

- When a customer purchases cloud computing services, does the vendor's server location create nexus for the customer?
- Whose footprint matters?
 - Customer?
 - Vendor?
 - Both?









Overview of the States

- Most states treat "prewritten computer software" as tangible property, but taxability may vary:
 - Tangible storage media
 - Downloaded
 - Remotely accessed
- Most states exempt services unless specifically identified in statute
- Where do "Cloud Based Services" fit?









Key Issues for Policymakers

- What is it?
 - Software
 - A service
 - Combination of the two
- Is there a non-Cloud Based equivalent service?
 - Is the equivalent taxed?
- Where is the service performed / delivered?









Key Issues for Policymakers

- Economic impact / economic development
 - Impact on providers of cloud based services
 - Impact on purchasers of cloud based services

Potential for tax pyramiding









- Consensus process including:
 - Legislators
 - Tax administrators / SSTP reps
 - Industry
- Approved by Task Force on August 6, 2012
- Frame issues for legislatures wishing to examine taxation of Cloud-Based Services









 1A -- Establish consistent sourcing rules to prevent double taxation or tax avoidance

- 1B -- Do not impose discriminatory taxes on Cloud Based Services
 - Tax rate discrimination higher rates on CBS
 - Tax base discrimination tax CBS while exempting equivalent non-CBS
 - Key question is there an equivalent?









 2 -- Base tax decisions on the service, not the type of provider

 3A -- Tax imposition decisions should be made by legislators, not administrative rulings

3B -- Make definitions clear to avoid uncertainty







3C -- Recognize that Cloud Based Services
 encompasses a broad range of services which need
 to be addressed in statute

3D -- Design impositions on specific and clearly delineated services or, in states where statutes already tax services broadly, make exemptions (if any) clear







 3E -- Involve providers of Cloud Based Services in drafting statutes governing taxability and sourcing

3F -- Provide clear and consistent rules to govern bundled transactions involving Cloud Based Services









Concluding Thoughts

NCSL principles can help guide legislative discussions

Tax imposition decisions should be made by the legislature

 Legislative review may trigger broader conversations about taxation of services









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