receipts in total U.S. remote sales not exceeding \$1 million) to collect and remit sales and use taxes with respect to remote sales under provisions of the agreement . . $^{\prime\prime}$ 108 The 2013 version of the Marketplace Fairness Act passed the Senate but was held up in the House Judiciary Committee. 109

Following the *Wayfair* decision, the Protecting Businesses from Burdensome Compliance Cost Act of 2018 would have prohibited enforcement before January 1, 2019, required states to offer a uniform rate option, and required states to offer a single location for sellers to remit sales tax.¹¹⁰ The Online Sales Simplicity and Small Business Relief Act of 2018 would prohibit states from imposing a sales tax collection duty on remote sellers for sales before June 21, 2018 and allow it for sales after January 1, 2019.

111 It has a small seller exception for sellers with gross annual receipts in the United States of less than \$10 million in the previous calend year. As with the bills considered before the *Wayfair* decision, none of these by even enacted.



¹⁰⁸ https://www.congress.gov/bill/115th-congress/senate-bill/976

¹⁰⁹ https://www.congress.gov/bill/113th-congress/senate-bill/743/all-actions

¹¹⁰ https://www.congress.gov/bill/115th-congress/house-bill/6724

¹¹¹ https://www.congress.gov/bill/115th-congress/house-bill/6824

¹¹² https://www.congress.gov/bill/115th-congress/house-bill/6824