



# TaxNewsFlash

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## Rev. Proc. 2025-28: Research and experimental expenditures under OB3

The IRS today released [Rev. Proc. 2025-28](#) that instructs taxpayers on how to make various elections, file amended or superseding returns, and make changes in accounting method for research or experimental expenditures in order to comply with IRC sections 174, 174A, and 280C, as amended and added by section 70302 of the One Big Beautiful Bill Act (Pub. L. No. 119-21).

Rev. Proc. 2025-28 provides transitional rules, modifies [Rev. Proc. 2025-23](#), *List of Automatic Changes*, and grants an extension of time for certain taxpayers to file superseding 2024 federal income tax returns. [Read TaxNewsFlash](#)

Today's revenue procedure also provides procedures for making elections under section 174A(c) to amortize domestic research or experimental expenditures paid or incurred in tax years beginning after December 31, 2024. Finally, for a tax year beginning during 2024 and ending prior to September 15, 2025, for which the due date (excluding any extension) for the return of tax for such tax year was before September 15, 2025, the revenue procedure grants an automatic extension of time to file superseding tax and information returns to make elections or accounting method changes under the small business taxpayer transition rules of section 70302 of the OB3.

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