



STATE BOARD OF EQUALIZATION

September 19, 1950

Dear Sir:

This is in answer to your letter of September 13 with respect to the application of the State sales tax to the business of philately.

You are advised that we regard the sale of stamps by persons other than the United States Government to collectors or others for purposes other than use as postage as subject to the California Sales and Use Tax Law. Accordingly, a person engaged in business as a philatelist is required to hold a seller's permit issued by this Board. We are, therefore, enclosing an application for a seller's permit. When completed, it should be presented to our branch office, 308 Main Street, Salinas, California.

As indicated by Sales and Use Tax Ruling 55, copy enclosed, the sales tax will not apply to sales of stamps in interstate or foreign commerce, if all of the requirements of that ruling are complied with. The use of resale certificates in support of claims of exemption with respect to sales to dealers for resale in the regular course of business is governed by Ruling 68, copy enclosed.

A member of the staff of our Salinas branch office will be pleased to advise you on any problems you may have involving the computation of the tax, the keeping of records, and the filing of returns.

Very truly yours,

R. G. HAMLIN
Associate Tax Counsel