



STATE BOARD OF EQUALIZATION

April 23, 1958

Last week I was able to discuss with Assistant Attorney General James E. Sabine and Deputy Attorney General Ernest P. Goodman the matters discussed in this office on March 14 at a conference attended by yourself, --- and the undersigned.

The result of the discussion in the Attorney General's office is that we will regard the sale of repair parts or materials used in repairing of engines, modification of aircraft, etc., as falling within the exempt category of interstate sales in cases where the contract between the party doing the repair or modification work requires that such party ship the repaired articles or modified aircraft to which the repair parts and materials are attached, to a point outside this State by its own facilities or the facilities of a carrier. It will be considered immaterial that the repair parts or materials used in modification may be installed upon or attached to engines, aircraft or other property in this State belonging to the customer prior to the time the repaired or modified items are actually shipped or delivered to a carrier for shipment.

Our Van Nuys office is being informed of this conclusion by being sent a copy of this letter.

Very truly yours,

E. H. Stetson
Tax Counsel

EHS:tl

Cc: Mr. C. P. Hamlin
Cc: Van Nuys – Auditing (CWT)