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**STATE BOARD OF EQUALIZATION**

January 21, 1959

Attention:

Gentlemen:

We have reviewed the problem originally presented in your letter dated November 6, 1958, which was followed by our letter of December 17 requesting additional information, to which you replied under date of December 29.

Upon review of the entire matter, it appears that you were required by the purchase order, a copy of which was attached to your letter of November 6 and the "Bailee Clause" constituting part of that purchase order, to deliver to your customer at an out-of-state destination certain White motor chassis, equipped with bodies purchased by your customer from --- Prior to shipment of the completed unit, you are directed to deliver the chassis to the body works for installation of the bodies thereon. After installation, as we understand it, the completed units were delivered to you and you in turn, pursuant to the original purchase order, delivered the completed units to a common carrier for shipment to a designated out-of-state destination.

Under these facts, it is our opinion that your sale of the chassis to your customer constitutes an exempt interstate sale under the provisions of Sales and Use Tax Ruling 55, paragraph A-1-(c).

Very truly yours,

E. H. Stetson  
Tax Counsel

EHS:tl  
cc: San Francisco - Administrator