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**STATE BOARD OF EQUALIZATION**

March 24, 1955

Mr. G--- B. K---  
XXXX --- --- Street  
--- X, California

Dear Mr. K---:

You are in the business of high-vacuum optical coating. You evaporate aluminum, flouride and other materials on glass and plastics. Tax applies to the entire charge for coating glass for the first time. Tax does not apply to charges for recoating.

One of the customers sends in a number of filters to be flourided. Some are new and some are old and it is generally impossible to tell which is which. Large quantities are shipped at a time and it is not feasible for the customer to sort them as they are used over and over.

In a case such as this we would not require you to definitely determine whether each filter is new or old. Your customer will be able to tell you how many filters he purchases each quarter. He can thereby determine how many new filters he sends to you for flouriding each quarter. Tax can then be paid on the charge for flouriding this number of pieces and the balance of your receipts from this customer would be regarded as in the exempt category.

Very truly yours,

Bill Holden  
Associate Tax Counsel

BH: AMN