



STATE BOARD OF EQUALIZATION

December 10, 1951

Mr. E. F. H---
Assistant General Auditor
U--- S--- P--- and F--- C---
---, California

Account No. X-XXXX

Dear Mr. H---:

This is in reply to your letter of November 28 setting forth the facts with respect to your use of lumber for blocking pipe shipped in railroad cars. You state that you do not bill the customer specifically for the blocking material required.

It appears to us that you buy this lumber for some purpose other than resale, i.e., in order that you may properly prepare your products for safe shipment to your customer. Accordingly, it is our opinion that, pursuant to Sales and Use Tax Ruling 60, copy enclosed, the sales tax or the use tax applies with respect to the sale of this lumber to you.

Very truly yours,

E. H. Stetson
Tax Counsel

EHS:ph

cc: Mr. John B. Evans