



May 20, 2013

Mr. Todd Gilman  
Taxpayers' Rights Advocate  
State Board of Equalization

**STATE BOARD OF EQUALIZATION**



**Re: 2013 Taxpayers' Bill of Rights Hearing**

Appeal Name: Gina Rodriguez  
Case ID: Public Hearing ITEM #. E1  
Date: May 22, 2013 Exhibit No: 5.3  
TP FTB DEPT **PUBLIC COMMENT**

Dear Mr. Gilman,

This year, CalTax has three recommendations to increase transparency and make tax administration more effective:

- (1) Most, if not all, of the BOE's computer audit specialists ask taxpayers for the same information during eWaste fee audits and sales and use tax audits. This is a waste of valuable state resources, and increases taxpayers' compliance costs. Therefore, CalTax respectfully requests the BOE to review its audit workload and make the necessary adjustments by possibly combining these audits.
- (2) BOE has a wonderful subscription program, so that taxpayers can register to receive electronic announcements, including board meeting agendas. However, oftentimes changes are made to the agendas, and those updates are not released via the BOE's subscription program. CalTax respectfully requests the BOE to release updated agenda information to their subscribers.
- (3) The board is a strong proponent of transparency, and the Taxpayers' Bill of Rights should be no exception. Therefore, CalTax respectfully requests the BOE to post all formal responses to its website that result from Taxpayers' Bill of Rights suggestions. This would be consistent with responses from the advocate at the Franchise Tax Board hearings, which have been posted since 2006. See this link: ([https://www.ftb.ca.gov/aboutFTB/taxpayer\\_advocate/](https://www.ftb.ca.gov/aboutFTB/taxpayer_advocate/)).

CalTax looks forward to working with you and other board staff on these issues during the coming months. Thank you for your consideration.

Respectfully,

Gina Rodriguez  
Vice President of State Tax Policy

cc: The Honorable Jerome Horton, Board of Equalization, Chair  
The Honorable Michelle Steel, Board of Equalization, Vice Chair  
The Honorable Betty Yee, Board of Equalization, Member  
The Honorable George Runner, Board of Equalization, Member  
The Honorable John Chiang, State Controller