February 5,1957

re:

Dear Mr.

This is to advise you that we have given careful consideration to the data which was developed at the meeting attended by you, Mr. Mr. and the representatives of this Board, Mr. Roberti and Mr. Swanson.

It is our opinion that the sales of lumber used by the , in the erection of platforms, self-shorings and blockings on seagoing vessels for the purpose of increasing cargo capacity and prevention of shifting of heavy cargo are not sales of property exempted from the sales tax by the watercraft exemption. We feel that you have been correctly advised that this installation of lumber is comparable to that of the installation of dunnage on freight cars.

Since we have received no reply to our letter of October 19 in which we requested documentary verification of petitioner's claim that the measure of tax improperly included cartage charges, we can only recommend that no adjustment be made because of this item.

We shall, therefore, recommend to the Board that the petition be denied in its entirety and that the unpaid amount is due. You will receive notice of the Board's official action in due course.

Very truly yours,

Bill Holden
Associate Tax Counsel

JJD:rc

cc: San Francisco - Aud.