



October 24, 2008

Dean R. Kinnee, Chief  
County-Assessed Properties Division  
State Board of Equalization  
450 N Street, Room 122  
Sacramento, CA 95814

**RE: Proposed inclusion of economic lives in Assessors' Handbook Section 581**

Dear Mr. Kinnee,

AeA (American Electronics Association), the nation's oldest and largest high-tech trade association, is supportive of the interested parties process for determining whether economic life tables should be included in Assessors' Handbook Section 581, *Equipment Index and Percent Good Factors*.

The idea of adopting procedures and guidelines for future State wide property tax valuation tables is a good one; but only to the extent that those tables are predicated on meaningful data and analysis. Part of the process in determining what is meaningful requires input from the taxpayer. In some cases it may be determined by both the assessors' and the taxpayers that a life study is unwarranted, yet this determination must be made with taxpayer input.

The process to develop guidelines for future property valuation factor studies is supposed to produce a mechanism by which the State could bring interested parties together to develop meaningful statewide tables up front. We support such a process. However, it is our hope that if and when these tables are adopted, with the input of taxpayers during an interested parties process, that they are done so based on actual market research and studies when necessary.

Sincerely,

Devin C. Whitney  
Legislative Advocate, AeA