

October 23, 2016

Mr. Rick Bennion, Regulations Coordinator  
State Board of Equalization  
450 N Street, MIC 80  
P.O. BOX 942879  
Sacramento, CA 94279-0080

Subject: Regulation 2640, Administration. Readoption Pursuant to the Office of Administrative Law's Issues with Subdivision (b). **Request for Board Member Support**

Dear Mr. Bennion,

MuniServices appreciates the opportunity to provide comments to the Board of Equalization (Board) regarding the above-referenced item that will be considered during the Board's October 25-26, 2016 meetings. In our view of the proposed text, the proposed changes appear to be consistent with AB 1717.

MuniServices representatives were active stakeholders in the regulatory process for Regulations 2460, Administration, 2461, Exemptions, Deductions, Credits, and Specific Applications of Tax, and 2462, Refunds of Excess Charges Collected. MuniServices testified in support of the final proposed regulations during the Board's January, 2016 Public Hearing. Our representatives also worked collaboratively with Board staff when the Legislature was considering AB 1717 (Chapter 885, Statutes of 2014), Prepaid Mobile Telephony Services.

MuniServices provides a variety of UUT compliance services for approximately 60 California public agencies, which represent about 70% of the total UUT revenue generated in the State of California. We have especially appreciated our interaction with Board Staff to assure that participating local governments' have the necessary components in place to participate in AB 1717.

MuniServices and its client public agencies remain keenly interested in the proper and cost-effective implementation of AB 1717 and will continue its work to achieve the mutual goals of the various stakeholders. Should you have any questions or require additional information please contact me or my colleague Fran Mancia, Vice President, Government Relations at 559.288.7296 or Fran.Mancia@muniservices.com. Thank you again for allowing MuniServices to provide comments and to participate in the rulemaking process.

Sincerely,



Brenda Narayan, Director of Government Relations  
916.261.5147 or [brenda.narayan@muniservices.com](mailto:brenda.narayan@muniservices.com)