March 28, 2008

Mr. Scott Peterson  
Streamlined Sales Tax Governing Board  
4205 Hillsboro Pike  
Hobbs Building, Suite 305  
Nashville, TN  37215-3339

Dear Mr. Peterson:

I am the Governmental Affairs Officer for the Printing and Graphic Arts Industry in California which represents the collective interests of Printing Industries of Northern California, Printing Industries Association Inc. of Southern California and Printing Industry Association of San Diego. I am new to this process but it is my understanding that public comments are welcomed and I appreciate the opportunity to indicate my support for AM07035. We are concerned that the current delivery charge definition is ambiguous and puts us in the position of asking for an “exemption” for postage when California does not and, to our knowledge, has never regarded postage on mail as being a taxable delivery charge. It is my understanding that recent talks have been productive and that this issue may be resolved next week.

I support AM08002 with two parameters; (1) it should be drafted based on the current language in the agreement; (2) it should be passed with the understanding that this is part one of a two part process.

The printing industry needs this simplification option and it’s needed for both intrastate and interstate mail. We hope the Governing Board will adopt this amendment with the agreed understanding that Washington and West Virginia will draft part two of this amendment which will provide similar simplification for interstate direct mail. We would anticipate that both part one and part two would be optional but that any state adopting AM08002 would also adopt part two when it is drafted.

I hope that the Governing Board will return to the issue of how the current Section 313 is interpreted. The industry can not support any amendment to Section 313 without understanding how the current language is interpreted. Once we understand how the current language is interpreted, we can then assess what changes may be acceptable to achieve additional simplicity and/or uniformity. For this reason we hope that AM07034A01 and RP0716A01 will be deferred. I wish to express my support for the
“BAC Roadmap” for direct mail and my support for the Direct Mail Coalition led by Ms. Hill.

I am unable to attend the Reston meeting and will likely miss much of the direct mail debate due to the differences in time zone. If a compromise version of the above proposals surfaces during these meetings, please regard Ms. Hill as my spokesperson on the matter.

While I don’t understand the process, it would seem that a very small group reflecting each stakeholder could be formed with the assignment to draft a proposal which is unanimous within that group before being proposed to the larger constituencies. Thank you for establishing direct mail as a priority.

Sincerely,

Dr. Gerald Bonetto
VP Public Affairs
Government Relations Department
Printing Industries Association Inc. of Southern California