

M e m o r a n d u m**190.0280**

To: Mr. H. C. Motley (FCP)

May 2, 1950

From: R. G. Hamlin

Subject: ---
Elevator Maintenance

You have inquired whether the labor in the assembling of an elevator is taxable under Ruling 15.

You are advised that we regard the assembling of an elevator as distinguished from its installation, as a step in the production, fabrication, or processing of tangible personal property within the meaning of Ruling 15. Therefore, the tax will apply to the charge for assembling an elevator for a consumer.

Where the assembling of the component parts of a fixture and the installation thereof constitute an indivisible operation, that is, where the fixture does not exist as a unit until its component parts are attached to the realty, we would regard the component parts of the fixture as the property sold. In this event, the tax would not apply to the charge for installing the component parts of the fixture into the building, even though the installation constitutes, in part, the assembly of the completed fixture.

RGH:hb

8/8/89 Regulation 1521(c)(6) now covers elevator installations. DJH.
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