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**STATE BOARD OF EQUALIZATION**

May 24, 1954

Gentlemen:

You inquire concerning the application of sales tax to your chargon for cleaning of rugs and carpets. This is a service and your charges are not subject to sales tax. You are the consumer of materials used and the sale of sale of such materials to you is at retail and taxable.

You also inquire concerning the application of tax to your charges for sizing of rugs and carpets. We are not completely familiar with the terminology of your trade, but assume that sizing rugs refers to the application of a starch or glutinous material and does not mean the cutting of a rug or carpet to alter its dimensions. On our assumption of the facts, the tax applies in the same manner as to your charges for cleaning except where the work is performed on a new rug or carpet. In this case, your entire charge is taxable and you are regarded as reselling rather than consuming the materials used. If such materials have been purchased tax paid, you may take a deduction on line 11 of your return in accordance with ruling 71 (copy enclosed).

Very truly yours,

Bill Holden  
Assistant Counsel

CC: San Francisco - Auditing