



---

**STATE BOARD OF EQUALIZATION**

1529 Separately-stated-charges for development of kodacolor negatives.

September 22, 1964

Dear Mr. X-----,

This is in reply to your letter of September 9 in which you inquire if it was proper for a photo finisher to have charged you a sales tax on the price of developing two rolls of Kodak Kodacolor film when the charge was for developing only the Kodacolor negatives and not for making any positive color prints.

Development of color films by reversal processing methods to produce color transparencies or color positives is taxable. But if the developed film produces Q color negative, then the charge for processing the negative is not subject to tax if separately stated from the charge, if any, for the production of positive color prints.

Very truly yours,

E. H. Stetson  
Tax Counsel

PRD:o'b

Cc: San Mateo – Subdistrict Administrator