MPA
Manufacturing
Policy Alliance

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April 28, 2017

Laura Stanley, Esq.
Division Counsel
Sales and Use Tax Division
Ohio Department of Taxation
30 East Broad Street
Columbus, OH 43215

RE: Draft Rule 5703-9-21

Dear Ms. Stanley,

The Manufacturing Policy Alliance ("MPA") has begun review of the proposed changes to Ohio Administrative Code 5703-9-21, the manufacturing exemption rule.

MPA appreciates the effort by the Ohio Department of Taxation ("ODT") to update its rules, particularly O.A.C. 5703-9-21. As you know, Ohio's sales and use tax manufacturing exemption has a very significant impact on manufacturers and is an important tool for Ohio to maintain its competitiveness to attract and retain manufacturing. Therefore, MPA has encouraged its members to fully digest and evaluate the potential impact of the proposed changes. MPA will then provide such feedback to ODT.

MPA respectfully requests an additional six weeks to respond and make specific comments on the proposed changes to the manufacturing exemption rule. This will allow our members to more fully analyze the impact on their operations and provide more effective feedback, as well as recommend other changes and updates to the rule.

The current manufacturing exemption and related rule has been very successful since its enactment in 1990 because it was the result of joint efforts by ODT and businesses. MPA encourages ODT to sponsor a broader dialogue on Ohio's manufacturing exemption and the rule in an effort to ensure Ohio's competitiveness for attracting and retaining manufacturing.

If you have any questions, please do not hesitate to contact me at the above phone number or Tom Zaino at (614) 439-4810.

Very truly yours,

Robert J. Lapp

Robert J. Lapp
President

cc: Joseph Testa – Tax Commissioner

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