

OKLAHOMA TAX COMMISSION

TAX POLICY AND RESEARCH DIVISION
TONY MASTIN, DIRECTOR

PHONE (405) 521-3133
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October 16, 2002

Re: Our File Number LR-02-180; Determination of taxable Oklahoma income

Dear

This is in response to your inquiry as to whether the revenue and the subsequent royalty payments from the sale of Home Inspections Franchises is subject to Oklahoma income tax.

Based on the information provided and Commission Rule 710:50-17-3 (a) (9) copy enclosed, the income derived in Oklahoma would be subject to Oklahoma Income Tax.

This response applies only to the circumstances set out in your request of October 2, 2002. Pursuant to Commission Rule 710:1-3-73(e), this Letter Ruling may be generally relied upon **only** by the entity to whom it is issued, assuming that all pertinent facts have been accurately and completely stated, and that there has been no change in applicable law. If I can be of further assistance, please feel free to contact me.

Sincerely,


Brenda J. Sullivan
Tax Policy Analyst

Enclosure