OKLAHOMA TAX COMMISSION

TAX POLICY AND RESEARCH DIVISION
TONY MASTIN, DIRECTOR

PHONE (405) 521-3133
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April 27, 2006

RE: Our File Number LR-06-028; Tax status of a Pedicab Operation

This in response to your inquiry contesting the tax status of your "pedicab" operation in Jenks, OK which you stated has been recognized by the City of Tulsa as a taxicab operation.

You may have been told that the charges you make for local transportation of passengers is subject to sales tax. While it is true that local transportation of passengers is taxable if the pick-up point and the drop-off point are in different cities; it is also true that if the pick-up point and the drop-off point are within the same city, the sale of the transportation is exempt from sales tax.

Therefore, your "pedicab" operation in Jenks, Ok is exempt from sales tax if the services are within the city of Jenks.

This response applies only to the circumstances set out in your request of February 8, 2006 . 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

cc: Dewey Brandon, Communication Div.