Via Electronic Mail

May 6, 2025

The Honorable Marvin L. Abney Chair, House Committee on Finance Rhode Island State House Providence, RI 02903

RE: Letter Regarding House Bill 6256 – An Act Relating to Taxation – Property Subject to Taxation

Dear Chair Abney:

I am writing on behalf of the Rhode Island Department of Revenue, Division of Taxation ("Division"), to: i) express concerns regarding issues with proposed House Bill 6256 as currently drafted; ii) explain the background and current statutory context in order to clarify the intended and unintended consequences of this bill; and iii) make recommendations and request your support in implementing those recommendations.

This letter is not intended as a position in support of or opposition to the bill, but only as recommendations on drafting to provide clarity in the bill and to aid tax administration and compliance.

As you know, this bill would amend R.I. Gen. Laws § 44-3-3, entitled "Property Subject to Taxation – Property exempt," by deleting Subsection (27) thereby removing the property tax exemption for motorboats as defined in Title 46. The bill would further amend R.I. Gen. Laws § 44-18-30 by deleting Subsection (48) thereby removing the sales and use tax exemption for "[b]oats and vessels generally." The bill is set to take effect upon passage.

The State of Rhode Island Division of Taxation is a signatory to the Streamlined Sales and Use Tax Agreement ("SSUTA") pursuant to R.I. Gen. Laws § 44-18.1-1. The SSUTA mandates that a member state must comply with its numerous terms, including notification requirements. As such, the Division recommends an effective date of October 1, 2025, to allow for reasonable notice under the SSUTA and to ensure proper implementation of the change for all stakeholders.

The Division takes no position with respect to the remainder of the proposed legislation. Rather, the Division is concerned solely with the issues of clarity, tax compliance, and tax administration. As such, the Division respectfully suggests that the bill be redrafted for clarity.

I look forward to working with you to address the issues raised in this letter and appreciate your consideration.

Very truly yours,

Neena S. Savage Tax Administrator

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cc: The Honorable Members of the House Committee on Finance (via:

HouseFinance@rilegislature.gov)

The Honorable John Joseph Lombardi (rep-lombardi@rilegislature.gov) Nicole McCarty, Esquire, Chief Legal Counsel to the Speaker of the House

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