



LEGISLATIVE POSITION:

Favorable with Amendment

House Bill 366

**Office of the Comptroller – Legal Division and Private Letter Ruling Procedures
Senate Budget & Taxation Committee**

Tuesday, March 29, 2022

Dear Chairman Guzzone and Members of the Committee:

Founded in 1968, the Maryland Chamber of Commerce is the leading voice for business in Maryland. We are a statewide coalition of more than 5,500 members and federated partners working to develop and promote strong public policy that ensures sustained economic recovery and growth for Maryland businesses, employees, and families.

HB 366 establishes a Legal Division within the Comptroller's Office to provide expanded and detailed tax guidance and other duties relating to private letter rulings (PLR). A private letter ruling is a written determination from the Comptroller's Office on how certain tax laws and regulations are applied. These letters are incredibly helpful and provide real value for business owners when determining what taxes apply to their business.

Small businesses are the backbone of Maryland's economy and provide much needed employment opportunities and philanthropy to the communities they serve. HB 366 provides these businesses with an avenue to obtain clarity on Maryland's ever changing tax system and ensures that the Comptroller's office has qualified staff to execute this function.

Lastly, we appreciate the sponsor's amendment to increase the PLR expiration date from three years to seven years. Many of these issues remain the same after three years and this mandatory expiration would require small businesses to reapply for the private letter ruling, wasting both the businesses and legal division's time.

The Maryland Chamber of Commerce respectfully requests a **favorable report** on **HB 366**.