SC INFORMATION LETTER #08-23

SUBJECT:   Citator of SC Advisory Opinions

DATE:     October 13, 2008

SUPERSEDES: SC Information Letter #08-14

             SC Revenue Procedure #05-2

SCOPE:    An Information Letter is a written statement issued to the public
to announce general information useful in complying with the
laws administered by the Department. An Information Letter has
no precedential value.

A citator of advisory opinions issued by the Department from 1987 through September
30, 2008 is available. This citator provides assistance in determining what effect new
advisory opinions have on those previously published to the best of our knowledge. It
does not include the effect new laws, regulations, or court decisions have on
previously issued advisory opinions; it should not be relied on as a substitute for
researching original sources of authority.

This citator has been compiled as a reference tool for the convenience of taxpayers, tax
practitioners, and Department employees. Because of the number of years and the
number of advisory opinions, it is possible that you may find an error or omission in this
citator. If you find an error or omission, please contact Deana West in the Department’s
Policy Section at 803-898-5139.

A copy of the citator is attached.
CITATOR of ADVISORY OPINIONS

Attached is a citator that provides assistance in determining what effect new advisory opinions have on those previously published. It will generally be revised and issued on a quarterly basis.

Advisory Opinions are abbreviated and indexed as follows:

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<th>Abbreviation</th>
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<tr>
<td>RR</td>
<td>Revenue Ruling</td>
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<td>TRR</td>
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From January 1, 2000 through December 31, 2002, the Department issued advisory opinions under names different than listed above. They were referred to as:

<table>
<thead>
<tr>
<th>Abbreviation</th>
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<tr>
<td>RAB</td>
<td>Revenue Advisory Bulletin</td>
</tr>
<tr>
<td>TRAB</td>
<td>Temporary Revenue Advisory Bulletin</td>
</tr>
<tr>
<td>RPB</td>
<td>Revenue Procedural Bulletin</td>
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<td>TRPB</td>
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<td>PRO</td>
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<tr>
<td>RIB</td>
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The citator is organized by type of advisory opinion and lists each one effected in chronological order by year of issuance. Advisory opinions that are not listed in the citator are not obsolete, modified, or superseded, to the best of our knowledge. Certain advisory opinions contain information that is updated on a periodic basis, such as per capita income figures and county rankings used for certain credits. Advisory opinions announcing this information are not reflected in the citator as modified, superseded, or obsolete since they remain effective for the periods they cover. Please see the advisory opinion index to locate the appropriate advisory opinion.

A definition of the terms used in the citator to describe effected advisory opinions are as follows:

**Modified by** - The boldfaced advisory opinion has been changed in part. This term is commonly used to identify advisory opinions which have been changed in part by another advisory opinion.
**Modifying** - The boldfaced advisory opinion changes in part a previously issued advisory opinion.

**Obsolete** - The boldfaced advisory opinion has been withdrawn or is no longer valid.

**Superseded by** - The boldfaced advisory opinion has been replaced by a subsequent advisory opinion.

**Superseding** - The boldfaced advisory opinion is replacing a previously issued advisory opinion.

The Advisory Opinion Index and Interest Rate of Underpayments and Overpayments are issued quarterly and contain information of a cumulative nature. Exhibit 1 contains the most recently issued information on these topics. Information Letters issued previously remain valid for the periods they cover.
SC REVENUE RULINGS

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(Revised 10/13/08)
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