State of South Carolina Department of Revenue 301 Gervais Street, P.O. Box 125, Columbia, South Carolina 29214

SC INFORMATION LETTER #05-34

SUBJECT:	Citator of SC Advisory Opinions
DATE:	December 30, 2005
SUPERSEDES:	SC Information Letter #05-28
AUTHORITY:	S. C. Code Ann. Section 12-4-320 (2000) 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 to December 31, 2005 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:

- **RR** Revenue Ruling
- **TRR** Temporary Revenue Ruling
- **RP** Revenue Procedure
- **TRP** Temporary Revenue Procedure
- **PLR** Private Letter Ruling
- TAM Technical Advice Memorandum
- IL Information Letter

From January 1, 2000 through December 31, 2002, the Department issued advisory opinions under names different than listed above. They were referred to as:

- **RAB** Revenue Advisory Bulletin
- TRAB Temporary Revenue Advisory Bulletin
- **RPB** Revenue Procedural Bulletin
- **TRPB** Temporary Revenue Procedural Bulletin
- **PRO** Private Revenue Opinion
- **RIB** Revenue Informational Bulletin

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

REVENUE RULING #87-3

Modified by RR #91-15

REVENUE RULING #87-4

Modified by RR #91-15 Superseded by RR #87-6

REVENUE RULING #87-5

Superseded by RR #99-5

REVENUE RULING #87-6

Modified by RR #91-15 Superseding RR #87-4

REVENUE RULING #88-2 Superseded by RR #97-3

REVENUE RULING #88-6 Superseded by IL #94-31

REVENUE RULING #88-9 Obsolete

REVENUE RULING #88-12 Obsolete

REVENUE RULING #89-1 Obsolete

REVENUE RULING #89-9

Superseded by RP #95-5

(Revised 12/30/05)

REVENUE RULING #89-12

Obsolete

REVENUE RULING #89-13 Obsolete

REVENUE RULING #89-15

Superseded by RR #90-3 Superseded by RR #89-19 Superseding IL #89-22

REVENUE RULING #89-17

Superseded by RR #97-3

REVENUE RULING #89-19

Superseded by RR #90-3 Superseding RR #89-15 Superseding IL #89-22

REVENUE RULING #89-20

Superseded by IL #90-6 Superseding IL #89-19

REVENUE RULING #89-23

Modified by RR #90-8 Modified by RR #90-2

REVENUE RULING #90-2

Modifying RR #89-23

REVENUE RULING #90-3

Modified by IL #93-18 Superseding RR #89-19 Superseding RR #89-15 Superseding IL #89-22

REVENUE RULING #90-4

Superseded by RR #90-7

REVENUE RULING #90-5 Obsolete

REVENUE RULING #90-7

Modified by RR #92-1 Modified by IL #91-17 Modified by IL #91-10 Superseding RR #90-4

REVENUE RULING #90-8

Modifying RR #89-23

REVENUE RULING #90-9

Superseded by RR #96-2 Modifying TAM #90-8 Modifying TAM #90-7

REVENUE RULING #90-11

Superseded by RR #91-17

REVENUE RULING #91-1

Modifying IL #89-30 Modifying IL #89-1 Modifying IL #88-15

REVENUE RULING #91-3

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REVENUE RULING #91-4 Obsolete

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REVENUE RULING #91-10 Obsolete

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REVENUE RULING #91-15

Superseding IL #88-7 Modifying RR #87-6 Modifying RR #87-4 Modifying RR #87-3 Modifying PLR #87-6

REVENUE RULING #91-16

Superseded by RR #93-10 Modifying PLR #88-19

REVENUE RULING #91-17

Modified by RR #05-16 Superseding IL #91-13 Superseding RR #90-11

REVENUE RULING #92-1

Modifying IL #91-17 Modifying IL #91-10 Modifying RR #90-7

REVENUE RULING #92-3

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REVENUE RULING #95-5

Superseding IL #94-23 Modifying PLR #92-7 **REVENUE RULING #95-6**

Superseding RR #92-3

REVENUE RULING #95-7 Superseded by RR #95-13

REVENUE RULING #95-12 Superseded by RR #04-13

REVENUE RULING #95-13 Superseding RR #95-7

REVENUE RULING #95-14 Obsolete

REVENUE RULING #95-15 Modified by IL #98-20

REVENUE RULING #95-17 Superseding TAM #93-1

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REVENUE RULING #96-6 Obsolete

REVENUE RULING #96-7 Superseded by RR #99-8

REVENUE RULING #96-8 Superseded by RR #97-20

REVENUE RULING #96-9 Modified by RR #05-16

REVENUE RULING #97-3

Superseded by RR #98-21 Superseding RR #89-17 Superseding RR #88-2 REVENUE RULING #97-4 Obsolete

REVENUE RULING #97-9 Superseding RR #93-3

REVENUE RULING #97-11 Superseded by RR #99-13

REVENUE RULING #97-12 Modified by RR #05-3

REVENUE RULING #97-15 Superseding RR #93-10 Superseding RR #91-16

REVENUE RULING #97-18 Obsolete

REVENUE RULING #97-20 Superseding RR #96-8

REVENUE RULING #97-22 Superseding RR#98-5

REVENUE RULING #97-23 Superseded by RR #04-4

REVENUE RULING #98-5 Superseding RR #97-22

REVENUE RULING #98-6 Obsolete

REVENUE RULING #98-15 Superseded by RR #99-9

REVENUE RULING #98-16 Superseded by RAB #01-2

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REVENUE RULING #99-4

Superseded by TRAB #00-1

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Superseding RR #87-5 Superseding IL #87-2

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REVENUE RULING #99-8

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REVENUE RULING #05-12 Superseding RR #93-6

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REVENUE RULING #05-15 Superseding TRR #05-15

REVENUE RULING #05-16

Modifying RR #96-9 Modifying RR #91-17

SC TEMPORARY REVENUE RULINGS

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TEMPORARY REVENUE RULING #05-15

Superseded by RR #05-15

SC REVENUE ADVISORY BULLETINS

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REVENUE ADVISORY BULLETIN #00-5 Superseding TRAB #00-5

REVENUE ADVISORY BULLETIN #00-8 Obsolete

REVENUE ADVISORY BULLETIN #00-9 Obsolete

REVENUE ADVISORY BULLETIN #01-2 Superseding RR #98-16

REVENUE ADVISORY BULLETIN #01-3 Superseded by RAB #02-4

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REVENUE ADVISORY BULLETIN #02-2 Superseding IL #98-18

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REVENUE ADVISORY BULLETIN #02-4 Superseded by RR #05-9 Superseding RAB #01-3

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SC TEMPORARY REVENUE ADVISORY BULLETINS

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Superseded by RAB #00-1 Superseding RR #99-4

TEMPORARY REVENUE ADVISORY BULLETIN #00-5

Superseded by RAB #00-5

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REVENUE PROCEDURE #87-2 Superseded by RP #93-1

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REVENUE PROCEDURE #91-6

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REVENUE PROCEDURE #92-1 Superseded by RP #95-3

REVENUE PROCEDURE #92-2 Superseded by RP #96-1

REVENUE PROCEDURE #92-3

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REVENUE PROCEDURE #96-3

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REVENUE PROCEDURE #97-1

Superseded by RPB #01-6 Superseding RP #87-3 **REVENUE PROCEDURE #97-2**

Superseded by RP #99-1

REVENUE PROCEDURE #97-6 Superseded by RP #98-3

REVENUE PROCEDURE #97-8 Superseded by RP #99-4 Superseding RP #94-1

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REVENUE PROCEDURE #98-2 Superseding RP #95-1

REVENUE PROCEDURE #98-3

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REVENUE PROCEDURE #98-4 Obsolete

REVENUE PROCEDURE #99-1

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REVENUE PROCEDURE #04-4 Superseding RP #04-3

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REVENUE PROCEDURAL BULLETIN #00-3 Superseding RP#95-5

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SC TEMPORARY REVENUE PROCEDURAL BULLETINS

TEMPORARY REVENUE PROCEDURAL BULLETIN #00-1 Superseded by RPB #00-1

TEMPORARY REVENUE PROCEDURAL BULLETIN #01-2 Superseded by RPB #01-2

TEMPORARY REVENUE PROCEDURAL BULLETIN #01-3 Superseded by RPB #01-3 Modifying RP #95-7

TEMPORARY REVENUE PROCEDURAL BULLETIN #01-4 Superseded by RPB #01-4

TEMPORARY REVENUE PROCEDURAL BULLETIN #01-9 Superseded by RPB #01-9

TEMPORARY REVENUE PROCEDURAL BULLETIN #02-1 Superseded by RPB #02-1

SC PRIVATE LETTER RULINGS

PRIVATE LETTER RULING #87-6 Modified by RR #91-15

PRIVATE LETTER RULING #88-1 Obsolete

PRIVATE LETTER RULING #88-6 Modified by IL #92-1 Superseded by IL #90-9 Superseded by IL #89-13

PRIVATE LETTER RULING #88-19 Modified by RR #91-16

PRIVATE LETTER RULING #89-5 Modified by IL #89-30

PRIVATE LETTER RULING #89-6 Modified by RR #93-4

PRIVATE LETTER RULING #89-10 Modified by RR #93-8

PRIVATE LETTER RULING #89-13 Superseded by IL #90-30

PRIVATE LETTER RULING #92-7 Modified by RR #95-5

PRIVATE LETTER RULING #94-7 Superseded by RR #04-7

SC TECHNICAL ADVICE MEMORANDA

TECHNICAL ADVICE MEMORANDUM #87-2 Superseded by TAM #87-14

TECHNICAL ADVICE MEMORANDUM #87-3 Modified by TAM #89-5

TECHNICAL ADVICE MEMORANDUM #87-11 Obsolete

TECHNICAL ADVICE MEMORANDUM #87-14 Superseding TAM #87-2

TECHNICAL ADVICE MEMORANDUM #88-5 Obsolete

TECHNICAL ADVICE MEMORANDUM #88-7 Superseded by RR #92-14

TECHNICAL ADVICE MEMORANDUM #89-4 Modified by RP #94-3

TECHNICAL ADVICE MEMORANDUM #89-5 Modifying TAM #87-3

TECHNICAL ADVICE MEMORANDUM #89-7 Superseded by IL #94-23

TECHNICAL ADVICE MEMORANDUM #90-7 Modified by RR #90-9

TECHNICAL ADVICE MEMORANDUM #90-8 Superseded by RR #91-14 Modified by RR #90-9

TECHNICAL ADVICE MEMORANDUM #93-1 Superseded by RR #95-17

SC INFORMATION LETTERS

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Superseded by RR #99-5

INFORMATION LETTER #87-3 Modified by IL #92-18

INFORMATION LETTER #88-7 Superseded by RR #91-15

INFORMATION LETTER #88-10 Superseded by IL #94-31

INFORMATION LETTER #88-11 Superseded by IL #91-11

INFORMATION LETTER #88-15

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INFORMATION LETTER #88-16 Superseded by IL #90-9

INFORMATION LETTER #88-20 Obsolete

INFORMATION LETTER #89-1

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INFORMATION LETTER #89-13

Modified by IL #92-1 Superseding PLR #88-6

INFORMATION LETTER #89-15

Obsolete

INFORMATION LETTER #89-18 Obsolete

INFORMATION LETTER #89-19

Superseded by IL #90-6 Superseded by RR #89-20

INFORMATION LETTER #89-20 Obsolete

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INFORMATION LETTER #89-22

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INFORMATION LETTER #89-25

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INFORMATION LETTER #89-27

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Modified by RR #91-1 Modifying PLR #89-5 Modifying IL #89-1 Modifying IL #88-15

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Superseded by IL #98-8

INFORMATION LETTER #90-6

Superseding RR #89-20 Superseding IL #89-19

INFORMATION LETTER #90-9

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INFORMATION LETTER #90-28

Superseded by RP #90-3

INFORMATION LETTER #90-29 Modified by IL #92-19

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INFORMATION LETTER #90-37 Obsolete

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INFORMATION LETTER #91-6 Superseded by IL #91-18

INFORMATION LETTER #91-10

Modified by RR #92-1 Modified by IL #91-17 Modifying RR #90-7

INFORMATION LETTER #91-11

Superseded by IL #94-6 Superseding IL #88-11

INFORMATION LETTER #91-13

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INFORMATION LETTER #91-17

Modified by RR #92-1 Modifying IL #91-10 Modifying RR #90-7

INFORMATION LETTER #91-18

Superseding IL #91-6

INFORMATION LETTER #91-26

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Modifying PLR #88-6 Superseding IL #91-5 Superseding IL #91-4 Modifying IL #90-9 Modifying IL #89-13 Modifying IL #88-16

INFORMATION LETTER #92-7

Superseded by IL #94-4 Superseding IL #91-27 Superseding IL #91-13

INFORMATION LETTER #92-18 Modifying IL #87-3

INFORMATION LETTER #92-19 Obsolete

INFORMATION LETTER #92-20 Superseded by IL #93-9

INFORMATION LETTER #92-22 Obsolete

- **INFORMATION LETTER #92-25** Modifying IL #91-26
- INFORMATION LETTER #93-9 Superseding IL #92-20

INFORMATION LETTER #93-18 Modifying RR #90-3

INFORMATION LETTER #93-20 Superseded by IL #94-5

INFORMATION LETTER #93-25 Superseded by RR #05-4

INFORMATION LETTER #93-26

Superseded by IL #95-9 Superseding IL #90-9

INFORMATION LETTER #93-28 Modifying RR #92-15

INFORMATION LETTER #94-3 Superseded by RR #94-9

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INFORMATION LETTER #94-12

Superseded by IL #96-7

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Superseded by IL #95-11

INFORMATION LETTER #94-23

Superseded by RR #95-5 Superseding TAM #89-7 **INFORMATION LETTER #94-29**

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INFORMATION LETTER #94-31

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INFORMATION LETTER #97-8 Obsolete

INFORMATION LETTER #98-3 Superseded by IL #99-20

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INFORMATION LETTER #98-15 Obsolete

INFORMATION LETTER #98-17 Superseded by IL #03-6

INFORMATION LETTER #98-18

Superseded by RAB #02-2 Superseding IL #95-9 INFORMATION LETTER #98-20 Modifying RR #95-15

INFORMATION LETTER #98-25 Superseded by IL #99-9

INFORMATION LETTER #98-26 Modified by RIB #00-19

INFORMATION LETTER #99-9

Superseded by RIB #02-3 Superseding IL #98-25

INFORMATION LETTER #99-11

Superseded by RIB #00-16 Superseding IL #97-1

INFORMATION LETTER #99-14 Modifying RR #99-7

INFORMATION LETTER #99-20 Superseding IL #98-3

INFORMATION LETTER #03-2 Superseding IL #98-8

INFORMATION LETTER #03-6

Superseded by IL #05-13 Superseding IL #98-17

INFORMATION LETTER #03-7

Superseded by IL #03-26 Modified by IL #03-10 Superseding RIB #02-21

INFORMATION LETTER #03-10

Modifying IL #03-7

INFORMATION LETTER #03-26

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INFORMATION LETTER #04-20

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REVENUE INFORMATIONAL BULLETIN #00-16

Superseded by RIB #01-1 Superseding IL #99-11

REVENUE INFORMATIONAL BULLETIN #00-19 Modifying IL #98-26

REVENUE INFORMATIONAL BULLETIN #01-1

Superseded by RIB #02-2 Superseding RIB #00-16

REVENUE INFORMATIONAL BULLETIN #02-2

Superseded by RIB #02-21 Superseding RIB #01-1

REVENUE INFORMATIONAL BULLETIN #02-3

Superseded by IL #04-27 Superseding IL #99-9

REVENUE INFORMATIONAL BULLETIN #02-21

Superseded by IL #03-7 Superseding RIB #02-2

EXHIBIT 1

The following information letters are issued on a regular basis and contain information of a cumulative nature. Therefore, only the most recently issued information letters concerning these topics are listed. All prior information letters on these matters remain valid.

Advisory Opinion Index	IL #05-35
Interest Rate for Under/Over Payments	IL #05-33