



# INTERNATIONAL JET

AVIATION SERVICES

February 1, 2018

To Whom It May Concern:

We are a Colorado owned and based small business that operates aircraft in commercial transportation throughout Colorado and North America. We have been issued an Air Carrier Certificate by the Federal Aviation Administration which we have held since 1979. We operate a dozen aircraft of various types and operate passenger and cargo flights including air ambulance and critical organ transport.

We have been subject to unfair regulations as it relates to Colorado sales and use tax on the aircraft we operate. Although major airlines are completely exempt from such tax, we have to pay it simply because we don't have a published schedule. All of the aircraft we own are used exclusively in commercial transportation and are not used privately at all. We are put at a competitive disadvantage compared with a major airline that has a regular published schedule. All other aspects of our operations are the same yet we have to pay the tax.

We have presented our case on appeal to the Colorado Department of Revenue and they have repeatedly stated that they can only interpret the rules as written by the legislature. They have acknowledged that we are much like a major airline and they have encouraged us to get the rules changed to make it more fair. Whether or not we operate on a published schedule should not matter. It is all commercial transportation.

I would ask that consideration be given to exempt commercial operators like ourselves from paying the sales and use tax when the aircraft will be used in commercial transportation. Other states have done this already and have for many years so it must be working for them.

Sincerely,

INTERNATIONAL JET AVIATION SERVICES, INC.

Lynn M. Krogh  
Founder and CEO