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October 27, 2025

Ms. Janet Young Rules Coordinator Department of Revenue Sales and Use Tax P.O. Box 5906 Tallahassee, Florida 32314-5906

RE: Department of Revenue, Sales and Use Tax Proposed Rule Numbers 12A-1.0371 and .097

Dear Ms. Young:

I have reviewed the above-referenced proposed rules, which were advertised in the Florida Administrative Register on October 13, 2025. I have the following comments.

12A-1.0371: Rulemaking Authority

The citation to section 212.08(7)(ww), F.S., should be removed as it does

not contain a grant of rulemaking authority.

12A-1.097: Law Implemented

Please review whether section 212.099, F.S., should be removed as a law

implemented consistent with the updates to this rule.

Please let me know if you have any questions. Otherwise, I look forward to your response.

Sincerely,

Jamie L. Jackson Chief Attorney