

average value for the twelve months preceding the date of finality in the year 1962 and in every year thereafter.

3. For the purposes of this subsection the terms “warehouser” or “engaging in the business of warehousing” apply to a person, firm, or corporation engaged only in the business of warehousing merchandise as a distribution center and having neither retail nor wholesale sales persons. Also for the purposes of this subsection the terms “manufacturer” or “engaging in manufacturing” apply to any person, firm, or corporation having activities which may be described by at least two of the following descriptive terms:

- (1) The application of labor, skill, art, or science; or
- (2) Changes or modifications in existing material effected by a process popularly regarded as manufacturing; or
- (3) The evolution of new forms, qualities, properties, combinations, or adaptability to certain uses; or
- (4) The production of a different material with a new use capable of or adapted to the situation of some want or desire of man.

The Board of County Commissioners in each instance shall determine whether either of these terms applies to any person, firm, or corporation, and its judgment in any instance may be appealed to the appeal tax court of Washington County.

(d) For the purpose of county taxation in Allegany, Baltimore, Caroline, Cecil, Dorchester, Frederick, Garrett, Harford, Kent, Queen Anne’s, Somerset, Talbot, Wicomico and Worcester counties, such stock in business shall be assessed at sixty per centum (60%) of such fair average value for the twelve months preceding the date of finality. For the purpose of county taxation in Anne Arundel County, stock in business shall be assessed at twenty-five per centum (25%) of such fair average value for the twelve months preceding the date of finality; for the taxable year beginning July 1, 1972, such stock shall be entirely exempt from valuation, assessment, and taxation under the provisions of this section.

(e) *Exemptions not allowed in computing percentage valuation.*—Provided further, however, that any person, firm or corporation who shall take advantage of the provisions of this section shall not be allowed the exemption in the percentage of the total assessed valuation which is provided by Section 9, subsection (24) of this article.】

16. Operating property, except land, of railroads, other public utilities and contract carriers shall be valued and assessed as follows:

(b) If an operating unit is located wholly within this State, the entire value thereof shall be allocated to the operating property, including land, located in this State. If part only of an operating unit is located in this State, the Department shall allocate to the operating property, including land, located in this State such part of the entire value of such operating unit as is reasonably attributable to the part of such operating unit which is located in this State. In computing the assessment for purposes of State taxation of the operating property, except land, located in this State, the Department shall, subject to the provisions of Section [9] 9A of this Article or any special act providing for exemption from ordinary State taxes, deduct