REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE

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RECORDS MANAGEMENT DIVISION
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REVENUE MEMORANDUM CIRCULAR NO. 092-2024

SUBJECT : Guidelines on the Proper Sale and Affixture of Loose Documentary Stamps to Taxable Documents

TO : All Revenue Officials, Employees and Other Concerned

BACKGROUND

In 2008, Revenue Memorandum Order (RMO) No. 13-2008 (now Revenue Regulations No. 2-2023) was issued prescribing the use of Constructive System/ Receipt System (CS/RS) for certificates being issued by government agencies and its instrumentalities, including local government units, to address the unavailability of loose stamps and the technical and operational inadequacies of Documentary Stamp Electronic Imprinting Machine (DSEIM). The temporary use of CS/RS was likewise prescribed for DSEIM users under RMO No. 14-2008, in order to address the loading limitation of these machines, until it was revoked effective January 1, 2010 by Revenue Regulations (RR) No. 7-2009, when the eDST System was implemented replacing the DSEIMs.

While RR No. 7-2009 has identified industry sectors that are mandated to use the eDST System, it was noted that certain taxpayers failed to enroll and use the said system. It was later discovered that these taxpayers have either continued to use the CS/RS or purchased and affixed loose documentary stamps on their taxable documents.

Further, the following incidents were recently reported to this Bureau:

1. Sale of loose DST through online platforms or physical stores.

2. Affixture of both spurious eDST system-printed stamps and loose documentary stamps to taxable documents.

3. Affixture of loose documentary stamps to taxable documents by eDST System taxpayers-users instead of the system-generated stamp.

4. Affixture of loose documentary stamps to taxable documents with DST due of more than P15.00 (now P30.00) in violation of RR No. 15-2001.

GUIDELINES ON THE PROPER SALE AND AFFIXTURE OF LOOSE DOCUMENTARY STAMPS

In order to address these incidents, this Circular is hereby issued to prescribe the following policies and procedures for strict compliance by all concerned taxpayers and revenue personnel of this Bureau:

1. The affixture of loose documentary stamps to taxable documents shall not apply to the following taxable documents/transactions:

   a. One-Time Transaction (ONETT);
   b. Taxable documents issued in the regular operations of mandated taxpayers-users of the eDST System of this Bureau; and
   c. Certificates covered by the CS/RS under RR No. 2-2023.

2. Loose documentary stamps shall only be purchased from and sold by the authorized Specialized Revenue Collecting Officers (SRCO)/Revenue Collection Officers (RCO) assigned at the National Office and Revenue District Office of this Bureau.

   In order that the amount of the daily proceeds from sale of loose documentary stamps are uploaded as collections to the Collection and Bank Reconciliation of the Integrated Tax System (CBR-ITS)/Collection, Remittance and Reconciliation of the Internal Revenue Integrated System (CRR-IRIS), an electronic Revenue Official Receipt (eROR) or manual ROR, in case of unavailability of the Mobile Revenue Collection Officer System (MRCOS) and/or the Collection Officer Receipting Device (CORD), shall be generated by the SRCO/RCO covering all sales of documentary stamps for the day. The RCO/SRCO shall use the Taxpayer Identification Number of the Revenue District Office in the issuance of said receipts, and the inclusive series of the loose documentary stamps sold shall be indicated in the "REMARKS" field of the MRCOS.

3. A single piece of loose documentary stamp shall only be purchased and sold by the SRCO/RCO for each taxable document with DST due of not exceeding P30.00. In addition, the SRCO/RCO shall undertake the following procedures:

   a. Require the presentation of the original copy of the duly signed taxable document to which the documentary stamp tax is to be affixed;

   b. Affix the loose documentary stamp to the lower portion of the taxable document;

   c. Cancel the stamp by writing two lines across the stamp and extending to portions of the document to which it is affixed, and indicating the date of affixture thereto by perforation as to render it unreusable. In case of unavailability of a perforating device, it shall be sufficient that the date of affixture may be indicated through a mechanical dater, rubber stamp or by hand writing; and

   d. Release the taxable document with the duly cancelled documentary stamp.

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However, for those taxpayers who issue taxable documents with tax due of not more than P30.00 such as schools and universities, except those taxpayers who are using the eDST System and those taxpayers covered by RR No. 2-2023, they shall be allowed to purchase two or more pieces of loose documentary stamps, provided that the following requirements shall be complied with:

a. The taxpayer shall submit to the SRCO/RCO a written letter with its official letterhead duly signed by the taxpayer or its authorized representative requesting the purchase of loose documentary stamps, with the following information:

   i. Name and address of the requesting taxpayer;
   ii. Taxpayer Identification Number;
   iii. Number of loose documentary stamps being purchased;
   iv. The purpose for which the loose documentary stamps shall be used; and
   v. Name of taxable document on which the loose documentary stamps shall be affixed to.

   In subsequent purchases, the previously purchased stamps shall be liquidated and included in the letter, as follows:

Beginning Balances		Stamps Purchased		Stamps Affixed			Ending Balances	
Count	Serial Numbers	Count	Date	Count	Period Covered	Serial Numbers	Count	Serial Numbers

b. The SRCO/RCO shall issue an eROR or manual ROR, as the case may be, with the amount equivalent to the total value of the loose documentary stamps being purchased;

c. The SRCO/RCO shall issue ONLY loose documentary stamps in sequential serial numbers for bulk purchases of these stamps. Accordingly, the SRCO/RCO shall maintain two (2) separate sheets of stamps with one sheet assigned for single-piece purchases of stamps and the other sheet for bulk purchases of stamps.

d. Based on the information indicated in the purchase letters of the taxpayers, a record, in hard or soft copy, shall be maintained by the SRCO/RCO using the following format:

TP Name	Address	TIN	Beginning Balances		No. of Stamps Purchased		No. of Stamps Affixed			Ending Balances	
			Count	Serial Nos.	Count	Date	Count	Period Covered	Serial Numbers	Count	Serial Nos.

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4. Original copies of surety bonds issued for excise tax purposes with documentary stamp imprinted by the eDST System shall not be accepted and recorded by the concerned offices of this Bureau, unless the name of the issuing company has been validated from the concerned revenue office as a duly enrolled taxpayer to the eDST System and the DST due from the surety bond is deducted from the taxpayer's ledger in the said system.

All internal revenue officials, employees and others concerned are hereby enjoined to give this Circular as wide publicity as possible.

This Circular shall take effect immediately.

ROMEO D. LUMAGUI, JR.
Commissioner of Internal Revenue

J-5

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