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Page status: **not legally binding**

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## **Ruling Compendium – TD 2014/24**

This is a compendium of responses to the issues raised by external parties to Draft Taxation Determination TD 2014/D6 *Income tax: consolidation: if the conditions in paragraph 50(3)(a) of Part 4 of Schedule 3 to the Tax Laws Amendment (2012 Measures No. 2) Act 2012 are satisfied and the interim rules apply to an assessment and, on or after 29 June 2012 that assessment is amended to include a new claim which was not previously made in the assessment, do the interim rules apply to the new claim?*

This compendium of comments has been edited to maintain the anonymity of entities that commented on the draft ruling.

### **Summary of issues raised and responses**

| <b>Issue No.</b> | <b>Issue raised</b>                                                                      | <b>ATO Response/Action taken</b>                                                                                                                                                                                                                                                                                                                                                             |
|------------------|------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                | The Draft Determinations are very technical and very difficult to follow and understand. | It is acknowledged that this is the case, however, the law is complex in nature and therefore we have not found it possible to simplify the explanation, or to avoid using technical language without affecting their accuracy. As an aid to understanding, some additional paragraphs have been added which explain the principles behind the interpretative approach which has been taken. |