

# ***CR 2004/74W - Income tax: capital reduction: Singapore Telecommunications Limited***



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This document has changed over time. This is a consolidated version of the ruling which was published on *1 July 2005*



## Class Ruling

### Income tax: capital reduction: Singapore Telecommunications Limited

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#### **Preamble**

*The number, subject heading, **What this Class Ruling is about** (including **Tax law(s)**, **Class of persons** and **Qualifications** sections), **Date of effect**, **Withdrawal**, **Arrangement** and **Ruling** parts of this document are a 'public ruling' in terms of Part IVAAA of the **Taxation Administration Act 1953**. CR 2001/1 explains Class Rulings and Taxation Rulings TR 92/1 and TR 97/16 together explain when a Ruling is a 'public ruling' and how it is binding on the Commissioner.*

## Withdrawal

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1. This Class Ruling is withdrawn and ceases to have effect after 30 June 2005. However, the Ruling continues to apply after its withdrawal in respect of the tax laws ruled upon, to all persons within the specified class who entered into the specified arrangement during the term of the Ruling, subject to there being no change in the arrangement or in the person's involvement in the arrangement.

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#### **Commissioner of Taxation**

14 July 2004

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#### *Previous draft:*

Not previously issued as a draft

#### *Related Rulings/Determinations:*

CR 2001/1; TR 92/1; TR 92/20; TR 97/16

#### *Subject references:*

- anti avoidance measures
- capital reductions
- deemed dividends
- dividend income
- return of capital on shares
- share capital
- share premium accounts

#### *Legislative references:*

- Copyright Act 1968

- TAA 1953 Pt IVAAA
- ITAA 1936 6(1)
- ITAA 1936 6(4)
- ITAA 1936 44(1)
- ITAA 1936 45A
- ITAA 1936 45A(2)(a)
- ITAA 1936 45A(2)(c)
- ITAA 1936 45A(3)(b)
- ITAA 1936 45B
- ITAA 1936 45B(5)(b)
- ITAA 1936 45B(9)
- ITAA 1936 45C

#### *Other references:*

- Taxation Laws Amendment (Company Law Review) Act 1998

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# CR 2004/74

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Page 2 of 2

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ATO references

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