# TD 98/D10 - Income tax: is a reward received under a 'consumer loyalty program' that results from private expenditure assessable as ordinary income?

This cover sheet is provided for information only. It does not form part of *TD 98/D10 - Income tax: is a reward received under a 'consumer loyalty program' that results from private expenditure assessable as ordinary income?* 

This document has been finalised by TD 1999/34.



## Taxation Determination TD 98/D10

FOI Status: draft only - for comment

Page 1 of 1

Draft Taxation Determinations (TDs) represent the preliminary, though considered, views of the ATO. Draft TDs may not be relied on; only final TDs are authoritative statements of the ATO.

## **Draft Taxation Determination**

Income tax: is a reward received under a 'consumer loyalty program' that results from private expenditure assessable as ordinary income?

- 1 No
- 2. A 'consumer loyalty program' is defined in Taxation Ruling TR 98/D9 'Income tax and fringe benefits tax: flight rewards received under frequent flyer and other similar consumer loyalty programs'.
- 3. Rewards that result from private expenditure do not have the characteristics of an income receipt.

#### Your comments

4. If you wish to comment on this draft Determination, please send your comments by 21 August 1998 to:

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#### **Commissioner of Taxation**

8 July 1998

FOI INDEX DETAIL: Reference No.
Related Determinations: TD 98/D11
Related Rulings: TR 97/D15; TR 98/D9

Subject Ref: frequent flyer benefits; income; non cash benefits

Legislative Ref: ITAA97 6-5

Case Ref:

ATO Ref: NAT 98/6906-9; BO 97/5833-0