GSTA TPP 054W - Goods and services tax: Is B's payment to A consideration for A's supply to B where, under an agreement between A and B: A licenses intellectual property to B (who sublicenses it to C) and; the amount B pays A is calculated by reference to the extent of B's supply to C?

This cover sheet is provided for information only. It does not form part of GSTA TPP 054W - Goods and services tax: Is B's payment to A consideration for A's supply to B where, under an agreement between A and B: A licenses intellectual property to B (who sublicenses it to C) and; the amount B pays A is calculated by reference to the extent of B's supply to C?

This document has changed over time. This is a consolidated version of the ruling which was published on 2 July 2014

GSTA TPP 054

Page 1 of 2

Notice of Withdrawal

Goods and Services Tax Advice

Goods and services tax: is B's payment to A consideration for A's supply to B where, under an agreement between A and B:

- A licences intellectual property to B (who sublicenses it to C); and
- the amount B pays A is calculated by reference to the extent of B's supply to C?

Goods and Services Tax Advice GSTA TPP 054 is withdrawn with effect from today.

- 1. GSTA TPP 054 considered a particular transaction and the associated supplies and the consideration for the supply. The advice explained that a supply is made for consideration when there is a sufficient nexus between that supply and the consideration provided by the recipient.
- 2. GSTA TPP 054 is withdrawn because the concepts of consideration and supplies considered in the advice are explained in existing public rulings.
- 3. These concepts are explained in Goods and Services Tax Ruling GSTR 2006/9 *Goods and services tax ruling*: supplies and Goods and Services Tax Ruling GSTR 2001/6 *Goods and services tax ruling*: non-monetary consideration.

Commissioner of Taxation

2 July 2014

Goods and Services Tax Advice

GSTA TPP 054

Page 2 of 2

ATO references

NO:	1-5E173D4
ISSN:	1833-0053
ATOlaw topic:	Goods and Services Tax ~~ General rules and concepts ~~ consideration

© AUSTRALIAN TAXATION OFFICE FOR THE COMMONWEALTH OF AUSTRALIA

You are free to copy, adapt, modify, transmit and distribute this material as you wish (but not in any way that suggests the ATO or the Commonwealth endorses you or any of your services or products).