



# ***PR 2006/26W - Income tax: deductibility of interest incurred on borrowings related to the Merrill Lynch Structured Equity Loan***

 This cover sheet is provided for information only. It does not form part of *PR 2006/26W - Income tax: deductibility of interest incurred on borrowings related to the Merrill Lynch Structured Equity Loan*

 This document has changed over time. This is a consolidated version of the ruling which was published on *1 July 2007*



# Notice of Withdrawal

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## Product Ruling

### Income tax: deductibility of interest incurred on borrowings related to the Merrill Lynch Structured Equity Loan

Product Ruling PR 2006/26 is withdrawn with effect from 1 July 2007.

1. Product Ruling PR 2006/26 sets out the Commissioner's view on the deductibility of interest incurred on borrowings related to the Merrill Lynch Structured Equity Loan.
2. From 1 July 2007, the recently enacted Division 247 of the *Income Tax Assessment Act 1997* applies a different methodology for calculating the cost of the capital protection for entities in the Merrill Lynch Structured Equity Loan. PR 2006/26 therefore has no application to entities entering into the Merrill Lynch Structured Equity Loan on or after 1 July 2007.

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**Commissioner of Taxation**

4 July 2007

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#### ATO references

NO: 2006/20258  
ISSN: 1441-1172  
ATOlaw topic: Income Tax ~~ Product ~~ finance