



TD 2005/7W - Income tax: section 8-1 of the Income Tax Assessment Act 1997: capital protected loan facility with a call option writing feature: interest deductibility

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 This document has changed over time. This is a consolidated version of the ruling which was published on 7 December 2016



Notice of Withdrawal

Taxation Determination

Income tax: section 8-1 of the *Income Tax Assessment Act 1997*: capital protected loan facility with a call option writing feature: interest deductibility

Taxation Determination TD 2005/7 is withdrawn with effect from today.

1. TD 2005/7 deals with interim measures relating to changes announced in 2003 in respect of the treatment of capital protected borrowings. Specifically, it explains when interest payable on a capital protected loan facility with a call option writing feature is deductible under section 8-1 of the *Income Tax Assessment Act 1997* (ITAA 1997).
2. Capital protected borrowings are now dealt with by Division 247 of the ITAA 1997.
3. TD 2005/7 has no ongoing relevance, and is therefore withdrawn without replacement.

Commissioner of Taxation

7 December 2016

ATO references

NO: 1-9N72KXS
ISSN: 2205-6211
BSL: TCN

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