


# ***TR 98/22A2 - Addendum - Income tax: the taxation consequences for taxpayers entering into certain linked or split loan facilities***

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## Addendum

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### Taxation Ruling

#### Income tax: the taxation consequences for taxpayers entering into certain linked or split loan facilities

This Addendum updates the Addendum to Taxation Ruling TR 98/22 which issued 11 August 2004 to the extent that it deals with whether interest incurred under linked or split loan facilities can be included in the cost base of assets financed by these facilities, where the interest has been disallowed pursuant to Part IVA of the *Income Tax Assessment Act 1936*.

As foreshadowed in that Addendum, the Commissioner has reviewed his opinion on this issue. The Commissioner's views are now expressed in Taxation Determination TD 2005/33 which issued on 3 August 2005.

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**Commissioner of Taxation**

19 October 2005

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ATO references

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