

TR 2005/5DCW - Income tax: ascertaining the right to tax United States (US) and United Kingdom (UK) resident financial institutions under the US and the UK Taxation Conventions in respect of interest income arising in Australia

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! This draft update has been replaced by [TR 2005/5DC2](#)

! This document has changed over time. This is a consolidated version of the ruling which was published on *21 September 2022*



Notice of Withdrawal

Taxation Ruling

Income tax: ascertaining the right to tax United States (US) and United Kingdom (UK) resident financial institutions under the US and the UK Taxation Conventions in respect of interest income arising in Australia

Draft update to Taxation Ruling TR 2005/5 is withdrawn with effect from today.

1. This draft update, which issued on 28 November 2018, proposed changes to clarify certain aspects of the second limb of the definition of 'financial institution' as used in Australia's Double Taxation Conventions with the United States and the United Kingdom.
2. The proposed changes in that draft update are included in a further draft update to TR 2005/5 *Income tax: ascertaining the right to tax United States (US) and United Kingdom (UK) resident financial institutions under the US and the UK Taxation Conventions in respect of interest income arising in Australia*, which issued today. This update expands on the Commissioner's view in TR 2005/5DC. It has been issued in draft form to allow further community consultation and comment.

Commissioner of Taxation

21 September 2022

ATO references

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