


TD 93/D188W - Withdrawal - Does Division 13 of the Income Tax Assessment Act 1936 apply to impute interest income to an Australian company which makes an interest-free loan to a non-resident subsidiary to enable this subsidiary to guarantee a third party loan to another non-resident subsidiary?

 This cover sheet is provided for information only. It does not form part of *TD 93/D188W - Withdrawal - Does Division 13 of the Income Tax Assessment Act 1936 apply to impute interest income to an Australian company which makes an interest-free loan to a non-resident subsidiary to enable this subsidiary to guarantee a third party loan to another non-resident subsidiary?*

Notice of Withdrawal

Does Division 13 of the *Income Tax Assessment Act 1936* apply to impute interest income to an Australian company which makes an interest-free loan to a non-resident subsidiary to enable this subsidiary to guarantee a third party loan to another non-resident subsidiary?

Draft Taxation Determination TD 93/D188 is withdrawn with effect from today.

The topic is not considered to be a high priority and does not justify a public ruling.

Commissioner of Taxation

30 August 1995

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