



# ***PR 2005/78W - Income tax: tax consequences of investing in the Commonwealth Bank Protected Portfolio Loan***

 This cover sheet is provided for information only. It does not form part of *PR 2005/78W - Income tax: tax consequences of investing in the Commonwealth Bank Protected Portfolio 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: tax consequences of investing in the Commonwealth Bank Protected Portfolio Loan

Product Ruling PR 2005/78 is withdrawn with effect from 1 July 2007.

1. Product Ruling PR 2005/78 sets out the Commissioner's view on the income tax consequences for entities participating in the Commonwealth Bank Protected Portfolio Loan (the 'PPL').
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 capital protection for entities in the PPL. PR 2005/78 therefore has no application to entities entering into the PPL on or after 1 July 2007.

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**Commissioner of Taxation**

27 June 2007

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#### ATO references

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