TD 92/152W - Income tax: is interest withholding tax, or an amount equivalent to interest withholding tax, paid by a borrower on behalf of a foreign lender deductible?

UThis cover sheet is provided for information only. It does not form part of *TD 92/152W* - *Income tax: is interest withholding tax, or an amount equivalent to interest withholding tax, paid by a borrower on behalf of a foreign lender deductible?*

Units document has changed over time. This is a consolidated version of the ruling which was published on *3 May 2000*



FOI status: may be released

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Notice of Withdrawal

Income tax: is interest withholding tax, or an amount equivalent to interest withholding tax, paid by a borrower on behalf of a foreign lender deductible?

Taxation Determination TD 92/152 is withdrawn with effect from today.

As a result of the Full Federal Court's decision in *FCT v. Century Yuasa Batteries Pty Ltd* (1998) 82 FCR 288, the Taxation Determination is no longer appropriate.

Commissioner of Taxation 3 May 2000

ATO References: NO T2000/4313 BO

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