

TD 93/160 - Income tax: Foreign Income (FI) Cell: what is the purpose of the FI Cell and what are its objectives?

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⚠ This document has changed over time. This is a consolidated version of the ruling which was published on *19 August 1993*

This Determination, to the extent that it is capable of being a 'public ruling' in terms of Part IVAAA of the *Taxation Administration Act 1953*, is a public ruling for the purposes of that Part. Taxation Ruling TR 92/1 explains when a Determination is a public ruling and how it is binding on the Commissioner. Unless otherwise stated, this Determination applies to years commencing both before and after its date of issue. However, this Determination does not apply to taxpayers to the extent that it conflicts with the terms of a settlement of a dispute agreed to before the date of issue of the Determination (see paragraphs 21 and 22 of Taxation Ruling TR 92/20).

Taxation Determination

Income tax: Foreign Income (FI) Cell: what is the purpose of the FI Cell and what are its objectives?

1. The FI Cell is a specialist cell within the ATO. Its purpose is to provide a reference point and 'centre of expertise' to resolve the most complex and significant issues arising from the taxation of foreign income.
2. "Foreign Income" means matters relating to:
 - * The Controlled Foreign Company measures
 - * The Transferor Trust measures
 - * The Foreign Investment Fund measures
 - * The Foreign Tax Credit System
3. The objectives of the FI Cell are to:
 - (a) Co-ordinate the identification and resolution of the more complex and significant foreign income issues.
 - (b) Implement strategies which provide solutions to issues, ensuring that decisions and outcomes are widely communicated.
 - (c) Provide a focus for, and promote the discussion and consideration of, the taxation of foreign income.
4. The Determinations and Rulings issued by the Cell provide a means of communicating the ATO view on foreign income matters.

Commissioner of Taxation

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