


TD 94/80W - Income tax: is an investor who borrows to fund the purchase price of infrastructure borrowings, entitled to a deduction under subsection 51(1) of the Income Tax Assessment Act 1936 for any interest incurred by the investor for that purpose?

 This cover sheet is provided for information only. It does not form part of *TD 94/80W - Income tax: is an investor who borrows to fund the purchase price of infrastructure borrowings, entitled to a deduction under subsection 51(1) of the Income Tax Assessment Act 1936 for any interest incurred by the investor for that purpose?*

 This document has changed over time. This is a consolidated version of the ruling which was published on 7 December 2016



Notice of Withdrawal

Taxation Determination

Income tax: is an investor who borrows to fund the purchase price of infrastructure borrowings, entitled to a deduction under subsection 51(1) of the *Income Tax Assessment Act 1936* for any interest incurred by the investor for that purpose?

Taxation Determination TD 94/80 is withdrawn with effect from today.

1. TD 94/80 explains that an investor who borrows to fund the purchase price of infrastructure borrowings is entitled to deduct the interest incurred under former subsection 51(1) of the *Income Tax Assessment Act 1936* (ITAA 1936).
2. TD 94/80 deals with the former infrastructure borrowing provisions in Division 16L of Part III of the ITAA 1936, which were repealed by the *Taxation Laws Amendment (Infrastructure Borrowings) Act 1997*.
3. TD 94/80 has no ongoing relevance and is therefore withdrawn without replacement.

Commissioner of Taxation
7 December 2016

ATO references

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