


***TD 98/D10 - Income tax: is a reward received under a 'consumer loyalty program' that results from private expenditure assessable as ordinary income?***

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This document has been finalised by TD 1999/34.

Draft Taxation Determinations (TDs) represent the preliminary, though considered, views of the ATO. Draft TDs may not be relied on; only final TDs are authoritative statements of the ATO.

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## Draft Taxation Determination

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**Income tax: is a reward received under a 'consumer loyalty program' that results from private expenditure assessable as ordinary income?**

1. No.
2. A 'consumer loyalty program' is defined in Taxation Ruling TR 98/D9 'Income tax and fringe benefits tax: flight rewards received under frequent flyer and other similar consumer loyalty programs'.
3. Rewards that result from private expenditure do not have the characteristics of an income receipt.

### Your comments

4. If you wish to comment on this draft Determination, please send your comments by 21 August 1998 to:

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**Commissioner of Taxation**

8 July 1998

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FOI INDEX DETAIL: [Reference No.](#)

[Related Determinations:](#) TD 98/D11

[Related Rulings:](#) TR 97/D15; TR 98/D9

[Subject Ref:](#) frequent flyer benefits; income; non cash benefits

[Legislative Ref:](#) ITAA97 6-5

[Case Ref:](#)

[ATO Ref:](#) NAT 98/6906-9; BO 97/5833-0