TR 93/15W - Income tax: capital gains tax consequences of consideration comprising a lump sum plus a right to a contingent and unascertainable amount

• This cover sheet is provided for information only. It does not form part of *TR* 93/15W - Income tax: capital gains tax consequences of consideration comprising a lump sum plus a right to a contingent and unascertainable amount

Units document has changed over time. This is a consolidated version of the ruling which was published on 17 October 2007

Australian Government



Australian Taxation Office

Notice of Withdrawal

Taxation Ruling

Income tax: capital gains tax consequences of consideration comprising a lump sum plus a right to a contingent and unascertainable amount

Taxation Ruling TR 93/15 is withdrawn with effect from today.

1. Taxation Ruling TR 93/15 was concerned with the capital gains tax consequences of the sale of an asset for a lump sum plus a contingent and unascertainable amount.

- 2. The Ruling explained:
 - the capital gains tax consequences for the seller; (a)
 - (b) the capital gains tax consequences for the buyer; and
 - the particular capital gains tax consequences of the (C) transaction of the sale of an asset acquired before 20 September 1985.

The matters considered in TR 93/15 – and additional matters 3. - are now dealt with in Draft Taxation Ruling TR 2007/D10, which applies on and from 17 October 2007. TR 2007/D10 now sets out the Commissioner's current, although preliminary, view about the way in which the relevant taxation laws apply.

To the extent that the views contained in TR 93/15 continue to 4. represent the views of the Commissioner, they have been incorporated into TR 2007/D10.

Commissioner of Taxation 17 October 2007 ATO references NO: 2006/20258 ISSN: 1039-0731 Income Tax ~~ Capital Gains Tax ~~ capital proceeds ATOlaw topic: