TD 2007/D16W - Notice of Withdrawal - Income tax: can section 177EA of the Income Tax Assessment Act 1936 apply to the issue of 'dollar value' convertible notes of the type described in this Taxation Determination?

• This cover sheet is provided for information only. It does not form part of *TD 2007/D16W* - Notice of Withdrawal - Income tax: can section 177EA of the Income Tax Assessment Act 1936 apply to the issue of 'dollar value' convertible notes of the type described in this Taxation Determination?



Australian Government

Australian Taxation Office

Taxation Determination TD 2007/D16

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## Notice of Withdrawal

## **Draft Taxation Determination**

Income tax: can section 177EA of the *Income Tax Assessment Act 1936* apply to the issue of 'dollar value' convertible notes of the type described in this Taxation Determination?

Draft Taxation Determination TD 2007/D16 is withdrawn with effect from today.

1. Draft Taxation Determination TD 2007/D16 considered the potential application of section 177EA of the *Income Tax Assessment Act 1936* to a particular type of convertible note that has certain features, including a 'dollar value' conversion mechanism (that are explained in the draft Determination).

2. TD 2007/D16 is being replaced by TR 2008/D8. To the extent that our views in TD 2007/D16 still apply, they have been incorporated into TR 2008/D8 which issued today.

## **Commissioner of Taxation** 17 December 2008

ATO references

NO:	2006/20258
ISSN:	1038-8982
ATOlaw topic:	Income Tax ~~ Entity specific matters ~~ franking of dividends - company matters
	Income Tax ~~ Tax integrity measures ~~ debt and equity interests