PR 2001/89W - Income tax: deductibility of interest incurred on borrowings under the Equity Margins Limited Protected Equity Portfolio Loan

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Uhis document has changed over time. This is a consolidated version of the ruling which was published on 26 June 2002

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FOI status: may be released

Product Ruling

Income tax: deductibility of interest incurred on borrowings under the Equity Margins Limited Protected Equity Portfolio Loan

Preamble

The number, subject heading, and the What this Product Ruling is about (including Tax law(s), Class of persons and Qualifications sections), Date of effect, Withdrawal, Arrangement and Ruling parts of this document are a 'public ruling' in terms of Part IVAAA of the Taxation Administration Act 1953. Product Ruling PR 1999/95 explains Product Rulings and Taxation Rulings TR 92/1 and TR 97/16 together explain when a Ruling is a public ruling and how it is binding on the Commissioner.

Withdrawal

1. This Ruling has been withdrawn on 26 June 2002 and replaced by PR 2002/95.

| Commissioner of Taxation | |
|---|--------------------------|
| 20 June 2001 | |
| Previous draft: | - ITAA 1936 82KZL(2)(a) |
| Not previously issued in draft form | - ITAA 1936 82KZM |
| i i i i i i i i i i i i i i i i i i i | - ITAA 1936 82KZMA |
| Related Rulings/Determinations: | - ITAA 1936 82KZMB |
| TR 92/1; TR 92/20; TR 95/33, | - ITAA 1936 82KZMC |
| TR 97/16; TD 93/34; PR 1999/95 | - ITAA 1936 82KZME |
| 1K 77/10, 1D 73/34, 1K 1777/73 | - ITAA 1936 82KZME(4) |
| Subject references: | - ITAA 1936 82KZME(5) |
| v v | - ITAA 1936 82KZMF |
| - financial products | - ITAA 1936 Pt III |
| - interest expenses | - ITAA 1936 Pt IVA |
| - prepaid expenses | - ITAA 1936 Subdiv H |
| - product rulings | - ITAA 1936 Div 3 |
| - public rulings | - ITAA 1997 Part 3-1 |
| small business taxpayer | - ITAA 1997 8-1 |
| taxation administration | - ITAA 1997 Div 108 |
| tax avoidance | - ITAA 1997 Subdiv 960-Q |
| | - ITAA 1997 960-335 |
| Legislative references: | - ITAA 1997 960-350 |
| - ITAA 1936 51AAA | |
| - ITAA 1936 82KL | |

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ATO references:

NO T2001/008762

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