



COMMISSIONER OF TAXATION

The Commissioner of Taxation, Chris Jordan, gives notice of the following Rulings, copies of which can be obtained from Branches of the Australian Taxation Office or at <http://law.ato.gov.au>.

NOTICE OF RULINGS		
Ruling Number	Subject	Brief Description
TD 2014/18	Income tax: can the exemption in section 820-39 of the <i>Income Tax Assessment Act 1997</i> apply to the special purpose finance entity established as part of the 'securitised licence structure' used in some social infrastructure Public Private Partnerships?	The Determination sets out the Commissioner's position for special purpose finance entities that are established as part of the 'securitised licence structure' and used in some social infrastructure Public Private Partnerships. The Determination applies to years of income commencing both before and after its date of issue.
CR 2014/54	Income tax: Goodman Group Long Term Incentive Plan	The Ruling sets out the Commissioner's position about employees and other individuals providing services to Goodman Property Services (Aust) Pty Limited and Moorabbin Airport Corporation Pty Limited (together, the Employers and each an Employer) which are subsidiaries of Goodman Limited (Goodman) The Ruling applies from 1 July 2012.
CR 2014/55	Income tax: Australian Government Bond holders electing to exchange Bonds for CHESS Depositary Interests (CDIs)	The Ruling sets out the Commissioner's position on inscribed stock holders of Treasury Bonds and Treasury Indexed Bonds whose names are entered in the Commonwealth Government Inscribed Stock Registry and who: (a) elect to exchange their existing holding of a Bond for a CHESS Depositary Interest in that Bond recorded against a CHESS Holder Identification Number in their name; and (b) do not hold their Bonds as trading stock for income tax purposes. The Ruling applies from the income years ending 30 June 2014 to 30 June 2018.

CR 2014/56	Fringe benefits tax: corporate clients of Dell Australia Pty Ltd (Dell Australia) who participate in the Dell Australia employee purchase program (EPP)	The Ruling sets out the Commissioner's position about employers who enter into an agreement with Dell Australia Pty Ltd to enable the employees to participate in the Dell Employee Purchase Program. The Ruling applies from 1 April 2012.
PR 2014/13	Income tax: CommInsure Protection – Split TPD Cover	The Ruling sets out the Commissioner's position about the purchase and holding of a CommInsure Protection product referred to as Split TPD Cover issued by The Colonial Mutual Life Assurance Society Limited and offered under the CommInsure Protection Combined Product Disclosure Statement and Policy dated 11 May 2014. The Product Ruling applies from 1 July 2014.
PR 2014/14	Income tax: OnePath Life Limited – OneCare Policy – Life Cover, Total and Permanent Disability Cover and/or Trauma Cover	The Ruling sets out the Commissioner's position about recipients of the OneCare Policy offered by OnePath Life Limited in respect of Life Cover, Total and Permanent Disability (TPD) Cover and/or Trauma Cover. The Product Ruling applies from 1 July 2014.
PR 2014/15	Income tax: deductibility of interest in relation to investment in a Property Investor Trust	The Ruling sets out the Commissioner's position about participants that invest in the Property Investor Trust offered by Chan & Naylor Australia Pty Ltd. The Product Ruling applies prospectively from 1 July 2014.

NOTICE OF WITHDRAWALS		
Ruling Number	Subject	Brief Description
GSTA TPP 053	Goods and services tax: is GST payable on the taxable importation of consignment stock into Australia when ownership passes to the vendor as is the case with taxable supplies?	Withdrawn with effect from 2 July 2014.
GSTA TPP 054	Goods and services tax: is B's payment to A consideration for A's supply to B where, under an agreement between A and B: - A licences intellectual property to B (who sublicenses it to C); and - the amount B pays A is calculated by reference to the extent of B's supply to C?	Withdrawn with effect from 2 July 2014.