

Dear Rob Dalla Costa,

We operate a taxation training and consulting business. We train and consult exclusively to tax agents in practice.

We understand this submission is late and can be ignored. We would appreciate if it is given some consideration irrespective. Our comment is short and to the point.

We have no issues with the content of the discussion paper and agree in principle with all of the recommended changes. We ask, if possible if the following be considered.

Division 75 will be significantly re-written as a result of these changes. It would be far easier to delete the whole of Division 75 and enact the new provisions into new Division 76. There currently is no Division 76. This will make it far easier to interpret the law and to compare it to the previous law. We strongly recommend that such an approach be considered. Tax agents and taxpayers must continually work through amended law when applying it to their client's circumstances. When a Division is completely re-written, it becomes almost impossible to work through the amendments where each provision is amended on a piece meal basis. Given the whole division is being rewritten, it makes sense, if it is possible, to take the approach we recommend.

Regards

Tony Evans

*Gustax Consulting Pty Ltd
(Just Tax Consulting)*

Telephone (03) 9884 1187
Facsimile (03) 9887 5325
Mobile 0402 035 767
Email tony@justtax.com.au
Website www.justtax.com.au

We do not issue engagement letters in relation to consulting assignments. All clients engaging us for consulting work are deemed to have read and agreed to our terms of engagement and trading terms as published on our website. These can be reviewed at the website listed above. Please also note that we do not provide tax advice in relation to State taxes or the SIS Act.

This email and any files transmitted with it are intended for the addressee only. If you have received this email in error, please notify us immediately by return email to the sender. Please also delete the original email. Any views expressed in this email or the attachments are the views of the individual sender except where the sender specifically states that they are the views of Gustax Consulting Pty Ltd and the sender has the appropriate authorisation to make such claims. All reasonable attempts have been to ensure that this email and any attachments are free from any viruses, worms or other adverse objects by the use of anti-viral software. However we strongly recommend that this email and any attachments are appropriately scanned prior to being accessed by you. Irrespective, we cannot take any responsibility for any damage or inconvenience experienced by the recipient as a result of any virus, worm or other adverse attachment being distributed to you via this email.

To the full extent that is possible by law, this email and any attachments is protected by legal professional privilege.

Effective from Saturday 10th April 2004, new Australian Federal Government legislation came into force that requires that no unsolicited emails be sent without the permission of the recipient. Gustax Consulting Pty Ltd has an email database and sends out periodic newsletters to interested clients and contacts. If you do not wish to receive further newsletters and other emails in the future, please advise by emailing tony@justtax.com.au.

Liability limited by a scheme approved under Professional Standards Legislation

Gustax Consulting Pty Ltd operates under the limited liability scheme offered by the Institute of Chartered Accountants in Australia (Victorian Division) and carries professional indemnity insurance cover of \$1 million in accordance with the scheme. This is the maximum extent of our exposure under this scheme (the actual exposure may be less depending on the fee charged for this advice) and no claims in excess of the coverage provided by this scheme will be recognised by Gustax Consulting Pty Ltd or their officers.