

GREGORY & McCARTHY



Chartered Accountants

ABN 37 619 576 503

TELEPHONE: (02) 6226 1344
FACSIMILE: (02) 6226 3066
EMAIL: email@gregmc.com.au
P.O. BOX 295

75 LEAD STREET,
YASS. N.S.W. 2582

A.W. McCARTHY, B.Com., F.C.A.
M.G. GLASSON, F.C.A.
P.H. TWOHILL, B.Ec., C.A.

Consultant
J.J. FISH, C.A.

awm:lb

27th March, 2002

The Secretary,
The Board of Taxation,
Langton Crescent,
PARKES. A.C.T. 2600

Dear Mr. Edwards,

Re: Submissions on Tax Value Method (TVM)

The March issue of "The Tax Agent" invited submissions on TVM from tax agents during the next month. The newsletter also referred to:-

1. Key dates for practitioners including...
 - * final date for lodgement of various tax returns;
 - * final date for quarterly activity statements;
 - * final date for numerous other returns.
2. The new late lodgement penalty regime.
3. Education of superannuation fund trustees and lodgement of surcharge statements.
4. Education of clients lodging Business Activity Statements and the errors identified by the ATO.
5. Reportable fringe benefits not reported.

Apart from these requirements of the Taxation Office, we have our clients to look after particularly in relation to current year income, variation of PAYG instalments, investment in farm management deposits and other matters.

Tax agents at the coal face of small business do not have the time for considered submissions about TVM. Regrettably the consultative process therefore fails to obtain the opinion of the very people who you will ask to implement TVM.

Please look at the five important items, referred to above, from the March newsletter to tax agents. These are the sort of things that agents are trying to copy with. These are practical matters. These are the reasons why agents don't have time to discuss TVM.

Furthermore, the proposed Tax Value Method won't solve these problems or simplify our present complex taxation administration.

Yours faithfully,



Alfred McCarthy FCA

