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AFTS Secretariat The Treasury Langton Crescent Parkes ACT 2600

Dear Sir

Re: Tax Review

Re: Australia's Future Tax System

I've been a Registered Tax Agent since 21 May 1962 and during that evolving period the outstanding observation from my desk and ATO communication has been the interpretation formulation of the taxation legislation. Nothing is ever in conclusive black and white.

The dictionary defines "interpretation" as meaning "the construction, the translation of composition". As a sole practitioner compliance requires coverage of the entire taxation legislation whereas the large companies are sectionally specialised. However, interpretation still prevails.

Reformation of interpretation would be a major challenge and perhaps the present system does present substantiation for the payment of preparation fees.

Yours faithfully

GW Roberts