

## All India Federation of Tax Practitioners



# AIFTA TIMES

Volume 8 – No. 3 • March 2017

## FORTHCOMING PROGRAMMES

| Date & Month         | Programme                            | Place                          |
|----------------------|--------------------------------------|--------------------------------|
| 4, 17, 18, 24-3-2017 | Workshop on GST, MVAT & Service Tax  | Mumbai                         |
| 22-4-2017            | National Executive Committee Meeting | Anand                          |
| 22, 23-4-2017        | Two Day National Tax Conference      | Anand                          |
| 3/4 to 9/10-6-2017   | International Tour-cum-Conference    | Sri Lanka<br>(Kandy & Colombo) |

## Workshop on GST, MVAT & Service Tax

**Enrolment  
Closed**

Organised by

All India Federation of Tax Practitioners (WZ)  
Jointly with STPAM, BCAS, CTC, MCTC & WIRC of ICAI

|                       |  |
|-----------------------|--|
| <b>Timing</b>         | 2.30 P.M. to 5.30 P.M.   |
| <b>Venue</b>          | STPAM Mazgaon Library, 1st Floor, 104, Vikrikar Bhavan, Mazgaon, Mumbai- 400 010.      |
| <b>Delegates Fees</b> | Members ₹ 2,000/- (incl. of Service tax), Non-Members ₹ 2,500/- (incl. of Service tax) |

| Date                   | Subject  | Speaker                       |
|------------------------|--|-------------------------------|
| 04.03.2017<br>Saturday | Valuation of Goods and Services under GST Act + Job Work Provisions (incl. Transitional Provisions)                    | CA. Pranav Kapadia            |
|                        | Assessment, Penalty and Search & Seizure under GST Act   | Smt. Nikita Badheka, Advocate |
| 17.03.2017<br>Friday   | Registration, Returns, Payment, Composition Levy and Refund incl. Preparedness in relation to Documentation by dealers | Shri Dhaval Talati, TP        |
|                        | E-Commerce Transactions, TDS & TCS Provisions  | CA. Deepak Thakkar            |
| 18.03.2017<br>Saturday | Taxation under Present Regime <i>vis-a-vis</i> under GST Regime on Trading, Manufacturing and Distributors sector      | CA. Janak Vaghani             |
|                        | Taxation under Present Regime <i>vis-a-vis</i> under GST Regime on Builders, Works Contractors and Services sector     | Eminent Faculty               |
| 24.03.2017<br>Friday   | Transitional Issues under GST - Mega Brains' Trust session   | Eminent Faculty               |

### FOR ANY QUERIES MEMBERS MAY CONTACT ANY OF THE FOLLOWING OFFICE BEARERS

| Name   | Mobile     | Tel. (O)     | Fax      | E-mail                    |
|--|------------|--------------|----------|---------------------------|
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| <b>Treasurer</b> – Shri Vipul B. Joshi, Adv.               | 9820045569 | 022-66333736 | 22080951 | vipulbjoshi@gmail.com     |

## INTERNATIONAL TOUR-CUM-CONFERENCE SRI LANKA (KANDY & COLOMBO)

7 Days / 6 Nights  
(Minimum 100 Pax)

### Tentative Departure Schedule (Subject to Confirmation)

From Delhi to Mumbai by Jet Airways at 9.50 PM on 2nd June 2017, reaches at Mumbai at 12.00 mid-night

From Mumbai to Colombo by Jet Airways at 2.01 AM on 3rd June, 2017, reaches at Colombo at 4.35 AM

From Chennai to Colombo by Spicejet at 00.05 AM on 3rd June 2017, reaches at Colombo at 1.45 AM

#### Day-1 : 3rd June, 2017

Arrived Colombo at 6.00 AM and transfer to Kandy

Fresh-up & Breakfast at Negombo (en-route)

Reach Kandy at 1200 Noon

Lunch at local restaurant

Sight Seeing – Kandy Lake and Tooth Temple,

Shopping in the evening and dinner at hotel

#### Day-2 : 4th June, 2017

Breakfast at hotel, leave hotel at 09.00 AM for Nuwara Eliya – 2 hrs. drive approx.

Sight Seeing – Ramboda Temple, Seeta Eliya Temple (Ashok Vatika) and Lake Gregory

Lunch enroute at a local restaurant

Tea factory visit, evening back to hotel at 7.00 PM.

Dinner and Night stay at hotel in Kandy.

#### Day-3 : 5th June, 2017

Breakfast at hotel

09.00 to 12.00 AM – Conference

Post Conference, Lunch at local restaurant

Visit to Spice Gardens and Gems Factory

Evening Kandian Dances (optional, paid basis)

Dinner and night stay at Hotel Kandy

#### Day-4 : 6th June, 2017

After breakfast check-out hotel at 9.30 AM and transfer to Colombo

On the way, visit Munneswaram and Kali Amman Temple – Lunch en-route

Reaching Colombo at 5.00 PM approx.

Dinner at local restaurant

Night stay at hotel in Colombo

(Optional – Casino Drop post Dinner)

#### Day-5 : 7th June, 2017

Breakfast at hotel

Conference – 9.00 AM to 12.00 AM

Post Conference – Visit Anjaneyar Temple (Panchmukhi Hanuman Temple)

Lunch at Indian Restaurant

Post Lunch shopping at Odel and Stone & String (Shops)

Gala Dinner

(Liquor at Own Expense)

Night stay at Hotel in Colombo

#### Day-6 : 8th June, 2017

Breakfast at hotel

Visit Bentota – leaving hotel at 8.00 AM (2 hrs. journey approx.)

Enjoy Water Sports (at own cost)

Lunch at Bentota

Return Colombo at 4.00 PM approx.

Gala Dinner

(Liquor at Own Expense)

(Optional – Casino Drop post Dinner)

#### Day-7 : 9th June, 2017

Breakfast at hotel and leaving Colombo

### Departure Schedule Tentative

Colombo to Chennai – Spicejet at 2.45 AM, reaches Chennai at 4.40 AM  
Colombo to Mumbai – Jet Airways at 5.40 AM, reaches Mumbai at 8.15 AM  
Mumbai to Delhi – Jet Airways at 11.05 AM, reaches Delhi at 13.15 PM

### Tour Cost

| EX CHENNAI             | EX MUMBAI              | EX DELHI               |
|------------------------|------------------------|------------------------|
| 5 Star – ₹ 57,000/- PP | 5 Star – ₹ 62,000/- PP | 5 Star – ₹ 67,000/- PP |

Payment to be done as follows :

1. INR 15,000/- (From Chennai), INR 20,000/- (From Mumbai) and INR 25,000/- (From Delhi) in the name of LUXURY TOURS.
2. USD 630, (for your expenses at Sri Lanka). Please contact us post booking/confirmation for Vendor.

Note : Above rates quoted on twin sharing basis.

### Includes

Airfare (as per selected Package)  
Hotel accommodation at hotel selected on twin share basis.  
(3 Nights stay at Kandy and 3 Nights at Colombo )  
Visa Fee  
All Lunches and Dinners at local Indian restaurant  
2 bottles of mineral water 500 ml per day Per Person  
Daily sight seeings as per itinerary  
2 Half Day conferences with High Tea  
2 Gala Dinner at Colombo

### Cost Excludes

- Travel Insurance
- Any other service not included in above cost
- Surcharges (if any)

Note:-

- 1) All bookings subject to availability.
- 2) Above rates valid for 100 passengers travelling together, in batches from Delhi, Mumbai and Chennai respectively.
- 3) Surcharges applicable (if any).
- 4) Above is only a tentative itinerary and subject to change as per mutual consent.
- 5) All Documents should be submitted with us 45 days prior to travel.
- 6) RATES ARE BASED ON CURRENT APPLICABLE TAXES AND ANY CHANGE IN THE SAME WILL BE CHARGEABLE ACCORDINGLY.

\*\* Please note the Dollar (\$) Rate considered for the above booking is 1 USD = 67 INR and for any further increase into the rate of USD may increase the cost of the package.

Kindly send your entries on or before 25th March 2017

*For further details please contact*

**Shri Sanjay Sharma, Secretary General–AIFTP, Mobile: 9810071545 • E-mail: adv\_sanjay\_31@yahoo.co.in**



## *Hearty Congratulations*

Hearty Congratulations to the newly elected office bearers of Bihar Income Tax Bar Association, Patna for the period 2017-19.

- President : Shri Lakshmi Narayan Rastogi, Sr. Advocate  
 Vice-Presidents : Shri Sudhir Kumar Narain, Advocate • Shri Desh Bandhu Gupta, Advocate  
 Shri Ranjan Kumar Tripathy, Advocate  
 Treasurer : Shri Kamlesh Kumar Saha, Advocate  
 General Secretary : Shri Jagadish Kumar, Advocate  
 Joint Secretaries : Shri Sanjeev Kumar Anwar, Advocate • Shri Ashish Prasad, Advocate  
 Shri Prabhat Kumar, Advocate

We wish them all the success.

### **Advertisement Tariff for AIFTP Journal (W.e.f. 15th July, 2013)**

|  | Particulars        | Per Insertion |
|--|--------------------|---------------|
| 1.   | Quarter page       | ₹ 1,500/-     |
| 2.   | Ordinary half page | ₹ 2,500/-     |
| 3.   | Ordinary full page | ₹ 5,000/-     |
| 4.   | Third cover page   | ₹ 7,500/-     |
| 5.   | Fourth cover page  | ₹ 10,000/-    |
| There shall be Discounts on bulk advertisements. |                    |               |

### **Membership of AIFTP as on 27-2-2017 Life Members**

|              | Associate | Individual  | Association | Corporate | Total       |
|--------------|-----------|-------------|-------------|-----------|-------------|
| Central      | 0         | 899         | 23          | 3         | 925         |
| Eastern      | 3         | 1314        | 36          | 3         | 1356        |
| Northern     | 0         | 1044        | 17          | 0         | 1061        |
| Southern     | 1         | 1131        | 19          | 8         | 1159        |
| Western      | 4         | 2221        | 37          | 18        | 2280        |
| <b>Total</b> | <b>8</b>  | <b>6609</b> | <b>132</b>  | <b>32</b> | <b>6781</b> |

### **STATEMENT AS PER PRESS AND REGISTRATION OF BOOKS ACT FORM IV**

*[See Rule 8]*

### **AIFTP TIMES**

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215, Rewa Chambers, 31, New Marine Lines, Mumbai 400 020.

I, Shri Kotecha Mitesh Ashwin, hereby, declare that the particulars given above are true to the best of my knowledge and belief.

Date : 27-2-2017.

**KOTECHA MITESH ASHWIN**  
Signature of the Publisher

## DIRECT TAXES

Ms. Neelam Jadhav, *Advocate*, KSA Legal Chambers

### TRIBUNALS

#### **S.2(42A) : Capital Gains – Holding period should be computed from the date of issue of allotment letter**

The assessee sold office unit and according to the assessee, asset was held for more than 36 months, therefore, it was 'long term capital asset' and, its resultant gain was shown in return as long term capital gain. The AO noted that though allotment of said office unit was done prior to 36 months from date of sale but agreement to sale was registered during period of 36 months only. Therefore, AO computed holding period from date of registration of agreement and accordingly it was held that said asset was 'short term capital asset. The CIT(A) also confirmed action of AO.

The Hon'ble ITAT held that the date of allotment was relevant for purpose of computing holding period and not date of registration of conveyance deed. Similarly the Madras High Court in *CIT v. S.R. Jeyashankar* has taken a view that holding period should be computed from date of allotment. Therefore, It was found that holding period should be computed from date of issue of allotment letter, if done so, holding period becomes more than 36 months and consequently, property sold by assessee would be long term capital asset in hands of assessee and gain on sale of same would be taxable in hands of assessee as Long Term Capital Gain.

*Anita D Kanjani v. ACIT, ITA No. 2291/Mum./2015 dtd. 13-2-2017 (Mum.)(Trib.) Source : www.itat.nic.in*

#### **S.23(1)(a) : Income from House Property – Determination of Annual Value – Enhancement – Rental income**

The AO determined Annual letting value of property let out to X Co., by taking assessee's share in lease income earned by B as the basis. The CIT(A) deleted enhancement so made by the AO. the Hon'ble ITAT held that X Co. have been occupying premises of assessee since 1995 and agreement was being renewed periodically. AO had not shown that fair rental value of property was more than rent received by assessee. Agreement with B was entered only in preceding year and assessee could fix rental value on some other methodology depending upon market conditions. And the same would not render agreements entered by assessee with X since 1995 void. Therefore, AO

was not justified in determining Annual Letting value of property let out to X Co. by taking share of income of assessee in lease rent as basis.

*Empress Tin Factory Pvt. Limited v. Dy. CIT ITA No. 322/Mum/2012, 8722/Mum./2011 dtd. 15-2-2017 (Mum.)(Trib.) Source : www.itat.nic.in*

#### **S.271(1)(c) : No deliberate furnishing of inaccurate particulars in respect of the interest income and when the lower authorities did not prove that the explanation of the assessee was false and not a bona fide explanation then the penalty levied not justified.**

Assessee was software engineer deriving income from salary and other sources, filed return of income declaring income. While completing assessment AO made addition under head Other sources being interest income from savings bank and fixed deposits. AO came to know that assessee earned interest income from savings bank and fixed deposits and same was not declared in the return. Explanation of assessee was not accepted by AO and addition was made holding that it was responsibility of assessee to disclose income fully and truly and the omission of such huge amount could not be treated as simple mistake. Penalty proceedings were initiated u/s. 271(1)(c) and order was passed imposing penalty.

During penalty proceedings, assessee's submitted that assessee was non-resident and his tax return was filed by his father, Assessee's father was undergoing medical treatment. Further submitted that certain income was remained to be offered in the original return of income was offered in the revised statement during the assessment proceedings. Explanation offered was rejected by AO and imposed penalty u/s. 271(1)(c) and same has been sustained by CIT(A).

The Hon'ble ITAT held that there was no deliberate furnishing of inaccurate particulars in respect of interest income; Assessee's father filed return of income based on Form No. 16 and by mistake he omitted to include interest on savings and fixed deposits. The Explanation of assessee appears to be *bona fide* that his father inadvertently omitted to include interest income in return of income filed appears to be *bona fide* and genuine. Further the lower authorities did not prove that explanation of assessee was false and not *bona fide*

explanation therefore conduct of assessee did not show that there was deliberate concealment of income.

*Sachidanand Padgaonkar v. ITO ITA No. 6020/Mum./2014, Dtd. 3-2-2017 Source : www.itat.nic.in*

**Rule 46A: CIT(A) not granted opportunity to the AO to examine the additional documents – Violation of Rule 46A**

The additional documents/evidences on the basis of which CIT(A) has granted relief, all the documents obtained after the date of assessment order. It's

clear that these documents/evidences were not before the AO. During the Appellate proceedings CIT(A) has not followed the prescription of Rule 46A of giving an opportunity to examine of comment upon the same to the AO. The Hon'ble ITAT has taken view that proper opportunity should be granted of being heard to AO also.

*ITO v. Narendra Shantilal Parikh ITA No. 3724/Mum./2015 dtd. 24-2-2017(Mum.)(Trib.) Source : www.itat.nic.in*

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**INDIRECT TAXES**

CA. Janak Vaghani

**1. Taxable turnover – Post sale discount – Liable to be deducted for levy of tax**

Perceptionally, if taxable turnover is to be comprised of sale/purchase price, it is beyond one's comprehension as to why the trade discount should be disallowed, subject to the proof thereof, only because it was effectuated subsequent to the original sale but evidenced by contemporaneous documents and reflected in the relevant accounts. Such post sale discounts even not shown in invoice is deductible from taxable turnover.

*[Source: M/s. Southern Motors v. State of Karnataka and Others, Civil Appeal Nos. 10955-10971 of 2016, dated 18th January, 2017 (SC)]*

**2. Reassessment – Cannot be made due to subsequent judgment of Supreme Court**

A subsequent reversal of legal position by the judgment of the Supreme Court does not authorise the Department to reopen the assessment which stood closed on the basis of law at the relevant time.

*[Source: M/s. Samsung India Electronics Pvt. & Others v. The State of Bihar & Ors, Civil Appeal No. 3942 of 2015, dated 14th December, 2016, (Pat)]*

**3. VAT on SIM replacement charges and lease line revenue – Unconstitutional**

Sections 2(u) and 2(v) of the MP VAT Act, 2002 is *ultra-vires* and void, in so far as it relates to imposition of VAT on SIM replacement charges and lease line revenue, which are merely services. The

other orders relating to imposition of VAT on SIM replacement charges and lease line revenue were quashed.

*[Source: M/s. Idea Cellular Ltd. v. The Assistant Commissioner, WP No. 7631/2014, dated 3rd January, 2017, (MP)]*

**4. Interstate sale – Missiles manufactured at Hyderabad – Brought to Nagpur for warhead integration – And sold to Army – Is an interstate sale occasioning movement of goods from Hyderabad – Taxable under the CST Act**

Sub-section (1) of section 9 of the CST Act, in clearest terms, states that the tax levied on sales of goods in the course of interstate trade or commerce shall be collected by that Government in accordance with the provisions of sub-section (2), in the State from which the movement of the goods commenced. Missiles manufactured at the unit at Hyderabad. These missiles, only for warhead integration, were brought to Nagpur. The issue that without warhead integration, the missile is not complete and cannot be used to target any particular place or point will not make any difference, once the missile is the identifiable goods and in that form that it is sold. Therefore, the interstate movement of missiles occasions from Hyderabad as such taxable under the CST Act in AP and not in Maharashtra.

*[Source: M/s. Brahmos Aerospace Private v. The State of Maharashtra & Ors., WP No. 11393 of 2015, dated 10th January, 2017 (Bom)].*

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## FEW IMPORTANT CASE LAWS IN SERVICE TAX, CENTRAL EXCISE

S. S. Satyanarayana, *Tax Practitioner*, Hyderabad.

### CENVAT Credit

Assessee – manufacturer applied for refund of CENVAT credit pertaining to inputs and input services used for export goods. The Department denied credit and consequent refund on ground that activity did not amount to manufacture. On assessee's appeal, Tribunal held that activity was manufacture and directed the Department to allow refund. Assessee filed revised claim of refund on insistence of department. The Department allowed refund but did not grant interest on ground that refund was granted within 3 months of revised claim. Assessee argued that 3 months should be counted from date of filing of original claim and, accordingly, interest on belated refund must be allowed. Held : If refund claim filed originally by assessee is complete in all respects and refund is not granted within 3 months therefrom, then, assessee is entitled to interest on belated refund. Revised calculation submitted by assessee on insistence of Department cannot amount to filing of fresh 'refund claim'.

[*Jindal Drugs P Ltd. v. UOI - [2016] 75 taxmann.com 47 (Mumbai)*]

### Central Excise

Assessee was engaged in repacking of 'RBB Palmolein Oil' received in tanker in bulk into smaller packs. Department argued that said activity would amount to 'repacking from bulk to retail packs' and would amount to 'deemed manufacture' and liable to duty. Held : 'Tankers' cannot be treated as 'bulk packs' and hence, packing of oil received in tankers into smaller packs cannot be held as 'repacking from bulk packs to retail packs' and accordingly, said activity is not deemed manufacture and not liable to duty.

[*Ghodawat Foods I Ltd. v. CCE, Pune II - [2016] 75 taxmann.com 190 (Mumbai - CESTAT)*]

- (1) Recovery of duty or tax not levied/paid or short-levied/paid or erroneously refunded. Extended period of limitation cannot be invoked where:  
(a) Revenue has been in knowledge of things since very beginning; (b) assessee has been in

correspondence with department and has given numerous letters to revenue on problems faced by assessee; (c) assessee has also been filing regular returns. This is so because, in such a case, there has not been any suppression of facts or wilful misstatement on the part of assessee. Hence, invocation of extended period was set aside.

- (2) For deciding eligibility to SSI-exemption Notification, turnover is to be computed as follows : (a) value of non-excisable and exempted excisable goods is to be excluded; (b) value is to be computed at transaction value, as per Central Excise Act and valuation rules; and (c) value of goods liable to duty based on retail sale price, is to be computed after giving benefit of abatement from retail sale price.

[*Wenger And Company v. CCE, Delhi I - [2016] 75 taxmann.com 243 (New Delhi - CESTAT)*].

### Service Tax

The appellant was registered with Service Tax Department under the category of 'Manpower Recruitment and Supply Agency Service'. On verification of the record of the appellant by audit, it was noticed that the appellant has imported services from the foreign companies. As per Rule 2(1)(d)(iv) of the Service Tax Rules, 1994, 'import of service' is liable to service tax. On being pointed out by the Department, the appellant paid service tax along with interest before issuance of SCN. Subsequently a showcause notice was issued to the appellant alleging that they are liable to pay service tax and interest and also proposed penalty under Sections 76 & 78 of the Finance Act, 1994. The AA has confirmed the proposal made in the showcause notice. Held : Except mere allegation of suppression, the Department did not bring any material on record to prove that there was suppression and concealment of facts to evade payment of tax. No penalty can be imposed.

[*Meritrac Services P Ltd. v. CST, Bengaluru - 2016 (11) TMI 141 - CESTAT, Bengaluru*]



## TWO DAY NATIONAL TAX CONFERENCE ON DIRECT & INDIRECT TAXES

Organised by

**ALL INDIA FEDERATION OF TAX PRACTITIONERS (WESTERN ZONE)**

Jointly with

**ALL GUJARAT FEDERATION OF TAX CONSULTANTS**

**CENTRAL GUJARAT CHAMBER OF TAX CONSULTANTS • ANAND VAT BAR ASSOCIATION**

on 22nd & 23rd of April, 2017 (Saturday & Sunday) at MADHUBHAN Resort, Vallabhvidyanagar, Anand, Gujarat.

Detailed Programme will be uploaded in aiftp's website and will be published in next aiftp times.

◀ AIFTP Times • March, 2017 ▶

### Publications for sale

| Sr. No. | Name of Publication  | Edition    | Rates (₹) |             |                 |
|---------|--|------------|-----------|-------------|-----------------|
|         |  |            | Members   | Non-Members | Courier Charges |
| 1.      | Interpretation of Taxing Statutes – Frequently Asked Questions | Dec., 2016 | 600.00    | 675.00      | 80.00           |
| 2.      | AIFTP – Of Milestone and Beyond – History Book                 | Nov., 2016 | 400.00    | 450.00      | 80.00           |
| 3.      | “212 Frequently Asked Questions on Survey – Direct Taxes”      | Dec., 2015 | 240.00    | 270.00      | 60.00           |

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2. Local/Outstation members not collecting from office are requested to add courier charges, as mentioned above.  
3. Please draw Cheque/Draft in favour of “All India Federation of Tax Practitioners” payable at Mumbai.

### Publications from AIFTP Western Zone for sale

| Sr. No. | Name of Publication   | Edition    | Rates (₹) |             |                 |
|---------|---|------------|-----------|-------------|-----------------|
|         |   |            | Members   | Non-Members | Courier Charges |
| 1.      | Limited Liability Partnership simplified through – Frequently Asked Questions | Nov., 2016 | 200.00    | 225.00      | 60.00           |
| 2.      | Levy of Penalty u/s. 271(1)(c) – Some Important Issues                        | Nov., 2016 | 200.00    | 225.00      | 60.00           |

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