

GMA TAX

Tax Agent & Accountants
ABN 89 0536 40 039

Suite 201/28 Gidley St,
St Marys NSW 2760
Ph (02) 9623 1624

PO Box 900
St Marys NSW 1790

Board of Taxation Secretariat
C/- The Treasury
Langton Crescent,
PARKES ACT 2600

Received
13 AUG 2008
Board of Taxation

Dear Secretariat,

Review of Legal Framework for Administration of the GST

I wish to make a second submission in regard to the timing and lodgement of BAS.

Background

I prepare approximately 200 Activity Statements each quarter using actual income and expenses as I believe this is the method.

In addition to the Activity Statements, I provide my clients with quarterly profit and loss statements so they know what is going on in their business through-out the year. Businesses that pay instalments do not know how they are going through-out the year.

The problem is the due date for lodging the Activity Statements.

Where the instalments only are paid, there should be no problem. However, when actual income and expenses are used it is very difficult to meet the due date. I have always lodged the Activity Statements on time, but it takes working seven days a week for seven weeks each quarter to achieve this.

I appreciate there is a facility to ask the Commissioner for extension of the time to lodge, however this has to be done every quarter for individual clients as required.

In regard to the quarter ended 30th June each year, there is an automatic extension for PAYG Payment Summaries until 30th September, but the Activity Statements are still due by 25th August. The Activity Statements cannot be completed until the PAYG Payment Summary has been reconciled. In effect the extension for the PAYG Payment Summary is only eleven days.

Proposal

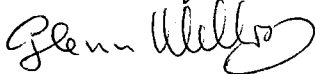
For accountants using actual income and expenses, the due date should be the end of the next quarter

Period end date	Due lodgement date
30 th September	31 st December
31 st December	31 st March
31 st March	30 th June
30 th June	30 th September.

I appreciate it would be necessary for Activity Statements to be lodged, as completed throughout the quarter. Payment would be due no earlier than the existing due dates.

Please feel free to contact me should you have any queries with this proposal.

Yours faithfully



Glenn Mellross FPNA
11th August 2008.