

23<sup>rd</sup> July, 2019

GCCI/DYSGR/DT/2019-20/ 7760

**Shri P.C. Mody**  
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North Block,  
New Delhi.

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**Dilip M. Padhya**  
Secretary (R)

**Pathik S. Patwari**  
Treasurer

**Sub.: Request to extend time limit for filing returns of income for AY 2019-20**

Respected Sir,

We would like to bring to your kind notice some of the severe hardships faced by the tax payers in filing returns of income for AY 2019-20.

Sir, the last date for filing returns of income is 31<sup>st</sup> July for the majority of taxpayers. However, the taxpayers are facing severe hardships in filing of returns due to the problems like the ones mentioned below:

1. There have been constant changes to the ITR forms which led to changes in the software on the e-filing portal. Due to these changes, there were huge delays in making the government utility available to the taxpayers. It so happens mostly that the taxpayers have prepared their returns using a particular version of the utility, but have to change it due to the modification. Even after the revised utility was finally available, there were errors in the utility which were resolved as late as 11<sup>th</sup> July. Due to this the taxpayers have been left with very little time to prepare and file their returns.
2. Tax on Long Term Capital Gains (LTCG) on transfer of listed shares and units of equity oriented mutual funds has been introduced for the first time since 2004. This being the first year, most taxpayers are struggling with the calculation. Your good office had revealed that large number of tax-payers had already filed their returns, but these were returns were possibly of those taxpayers who had no income from long-term capital gains but just income from other sources such as bank account interest, dividend etc.



3. The ITR 1, 2 and 4 were made available on the portal as late as 2<sup>nd</sup> May, 2019 while the other forms such as ITR3, 5, 6 and 7 were made available even later. ITR6 was uploaded as late as 8<sup>th</sup> July. Therefore, no returns could be filed in the month of April, and the whole month was wasted for no fault of the taxpayers.

4. Schedule 112A for furnishing details in respect of long-term capital gain transactions has been updated suddenly and the requirement of reporting ISIN code/folio number with respect to shares/units sold has been added. It is immensely difficult to obtain such information within such a short time.

5. While reporting “general information”, the assessee is required to report the details of unlisted shares which are held by him. One of the fields in this section is for providing the PAN of the company whose shares are held. This requirement is difficult to fulfil as it is currently difficult to trace many such companies which were once listed on stock exchanges but have since disappeared.

6. The due date for filing TDS statement for Q4 of 2018-10 was 31<sup>st</sup> May but was extended to 30<sup>th</sup> June 2019 in case of TDS from salaries, due to change in format by your office. Most employers have not been able to furnish TDS certificates and even the 26AS of employees is not updated. This is causing delays in filing returns.

Sir, in addition to these serious issues, there are many additional minor issues, which is delaying the process of filing the returns. In view of these genuine concerns, we would request you to kindly consider extension of last date for filing returns from 31<sup>st</sup> July 2019 to 31<sup>st</sup> August 2019.

Sir, you have always been positive and empathetic towards genuine concerns of the taxpayers. Your positive decision in the matter will provide the much-needed adequate time to taxpayers for filing their returns of income, and would prevent them from facing undue hardships.

We eagerly look forward to your positive decision in this serious matter.

With Best Regards,

Sincerely,

*J.V.*  
for, **Jainik Vakil**

**Chairman, Direct Tax Committee**

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