

Ref : <u>KTBA/09.2023/089</u> Date : September 11, 2023

Malik Amjad Zubair Tiwana

Chairman, Federal Board of Revenue, Islamabad

Dear Malik Sahib, AOA

IRIS 2.0; NEW ISSUES SURFACED

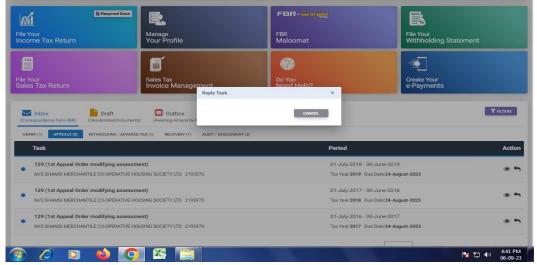
This letter is sequel to our earlier two (02) letters on the issues with the same new IRIS 2.0 version.

Our Zoom Meeting

- 2- At the outset we would like to acknowledge your consideration to permit the Zoom meeting we had on 7th of September with your Member IT, Member Operations, Chief IT Policy alongwith the core Technical Team of PRAL with us and with representatives of PTBA and the LTBA whereby we were given full audience during two (02) hours long meeting. We would formally like to place our appreciation that all the issues covered in our last two (02) letters were heard patiently and discussed at the desired length and more importantly were duly considered for resolution.
- 3- As was agreed during our Zoom meeting that we would continue to highlight the issues being faced by our members, the current issues at hand for which this letter is meant for, have been shared lately, which are being narrated in the ensuing paragraphs.

4- New IT Glitch in IRIS: Inability to Respond to Notices

- 4.1- This new glitch in the system has emerged recently and is pertained to the inability of the taxpayer to respond to notices issued by IR Officers (IROs) following the modifications of orders in appeal orders by the Commissioner Inland Revenue- Appeals (CIR-A). As you would know that after a CIR-A modifies an assessment order, the concerned IRO issues a notice to the taxpayer for further proceedings, for whom there is currently no option available within the IRIS 2.0 to submit his reply or response.
- 4.2- To provide a visual representation of this issue, we have pasted a screenshot hereunder illustrating the absence of the option to respond:





- 4.3- This issue understandably results in inconceivable non compliance of a notice without the taxpayer own's fault. This is a sheer absence of a mechanism in the 2.0 version for responding to these notices owing to which every taxpayer is portrayed as non compliant, invariably.
- 5- Rectification application can be filed only once in a Year
- 5.1- Strange as it sounds as actually it is. A Rectification application under Section 221 of the Ordinance can be filed only once in a Tax Year. IRIS 2.0 doesn't allow the second application.
- 5.2- Needless to mention that in cases of multiple proceedings which can be undertaken under the following Sections, your taxpayer is completely handicapped due to IRIS 2.0 new feature:
 - a) Section 177: Income Tax Audit
 - b) Section 122: Income Tax Assessment
 - c) Section 161: Monitoring of Withholdings
 - d) Section 182: Penalty Proceedings
 - e) Section 170: Refund Proceedings
 - f) Section 205: Imposition of Default Surcharge

Way Forward

Your attention is needed towards resolution of both the issues as follows:

1- Response Option in the IRIS 2.0 system

Option should instantly be made available to enable the taxpayer to respond to Notices. In cases where non compliance has occurred due to the above system limitation it would befitting if instructions are issued to field formations **not to take adverse action** till the IRIS 2.0 provides for it.

Alternatively, instructions should be issued to have allowed taxpayer to file replies manually and which should be acceptable to officers till IRIS 2.0 provides for the Option Tab.

2- The anomaly of only one Rectification application in a Tax Year should be removed henceforth.

We look forward to your response as to whether we need to explain any point further.

Regards,



(Syed Zafar Ahmed)

President

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C.C. to:

- i. Mr. Afaque Ahmed Qureshi, Member (Inland Revenue Policy), FBR, Islamabad.
- ii. Mir Badshah Khan Wazir, Member-IR (Operations), FBR, Islamabad.
- iii. **Mr. Nasir Khan,** Member (Information Technology), FBR, Islamabad.
- iv. Dr. Muhammad Amir Malik, Chief Executive Officer / Chairman BOM, PRAL, Islamabad.
- v. Mr. Rana Munir Hussain, President, Pakistan Tax Bar Association.
- vi. Press Media

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