# THE AUTHORITY FOR ADVANCE RULINGS
# IN KARNATAKA
# GOODS AND SERVICES TAX
# VANIJYA THERIGE KARYALAYA, KALIDASA ROAD
# GANDHINAGAR, BENGALURU – 560 009

**F. No. KAR.AAR 29/2026**
**Order No. KAR.ADRG 29/2026** **Date:06.07.2026**

**Present:**

1. **Shri. Kalyanam Rajesh Rama Rao**
Additional Commissioner of Customs & Indirect Taxes .... Member (**Central**)

2. **Shri. Sivakumar S Itagi**
Additional Commissioner of Commercial Taxes .... Member (**State**)

| | | |
|---|---|---|
| 1 | Name and address of the applicant | Shri Dayanand Sharma, Prop. M/s D N Transport, # GMHPS, Ground Floor, D.No.360/1, 15th Ward, Near Old ganesh Gas Godown, Bharathinagar, Amravathi, Hosapete-583201. |
| 2 | GSTIN or User ID | 29AONPS5503B2ZU |
| 3 | Date of filing of Form GST ARA-01 (ARN date) | 08.08.2023 |
| 4 | Represented by | --Not Applicable-- |
| 5. | Jurisdictional Authority – Centre | The Commissioner of Central Tax, Belagavi, GST Commissionerate. |
| 6 | Jurisdictional Authority – State | ACCT, LGSTO 500-Hosapete, |
| 7 | Whether the payment of fees discharged and if yes, the amount and CIN | No, the Applicant has discharged the prescribed application fee only of ₹5,000/- under an incorrect debit head. |

**ORDER UNDER SECTION 98(2) OF THE CGST ACT, 2017**
**& UNDER SECTION 98(2) OF THE KGST ACT, 2017**

M/s DN Transport, Shri. Dayanand Sharma, Prop. (hereinafter referred to as the "Applicant"), having GSTIN 29AONPS5503B2ZU and principal place of business at # GMHPS, Ground Floor, D.No.360/1, 15th Ward, Near Old ganesh Gas Godown, Bharathinagar, Amravathi, Hosapete-583201, filed an application for Advance Ruling under Section 97 of the Central Goods and Services Tax Act, 2017 read with Rule 104 of the Central Goods and Services Tax Rules, 2017 and the corresponding provisions of the Karnataka Goods and Services Tax Act, 2017, in FORM GST ARA-01.

It was observed that, in terms of Section 97(1) of the CGST/KGST Act, 2017 read with Rule 104 of the CGST/KGST Rules, 2017, an application for Advance Ruling is required to be accompanied by a fee of **₹5,000/- each under the CGST Act and the KGST Act**. However, the Applicant had not discharged the prescribed fee in full and was accordingly advised to rectify the defect by remitting the requisite balance fee.

**2.** The Applicant is engaged in providing transportation-related services by way of renting trucks to another transporter, namely a Goods Transport Agency (GTA). The Applicant raises tax invoices for the said services under the CGST Act, 2017 and discharges GST under the Forward Charge Mechanism (FCM) at the rate of 12% under **SAC 996601**. The Applicant also avails and utilizes eligible input tax credit on the purchase of trucks, spare parts, and other materials used in the course of business. In this regard, the Applicant has sought an Advance Ruling on the following question:

*a)* ***What is the rate of GST "Truck on Rent" operational expenses like as operator, fuel & Maintenance etc. bear by DN Transport (service provider/Supplier?***

*b)* ***What is above said (Background) GST rate is correct or not. If incorrect please provide the rate of GST & clarification with notification, including rules & Act.***

*c)* ***What is the rate of GST "Truck on rent" operational expenses like as operator, fuel & Maintenance etc. bear by recipients. Please provide the clarification with notification, including rules & Acts.***

**3.** Subsequently, the Applicant, vide letter dated **30.05.2026**, requested withdrawal of the Advance Ruling application. The relevant extracts of the said letter are reproduced *inter alia* as under:

> *"The Applicant submitted that the Advance Ruling application was filed seeking clarification regarding the classification and applicability of the appropriate HSN/ SAC in respect of the transportation services provided by them. However, the Applicant has since obtained professional advice and clarification from its auditor on the issues raised in the application, and has stated that its doubts have been satisfactorily resolved."*

**4.** In view of the above, we pass the following,

**<u>R U L I N G</u>**

*The application filed by the applicant for advance ruling is disposed off as withdrawn.*

**(Kalyanam Rajesh Rama Rao)**
Member
MEMBER
Karnataka Advance Ruling Authority

**(Sivakumar S Itagi)**
Member
MEMBER
Karnataka Advance Ruling Authority

Place: Bengaluru,
Date: 06.07.2026

To,
The applicant

Copy to:

1. The Principal Chief Commissioner of Central Tax, Bangalore Zone, Karnataka.
2. The Commissioner of Commercial Taxes, Karnataka, Bengaluru.
3. The Commissioner of Central Tax, Belagavi, GST Commissionerate.
4. The Assistant Commissioner, LGSTO 500-Hosapete.
5. Officer Folder.