M/s C. Ramappa, #2, Akshaya Nilaya, 1st Main, 1st Cross, Dooravani Nagar, Vijinapura, Bengaluru - 560 016 (Sri C. Ramappa)

Authority for Advance Ruling — Karnataka

Advance Ruling No. KAR ADRG 14/2020, Date: 20-03-2020 Dated **20.03.2020**

Q Questions Before the Authority

- Whether letting out a residential dwelling to a firm, which in turn sublets the premises to individuals, families and corporates for residential purposes, results in a supply of service?

F Facts

The applicant, an unregistered person, intended to let out a residential dwelling to a firm. The firm would sublet the premises to individuals, families and corporates for residential use. On that basis the applicant filed Form GST ARA-01 seeking to know whether the head lease to the firm is a supply of service.

H Ruling

The authority did not decide the question. The applicant attended a hearing on 09.03.2020 through a chartered accountant, but on 20.03.2020 wrote to withdraw the application without giving reasons and asked that no ruling be passed. The authority disposed of the application as **withdrawn** , so no answer was given on whether the arrangement is a supply of service.

R Reasoning

The order was passed under Section 98(4) of the CGST Act, 2017 and the corresponding KGST Act provision, on an application made under Section 97 read with Rule 104 of the CGST and KGST Rules. After the hearing, the applicant's written request to withdraw was accepted. The authority therefore recorded the application as withdrawn and gave no reasoning on the merits. The order contains no discussion of the substantive GST question.

P Provisions Relied On

Section 97 of the CGST Act, 2017 and the KGST Act, 2017 (advance ruling application)

Section 98(4) of the CGST Act, 2017 and the KGST Act, 2017 (order disposing of the application)

Rule 104 of the CGST Rules, 2017 and the KGST Rules, 2017 (form and procedure for advance ruling)

Prepared as a reading aid. Where this summary and the original order differ, the order governs.

! For the Practitioner

This order has no precedential value on whether residential sub-letting arrangements are a taxable supply of service. A practitioner should not cite it as an authority on that point, because the applicant withdrew before any ruling was made. It only shows that the Karnataka authority accepted a withdrawal after a hearing had been held. The question of whether a head lease of residential premises to a firm is a supply of service remains undecided by this order.

Source

Summary prepared from the published order, which is a scanned document. It is a reading aid and not the authority: where the two differ, the order governs. Verify every provision against the original before relying on it.

Original order: www.gstcouncil.gov.in -> kar_aar_14_2020_c_ramappa.pdf

Prepared 20-11-2026.

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