

**Income Tax Act 1961 s 245-S - Applicability of  
advance ruling**

**(1) The advance ruling pronounced by the Authority under section 245R shall be binding only—**

**(a) on the applicant who had sought it;**

**(b) in respect of the transaction in relation to which the ruling had been sought; and**

**(c) on the Principal Commissioner or Commissioner, and the income-tax authorities subordinate to him, in respect of the applicant and the said transaction.**

**(2) The advance ruling referred to in sub-section (1) shall be binding as aforesaid unless there is a change in law or facts on the basis of which the advance ruling has been pronounced.**