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Introduction The Income-Tax Appellate Tribunal (Hon'ble ITAT) country's first tribunal instituted for administering the appeals under Direct Taxes Act. It is known as the "Mother Tribunal" of India. With its institution in 1941, the tribunal has been discharging its functions in a fair and efficient manner. It was the success of Hon'ble ITAT that inspired the Government to establish similar tribunals. The rulings of the tribunal are final and the next appellate forum from it is its jurisdictional High Court. The appeal in High Court is only admitted if there is a substantial question of law, which makes Hon'ble ITAT the last fact-finding authority. By virtue of section 86 of the Finance Act, 2021, an amendment was carried on to section 255 of the Income-tax Act ("the Act") to bring in new sub-section (7), (8), and (9) with effect from April 01, 2021. The amendment proposed to replace the existing tribun.....