

Section 1274.--Determination of Issue Price in the Case of Certain Debt Instruments Issued for Property

(Also Sections 42, 280G, 382, 467, 468, 482, 483, 1288, 7520, 7872.)

Rev. Rul. 2019-17

This revenue ruling provides various prescribed rates for federal income tax purposes for August 2019 (the current month). Table 1 contains the short-term, mid-term, and long-term applicable federal rates (AFR) for the current month for purposes of section 1274(d) of the Internal Revenue Code. Table 2 contains the short-term, mid-term, and long-term adjusted applicable federal rates (adjusted AFR) for the current month for purposes of section 1288(b). Table 3 sets forth the adjusted federal long-term rate and the long-term tax-exempt rate described in section 382(f). Table 4 contains the appropriate percentages for determining the low-income housing credit described in section 42(b)(1) for buildings placed in service during the current month. However, under section 42(b)(2), the applicable percentage for non-federally subsidized new buildings placed in service after July 30, 2008, shall not be less than 9%. Finally, Table 5 contains the federal rate for determining the present value of an annuity, an interest for life or for a term of years, or a remainder or a reversionary interest for purposes of section 7520.

Applicable Federal Rates (AFR) for August 2019

	<u>Annual</u>	<u>Period for Compounding</u>		<u>Monthly</u>
		<u>Semiannual</u>	<u>Quarterly</u>	
		<u>Short-term</u>		
AFR	1.91%	1.90%	1.90%	1.89%
110% AFR	2.10%	2.09%	2.08%	2.08%
120% AFR	2.29%	2.28%	2.27%	2.27%
130% AFR	2.49%	2.47%	2.46%	2.46%
		<u>Mid-term</u>		
AFR	1.87%	1.86%	1.86%	1.85%
110% AFR	2.06%	2.05%	2.04%	2.04%
120% AFR	2.24%	2.23%	2.22%	2.22%
130% AFR	2.43%	2.42%	2.41%	2.41%
150% AFR	2.81%	2.79%	2.78%	2.77%
175% AFR	3.29%	3.26%	3.25%	3.24%
		<u>Long-term</u>		
AFR	2.33%	2.32%	2.31%	2.31%
110% AFR	2.57%	2.55%	2.54%	2.54%
120% AFR	2.80%	2.78%	2.77%	2.76%
130% AFR	3.04%	3.02%	3.01%	3.00%

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Adjusted AFR for August 2019

	<u>Period for Compounding</u>			
	<u>Annual</u>	<u>Semiannual</u>	<u>Quarterly</u>	<u>Monthly</u>
Short-term adjusted AFR	1.45%	1.44%	1.44%	1.44%
Mid-term adjusted AFR	1.41%	1.41%	1.41%	1.41%
Long-term adjusted AFR	1.77%	1.76%	1.76%	1.75%

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Rates Under Section 382 for August 2019

Adjusted federal long-term rate for the current month	1.77%
Long-term tax-exempt rate for ownership changes during the current month (the highest of the adjusted federal long-term rates for the current month and the prior two months.)	2.09%

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Appropriate Percentages Under Section 42(b)(1) for August 2019

Note: Under section 42(b)(2), the applicable percentage for non-federally subsidized new buildings placed in service after July 30, 2008, shall not be less than 9%.

Appropriate percentage for the 70% present value low-income housing credit	7.48%
Appropriate percentage for the 30% present value low-income housing credit	3.21%

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Rate Under Section 7520 for August 2019

Applicable federal rate for determining the present value of an annuity, an interest for life or a term of years, or a remainder or reversionary interest

2.2%