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. 2020-3

This revenue ruling provides various prescribed rates for federal income tax purposes for February 2020 (the current month). Table 1 contains the short-term, midterm, 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, midterm, 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

REV. RUL. 2020-3 TABLE 1

Applicable Federal Rates (AFR) for February 2020

	Period for Compounding				
	<u>Annual</u>	<u>Semiannual</u>	<u>Quarterly</u>	<u>Monthly</u>	
	<u>Short-term</u>				
AFR 110% AFR 120% AFR 130% AFR	1.59% 1.75% 1.91% 2.06%	1.58% 1.74% 1.90% 2.05%	1.58% 1.74% 1.90% 2.04%	1.57% 1.73% 1.89% 2.04%	
	<u>Mid-term</u>				
AFR 110% AFR 120% AFR 130% AFR 150% AFR 175% AFR	1.75% 1.92% 2.10% 2.27% 2.63% 3.07%	1.74% 1.91% 2.09% 2.26% 2.61% 3.05%	1.74% 1.91% 2.08% 2.25% 2.60% 3.04%	1.73% 1.90% 2.08% 2.25% 2.60% 3.03%	
	<u>Long-term</u>				
AFR 110% AFR 120% AFR 130% AFR	2.15% 2.36% 2.59% 2.80%	2.14% 2.35% 2.57% 2.78%	2.13% 2.34% 2.56% 2.77%	2.13% 2.34% 2.56% 2.76%	

REV. RUL. 2020-3 TABLE 2

Adjusted AFR for February 2020

	<u>P</u> Annual	eriod for Compo Semiannual	ounding Quarterly	Monthly
Short-term adjusted AFR	1.20%	1.20%	1.20%	1.20%
Mid-term adjusted AFR	1.32%	1.32%	1.32%	1.32%
Long-term adjusted AFR	1.63%	1.62%	1.62%	1.61%

REV. RUL. 2020-3 TABLE 3

Rates Under Section 382 for February 2020

Adjusted federal long-term rate for the current month 1.63%

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.)

1.63%

## REV. RUL. 2020-3 TABLE 4

Appropriate Percentages Under Section (42(b)(1)) for February 2020 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 7.45%

Appropriate percentage for the 30% present value low-income housing credit 3.19%

REV. RUL. 2020-3 TABLE 5

Rate Under Section 7520 for February 2020

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%