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. 2020-11

This revenue ruling provides various prescribed rates for federal income tax purposes for May 2020 (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

REV. RUL. 2020-11 TABLE 1

Applicable Federal Rates (AFR) for May 2020

	Period for Compounding				
	<u>Annual</u>	<u>Semiannual</u>	<u>Quarterly</u>	Monthly	
	<u>Short-term</u>				
AFR 110% AFR 120% AFR 130% AFR	0.25% 0.28% 0.30% 0.33%	0.25% 0.28% 0.30% 0.33%	0.25% 0.28% 0.30% 0.33%	0.25% 0.28% 0.30% 0.33%	
130 /6 AT IT	0.33 /6	0.55 /6	0.55 /6	0.55 /6	
	<u>Mid-term</u>				
AFR 110% AFR 120% AFR 130% AFR 150% AFR 175% AFR	0.58% 0.64% 0.70% 0.75% 0.87% 1.02%	0.58% 0.64% 0.70% 0.75% 0.87% 1.02%	0.58% 0.64% 0.70% 0.75% 0.87% 1.02%	0.58% 0.64% 0.70% 0.75% 0.87% 1.02%	
	<u>Long-term</u>				
AFR 110% AFR 120% AFR 130% AFR	1.15% 1.27% 1.38% 1.51%	1.15% 1.27% 1.38% 1.50%	1.15% 1.27% 1.38% 1.50%	1.15% 1.27% 1.38% 1.50%	

REV. RUL. 2020-11 TABLE 2

Adjusted AFR for May 2020

	Period for Compounding				
	<u>Annual</u>	<u>Semiannual</u>	Quarterly	Monthly	
Short-term adjusted AFR	0.19%	0.19%	0.19%	0.19%	
Mid-term adjusted AFR	0.44%	0.44%	0.44%	0.44%	
Long-term adjusted AFR	0.87%	0.87%	0.87%	0.87%	

REV. RUL. 2020-11 TABLE 3

Rates Under Section 382 for May 2020

Adjusted federal long-term rate for the current month

.87%

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.)

1.47%

REV. RUL. 2020-11 TABLE 4

Appropriate Percentages Under Section 42(b)(1) for May 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	7.20%
Appropriate percentage for the 30% present value low-income housing credit	3.08%

REV. RUL. 2020-11 TABLE 5

Rate Under Section 7520 for May 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

.8%