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 longterm rate and the long-term tax-exempt rate described in section [382(f)] Table 4 contains the appropriate percentages for determining the lowincome 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. 2019-17 TABLE 1

Applicable Federal Rates (AFR) for August 2019

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

REV. RUL. 2019-17 TABLE 2

Adjusted AFR for August 2019

	Period for Compounding				
	<u>Annual</u>	<u>Semiannual</u>	<b>Quarterly</b>	<b>Monthly</b>	
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%	

REV. RUL. 2019-17 TABLE 3

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%

## REV. RUL. 2019-17 TABLE 4

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%

REV. RUL. 2019-17 TABLE 5

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%