

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. 2023-6

This revenue ruling provides various prescribed rates for federal income tax purposes for April 2023 (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. 2023-6 TABLE 1

Applicable Federal Rates (AFR) for April 2023

	<u>Annual</u>	<u>Period for Compounding</u>		<u>Monthly</u>
		<u>Semiannual</u>	<u>Quarterly</u>	
<u>Short-term</u>				
AFR	4.86%	4.80%	4.77%	4.75%
110% AFR	5.35%	5.28%	5.25%	5.22%
120% AFR	5.84%	5.76%	5.72%	5.69%
130% AFR	6.34%	6.24%	6.19%	6.16%
<u>Mid-term</u>				
AFR	4.15%	4.11%	4.09%	4.08%
110% AFR	4.57%	4.52%	4.49%	4.48%
120% AFR	4.99%	4.93%	4.90%	4.88%
130% AFR	5.41%	5.34%	5.30%	5.28%
150% AFR	6.27%	6.17%	6.12%	6.09%
175% AFR	7.32%	7.19%	7.13%	7.08%
<u>Long-term</u>				
AFR	4.02%	3.98%	3.96%	3.95%
110% AFR	4.43%	4.38%	4.36%	4.34%
120% AFR	4.84%	4.78%	4.75%	4.73%
130% AFR	5.24%	5.17%	5.14%	5.12%

REV. RUL. 2023-6 TABLE 2

Adjusted AFR for April 2023

	<u>Period for Compounding</u>			
	<u>Annual</u>	<u>Semiannual</u>	<u>Quarterly</u>	<u>Monthly</u>
Short-term adjusted AFR	3.67%	3.64%	3.62%	3.61%
Mid-term adjusted AFR	3.14%	3.12%	3.11%	3.10%
Long-term adjusted AFR	3.04%	3.02%	3.01%	3.00%

REV. RUL. 2023-6 TABLE 3

Rates Under Section 382 for April 2023

Adjusted federal long-term rate for the current month	3.04%
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.)	3.04%

REV. RUL. 2023-6 TABLE 4

Appropriate Percentages Under Section 42(b)(1) for April 2023

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	7.95%
Appropriate percentage for the 30% present value low-income housing credit	3.41%

REV. RUL. 2023-6 TABLE 5

Rate Under Section 7520 for April 2023

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	5.00%
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