

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, 642, 1288, 7520, 7872.)

Rev. Rul. 2017-12

This revenue ruling provides various prescribed rates for federal income tax purposes for June 2017 (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. 2017-12 TABLE 1

Applicable Federal Rates (AFR) for June 2017

	<u>Annual</u>	<u>Period for Compounding</u>		<u>Monthly</u>
		<u>Semiannual</u>	<u>Quarterly</u>	
<u>Short-term</u>				
AFR	1.18%	1.18%	1.18%	1.18%
110% AFR	1.30%	1.30%	1.30%	1.30%
120% AFR	1.43%	1.42%	1.42%	1.42%
130% AFR	1.54%	1.53%	1.53%	1.53%
<u>Mid-term</u>				
AFR	1.96%	1.95%	1.95%	1.94%
110% AFR	2.16%	2.15%	2.14%	2.14%
120% AFR	2.35%	2.34%	2.33%	2.33%
130% AFR	2.56%	2.54%	2.53%	2.53%
150% AFR	2.95%	2.93%	2.92%	2.91%
175% AFR	3.44%	3.41%	3.40%	3.39%
<u>Long-term</u>				
AFR	2.68%	2.66%	2.65%	2.65%
110% AFR	2.95%	2.93%	2.92%	2.91%
120% AFR	3.22%	3.19%	3.18%	3.17%
130% AFR	3.49%	3.46%	3.45%	3.44%

REV. RUL. 2017-12 TABLE 2

Adjusted AFR for June 2017

	<u>Period for Compounding</u>			
	<u>Annual</u>	<u>Semiannual</u>	<u>Quarterly</u>	<u>Monthly</u>
Short-term adjusted AFR	.88%	.88%	.88%	.88%
Mid-term adjusted AFR	1.46%	1.45%	1.45%	1.45%
Long-term adjusted AFR	1.99%	1.98%	1.98%	1.97%

REV. RUL. 2017-12 TABLE 3

Rates Under Section 382 for June 2017

Adjusted federal long-term rate for the current month	1.99%
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. 2017-12 TABLE 4

Appropriate Percentages Under Section 42(b)(1) for June 2017

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	7.53%
Appropriate percentage for the 30% present value low-income housing credit	3.23%

REV. RUL. 2017-12 TABLE 5

Rate Under Section 7520 for June 2017

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	2.4%
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