

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.)

Rev. Rul. 2018-12

This revenue ruling provides various prescribed rates for federal income tax purposes for May 2018 (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. 2018-12 TABLE 1

Applicable Federal Rates (AFR) for May 2018

	<u>Annual</u>	<u>Period for Compounding</u>		<u>Monthly</u>
		<u>Semiannual</u>	<u>Quarterly</u>	
<u>Short-term</u>				
AFR	2.18%	2.17%	2.16%	2.16%
110% AFR	2.40%	2.39%	2.38%	2.38%
120% AFR	2.62%	2.60%	2.59%	2.59%
130% AFR	2.84%	2.82%	2.81%	2.80%
<u>Mid-term</u>				
AFR	2.69%	2.67%	2.66%	2.66%
110% AFR	2.96%	2.94%	2.93%	2.92%
120% AFR	3.23%	3.20%	3.19%	3.18%
130% AFR	3.50%	3.47%	3.46%	3.45%
150% AFR	4.05%	4.01%	3.99%	3.98%
175% AFR	4.72%	4.67%	4.64%	4.63%
<u>Long-term</u>				
AFR	2.94%	2.92%	2.91%	2.90%
110% AFR	3.24%	3.21%	3.20%	3.19%
120% AFR	3.53%	3.50%	3.48%	3.47%
130% AFR	3.84%	3.80%	3.78%	3.77%

REV. RUL. 2018-12 TABLE 2

Adjusted AFR for May 2018

	<u>Period for Compounding</u>			
	<u>Annual</u>	<u>Semiannual</u>	<u>Quarterly</u>	<u>Monthly</u>
Short-term adjusted AFR	1.66%	1.65%	1.65%	1.64%
Mid-term adjusted AFR	2.04%	2.03%	2.02%	2.02%
Long-term adjusted AFR	2.23%	2.22%	2.21%	2.21%

REV. RUL. 2018-12 TABLE 3

Rates Under Section 382 for May 2018

Adjusted federal long-term rate for the current month	2.23%
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.)	2.30%

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Appropriate Percentages Under Section 42(b)(1) for May 2018

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	7.65%
Appropriate percentage for the 30% present value low-income housing credit	3.28%

REV. RUL. 2018-12 TABLE 5

Rate Under Section 7520 for May 2018

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	3.2%
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