Section 1274.—Determination of Issue Price in the Case of Certain Debt Instruments Issued for Property

(Also Sections 42, 280G, 382, 412, 467, 468, 483, 807, 846, 1288, 7520, 7872.)

Federal rates; adjusted federal rates; adjusted federal long-term rate, and the long-term exempt rate. For purposes of sections 1274, 1288, 382, and other sections of the Code, tables set forth the rates for January 1996.

Rev. Rul. 96-6

This revenue ruling provides various prescribed rates for federal income tax purposes for January 1996 (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 taxexempt rate described in section 382(f). Table 4 contains the appropriate percentages for determining the lowincome housing credit described in section 42(b)(2) for buildings placed in service during the current month. 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. 95–79, 1995–49 I.R.B. 4, which set forth the applicable federal rates and various other rates for December 1995, incorrectly provided in Table 1 that the Long-Term 120% Applicable Federal Rate based on annual compounding was 7.01%. The correct percentage is 7.65%. This correction will be made to Rev. Rul. 95–79 when it is published in issue 1995–2 of the Cumulative Bulletin.

REV. RUL. 96-6 TABLE 1

Applicable Federal Rates (AFR) for January 1996

	i erioa joi	Compounding		
	Annual	Semiannual	Quarterly	Monthly
Short-Term				
AFR	5.50%	5.43%	5.39%	5.37%
110% AFR	6.06%	5.97%	5.93%	5.90%
120% AFR	6.63%	6.52%	6.47%	6.43%
Mid-Term				
AFR	5.73%	5.65%	5.61%	5.58%
110% AFR	6.32%	6.22%	6.17%	6.14%
120% AFR	6.89%	6.78%	6.72%	6.69%
150% AFR	8.66%	8.48%	8.39%	8.33%
175% AFR	10.13%	9.89%	9.77%	9.69%
Long-Term				
AFR	6.19%	6.10%	6.05%	6.02%
110% AFR	6.82%	6.71%	6.65%	6.62%
120% AFR	7.45%	7.32%	7.25%	7.21%

REV. RUL. 96-6 TABLE 2

Adjusted AFR for January 1996

Period for Compounding

	Annual	Semiannual	Quarterly	Monthly
Short-term adjusted AFR	3.68%	3.65%	3.63%	3.62%
Mid-term adjusted AFR	4.37%	4.32%	4.30%	4.28%
Long-term adjusted AFR	5.31%	5.24%	5.21%	5.18%

REV. RUL. 95-79 TABLE 3

Rates Under Section 382 for January 1996

Adjusted federal long-term rate for the current month

5.31%

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).

5.65%

REV. RUL. 95-79 TABLE 4

Appropriate Percentages Under Section 42(b)(2) for January 1996

Appropriate percentage for the	70% present value low-income hous	ng credit 8.40%
Appropriate percentage for the	30% present value low-income hous	ng credit 3.60%

REV. RUL. 96–6 TABLE 5

Rate Under Section 7520 for January 1996

6.8%

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