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

(Also Sections 42, 280G, 382, 412, 467, 468, 482, 483, 642, 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 1997.

Rev. Rul. 97-1

This revenue ruling provides various prescribed rates for federal income tax purposes for January 1997 (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)(2) for buildings placed in service during the current month. 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. Finally, Table 6 contains the deemed rate of return for transfers made during calendar year 1997 to pooled income funds described in section 642(c)(5) that have been in existence for less than 3 taxable years immediately preceding the taxable year in which the transfer is made.

REV. RUL. 97–1 TABLE 1
Applicable Federal Rates (AFR) for January 1997
Period for Compounding

Period for Compounding						
	$Annual \lnot$	$Semiannual \lnot$	$Quarterly \neg$	Monthly		
Short-Term						
$AFR \neg$	5.63%¬	5.55%¬	5.51%¬	5.49%		
110% AFR¬	6.20%¬	6.11%¬	6.06%¬	6.03%		
120% AFR¬	6.77%¬	6.66%¬	6.61%¬	6.57%		
130% AFR¬	7.35%¬	7.22%¬	7.16%¬	7.11%		
Mid-Term						
$AFR \neg$	6.10%¬	6.01%¬	5.97%¬	5.94%		
110% AFR¬	6.72%¬	6.61%¬	6.56%¬	6.52%		
120% AFR¬	7.34%¬	7.21%¬	7.15%¬	7.10%		
130% AFR¬	7.96%¬	7.81%¬	7.74%¬	7.69%		
150% AFR¬	9.22%¬	9.02%¬	8.92%¬	8.86%		
175% AFR¬	10.80%¬	10.52%¬	10.39%¬	10.30%		
Long-Term						
$AFR \neg$	6.54%¬	6.44%¬	6.39%¬	6.36%		
110% AFR¬	7.21%¬	7.08%¬	7.02%¬	6.98%		
120% AFR¬	7.88%¬	7.73%¬	7.66%¬	7.61%		
130% AFR¬	8.55%¬	8.37%¬	8.28%¬	8.23%		

REV. RUL. 97-1 TABLE 2

Adjuste d AFR for Januar y 1997

Period for Compounding

	$Annual \lnot$	$Semiannual \lnot$	$Quarterly \neg$	Monthly
Short-term adjuste d AFR¬	3.64% ¬	3.61% ¬	3.59% ¬	3.58%
Mid-term adjuste d AFR¬	4.45% ¬	4.40% ¬	4.38% ¬	4.36%
Long-term adjuste d AFR¬	5.35% ¬	5.28% ¬	5.25% ¬	5.22%

REV. RUL, 97-1 TABLE 3

Rate s Under Sectio n 38 2 for Januar y 1997

Adjuste d federa 1 long-ter m rate for the curren t month ¬

5.35%

Long-ter m tax-exemp t rate for ownershi p change s durin g the curren t mont h (the highes t of the adjuste d federa 1 long-ter m rate s for the curren t mont h and the prior two months.)

REV. RUL. 97-1 TABLE 4

Appropriat e Percentage s Under Sectio n 42(b)(2) for Januar y 1997

REV. RUL. 97-1 TABLE 5

Rate Under Sectio n 752 0 for Januar y 1997

Applicable federa l rate for determining the present value of an annuity, an interest for life or a term of years, or a remainder or reversionary interest

7.4%

REV. RUL, 97-1 TABLE 6

Deeme d Rate for Transfer s to New Poole d Incom e Funds During 1997

Deeme d rat e of retur n for transfer s durin g 199 7 to poole d incom e fund s that have been in existence for less than 3 taxable years. \neg

7.2%