

## Section 995.- Taxation of DISC Income to Shareholders

1998 base period T-bill rate. The "base perio d T-bill rate" for the period ending September 30, 1998, is published, as required by section $995(\mathrm{f})$ of the Code.

## Rev. Rul. 98-55

Section 995(f)(1) of the Internal Revenue Code provides that a shareholder of a DISC shall pay interest each taxable year in an amount equal to the product of the shareholder's DISC-related deferred tax liability for the year and the "base period T-bill rate." Under section 995(f)(4), the base period T-bill rate is the annual rate of interest determined by the Secretary to be equivalent to the average investment yield
of United States Treasury bills with maturities of 52 weeks which were auctioned during the one-year period ending on September 30 of the calendar year ending with (or of the most recent calendar year ending before) the close of the taxable year of the shareholder. The base period Tbill rate for the period ending September 30,1998 , is 5.34 percent.
Pursuant to section 6622 of the Code, interest must be compounded daily. The table below provides factors for compounding the base period T -bill rate daily for any number of days in the shareholder's taxable year (including a 52-53 week accounting period) for the 1998 base period T-bill rate. To compute the amount of the interest charge for the shareholder's taxable year, multiply the amount of the shareholder's DISC-related deferred tax liability (as defined in section $995(\mathrm{f})(2)$ ) for that year by the base period T -bill rate factor corresponding to the number of days in the shareholder's taxable year for which the interest charge is being computed. Generally, one would use the factor for 365 days. One would use a different factor only if the shareholder's taxable year for which the interest charge being determined is a short taxable year, if the shareholder uses the $52-53$ week taxable year, or if the shareholder's taxable year is a leap yea r.
For the base perio d T-bill rates for the periods ending in prior years, see: Rev. Rul. 86-132, 1986-2 C.B. 137; Rev. Rul. 87-129, 1987-2 C.B. 196; Rev. Rul. 8894, 1988-2 C.B. 301; Rev. Rul. 89-116, 1989-2 C.B. 197; Rev. Rul. 90-96, 19902 C.B. 188; Rev. Rul. 91-59, 1991-2 C.B. 347; Rev. Rul. 92-98, 1992-2 C.B. 201; Rev. Rul. 93-77, 1993-2 C.B. 253; Rev. Rul. 94-68, 1994-2 C.B. 177; Rev. Rul. 95-77, 1995-2 C.B. 122; Rev. Rul. 9655, 1996-2 C.B. 57; and Rev. Rul. 97-49, 1997-48 I.R.B. 4.

## DRAFTING INFORMATION

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1998 ANNUAL RATE, COMPOUNDED DAILY

## DAYS

### 5.34 PERCENT

 FACTOR. 000146301
. 000292624
. 000438968
. 000585334
. 000731721
. 000878129
. 001024559
. 001171010
. 001317483
. 001463977
.001610493
.001757030
.001903588
. 002050168
.002196769
. 002343392
. 002490036
. 002636702
. 002783389
. 002930098
.003076828
. 003223579
.003370352
. 003517147
.003663963
. 003810800
. 003957659
. 004104539
. 004251441
. 004398365
. 004545309
. 004692276
. 004839264
. 004986273
.005133304
. 005280356
. 005427430
. 005574526
. 005721643
. 005868781
. 006015941
.006163122
. 006310325
.006457550
.006604796

| 46 | . 006752064 | 97 |
| :---: | :---: | :---: |
| 47 | . 006899353 | 98 |
| 48 | . 007046664 | 99 |
| 49 | . 007193996 | 100 |
| 50 | . 007341350 |  |
| 51 | . 007488725 | 102 |
| 52 | . 007636122 | 103 |
| 53 | . 007783541 | 104 |
| 54 | . 007930981 | 105 |
| 55 | . 008078443 |  |
| 56 | . 008225926 | 107 |
| 57 | . 008373431 | 108 |
| 58 | . 008520957 | 109 |
| 59 | . 008668505 | 110 |
| 60 | . 008816075 |  |
| 61 | . 008963666 | 112 |
| 62 | . 009111279 | 113 |
| 63 | . 009258913 | 114 |
| 64 | . 009406569 | 115 |
| 65 | . 009554247 |  |
| 66 | . 009701946 | 117 |
| 67 | . 009849667 | 118 |
| 68 | . 009997409 | 119 |
| 69 | . 010145173 | 120 |
| 70 | . 010292959 |  |
| 71 | . 010440766 | 122 |
| 72 | . 010588595 | 123 |
| 73 | . 010736445 | 124 |
| 74 | . 010884317 | 125 |
| 75 | . 011032211 |  |
| 76 | . 011180126 | 127 |
| 77 | . 011328064 | 128 |
| 78 | . 011476022 | 129 |
| 79 | . 011624003 | 130 |
| 80 | . 011772005 |  |
| 81 | . 011920028 | 132 |
| 82 | . 012068073 | 133 |
| 83 | . 012216140 | 134 |
| 84 | . 012364229 | 135 |
| 85 | . 012512339 |  |
| 86 | . 012660471 | 137 |
| 87 | . 012808625 | 138 |
| 88 | . 012956800 | 139 |
| 89 | . 013104997 | 140 |
| 90 | . 013253216 |  |
|  |  | 141 |
| 91 | . 013401456 | 142 |
| 92 | . 013549718 | 143 |
| 93 | . 013698002 | 144 |
| 94 | . 013846307 | 145 |
| 95 | . 013994634 |  |
| 96 | 014142983 | 146 |
|  | . 014142983 | 147 |


| . 014291354 | 148 | . 021887103 |
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| . 014885053 | 152 | . 022485248 |
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| . 015182033 | 154 | . 022784452 |
| . 015330555 | 155 | . 022934087 |
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| . 015627665 | 157 | . 023233422 |
| . 015776253 | 158 | . 023383123 |
| . 015924863 | 159 | . 023532845 |
| . 016073494 | 160 | . 023682589 |
| . 016222147 | 161 | . 023832355 |
| . 016370821 | 162 | . 023982143 |
| . 016519518 | 163 | . 024131953 |
| . 016668236 | 164 | . 024281785 |
| . 016816976 | 165 | . 024431639 |
| . 016965738 | 166 | . 024581515 |
| . 017114521 | 167 | . 024731413 |
| . 017263326 | 168 | . 024881332 |
| . 017412153 | 169 | . 025031274 |
| . 017561002 | 170 | . 025181237 |
| . 017709873 | 171 | . 025331223 |
| . 017858765 | 172 | . 025481230 |
| . 018007679 | 173 | . 025631259 |
| . 018156615 | 174 | . 025781311 |
| . 018305573 | 175 | . 025931384 |
| . 018454552 | 176 | . 026081479 |
| . 018603554 | 177 | . 026231596 |
| . 018752577 | 178 | . 026381735 |
| . 018901622 | 179 | . 026531896 |
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| . 019348887 | 182 | . 026982511 |
| . 019498019 | 183 | . 027132760 |
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| . 019796349 | 185 | . 027433324 |
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|  | 186 | . 027583639 |
| . 020094766 | 187 | . 027733976 |
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| . 020393271 | 189 | . 028034716 |
| . 020542555 | 190 | . 028185118 |
| . 020691862 |  | 028335543 |
| . 020841191 | 192 | .028335543 .028485990 |
| . 020990541 | 193 | . 028636459 |
| . 021139914 | 194 | . 028786950 |
| . 021289308 | 195 | . 028937463 |
| . 021438724 |  |  |
|  | 196 | . 029087998 |
| . 021588162 | 197 | . 029238555 |
| . 021737621 | 198 | . 029389134 |


| 199 | . 029539735 | 251 | . 037401426 | 302 | . 045170241 |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 200 | . 029690358 | 252 | . 037553200 | 303 | . 045323151 |
|  |  | 253 | . 037704995 | 304 | . 045476083 |
| 201 | . 029841003 | 254 | . 037856813 | 305 | . 045629037 |
| 202 | . 029991670 | 255 | . 038008653 |  | . 04562937 |
| 203 | . 030142359 |  |  | 306 | . 045782014 |
| 204 | . 030293071 | 256 | . 038160515 | 307 | . 045935014 |
| 205 | . 030443804 | 257 | . 038312399 | 308 | . 046088035 |
| 206 | . 030594559 | 258 | . 038464306 | 309 | . 046241080 |
| 207 | . 030745337 | 259 | . 038616234 | 310 | . 046394146 |
| 208 | . 030896136 | 260 | . 038768185 | 311 | . 046547235 |
| 209 | . 031046958 | 261 | . 038920158 | 312 | . 046700346 |
| 210 | . 031197801 | 262 | . 039072154 | 313 | . 046853480 |
| 211 | . 031348667 | 263 | . 039224172 | 314 | . 047006636 |
| 212 | . 031499555 | 264 | . 039376212 | 315 | . 047159815 |
| 213 | . 031650464 | 265 | . 039528274 | 316 | . 047313015 |
| 214 | . 031801396 | 266 | . 039680358 | 317 | . 047466239 |
| 215 | . 031952350 | 267 | . 039832465 | 318 | . 047619485 |
| 216 | . 032103326 | 268 | . 039984594 | 319 | . 047772753 |
| 217 | . 032254324 | 269 | . 040136745 | 320 | . 047926043 |
| 218 | . 032405345 | 270 | . 040288918 | 321 | 048079356 |
| 219 | . 032556387 | 271 | . 040441114 | 322 | . 048232692 |
| 220 | . 032707451 | 272 | . 040593332 | 323 | . 048386050 |
| 221 | . 032858538 | 273 | . 040745572 | 324 | . 048539430 |
| 222 | . 033009647 | 274 | . 040897835 | 325 | . 048692833 |
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| 224 | . 033311930 |  |  | 326 | . 048846258 |
| 225 | . 033463105 | 276 | . 041202426 | 327 | . 048999706 |
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|  |  | 287 | . 042879276 | 338 | . 050689112 |
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| 238 | . 035430393 | 290 | . 043337066 |  |  |
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| 244 | . 036339635 |  |  | 346 | . 051919480 |
| 245 | . 036491253 | 296 | . 044253251 | 347 | . 052073377 |
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| 246 | . 036642893 | 298 | . 044558825 | 349 | . 052381239 |
| 247 | . 036794555 | 299 | . 044711645 | 350 | . 052535204 |
| 248 | . 036946240 | 300 | . 044864488 |  |  |
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| 353 | .052997234 | 363 | .054538798 |
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| 361 | .054230304 | 371 | .055773674 |
| 362 | .054384540 |  | - |

## Section 1231.-Property Used in a Trade or Business and Involuntary Conversions

26 CFR 1.1231-1: Gains and losses from the sale or exchange of certain property used in the trade or business.

Is gain that is treated as long-term capital gain under § 1231(a)(1) of the Code disqualified income for purposes of the earned income credit. See Rev. Rul. 98-56, page 5.

