## Section 846.- Discounted Unpaid Losses Defined

The adjusted applicable federal short-term, midterm, and long-term rates are set forth for the month of January 2000. See Rev. Rul. 2000-1, page 250.

## 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 section of the Code, tables set forth the rates for January 2000.

## Rev. Rul. 2000-1

This revenue ruling provides various prescribed rates for federal income tax purposes for January 2000 (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 $382(\mathrm{f})$. 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 2000 to pooled income funds described in § 642(c)(5) that have been in existence for less than 3

Section 807.— Rules for Certain Reserves taxable years immediately preceding the taxable year in which the transfer is made.

REV. RUL. 2000-1 TABLE 1
Applicable Federal Rates (AFR) for January 2000
Period for Compounding
Annual Semiannual Quarterly Monthly

Short-Term

| AFR | $5.88 \%$ | $5.80 \%$ | $5.76 \%$ | $5.73 \%$ |
| ---: | :--- | :--- | :--- | :--- |
| $110 \%$ AFR | $6.48 \%$ | $6.38 \%$ | $6.33 \%$ | $6.30 \%$ |
| $120 \%$ AFR | $7.08 \%$ | $6.96 \%$ | $6.90 \%$ | $6.86 \%$ |
| $130 \%$ AFR | $7.68 \%$ | $7.54 \%$ | $7.47 \%$ | $7.42 \%$ |

Mid-Term

| AFR | $6.21 \%$ | $6.12 \%$ | $6.07 \%$ | $6.04 \%$ |
| ---: | ---: | ---: | ---: | ---: |
| $110 \%$ AFR | $6.84 \%$ | $6.73 \%$ | $6.67 \%$ | $6.64 \%$ |
| $120 \%$ AFR | $7.47 \%$ | $7.34 \%$ | $7.27 \%$ | $7.23 \%$ |
| $130 \%$ AFR | $8.12 \%$ | $7.96 \%$ | $7.88 \%$ | $7.83 \%$ |
| $150 \%$ AFR | $9.39 \%$ | $9.18 \%$ | $9.08 \%$ | $9.01 \%$ |
| $175 \%$ AFR | $11.00 \%$ | $10.71 \%$ | $10.57 \%$ | $10.48 \%$ |

Long-Term

| AFR | $6.45 \%$ | $6.35 \%$ | $6.30 \%$ | $6.27 \%$ |
| ---: | :--- | :--- | :--- | :--- |
| $110 \%$ AFR | $7.11 \%$ | $6.99 \%$ | $6.93 \%$ | $6.89 \%$ |
| $120 \%$ AFR | $7.77 \%$ | $7.62 \%$ | $7.55 \%$ | $7.50 \%$ |
| $130 \%$ AFR | $8.43 \%$ | $8.26 \%$ | $8.18 \%$ | $8.12 \%$ |


| REV. RUL. 2000-1 TABLE 2 |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| Adjusted AFR for January 2000 |  |  |  |  |
| Period for Compounding |  |  |  |  |
|  | Annual | Semiannual | Quarterly | Monthly |
| Short-term adjusted AFR | 4.01\% | 3.97\% | 3.95\% | 3.94\% |
| Mid-term adjusted AFR | 4.66\% | 4.61\% | 4.58\% | 4.57\% |
| Long-term adjusted AFR | 5.59\% | 5.51\% | 5.47\% | 5.45\% |

Adjusted federal long-term rate for the current month ..... 5.59\%Long-term tax-exempt rate for ownership changes during the current month (the highest of theadjusted federal long-term rates for the current month and the prior two months.)5.72\%
REV. RUL. 2000-1 TABLE 4
Appropriate Percentages Under Section 42(b)(2)
for January 2000
Appropriate percentage for the $70 \%$ present
value low-income housing credit ..... 8.48\%
Appropriate percentage for the $30 \%$ present value low-income housing credit ..... 3.64\%
REV. RUL. 2000-1 TABLE 5
Rate Under Section 7520 for January 2000
Applicable federal rate for determining the presentvalue of an annuity, an interest for life or a termof years, or a remainder or reversionary interest7.4\%
Rev. Rul. 2000-1 TABLE 6
Deemed Rate of Transfers to New Pooled Income Funds During 2000
Deemed rate of return for transfers during 2000 to pooledincome funds that have been in existence for less than 3taxable years6.80\%

