

## **Section 280G.—Golden Parachute Payments**

Federal short-term, mid-term, and long-term rates are set forth for the month of December 2000. See Rev. Rul. 2000-54, page 566.

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## **Section 382.—Limitation on Net Operating Loss Carryforwards and Certain Built-In Losses Following Ownership Change**

The adjusted applicable federal long-term rate is set forth for the month of December 2000. See Rev. Rul. 2000-54, page 566.

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## **Section 412.—Minimum Funding Standards**

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of December 2000. See Rev. Rul. 2000-54, page 566.

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## **Section 467.—Certain Payments for the Use of Property or Services**

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of December 2000. See Rev. Rul. 2000-54, on this page.

## **Section 468.—Special Rules for Mining and Solid Waste Reclamation and Closing Costs**

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of December 2000. See Rev. Rul. 2000-54, on this page.

## **Section 482.—Allocation of Income and Deductions Among Taxpayers**

Federal short-term, mid-term, and long-term rates are set forth for the month of December 2000. See Rev. Rul. 2000-54, on this page.

## **Section 483.—Interest on Certain Deferred Payments**

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of December 2000. See Rev. Rul. 2000-54, on this page.

## **Section 642.—Special Rules for Credits and Deductions**

Federal short-term, mid-term, and long-term rates are set forth for the month of December 2000. See Rev. Rul. 2000-54, on this page.

## **Section 807.—Rules for Certain Reserves**

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of December 2000. See Rev. Rul. 2000-54, on this page.

## **Section 846.—Discounted Unpaid Losses Defined**

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of December 2000. See Rev. Rul. 2000-54, on this page.

## **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 December 2000.

## **Rev. Rul. 2000-54**

This revenue ruling provides various prescribed rates for federal income tax purposes for December 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(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 2001 interest rate for purposes of sections 846 and 807.

REV. RUL. 2000-54 TABLE 1

Applicable Federal Rates (AFR) for December 2000

	<i>Period for Compounding</i>			
	<i>Annual</i>	<i>Semiannual</i>	<i>Quarterly</i>	<i>Monthly</i>
<i>Short-Term</i>				
AFR	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%
<i>Mid-Term</i>				
AFR	5.87%	5.79%	5.75%	5.72%
110% AFR	6.47%	6.37%	6.32%	6.29%
120% AFR	7.07%	6.95%	6.89%	6.85%
130% AFR	7.67%	7.53%	7.46%	7.41%
150% AFR	8.88%	8.69%	8.60%	8.54%
175% AFR	10.39%	10.13%	10.00%	9.92%
<i>Long-Term</i>				
AFR	5.98%	5.89%	5.85%	5.82%
110% AFR	6.58%	6.48%	6.43%	6.39%
120% AFR	7.19%	7.07%	7.01%	6.97%
130% AFR	7.81%	7.66%	7.59%	7.54%

## REV. RUL. 2000-54 TABLE 2

## Adjusted AFR for December 2000

*Period for Compounding*

	<i>Annual</i>	<i>Semiannual</i>	<i>Quarterly</i>	<i>Monthly</i>
Short-term adjusted AFR	4.30%	4.25%	4.23%	4.21%
Mid-term adjusted AFR	4.58%	4.53%	4.50%	4.49%
Long-term adjusted AFR	5.31%	5.24%	5.21%	5.18%

## REV. RUL. 2000-54 TABLE 3

## Rates Under Section 382 for December 2000

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.)	5.39%

## REV. RUL. 2000-54 TABLE 4

Appropriate Percentages Under Section 42(b)(2)  
for December 2000

Appropriate percentage for the 70% present value low-income housing credit	8.39%
Appropriate percentage for the 30% present value low-income housing credit	3.59%

## REV. RUL. 2000-54 TABLE 5

## Rate Under Section 7520 for December 2000

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	7.0%
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## REV. RUL. 2000-54 TABLE 6

## Rate Under Sections 846 and 807

Applicable rate of interest for 2001 for purposes of sections 846 and 807	6.00%
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**Section 1288.—Treatment of Original Issue Discounts on Tax-Exempt Obligations**

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of December 2000. See Rev. Rul. 2000-54, page 566.

**Section 7520.—Valuation Tables**

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of December 2000. See Rev. Rul. 2000-54, page 566.

**Section 7872.—Treatment of Loans With Below-Market Interest Rates**

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of December 2000. See Rev. Rul. 2000-54, page 566.