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

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

Rev. Rul. 97-10

This revenue ruling provides various prescribed rates for federal income tax purposes for March 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. 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.

| | R | EV. RUL. 97–10 TABLE 1 | | |
|-------------|---------------|----------------------------|------------------|---------|
| | Applicable 1 | Federal Rates (AFR) for Ma | urch 1997 | |
| | | Period for Compounding | | |
| Short- Term | Annual \neg | Semiannual \neg | Quarterly \neg | Monthly |
| AFR¬ | 5.83%¬ | 5.75%¬ | 5.71%¬ | 5.68% |
| 110% AFR¬ | 6.43%¬ | 6.33%¬ | 6.28%¬ | 6.25% |
| 120% AFR¬ | 7.02%¬ | 6.90%¬ | 6.84%¬ | 6.80% |
| 130% AFR¬ | 7.62%¬ | 7.48%¬ | 7.41%¬ | 7.37% |

REV. RUL. 97-10 TABLE 1-Continued

Applicable Federal Rates (AFR) for March 1997

Period for Compounding

| | Annual | Semiannual | Quarterly | Monthly |
|-----------|--------|------------|-----------|---------|
| Mid-Term | | | | |
| AFR | 6.42% | 6.32% | 6.27% | 6.24% |
| 110% AFR | 7.07% | 6.95% | 6.89% | 6.85% |
| 120% AFR | 7.72% | 7.58% | 7.51% | 7.46% |
| 130% AFR | 8.39% | 8.22% | 8.14% | 8.08% |
| 150% AFR | 9.70% | 9.48% | 9.37% | 9.30% |
| 175% AFR | 11.37% | 11.06% | 10.91% | 10.81% |
| Long-Term | | | | |
| AFR | 6.86% | 6.75% | 6.69% | 6.66% |
| 110% AFR | 7.57% | 7.43% | 7.36% | 7.32% |
| 120% AFR | 8.26% | 8.10% | 8.02% | 7.97% |
| 130% AFR | 8.97% | 8.78% | 8.69% | 8.62% |

| |] | REV. RUL. 97–10 TABLE | 2 | |
|----------------------------|--------|--------------------------|-----------|---------|
| | A | djusted AFR for March 19 | 97 | |
| | | Period for Compounding | | |
| | Annual | Semiannual | Quarterly | Monthly |
| Short-term adjusted AFR | 3.77% | 3.74% | 3.72% | 3.71% |
| Mid-term adjusted AFR | 4.62% | 4.57% | 4.54% | 4.53% |
| Long-term adjusted AFR | 5.50% | 5.43% | 5.39% | 5.37% |

| REV. RUL. 97–10 TABLE 3 | |
|---|----|
| Rates Under Section 382 for March 1997 | |
| djusted federal long-term rate for the current month 5.50% | |
| ong-term tax-exempt rate for ownership changes during the current month he highest of the adjusted federal long-term rates for the current month and the prior two months.) 5.50% | |
| he highest of the adjusted federal long-term rates for the current month and | 0% |

| REV. RUL. 97–10 TABLE 4 | | | | |
|--|-------|--|--|--|
| Appropriate Percentages Under Section 42(b)(2) for March 1997 | | | | |
| Appropriate percentage for the 70% present value low-income housing credit | 8.56% | | | |
| Appropriate percentage for the 30% present value low-income housing credit | 3.67% | | | |

REV. RUL. 97-10 TABLE 5

Rate Under Section 7520 for March 1997

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