## Sectia 1274.- Determinatiof Issue Price in the Case of Certain Debt Instrumerstlssued for Propety

(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 $1288(\mathrm{~b})$. 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.

REV. RUL. 97-10 TABLE 1
Applicable Federal Rates (AFR) for March 1997
Period for Compounding

|  | Annual $\neg$ | Semiannual $\neg$ | Quarterly $ᄀ$ | Monthly |
| :---: | :---: | :---: | :---: | :---: |
| Short- Term |  |  |  |  |
| AFR ${ }^{\text {a }}$ | 5.83\% | 5.75\% | 5.71\% ${ }^{\text {a }}$ | 5.68\% |
| 110\% AFRᄀ | 6.43\% | 6.33\% | 6.28\% 7 | 6.25\% |
| 120\% AFR ${ }^{\text {a }}$ | 7.02\% | 6.90\% | 6.84\% ${ }^{\text {¢ }}$ | 6.80\% |
| $130 \%$ AFR | $7.62 \%$ | $7.48 \%$ | $7.41 \%$ ᄀ | 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 Semer |  |  |  |  |
| 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
Adjusted AFR for March 1997
Period for Compounding

|  | Annual | Semiannual | Quarterly | Monthly |
| :--- | :---: | :---: | :---: | :---: |
| Short-term <br> adjusted AFR | $3.77 \%$ | $3.74 \%$ | $3.72 \%$ | $3.71 \%$ |
| Mid-term <br> adjusted AFR | $4.62 \%$ | $4.57 \%$ | $4.54 \%$ | $4.53 \%$ |
| Long-term <br> adjusted AFR | $5.50 \%$ | $5.43 \%$ | $5.39 \%$ | $5.37 \%$ |

REV. RUL. 97-10 TABLE 3
Rates Under Section 382 for March 1997
Adjusted federal long-term rate for the current month 5.50\%

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.)

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 $\quad 8.56 \%$
Appropriate percentage for the $30 \%$ present value low-income housing credit $\quad 3.67 \%$

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

