

## Part I

### 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.)

#### Rev. Rul. 2011-20

This revenue ruling provides various prescribed rates for federal income tax purposes for September 2011 (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)(1) for buildings placed in service during the current month. However, under section 42(b)(2), the applicable percentage for non-federally subsidized new buildings placed in service after July 30, 2008, and before December 31, 2013, shall not be less than 9%. 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. 2011-20 TABLE 1

## Applicable Federal Rates (AFR) for September 2011

|                   | <u>Annual</u> | <u>Period for Compounding</u> |                  |                |
|-------------------|---------------|-------------------------------|------------------|----------------|
|                   |               | <u>Semiannual</u>             | <u>Quarterly</u> | <u>Monthly</u> |
| <u>Short-term</u> |               |                               |                  |                |
| AFR               | .26%          | .26%                          | .26%             | .26%           |
| 110% AFR          | .29%          | .29%                          | .29%             | .29%           |
| 120% AFR          | .31%          | .31%                          | .31%             | .31%           |
| 130% AFR          | .34%          | .34%                          | .34%             | .34%           |
| <u>Mid-term</u>   |               |                               |                  |                |
| AFR               | 1.63%         | 1.62%                         | 1.62%            | 1.61%          |
| 110% AFR          | 1.79%         | 1.78%                         | 1.78%            | 1.77%          |
| 120% AFR          | 1.95%         | 1.94%                         | 1.94%            | 1.93%          |
| 130% AFR          | 2.12%         | 2.11%                         | 2.10%            | 2.10%          |
| 150% AFR          | 2.44%         | 2.43%                         | 2.42%            | 2.42%          |
| 175% AFR          | 2.86%         | 2.84%                         | 2.83%            | 2.82%          |
| <u>Long-term</u>  |               |                               |                  |                |
| AFR               | 3.57%         | 3.54%                         | 3.52%            | 3.51%          |
| 110% AFR          | 3.93%         | 3.89%                         | 3.87%            | 3.86%          |
| 120% AFR          | 4.30%         | 4.25%                         | 4.23%            | 4.21%          |
| 130% AFR          | 4.65%         | 4.60%                         | 4.57%            | 4.56%          |

## REV. RUL. 2011-20 TABLE 2

## Adjusted AFR for September 2011

|                            | <u>Period for Compounding</u> |                   |                  |                |
|----------------------------|-------------------------------|-------------------|------------------|----------------|
|                            | <u>Annual</u>                 | <u>Semiannual</u> | <u>Quarterly</u> | <u>Monthly</u> |
| Short-term<br>adjusted AFR | .35%                          | .35%              | .35%             | .35%           |
| Mid-term<br>adjusted AFR   | 1.47%                         | 1.46%             | 1.46%            | 1.46%          |
| Long-term<br>adjusted AFR  | 3.77%                         | 3.74%             | 3.72%            | 3.71%          |

## REV. RUL. 2011-20 TABLE 3

## Rates Under Section 382 for September 2011

|                                                                                                                                                                                |       |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Adjusted federal long-term rate for the current month                                                                                                                          | 3.77% |
| 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.) | 3.86% |

## REV. RUL. 2011-20 TABLE 4

## Appropriate Percentages Under Section 42(b)(1) for September 2011

Note: Under Section 42(b)(2), the applicable percentage for non-federally subsidized new buildings placed in service after July 30, 2008, and before December 31, 2013, shall not be less than 9%.

|                                                                            |       |
|----------------------------------------------------------------------------|-------|
| Appropriate percentage for the 70% present value low-income housing credit | 7.60% |
|----------------------------------------------------------------------------|-------|

|                                                                            |       |
|----------------------------------------------------------------------------|-------|
| Appropriate percentage for the 30% present value low-income housing credit | 3.26% |
|----------------------------------------------------------------------------|-------|

## REV. RUL. 2011-20 TABLE 5

## Rate Under Section 7520 for September 2011

|                                                                                                                                                           |      |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| 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 | 2.0% |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------|------|