Section 1274.--Determination of Issue Price in the Case of Certain Debt Instruments Issued for Property

(Also Sections 42, 280G, 382, 467, 468, 482, 483, 1288, 7520, 7872.)

Rev. Rul. 2023-10

This revenue ruling provides various prescribed rates for federal income tax purposes for June 2023 (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, 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. 2023-10 TABLE 1
Applicable Federal Rates (AFR) for June 2023

	<u>Annual</u>	Period for Compounding Semiannual Quarterly Monthly			
	<u>Short-term</u>				
AFR 110% AFR 120% AFR 130% AFR	4.43% 4.88% 5.33% 5.77%	4.38% 4.82% 5.26% 5.69%	4.36% 4.79% 5.23% 5.65%	4.34% 4.77% 5.20% 5.62%	
	<u>Mid-term</u>				
AFR 110% AFR 120% AFR 130% AFR 150% AFR 175% AFR	3.56% 3.92% 4.28% 4.64% 5.37% 6.28%	3.53% 3.88% 4.24% 4.59% 5.30% 6.18%	3.51% 3.86% 4.22% 4.56% 5.27% 6.13%	3.50% 3.85% 4.20% 4.55% 5.24% 6.10%	
	Long-term				
AFR 110% AFR 120% AFR 130% AFR	3.79% 4.17% 4.55% 4.94%	3.75% 4.13% 4.50% 4.88%	3.73% 4.11% 4.47% 4.85%	3.72% 4.09% 4.46% 4.83%	

#### REV. RUL. 2023-10 TABLE 2

### Adjusted AFR for June 2023

	Period for Compounding			
	<u>Annual</u>	<u>Semiannual</u>	<u>Quarterly</u>	<u>Monthly</u>
Short-term adjusted AFR	3.36%	3.33%	3.32%	3.31%
Mid-term adjusted AFR	2.70%	2.68%	2.67%	2.67%
Long-term adjusted AFR	2.87%	2.85%	2.84%	2.83%

#### REV. RUL. 2023-10 TABLE 3

#### Rates Under Section 382 for June 2023

Adjusted federal long-term rate for the current month	2.87%
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.)	3.04%

## REV. RUL. 2023-10 TABLE 4

Appropriate Percentages Under Section 42(b)(1) for June 2023 Note: Under section 42(b)(2), the applicable percentage for non-federally subsidized new buildings placed in service after July 30, 2008, shall not be less than 9%.

Appropriate percentage for the 70% present value low-income housing credit	7.85%
Appropriate percentage for the 30% present value low-income housing credit	3.36%

# Rate Under Section 7520 for June 2023

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

4.20%