

## Part III

### Administrative, Procedural, and Miscellaneous

26 CFR 601.201: Rulings and determination letters.  
(Also: Part I, Sections 846; 1.846-1.)

Rev. Proc. 2015-24

#### SECTION 1. PURPOSE

This revenue procedure contains five corrections to Rev. Proc. 2014-59, 2014-47 I.R.B. 843. Rev. Proc. 2014-59 prescribes the loss payment patterns and discount factors for the 2014 accident year. These factors are used to compute discounted unpaid losses under § 846 of the Internal Revenue Code.

#### SECTION 2. CORRECTIONS

.01 The loss discount factor for Tax Year 2016 and later years in the table for Auto Physical Damage provided in section 3.04 of Rev. Proc. 2014-59 was incorrect. The

revenue procedure incorrectly stated that it is 98.1168 percent. The revenue procedure should have stated that it is 99.1168 percent.

.02 The composite method loss discount factor language in the table for Auto Physical Damage provided in section 3.04 of Rev. Proc. 2014-59 misstated that it applied to losses incurred in 2013 and prior years. The last sentence in the table for Auto Physical Damage provided in section 3.04 of the revenue procedure should have stated:

Taxpayers that use the composite method of Notice 88-100 should use 99.1168 percent to discount unpaid losses incurred in this [the Auto Physical Damage] line of business in 2014 and prior years and that are outstanding at the end of the 2016 taxable year.

.03 The composite method loss discount factor language in the table for Composite provided in section 3.04 of Rev. Proc. 2014-59 misstated that it applied to losses incurred in 2013 and prior years. The last sentence in the table for Corporate provided in section 3.04 of the revenue procedure should have stated:

Taxpayers that use the composite method of Notice 88-100 should use 94.8470 percent to discount unpaid losses incurred in this [the Composite] line of business in 2014 and prior years and that are outstanding at the end of the 2024 taxable year.

.04 The composite method loss discount factor language in the table for Financial Guaranty/Mortgage Guaranty provided in section 3.04 of Rev. Proc. 2014-59 provided the wrong discount factor for 2014 and prior years that are outstanding at the end of the 2016 taxable year. The revenue procedure incorrectly stated that it is 98.1168 percent. The last sentence in the table for Financial Guaranty/Mortgage Guaranty provided in section 3.04 of the revenue procedure should have stated that it is 99.1168 percent.

.05 The loss discount factor for Tax Year 2021 in the table for International (Composite) provided in section 3.04 of Rev. Proc. 2014-59 was incorrect. The revenue procedure incorrectly stated that it is 91.5719 percent. The revenue procedure should have stated that it is 92.5719 percent.

### SECTION 3. EFFECT ON OTHER REVENUE PROCEDURES

Rev. Proc. 2014-59 is modified.

### SECTION 4. PROSPECTIVE APPLICATION

Under the authority of section 7805(b), the corrected discount factors and language will not be applied adversely with respect to tax returns filed on or before March 12, 2015.

### SECTION 5. DRAFTING INFORMATION

The principal author of this revenue procedure is David Remus of the Office of Associate Chief Counsel (Financial Institutions & Products). For further information regarding this revenue procedure contact Mr. Remus on (202) 317-6995 (not a toll free call).