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. 2019-12
This revenue ruling provides various prescribed rates for federal income tax purposes for May 2019 (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. 2019-12 TABLE 1
Applicable Federal Rates (AFR) for May 2019
Period for Compounding
Annual Semiannual Quarterly Monthly

## Short-term

| AFR | $2.39 \%$ | $2.38 \%$ | $2.37 \%$ | $2.37 \%$ |
| :--- | :--- | :--- | :--- | :--- |
| $110 \%$ AFR | $2.64 \%$ | $2.62 \%$ | $2.61 \%$ | $2.61 \%$ |
| $120 \%$ AFR | $2.88 \%$ | $2.86 \%$ | $2.85 \%$ | $2.84 \%$ |
| $130 \%$ AFR | $3.11 \%$ | $3.09 \%$ | $3.08 \%$ | $3.07 \%$ |
|  | Mid-term |  |  |  |


| AFR | $2.37 \%$ | $2.36 \%$ | $2.35 \%$ | $2.35 \%$ |
| :--- | :--- | :--- | :--- | :--- |
| $110 \%$ AFR | $2.62 \%$ | $2.60 \%$ | $2.59 \%$ | $2.59 \%$ |
| $120 \%$ AFR | $2.85 \%$ | $2.83 \%$ | $2.82 \%$ | $2.81 \%$ |
| $130 \%$ AFR | $3.09 \%$ | $3.07 \%$ | $3.06 \%$ | $3.05 \%$ |
| $150 \%$ AFR | $3.57 \%$ | $3.54 \%$ | $3.52 \%$ | $3.51 \%$ |
| $175 \%$ AFR | $4.17 \%$ | $4.13 \%$ | $4.11 \%$ | $4.09 \%$ |
|  | Long-term |  |  |  |


| AFR | $2.74 \%$ | $2.72 \%$ | $2.71 \%$ | $2.70 \%$ |
| :--- | :--- | :--- | :--- | :--- |
| $110 \%$ AFR | $3.01 \%$ | $2.99 \%$ | $2.98 \%$ | $2.97 \%$ |
| $120 \%$ AFR | $3.29 \%$ | $3.26 \%$ | $3.25 \%$ | $3.24 \%$ |
| $130 \%$ AFR | $3.57 \%$ | $3.54 \%$ | $3.52 \%$ | $3.51 \%$ |

REV. RUL. 2019-12 TABLE 2

Adjusted AFR for May 2019

|  | Period for Compounding |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
|  | Annual | Semiannual | Quarterly | Monthly |
| Short-term adjusted AFR | 1.82\% | 1.81\% | 1.81\% | 1.80\% |
| Mid-term adjusted AFR | 1.80\% | 1.79\% | 1.79\% | 1.78\% |
| Long-term adjusted AFR | 2.08\% | 2.07\% | 2.06\% | 2.06\% |

REV. RUL. 2019-12 TABLE 3

Rates Under Section 382 for May 2019
Adjusted federal long-term rate for the current month 2.08\%
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.)
2.20\%

Appropriate Percentages Under Section 42(b)(1) for May 2019
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

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

## REV. RUL. 2019-12 TABLE 5

Rate Under Section 7520 for May 2019
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

