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. 2023-5
This revenue ruling provides various prescribed rates for federal income tax purposes for March 2023 (the current month). Table 1 contains the short-term, midterm, 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, midterm, 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 longterm 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. 2023-5 TABLE 1
Applicable Federal Rates (AFR) for March 2023
Period for Compounding
Annual Semiannual Quarterly Monthly

## Short-term

| AFR | $4.50 \%$ | $4.45 \%$ | $4.43 \%$ | $4.41 \%$ |
| :--- | :--- | :--- | :--- | :--- |
| $110 \%$ AFR | $4.96 \%$ | $4.90 \%$ | $4.87 \%$ | $4.85 \%$ |
| $120 \%$ AFR | $5.41 \%$ | $5.34 \%$ | $5.30 \%$ | $5.28 \%$ |
| $130 \%$ AFR | $5.87 \%$ | $5.79 \%$ | $5.75 \%$ | $5.72 \%$ |

Mid-term

| AFR | $3.70 \%$ | $3.67 \%$ | $3.65 \%$ | $3.64 \%$ |
| :--- | :--- | :--- | :--- | :--- |
| $110 \%$ AFR | $4.08 \%$ | $4.04 \%$ | $4.02 \%$ | $4.01 \%$ |
| $120 \%$ AFR | $4.45 \%$ | $4.40 \%$ | $4.38 \%$ | $4.36 \%$ |
| $130 \%$ AFR | $4.83 \%$ | $4.77 \%$ | $4.74 \%$ | $4.72 \%$ |
| $150 \%$ AFR | $5.59 \%$ | $5.51 \%$ | $5.47 \%$ | $5.45 \%$ |
| $175 \%$ AFR | $6.52 \%$ | $6.42 \%$ | $6.37 \%$ | $6.34 \%$ |

Long-term

| AFR | $3.74 \%$ | $3.71 \%$ | $3.69 \%$ | $3.68 \%$ |
| :--- | :--- | :--- | :--- | :--- |
| $110 \%$ AFR | $4.12 \%$ | $4.08 \%$ | $4.06 \%$ | $4.05 \%$ |
| $120 \%$ AFR | $4.50 \%$ | $4.45 \%$ | $4.43 \%$ | $4.41 \%$ |
| $130 \%$ AFR | $4.88 \%$ | $4.82 \%$ | $4.79 \%$ | $4.77 \%$ |

REV. RUL. 2023-5 TABLE 2
Adjusted AFR for March 2023
Period for Compounding

|  | Annual | Semiannual | Quarterly | Monthly |  |
| :--- | :---: | :---: | :---: | :---: | :---: |
| Short-term <br> adjusted AFR | $3.41 \%$ | $3.38 \%$ |  | $3.37 \%$ | $3.36 \%$ |
| Mid-term | $2.81 \%$ | $2.79 \%$ | $2.78 \%$ | $2.77 \%$ |  |
| adjusted AFR | $2.84 \%$ | $2.82 \%$ | $2.81 \%$ | $2.80 \%$ |  |

REV. RUL. 2023-5 TABLE 3
Rates Under Section 382 for March 2023
Adjusted federal long-term rate for the current month
2.84\%

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.)
2.92\%

REV. RUL. 2023-5 TABLE 4
Appropriate Percentages Under Section 42(b)(1) for March 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
7.86\%

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

Rate Under Section 7520 for March 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

