

## 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. 2011-6

This revenue ruling provides various prescribed rates for federal income tax purposes for March 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. 2011-6 TABLE 1

## Applicable Federal Rates (AFR) for March 2011

	<u>Annual</u>	<u>Period for Compounding</u>		<u>Monthly</u>
		<u>Semiannual</u>	<u>Quarterly</u>	
<u>Short-term</u>				
AFR	.54%	.54%	.54%	.54%
110% AFR	.59%	.59%	.59%	.59%
120% AFR	.65%	.65%	.65%	.65%
130% AFR	.70%	.70%	.70%	.70%
<u>Mid-term</u>				
AFR	2.44%	2.43%	2.42%	2.42%
110% AFR	2.69%	2.67%	2.66%	2.66%
120% AFR	2.94%	2.92%	2.91%	2.90%
130% AFR	3.18%	3.16%	3.15%	3.14%
150% AFR	3.68%	3.65%	3.63%	3.62%
175% AFR	4.30%	4.25%	4.23%	4.21%
<u>Long-term</u>				
AFR	4.30%	4.25%	4.23%	4.21%
110% AFR	4.73%	4.68%	4.65%	4.64%
120% AFR	5.17%	5.10%	5.07%	5.05%
130% AFR	5.61%	5.53%	5.49%	5.47%

REV. RUL. 2011-6 TABLE 2  
Adjusted AFR for March 2011

	<u>Period for Compounding</u>			
	<u>Annual</u>	<u>Semiannual</u>	<u>Quarterly</u>	<u>Monthly</u>
Short-term adjusted AFR	.77%	.77%	.77%	.77%
Mid-term adjusted AFR	2.18%	2.17%	2.16%	2.16%
Long-term adjusted AFR	4.55%	4.50%	4.47%	4.46%

REV. RUL. 2011-6 TABLE 3

Rates Under Section 382 for March 2011

Adjusted federal long-term rate for the current month	4.55%
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.)	4.55%

## REV. RUL. 2011-6 TABLE 4

## Appropriate Percentages Under Section 42(b)(1) for March 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	7.78%
Appropriate percentage for the 30% present value low-income housing credit	3.33%

## REV. RUL. 2011-6 TABLE 5

## Rate Under Section 7520 for March 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	3.0%
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