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, 7702, 7872.)

Rev. Rul. 2026-24

This revenue ruling provides various prescribed rates for federal income tax purposes for December 2026 (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. 2026-24 TABLE 1

Applicable Federal Rates (AFR) for December 2026

	Period for Compounding			
	Annual	Semiannual	Quarterly	Monthly
		Short-term		
AFR	4.60%	4.55%	4.52%	4.51%
110% AFR	5.07%	5.01%	4.98%	4.96%
120% AFR	5.53%	5.46%	5.42%	5.40%
130% AFR	6.01%	5.92%	5.88%	5.85%
		Mid-term		
AFR	4.92%	4.86%	4.83%	4.81%
110% AFR	5.42%	5.35%	5.31%	5.29%
120% AFR	5.91%	5.83%	5.79%	5.76%
130% AFR	6.42%	6.32%	6.27%	6.24%
150% AFR	7.42%	7.29%	7.22%	7.18%
175% AFR	8.69%	8.51%	8.42%	8.36%
		Long-term		
AFR	5.36%	5.29%	5.26%	5.23%
110% AFR	5.90%	5.82%	5.78%	5.75%
120% AFR	6.45%	6.35%	6.30%	6.27%
130% AFR	7.00%	6.88%	6.82%	6.78%

REV. RUL. 2026-24 TABLE 2

Adjusted AFR for December 2026

	Period for Compounding			
	Annual	Semiannual	Quarterly	Monthly
Short-term adjusted AFR	3.48%	3.45%	3.44%	3.43%
Mid-term adjusted AFR	3.72%	3.69%	3.67%	3.66%
Long-term adjusted AFR	4.06%	4.02%	4.00%	3.99%

REV. RUL. 2026-24 TABLE 3

Rates Under Section 382 for December 2026

Adjusted federal long-term rate for the current month	4.06%
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.)	4.18%

REV. RUL. 2026-24 TABLE 4

Appropriate Percentages Under Section 42(b)(1) for December 2026

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	8.20%
Appropriate percentage for the 30% present value low-income housing credit	3.51%

REV. RUL. 2026-24 TABLE 5

Rate Under Section 7520 for December 2026

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	6.00%