

HIGHLIGHTS OF THIS ISSUE

These synopses are intended only as aids to the reader in identifying the subject matter covered. They may not be relied upon as authoritative interpretations.

INCOME TAX

Rev. Rul. 2013-4, page 520.

Insurance companies; interest rate tables. Prevailing state assumed interest rates are provided for the determination of reserves under section 807 of the Code for contracts issued in 2012 and 2013. Rev. Rul. 92-19 supplemented in part.

Rev. Rul. 2013-5, page 525.

This ruling holds that Eurex Deutschland, which is a regulated exchange of Germany, is a qualified board or exchange within the meaning of section 1256(g)(7)(C) of the Code.

Notice 2013-4, page 527.

Adjustment of applicable federal rates. This notice solicits comments regarding changes to the method used to determine adjusted applicable federal rates under section 1288(b) of the Code and the adjusted federal long-term rate under section 382(f) of the Code. It provides interim guidance describing modifications to the current method that will be in effect until further guidance is issued.

Notice 2013-5, page 529.

This notice provides for the waiver of additions to tax under section 6654(a) of the Code for underpayment of estimated taxes for certain farmers and fishermen due to the delayed start for filing 2012 tax year returns.

Notice 2013-9, page 529.

This document provides relief from certain requirements in section 142(d) of the Code to issuers of tax-exempt bonds that approve the housing of individuals displaced due to the effects of Hurricane Sandy ("displaced individuals") in residential rental projects ("Projects") financed with tax-exempt bonds under section 142(d).

EMPLOYEE PLANS

Announcement 2013-13, page 532.

This announcement contains corrections to Revenue Procedure 2013-6, 2013-1 I.R.B. 198, as published on January 2, 2013. In particular, this announcement clarifies that applications for determination letters should continue to be submitted to the Covington, KY address in section 6.15 of Rev. Proc. 2013-6. Comments submitted by interested parties in connection with the determination letter process should be sent to a different address in Cincinnati, OH in section 17.02 of Rev. Proc. 2013-6. Rev. Proc. 2013-6 corrected.

ADMINISTRATIVE

Notice 2013-5, page 529.

This notice provides for the waiver of additions to tax under section 6654(a) of the Code for underpayment of estimated taxes for certain farmers and fishermen due to the delayed start for filing 2012 tax year returns.

Finding Lists begin on page ii.
Index for January through February begins on page iv.



The IRS Mission

Provide America's taxpayers top-quality service by helping them understand and meet their tax responsibilities and en-

force the law with integrity and fairness to all.

Introduction

The Internal Revenue Bulletin is the authoritative instrument of the Commissioner of Internal Revenue for announcing official rulings and procedures of the Internal Revenue Service and for publishing Treasury Decisions, Executive Orders, Tax Conventions, legislation, court decisions, and other items of general interest. It is published weekly and may be obtained from the Superintendent of Documents on a subscription basis. Bulletin contents are compiled semiannually into Cumulative Bulletins, which are sold on a single-copy basis.

It is the policy of the Service to publish in the Bulletin all substantive rulings necessary to promote a uniform application of the tax laws, including all rulings that supersede, revoke, modify, or amend any of those previously published in the Bulletin. All published rulings apply retroactively unless otherwise indicated. Procedures relating solely to matters of internal management are not published; however, statements of internal practices and procedures that affect the rights and duties of taxpayers are published.

Revenue rulings represent the conclusions of the Service on the application of the law to the pivotal facts stated in the revenue ruling. In those based on positions taken in rulings to taxpayers or technical advice to Service field offices, identifying details and information of a confidential nature are deleted to prevent unwarranted invasions of privacy and to comply with statutory requirements.

Rulings and procedures reported in the Bulletin do not have the force and effect of Treasury Department Regulations, but they may be used as precedents. Unpublished rulings will not be relied on, used, or cited as precedents by Service personnel in the disposition of other cases. In applying published rulings and procedures, the effect of subsequent legislation, regulations,

court decisions, rulings, and procedures must be considered, and Service personnel and others concerned are cautioned against reaching the same conclusions in other cases unless the facts and circumstances are substantially the same.

The Bulletin is divided into four parts as follows:

Part I.—1986 Code.

This part includes rulings and decisions based on provisions of the Internal Revenue Code of 1986.

Part II.—Treaties and Tax Legislation.

This part is divided into two subparts as follows: Subpart A, Tax Conventions and Other Related Items, and Subpart B, Legislation and Related Committee Reports.

Part III.—Administrative, Procedural, and Miscellaneous.

To the extent practicable, pertinent cross references to these subjects are contained in the other Parts and Subparts. Also included in this part are Bank Secrecy Act Administrative Rulings. Bank Secrecy Act Administrative Rulings are issued by the Department of the Treasury's Office of the Assistant Secretary (Enforcement).

Part IV.—Items of General Interest.

This part includes notices of proposed rulemakings, disbarment and suspension lists, and announcements.

The last Bulletin for each month includes a cumulative index for the matters published during the preceding months. These monthly indexes are cumulated on a semiannual basis, and are published in the last Bulletin of each semiannual period.

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Part I. Rulings and Decisions Under the Internal Revenue Code of 1986

Section 382.—Limitation on Net Operating Loss Carryforwards and Certain Built-in Losses Following Ownership Change

This notice solicits comments regarding changes to the method used to determine adjusted applicable federal rates under section 1288(b) of the Code and the adjusted federal long-term rate under section 382(f) of the Code. It provides interim guidance describing modifications to the current method that will be in effect until further guidance is issued. See Notice 2013-4, page 527.

Section 446.—General Rule for Methods of Accounting

26 CFR 1.446-1: General rule for methods of accounting.

A revenue ruling holds that Eurex Deutschland, which is a regulated exchange of Germany, is a qualified board or exchange within the meaning of section 1256(g)(7)(C) of the Code. See Rev. Rul. 2013-5, page 525.

Section 481.—Adjustments Required by Changes in Method of Accounting

A revenue ruling holds that Eurex Deutschland, which is a regulated exchange of Germany, is a qualified board or exchange within the meaning of section 1256(g)(7)(C) of the Code. See Rev. Rul. 2013-5, page 525.

Section 807.—Rules for Certain Reserves

Insurance companies; interest rate tables. Prevailing state assumed interest rates are provided for the determination of reserves under section 807 of the Code for contracts issued in 2012 and 2013. Rev. Rul. 92-19 supplemented in part.

Rev. Rul. 2013-4

For purposes of § 807(d)(4) of the Internal Revenue Code, for taxable years beginning after December 31, 2011, this ruling supplements the schedules of prevailing state assumed interest rates set forth in Rev. Rul. 92-19, 1992-1 C.B. 227. This information is to be used by insurance companies in computing their reserves for (1) life insurance and supplementary total and permanent disability benefits, (2) individual annuities and pure endowments, and (3) group annuities and pure endowments. As § 807(d)(2)(B) requires that the interest rate used to compute these reserves be the greater of (1) the applicable federal interest rate, or (2) the prevailing state assumed interest rate, the table of applicable federal interest rates in Rev. Rul. 92-19 is also supplemented.

Following are supplements to schedules A, B, C, and D to Part III of Rev. Rul. 92-19, providing prevailing state assumed interest rates for insurance products with different features issued in 2012 and 2013, and a supplement to the table in Part IV of

Rev. Rul. 92-19, providing the applicable federal interest rates under § 807(d) for 2012 and 2013. This ruling does not supplement Parts I and II of Rev. Rul. 92-19.

This is the twenty-first supplement to the interest rates provided in Rev. Rul. 92-19. Earlier supplements were published in Rev. Rul. 93-58, 1993-2 C.B. 241 (interest rates for insurance products issued in 1992 and 1993); Rev. Rul. 94-11, 1994-1 C.B. 196 (1993 and 1994); Rev. Rul. 95-4, 1995-1 C.B. 141 (1994 and 1995); Rev. Rul. 96-2, 1996-1 C.B. 141 (1995 and 1996); Rev. Rul. 97-2, 1997-1 C.B. 134 (1996 and 1997); Rev. Rul. 98-2, 1998-1 C.B. 259 (1997 and 1998); Rev. Rul. 99-10, 1999-1 C.B. 671 (1998 and 1999); Rev. Rul. 2000-17, 2000-1 C.B. 842 (1999 and 2000); Rev. Rul. 2001-11, 2001-1 C.B. 780 (2000 and 2001); Rev. Rul. 2002-12, 2002-1 C.B. 624 (2001 and 2002); Rev. Rul. 2003-24, 2003-1 C.B. 557 (2002 and 2003); Rev. Rul. 2004-14, 2004-1 C.B. 511 (2003 and 2004); Rev. Rul. 2005-29, 2005-1 C.B. 1080 (2004 and 2005); Rev. Rul. 2006-25, 2006-1 C.B. 882 (2005 and 2006); Rev. Rul. 2007-10, 2007-1 C.B. 660 (2006 and 2007); Rev. Rul. 2008-19, 2008-1 C.B. 669 (2007 and 2008); Rev. Rul. 2009-3, 2009-5 I.R.B. 382 (2008 and 2009); Rev. Rul. 2010-7, 2010-8 I.R.B. 417 (2009 and 2010); Rev. Rul. 2011-23, 2011-43 I.R.B. 585 (2010 and 2011); and Rev. Rul. 2012-6, 2012-6 I.R.B. 349 (2011 and 2012).

Part III. Prevailing State Assumed Interest Rates — Products Issued in Years After 1982.*

Schedule A

STATUTORY VALUATION INTEREST RATES
BASED ON THE 1980 AMENDMENTS TO THE
NAIC STANDARD VALUATION LAW

A. Life insurance valuation:

Guarantee Duration (<u>years</u>)	Calendar Year of Issue <u>2013</u>
10 or fewer	3.75**
More than 10 but not more than 20	3.75**
More than 20	3.50**

Source: Rates calculated from the monthly averages, ending June 30, 2012, of Moody's Composite Yield on Seasoned Corporate Bonds.

* The terms used in the schedules in this ruling and in Part III of Rev. Rul. 92-19 are those used in the Standard Valuation Law; the terms are defined in Rev. Rul. 92-19.

** As these rates exceed the applicable federal interest rate for 2013 of 2.16 percent, the valuation interest rate to be used for this product under § 807 is the applicable rate specified in this table.

Part III, Schedule B

STATUTORY VALUATION INTEREST RATES
BASED ON THE 1980 AMENDMENTS TO THE
NAIC STANDARD VALUATION LAW

B. Single premium immediate annuities and annuity benefits involving life contingencies arising from other annuities with cash settlement options and from guaranteed interest contracts with cash settlement options:

<u>Calendar Year of Issue</u>	<u>Valuation Interest Rate</u>
2012	4.25*

Source: Rates calculated from the monthly averages, ending June 30, 2012, of Moody's Composite Yield on Seasoned Corporate Bonds (formerly known as Moody's Corporate Bond Yield Average — Monthly Average Corporates). The terms used in this schedule are those used in the Standard Valuation Law as defined in Rev. Rul. 92-19.

*As this prevailing state assumed interest rate exceeds the applicable federal interest rate for 2012 of 2.89 percent, the valuation interest rate of 4.25 percent is to be used for this product under § 807.

Part III, Schedule C24 — 2012

STATUTORY VALUATION INTEREST RATES
 BASED ON NAIC STANDARD VALUATION LAW
 FOR 2012 CALENDAR YEAR BUSINESS
GOVERNED BY THE 1980 AMENDMENTS

C. Valuation interest rates for other annuities and guaranteed interest contracts that are valued on an issue year basis:

Cash Settlement Options?	Future Interest Guarantee?	Guarantee Duration (years)	Valuation Interest Rate (%) For Plan Type		
			A	B	C
Yes	Yes	5 or fewer	4.25*	4.00*	3.75*
		More than 5, but not more than 10	4.25*	4.00*	3.75*
		More than 10, but not more than 20	4.00*	3.75*	3.75*
		More than 20	3.75*	3.50*	3.50*
Yes	No	5 or fewer	4.25*	4.00*	3.75*
		More than 5, but not more than 10	4.25*	4.00*	3.75*
		More than 10, but not more than 20	4.00*	3.75*	3.75*
		More than 20	3.75*	3.50*	3.50*
No	Yes or No	5 or fewer	4.25*		
		More than 5, but not more than 10	4.25*	NOT APPLICABLE	
		More than 10, but not more than 20	4.00*		
		More than 20	3.75*		

Source: Rates calculated from the monthly averages, ending June 30, 2012, of Moody's Composite Yield on Seasoned Corporate Bonds.

*As these rates exceed the applicable federal interest rate for 2012 of 2.89 percent, the valuation interest rate to be used for this product under § 807 is the applicable rate specified in the above table.

STATUTORY VALUATION INTEREST RATES
 BASED ON NAIC STANDARD VALUATION LAW
 FOR 2012 CALENDAR YEAR BUSINESS
GOVERNED BY THE 1980 AMENDMENTS

D. Valuation interest rates for other annuities and guaranteed interest contracts that are contracts with cash settlement options and that are valued on a change in fund basis:

Cash Settlement Options?	Future Interest Guarantee?	Guarantee Duration (years)	Valuation Interest Rate For Plan Type		
			A	B	C
Yes	Yes	5 or fewer	4.50*	4.25*	3.75*
		More than 5, but not more than 10	4.50*	4.25*	3.75*
		More than 10, but not more than 20	4.25*	4.25*	3.75*
		More than 20	4.00*	4.00*	3.50*
Yes	No	5 or fewer	4.50*	4.50*	4.00*
		More than 5, but not more than 10	4.50*	4.50*	4.00*
		More than 10, but not more than 20	4.25*	4.25*	3.75*
		More than 20	4.00*	4.00*	3.75*

Source: Rates calculated from the monthly averages, ending June 30, 2012, of Moody's Composite Yield on Seasoned Corporate Bonds.

*As these rates exceed the applicable federal interest rate for 2012 of 2.89 percent, the valuation interest rate to be used for this product under § 807 is the applicable rate specified in the above table.

Part IV. Applicable Federal Interest RatesTABLE OF
APPLICABLE FEDERAL INTEREST RATES
FOR PURPOSES OF § 807

<u>Year</u>	<u>Interest Rate</u>
2012	2.89
2013	2.16

Sources: Rev. Rul. 2004–106, 2004–2 C.B. 893, for the 2005 rate; Rev. Rul. 2005–77, 2005–2 C.B. 1071, for the 2006 rate; Rev. Rul. 2006–61, 2006–2 C.B. 1028 for the 2007 rate; Rev. Rul. 2007–70, 2007–2 C.B. 1158 for the 2008 rate; Rev. Rul. 2008–53, 2008–2 C.B. 1231 for the 2009 rate; Rev. Rul. 2009–38, 2009–49 I.R.B. 736 for the 2010 rate; Rev. Rul. 2010–29, 2010–50 I.R.B. 818 for the 2011 rate; Rev. Rul. 2011–31, 2011–49 I.R.B. 829 for the 2012 rate; and Rev. Rul. 2012–6, 2012–6 I.R.B. 349 (2011 and 2012).

EFFECT ON OTHER REVENUE RULINGS

Rev. Rul. 92–19 is supplemented by the addition to Part III of that ruling of prevailing state assumed interest rates under § 807 for certain insurance products issued in 2012 and 2013 and is further supplemented by an addition to the table in Part IV of Rev. Rul. 92–19 listing of applicable federal interest rates. Parts I and II of Rev. Rul. 92–19 are not affected by this ruling.

DRAFTING INFORMATION

The principal author of this revenue ruling is Linda K. Boyd of the Office of Associate Chief Counsel (Financial Institutions and Products). For further information regarding this revenue ruling, contact her at (202) 622–3970 (not a toll-free call).

Section 1256.—Section 1256 Contracts Marked to Market

(Also: §§ 446, 481, 7805; 1.446–1, 301.7805–1.)

This ruling holds that Eurex Deutschland, which is a regulated exchange of Germany, is a qualified board or exchange within the meaning of section 1256(g)(7)(C) of the Code.

Rev. Rul. 2013–5**ISSUE**

Is Eurex Deutschland, which is a regulated exchange of Germany, a qualified board or exchange within the meaning of section 1256(g)(7)(C) of the Internal Revenue Code?

FACTS

Eurex Deutschland is a regulated exchange of Germany. On August 10, 1999, the Commodity Futures Trading Commission (CFTC) issued—and on October 25, 2004, and April 25, 2006, it amended—a letter that granted Eurex Deutschland no-action relief. This relief allowed United States members to trade through Eurex Deutschland’s electronic trading system, notwithstanding that the CFTC had not designated Eurex Deutschland as a contract market pursuant to sections 5 and 5a of the Commodity Exchange Act.

On December 23, 2011, the CFTC published final rules regarding the registration with the CFTC of foreign boards of trade (FBOTs), including those with existing no-action relief (“the CFTC FBOT registration system”). See *Registration of Foreign Boards of Trade*, 76 Fed. Reg. 80674 (Dec. 23, 2011), codified at 17 CFR Part 48. The effective date for the final rules was February 21, 2012. Under the CFTC FBOT registration system, the CFTC may issue an Order of Registration to an FBOT, allowing the FBOT to provide direct access to its electronic trading and

order matching system from the United States. The CFTC FBOT registration system replaced the CFTC’s no-action relief system. Under 17 CFR 48.6(c), an FBOT with an existing no-action letter (like Eurex Deutschland) may continue to rely on the letter until the CFTC either revokes the letter or grants that FBOT an Order of Registration under the new system.

An FBOT’s status under the CFTC no-action relief system and the CFTC FBOT registration system is posted online at: <http://sirt.cftc.gov/sirt/sirt.aspx?Topic=ForeignTerminalRelief>.

LAW

Section 1256(g)(7) provides that the term “qualified board or exchange” means:

- (A) a national securities exchange which is registered with the Securities and Exchange Commission,
- (B) a domestic board of trade designated as a contract market by the CFTC, or
- (C) any other exchange, board of trade, or other market which the Secretary determines has rules adequate to carry out the purposes of section 1256.

HOLDING

The Internal Revenue Service determines that Eurex Deutschland, which is

a regulated exchange of Germany, is a qualified board or exchange within the meaning of section 1256(g)(7)(C) as long as—

- The CFTC continues to allow Eurex Deutschland to provide direct access to its electronic trading and order matching system from the United States under an existing no action letter, pending CFTC approval of an Order of Registration; or
- Eurex Deutschland holds a valid Order of Registration as an FBOT.

EFFECTIVE DATE

Under the authority of section 7805(b)(8) of the Code, this revenue ruling is effective for Eurex Deutschland Contracts (futures contracts and futures contract options that qualify as section 1256 contracts) that are entered into on or after March 1, 2013.

CHANGE IN METHOD OF ACCOUNTING

A change in the treatment of Eurex Deutschland Contracts to comply with this revenue ruling is a change in method of accounting within the meaning of sections 446 and 481 and the regulations thereunder. The Commissioner grants consent to taxpayers to change to the section 1256 mark-to-market method for the first taxable year during which the taxpayer holds a Eurex Deutschland Contract that was entered into on or after March 1, 2013. Such a taxpayer need not file a Form 3115, *Application for Change in Accounting Method*, and Eurex Deutschland Contracts that were entered into before March 1, 2013 will not be covered by the change in method for which consent is granted. Because the change is being made on a “cut-off” basis, there is no potential omission or duplication of income or

deductions, and therefore no adjustment under section 481 is required.

DRAFTING INFORMATION

The principal author of this revenue ruling is Shawn Tetelman of the Office of Associate Chief Counsel (Financial Institutions & Products). For further information regarding this revenue ruling, contact Ms. Tetelman at (202) 622-3930 (not a toll-free call).

Section 7805.—Rules and Regulations

26 CFR 301.7805-1: Rules and regulations.

A revenue ruling holds that Eurex Deutschland, which is a regulated exchange of Germany, is a qualified board or exchange within the meaning of section 1256(g)(7)(C) of the Code. See Rev. Rul. 2013-5, page 525.

Part III. Administrative, Procedural, and Miscellaneous

Adjusted Applicable Federal Rates and Adjusted Federal Long-Term Rates

Notice 2013-4

I. PURPOSE

The Treasury Department and the Internal Revenue Service (IRS) are reconsidering the method used to determine the adjusted applicable Federal rates (adjusted AFRs) under section 1288(b) of the Internal Revenue Code (Code) and the adjusted Federal long-term rate under section 382(f)(2). This notice requests comments from the public on what modifications should be made to the current method of determining such rates. To limit unintended effects of the current method under certain market conditions, this notice also provides interim guidance modifying the current method, which will apply pending future guidance.

II. BACKGROUND

A. Applicable Federal Rates

Section 1274(d) governs the determination of applicable Federal rates (AFRs) that are used for determining the imputed principal amount of obligations to which section 1274 applies, for computing total unstated interest on payments to which section 483 applies, and for other purposes. Under section 1274(d)(1), the AFR is: (i) in the case of a debt instrument with a term not over three years, the Federal short-term rate; (ii) in the case of a debt instrument with a term over three years but not over nine years, the Federal mid-term rate; and (iii) in the case of a debt instrument with a term over nine years, the Federal long-term rate. Section 1274(d)(1)(B) requires the Secretary to determine during each calendar month the foregoing rates that shall apply during the following calendar month. The IRS publishes the AFRs for each month in the Internal Revenue Bulletin, as described in section 1.1274-4(b) of the Income Tax Regulations.

Section 1288(b) provides that, in applying section 483 or section 1274 to a tax-exempt obligation (as defined in section

1275(a)(3)), under regulations prescribed by the Secretary, appropriate adjustments shall be made to the applicable Federal rate to take into account the tax exemption for interest on the obligation. Although no regulations have been issued under section 1288, the IRS also publishes the adjusted AFRs (determined as described below under "Adjustment of Rates") for each month in the Internal Revenue Bulletin.

B. Section 382

In the case of a corporation that has undergone an ownership change described in section 382(g): (i) section 382 places an annual limit (the section 382 limitation) on the amount of the corporation's taxable income that can be offset by certain net operating loss carryforwards and other tax attributes; and (ii) section 383 places a limit, determined by reference to the section 382 limitation, on the amount of the corporation's income tax liability that can be offset by certain tax credits and other tax attributes. Under section 382(b)(1), the section 382 limitation for a tax year ending after an ownership change generally equals the product of (A) the value of the stock of the corporation immediately prior to the ownership change, and (B) the long-term tax-exempt rate.

Section 382(f)(1) provides that the long-term tax-exempt rate shall be the highest of the adjusted Federal long-term rates in effect for any month in the three-calendar-month period ending with the calendar month in which the ownership change occurs. Section 382(f)(2) provides that the term "adjusted Federal long-term rate" means the Federal long-term rate determined under section 1274(d), except that sections 1274(d)(2) and (3) shall not apply, and such rate shall be properly adjusted for differences between rates on long-term taxable and tax-exempt obligations.

The Conference Report for the Tax Reform Act of 1986, Pub. L. No. 99-514, 100 Stat. 2254, which added section 382(f)(2) to the Code, indicates that the adjusted Federal long-term rate is to be computed as the yield on a diversified pool of prime, general obligation tax-exempt bonds with remaining periods to maturity of more than nine years. 2 H.R. Rep.

No. 99-841 (Conf. Rep.), 99th Cong., 2d Sess. II-188 (1986), 1986-3 C.B. (Vol. 4) 188. The report also explains that it is necessary to the purposes of section 382 that the long-term tax-exempt rate is lower than the long-term Federal rate, and that the long-term tax-exempt rate would ordinarily be lower by a percentage that is less than the corporate tax rate. *Id.*

C. Adjustment of Rates Since 1986

The Treasury Department has determined the adjusted AFRs described in section 1288(b)(1) and the adjusted Federal long-term rate described in section 382(f)(2) in the same manner since those rates were first published for November 1986. *See* Rev. Rul. 86-133, 1986-2 C.B. 59; Rev. Rul. 86-135, 1986-2 C.B. 150. The adjusted Federal long-term rate published under section 382(f)(2) is equal to the long-term adjusted AFR with annual compounding published under section 1288(b) in the same month. (The long-term tax-exempt rate prescribed by section 382(f)(1) is also published each month; it is equal to the highest of the adjusted Federal long-term rates for that month and the two preceding months.)

Since 1986, the adjusted Federal long-term rate and each adjusted AFR have been determined by multiplying the corresponding AFR by a fraction (the "adjustment factor"). The numerator of the adjustment factor is a composite yield of the highest grade tax-exempt obligations available, which are prime, general obligation tax-exempt bonds. The denominator is a composite yield of U.S. Treasury obligations with maturities similar to those of the tax-exempt bonds. Each of the composite yields is measured over a one-month period.

The adjustment factor uses prime, general obligation tax-exempt bonds in the numerator because, at the time the adjustment factor was created, such obligations were of a comparable credit quality with U.S. Treasury obligations. The Treasury Department is aware, however, that there is a difference in perceived credit risk between U.S. Treasury obligations and even the highest grade tax-exempt bonds. That difference affects the relative yields of the tax-exempt bonds and the U.S. Treasury

obligations represented in the adjustment factor in a way that offsets the effect of the tax exemption for the tax-exempt bonds. When the Treasury Department began using the adjustment factor, the effects of the credit spread were negligible, yields of tax-exempt bonds were consistently lower than those of U.S. Treasury obligations, and the adjustment factor produced adjusted AFRs and adjusted Federal long-term rates that were lower than the corresponding AFRs by percentages that were significant but smaller than the highest corporate tax rates.

In the last several years, however, the credit spread between U.S. Treasury obligations and most other obligations, including tax-exempt bonds, has grown appreciably. Consequently, since the beginning of 2008, market yields of prime, general obligation tax-exempt bonds have often exceeded those of comparable U.S. Treasury obligations, and the adjusted AFRs and adjusted Federal long-term rate have often exceeded the corresponding AFRs. Those results show that the adjustment factor no longer serves the purposes of sections 1288(b)(1) and 382(f)(2), which contemplate adjustments to reflect tax exemption but not credit quality. The rates are also inconsistent with the express intention of Congress that the adjusted Federal long-term rate and long-term tax-exempt rate be lower than the Federal long-term rate.

D. Possible Modification of Adjustments

The IRS and Treasury Department are considering how the method for determining adjusted AFRs and the adjusted Federal long-term rate should be modified so that the method will be: (i) consistent with the purposes of sections 382(f) and 1288, even as market conditions and tax rates change; and (ii) based on readily available data. To satisfy these objectives, the adjustment factor may be modified to use different types of obligations in the numerator, denominator, or both, or a new methodology may be implemented. The IRS and Treasury Department are also considering whether rates determined using the current adjustment factor or a modified version should be subject to any caps, floors, or other adjustments to ensure that the rates are determined in a manner consistent with the requirements of sections

1288(b)(1) and 382(f)(2). Finally, the IRS and Treasury Department are considering whether the adjusted Federal long-term rate described in section 382(f)(2) should continue to be determined in the same manner as the adjusted AFRs described in section 1288(b)(1).

Among the options for determining the adjusted AFRs and the adjusted Federal long-term rate that the IRS and Treasury Department are considering are the following:

1. Determine the rates using the current methodology, with two modifications. First, the adjustment factor would be subject to a cap at one, such that no adjusted AFR or adjusted Federal long-term rate can ever exceed the corresponding AFR. Therefore, when the yield of the tax-exempt bonds exceeds that of the taxable obligations, the adjustment factor will be one. Second, if the yield of the obligations usually used in the denominator of the adjustment factor is ever zero or a negative number, the adjustment factor would be one.
2. Use an adjustment factor based on tax rates. Specifically, each adjusted AFR and the adjusted Federal long-term rate would be the product of (A) the appropriate AFR, and (B) the excess of (i) one hundred percent, over (ii) an appropriate tax rate. Such tax rate might be the highest corporate tax rate in section 11(b), or a fixed percentage of the highest corporate tax rate (if a fixed percentage more reliably approximates the effect of tax exemption on market yields).
3. Use an adjustment factor in which the rates reflect equivalent credit qualities. For example, the denominator might be the LIBOR swap rate or a similar published rate. The numerator might be the yield of a pool of tax-exempt bonds determined by the Treasury Department to reflect the same credit quality and maturity as the rate in the denominator.
4. Use an adjustment factor based on the average percentage difference between the Federal long-term rates and the adjusted Federal long-term rates published between 1986 and 2007.
5. Use some combination of elements from the above approaches.

III. COMMENTS

The IRS and Treasury Department request comments on the possible modifications to the method by which adjusted AFRs and the adjusted Federal long-term rates are determined. Comments must be submitted by April 26, 2013. All materials submitted will be available for public inspection and copying. Comments should be submitted to Internal Revenue Service, CC:PA:LPD:PR (Notice 2013-4), Room 5203, PO Box 7604, Ben Franklin Station, Washington, DC 20044. Submissions may also be hand-delivered Monday through Friday between the hours of 8 a.m. and 4 p.m. to the Courier's Desk, 1111 Constitution Avenue, NW, Washington, DC 20224, Attn: CC:PA:LPD:PR (Notice 2013-4), Room 5203. Submissions may also be sent electronically via the internet to the following e-mail address: Notice.Comments@irscounsel.treas.gov. Include the notice number (Notice 2013-4) in both the subject line of the email and the body of the comment.

IV. INTERIM GUIDANCE

Until the IRS and Treasury Department issue further guidance, the adjusted AFRs, the adjusted Federal long-term rate, and the long-term tax-exempt rate will continue to be determined using the adjustment factor in the manner described above under "Adjustment of Rates," except that the adjustment factor shall equal one for any month in which (A) the adjustment factor would otherwise exceed one, or (B) the denominator of the adjustment factor would otherwise be zero or a negative number.

The modifications described above will be reflected in the monthly revenue rulings in which the adjusted AFRs and the adjusted Federal long-term rate are published, beginning with the rates for March 2013.

V. DRAFTING INFORMATION

The principal author of this notice is Steven Harrison of the Office of Associate Chief Counsel (Financial Institutions and Products). For further information regarding this notice, contact Mr. Harrison at (202) 622-3930 (not a toll-free call).

Estimated Tax Penalty Relief for Farmers and Fishermen

Notice 2013-5

This notice provides for the waiver of additions to tax under section 6654(a) of the Internal Revenue Code (Code) for underpayment of estimated taxes for certain farmers and fishermen due to the delayed start for filing 2012 tax year returns.

BACKGROUND

Generally, the Code requires individuals to pay federal income tax as they earn income. To the extent these taxes are not withheld from an individual's wages, an individual taxpayer must pay estimated taxes.

Section 6654(c) and (d)(1)(A) of the Code provides that, in general, estimated taxes are required in four installments and the amount of any required installment shall be 25 percent of the "required annual payment." Section 6654(a) provides for an addition to tax where a taxpayer fails to make a sufficient and timely payment of estimated tax.

Section 6654(i) provides a special rule for farmers and fisherman. Under section 6654(i)(1)(A), only one installment payment is required to be made. Under section 6654(i)(1)(B), the installment is due on January 15 of the following taxable year. Section 6654(i)(1)(D) provides that qualifying farmers and fishermen who choose not to make the required estimated tax installment payment are not subject to an estimated tax addition to tax if they file their returns and pay the full amount of tax due by March 1 of the following taxable year. Under section 6654(i)(2), a taxpayer qualifies as a farmer or fisherman for the 2012 tax year if at least two-thirds of the taxpayer's total gross income was from farming or fishing in either 2011 or 2012.

Section 6654(e)(3) authorizes the Internal Revenue Service to waive section 6654 penalties for underpayments of estimated tax in unusual circumstances to the extent its imposition would be against equity and good conscience.

On January 2, 2013, the American Taxpayer Relief Act of 2012 (ATRA), Pub. L. No. 112-240, 126 Stat. 2313, was enacted into law. The ATRA affected several tax forms that are often filed by farmers

and fishermen, including the Form 4562, Depreciation and Amortization (Including Information on Listed Property). Revision of these forms will require extensive programming and testing of IRS systems, which will delay the IRS's ability to accept and process these forms. These delays may affect the ability of many farmers and fishermen to file their 2012 tax year return by March 1, 2013.

TRANSITIONAL RELIEF FOR UNDERPAYMENT OF ESTIMATED TAXES

Pursuant to the authority in section 6654(e)(3), the Service will waive the section 6654 addition to tax for the 2012 tax year for farmers and fishermen who miss the March 1 deadline if they file their return and pay in full any tax due by April 15, 2013. Farmers and fishermen requesting this addition to tax waiver must attach Form 2210-F, *Underpayment of Estimated Tax by Farmers and Fishermen*, to their tax return. The form can be submitted electronically or on paper. The taxpayer's name and identifying number should be entered at the top of the form and the waiver box (Part I, Box A) should be checked. The rest of the form should be left blank. Forms, instructions, and other tax assistance are available on IRS.gov. The IRS toll-free number for general tax questions is 1-800-829-1040.

CONTACT INFORMATION

The principal author of this notice is Matthew S. Cooper of the Office of Associate Chief Counsel (Procedure & Administration). For further information regarding this notice, contact Matthew S. Cooper on 202-622-3400 (not a toll-free call).

Temporary Shelter for Individuals Displaced by Hurricane Sandy

Notice 2013-9

The Internal Revenue Service is suspending certain requirements under § 142(d) of the Internal Revenue Code for qualified residential rental projects financed with exempt facility bonds under § 142 to provide emergency housing relief needed as a result of the devastation

caused by Hurricane Sandy and associated storms (hereafter "Hurricane Sandy").

This notice provides relief for all qualified residential rental projects described herein. For those projects that are also low-income housing tax credit ("LIHTC") projects, this notice should be read with Notice 2012-68, 2012-48 I.R.B. 574, which suspends certain low-income and non-transient requirements under § 42 to allow low-income housing credit projects to provide emergency housing needed because of Hurricane Sandy.

BACKGROUND

The President issued major disaster declarations for several States because of the devastation caused by Hurricane Sandy. The President issued the declarations under the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5121 *et seq.* Subsequently, the Federal Emergency Management Agency ("FEMA") designated jurisdictions in several of these States for Individual Assistance (as FEMA uses that term). Because of the widespread damage to housing caused by Hurricane Sandy, the Service has determined that issuers can approve the use of qualified residential rental projects described in § 142(d) to temporarily house displaced individuals, as defined below, regardless of their income, in accordance with this notice. The Service has determined that the projects to which this approval may be given can be located in any State, regardless of whether a major disaster declaration with Individual Assistance has been issued for that State.

Consistent with Notice 2012-68, the term "displaced individual" means, for purposes of this notice, an individual who resided in a jurisdiction designated for Individual Assistance and who has been displaced because his or her residence was destroyed or damaged as a result of the devastation caused by Hurricane Sandy.

SECTION 1. SUSPENSION OF INCOME LIMITATIONS

The Service has determined that it is appropriate to temporarily suspend certain income limitation requirements under § 142(d) that apply to qualified residential rental projects financed with tax-exempt bonds issued by a qualified issuer under

§ 103 (“Issuer”). The suspension, described in Section 3 below, is available to both qualified residential rental projects under § 142(d) that are not subject to any LIHTC-related requirements (“Bond Projects”) and to qualified residential rental projects under § 142(d) that are also subject to LIHTC-related requirements (“Bond/LIHTC Projects”). For purposes of this notice, the term “Project” refers to either a Bond Project or a Bond/LIHTC Project.

SECTION 2. GENERAL REQUIREMENTS

.01 *Issuer Approval for Relief.* If an Issuer that issued exempt facility bonds for a Project desires to allow the use of the Project to temporarily house displaced individuals, the Issuer must approve that use and must determine an appropriate period for the temporary housing, not to extend beyond November 30, 2013 (“Temporary Housing Period”). If a Bond/LIHTC Project subject to both Notice 2012–68 and this notice receives approval, for purposes of § 42, for a Temporary Housing Period and for the suspension of income limitations from a State housing agency (as contemplated in Section IV(2) of Notice 2012–68) and that agency is not the Issuer, then the income limitations under § 142(d) for that Bond/LIHTC Project are suspended only if the project also receives the Issuer’s consent for a suspension. An Issuer that chooses to provide that consent must adopt for purposes of § 142(d) the same Temporary Housing Period that the agency adopted for purposes of § 42.

.02 *Protection of Tenants.* Existing tenants in a Project whose income is at or below an applicable income limitation under § 142(d) cannot be evicted or have their tenancy terminated as a result of efforts to provide temporary housing for displaced individuals.

.03 *Certification and Recordkeeping Requirements.* The Project operator must comply with the certification and recordkeeping requirements in Section 4 of this notice. For certification and recordkeeping requirements under § 42, see Notice 2012–68.

.04 *Rent Restrictions.* To the extent such rent restrictions are applicable, rents for the low-income units that house dis-

placed individuals must not exceed the lesser of—

(1) the maximum gross rent for that unit under § 142(d)(4)(B); or

(2) the maximum gross rent for that unit under § 42(g)(2).

.05 *Project Must Meet All Remaining Requirements.* Except as expressly provided in this notice, a Project continues to be subject to all other rules and requirements of § 142(d) and § 103.

SECTION 3. RELIEF FROM SECTION 142 REQUIREMENTS

.01 *Qualified Project Period.* Only a unit in a Project occupied by a non-displaced individual counts for purposes of determining the beginning of the qualified project period under § 142(d)(2)(A). Thus, only non-displaced individuals are counted for determining the 1st day on which 10 percent of the residential units in a Project are occupied under § 142(d)(2)(A). However, occupancy of a unit by any tenant (whether a displaced individual or a non-displaced individual) in a Project counts for purposes of determining the end of the qualified project period under § 142(d)(2)(A)(i). If occupancy by a displaced individual in a Project causes any termination of assistance with respect to the Project under section 8 of the United States Housing Act of 1937, then that termination is disregarded for determining when the qualified project period ends under § 142(d)(2)(A)(iii).

.02 *Satisfaction of the Non-Transient Use Requirement.* The occupancy of a unit in a Project by a displaced individual during the Temporary Housing Period is treated as satisfying the non-transient use requirement applicable to qualified residential rental projects described in § 142(d). See § 1.103–8(b)(4); see also Notice 2012–68 for suspension of the non-transient use requirement under § 42(i)(3)(B)(i).

.03 *Income Qualification of Units in Bond Projects during Temporary Housing Period.* A unit in a Bond Project occupied by a displaced individual during the Temporary Housing Period retains the income status it had immediately before that occupancy, regardless of whether the unit was a market-rate unit, a unit occupied by a tenant who met an applicable income limit, a designated low-income unit, or a

never previously occupied unit. See Rev. Proc. 2004–39, 2004–29 I.R.B. 49 (treating never previously occupied units as unavailable). This means, for example, that if a unit in a Bond Project had been designated as a low-income unit or rented to an individual whose income was at or below an applicable income limit or was a market-rate unit or an unavailable unit, then the unit remains as such while occupied by a displaced individual during the Temporary Housing Period regardless of the occupancy by, or income of, the displaced individual. Thus, the fact that a unit becomes occupied by a displaced individual does not affect compliance with the 20-50 test or 40-60 test of § 142(d)(1)(A) and (B) (or the 25-60 test under the special rule in § 142(d)(6)).

Under § 142(d)(3)(B), if the income of a low-income resident of a Project rises above a specified percentage of the applicable income limit, then, for that resident’s income to continue to be treated as not exceeding the applicable income limit, the next residential unit meeting certain criteria to become available in the same Project must be occupied by a new resident whose income does not exceed the applicable income limit (the “next available unit rule”). For purposes of determining compliance with the next available unit rule, an operator of a Bond Project may disregard the new occupancy of units during the Temporary Housing Period by displaced individuals, and apply the rule solely based on new occupancy by persons who are not displaced individuals. The operator may, however, take into account a displaced individual’s occupancy for purposes of § 142(d)(3)(B) if the operator obtains sufficient evidence that the displaced individual’s income does not exceed the applicable income limit.

.04 *Income Qualifications of Units in Bond/LIHTC Projects During the Temporary Housing Period.* The income status of a unit and the income qualification of the occupant of a unit for purposes of § 142(d) in a Bond/LIHTC Project occupied by a displaced individual during the Temporary Housing Period shall be treated the same as they are for purposes of § 42 under Notice 2012–68. For purposes of determining compliance with the next available unit rule, an operator of a Bond/LIHTC Project may disregard the new occupancy of units during the Temporary Housing Period by

displaced individuals, and apply the rule solely based on new occupancy by persons who are not displaced individuals. The operator may, however, take into account a displaced individual's occupancy for purposes of § 142(d)(3)(B) if the operator obtains sufficient evidence that the displaced individual's income does not exceed the applicable income limit.

.05 Income Qualifications when Temporary Housing Period Ends. After the end of the Temporary Housing Period, the status as a displaced individual of an occupant remaining in a unit in a Project will be disregarded and the status of the unit occupied by such individual and the income of such individual will be re-evaluated as though the formerly displaced individual commenced occupancy of the unit on the day immediately following the end of the Temporary Housing Period. Thus, if the displaced individual remains in the unit, the unit will be treated as occupied for all purposes of § 142(d) and the income of the displaced individual will be used for determining compliance with the requirements of § 142(d). If non-compliance relates to continued occupancy of the unit after the Temporary Housing Period by an occupant who was a displaced individual during the Temporary Housing Period, a 60-day period is allowed for correction.

SECTION 4. CERTIFICATIONS AND RECORDKEEPING

In addition to any information and certifications required by § 142(d)(7), Project operators must maintain and certify certain information concerning each displaced individual temporarily housed in the Project.

The records must contain the following information: the name of the displaced individual, the address of the damaged residence of the displaced individual, the displaced individual's social security number, and a statement signed under penalties of perjury by the displaced individual that, because of damage to the individual's residence in a jurisdiction designated for Individual Assistance by FEMA as a result of the devastation caused by Hurricane Sandy, the individual requires temporary housing. In addition, the Project operator must keep accurate records of the Issuer's approval of the Project's use for displaced individuals and the approved Temporary Housing Period and the dates during which displaced individuals occupied units in the Projects.

The recordkeeping described under this paragraph must be included as part of the books and records of the Project operator and also must be maintained in a manner that is consistent with any compliance monitoring process imposed by § 142(d).

SECTION 5. EFFECTIVE DATE

To be consistent with Notice 2012-68, this notice is effective as of October 22, 2012.

SECTION 6. PAPERWORK REDUCTION ACT

The collection of information contained in this notice has been reviewed and approved by the Office of Management and Budget in accordance with the Paperwork Reduction Act (44 U.S.C. 3507) under control number 1545-2237.

A Federal agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection of information displays a valid OMB control number.

The collection of information in this notice is in the section entitled "Section 4: CERTIFICATIONS AND RECORDKEEPING." This information is required to enable the Service to verify whether individuals are displaced as a result of the devastation caused by Hurricane Sandy and thus warrant temporary housing in vacant units in certain Projects. The collection of information is required to obtain a benefit. The likely respondents are individuals and businesses.

The estimated total annual recordkeeping burden is 1750 hours.

The estimated annual burden per recordkeeper is approximately 30 minutes. The estimated number of recordkeepers is 3500.

Books or records relating to a collection of information must be retained as long as their contents may become material to the administration of the internal revenue law. Generally, tax returns and tax return information are confidential, as required by 26 U.S.C. 6103.

SECTION 7. DRAFTING INFORMATION

The principal author of this notice is Timothy L. Jones of the Office of Associate Chief Counsel (Financial Institutions & Products). For further information regarding this notice, contact Mr. Jones at (202) 622-3980 (not a toll-free call).

Part IV. Items of General Interest

Announcement 2013-13

This announcement contains corrections to Revenue Procedure 2013-6, as published on January 2, 2013 (2013-1 I.R.B. 198). In particular, this announcement clarifies that applications for determination letters should continue to be submitted to the Covington, KY address in section 6.15 of Rev. Proc. 2013-6. Comments submitted by interested parties in connection with the determination letter process should be sent to a different address in Cincinnati, OH in section 17.02 of Rev. Proc. 2013-6.

Correction 1:

The third sentence of section 17.02, relating to comments submitted by interested

parties, contains a reference to an incorrect address. A portion of the third sentence is revised to read as follows:

“Such comments must be in writing, signed by the interested parties or by an authorized representative of such parties (as provided in section 9.02(11) of Rev. Proc. 2013-4), addressed to:

Internal Revenue Service
EP Determinations
Attn: Customer Service Manager
P.O. Box 2508
Cincinnati, OH 45202

Comments must contain the following information:”

Correction 2:

The reference to the address in section 17.03(2)(e) and section 18.03(4) is changed from “Section 6.17” to “Section 6.15”.

Correction 3:

The Exhibit: Sample Notice to Interested Parties, Item 7, contains an incorrect address to submit applications for determination letters. The correct address is as follows:

“Internal Revenue Service
EP Determinations
P.O. Box 12192
Covington, KY 41012-0192”

Definition of Terms

Revenue rulings and revenue procedures (hereinafter referred to as “rulings”) that have an effect on previous rulings use the following defined terms to describe the effect:

Amplified describes a situation where no change is being made in a prior published position, but the prior position is being extended to apply to a variation of the fact situation set forth therein. Thus, if an earlier ruling held that a principle applied to A, and the new ruling holds that the same principle also applies to B, the earlier ruling is amplified. (Compare with *modified*, below).

Clarified is used in those instances where the language in a prior ruling is being made clear because the language has caused, or may cause, some confusion. It is not used where a position in a prior ruling is being changed.

Distinguished describes a situation where a ruling mentions a previously published ruling and points out an essential difference between them.

Modified is used where the substance of a previously published position is being changed. Thus, if a prior ruling held that a principle applied to A but not to B, and the new ruling holds that it applies to both A

and B, the prior ruling is modified because it corrects a published position. (Compare with *amplified* and *clarified*, above).

Obsoleted describes a previously published ruling that is not considered determinative with respect to future transactions. This term is most commonly used in a ruling that lists previously published rulings that are obsoleted because of changes in laws or regulations. A ruling may also be obsoleted because the substance has been included in regulations subsequently adopted.

Revoked describes situations where the position in the previously published ruling is not correct and the correct position is being stated in a new ruling.

Superseded describes a situation where the new ruling does nothing more than restate the substance and situation of a previously published ruling (or rulings). Thus, the term is used to republish under the 1986 Code and regulations the same position published under the 1939 Code and regulations. The term is also used when it is desired to republish in a single ruling a series of situations, names, etc., that were previously published over a period of time in separate rulings. If the new ruling does more than restate the substance

of a prior ruling, a combination of terms is used. For example, *modified* and *superseded* describes a situation where the substance of a previously published ruling is being changed in part and is continued without change in part and it is desired to restate the valid portion of the previously published ruling in a new ruling that is self contained. In this case, the previously published ruling is first modified and then, as modified, is superseded.

Supplemented is used in situations in which a list, such as a list of the names of countries, is published in a ruling and that list is expanded by adding further names in subsequent rulings. After the original ruling has been supplemented several times, a new ruling may be published that includes the list in the original ruling and the additions, and supersedes all prior rulings in the series.

Suspended is used in rare situations to show that the previous published rulings will not be applied pending some future action such as the issuance of new or amended regulations, the outcome of cases in litigation, or the outcome of a Service study.

Abbreviations

The following abbreviations in current use and formerly used will appear in material published in the Bulletin.

A—Individual.
Acq.—Acquiescence.
B—Individual.
BE—Beneficiary.
BK—Bank.
B.T.A.—Board of Tax Appeals.
C—Individual.
C.B.—Cumulative Bulletin.
CFR—Code of Federal Regulations.
CI—City.
COOP—Cooperative.
Ct.D.—Court Decision.
CY—County.
D—Decedent.
DC—Dummy Corporation.
DE—Donee.
Del. Order—Delegation Order.
DISC—Domestic International Sales Corporation.
DR—Donor.
E—Estate.
EE—Employee.
E.O.—Executive Order.

ER—Employer.
ERISA—Employee Retirement Income Security Act.
EX—Executor.
F—Fiduciary.
FC—Foreign Country.
FICA—Federal Insurance Contributions Act.
FISC—Foreign International Sales Company.
FPH—Foreign Personal Holding Company.
F.R.—Federal Register.
FUTA—Federal Unemployment Tax Act.
FX—Foreign corporation.
G.C.M.—Chief Counsel’s Memorandum.
GE—Grantee.
GP—General Partner.
GR—Grantor.
IC—Insurance Company.
I.R.B.—Internal Revenue Bulletin.
LE—Lessee.
LP—Limited Partner.
LR—Lessor.
M—Minor.
Nonacq.—Nonacquiescence.
O—Organization.
P—Parent Corporation.
PHC—Personal Holding Company.
PO—Possession of the U.S.
PR—Partner.

PRS—Partnership.
PTE—Prohibited Transaction Exemption.
Pub. L.—Public Law.
REIT—Real Estate Investment Trust.
Rev. Proc.—Revenue Procedure.
Rev. Rul.—Revenue Ruling.
S—Subsidiary.
S.P.R.—Statement of Procedural Rules.
Stat.—Statutes at Large.
T—Target Corporation.
T.C.—Tax Court.
T.D.—Treasury Decision.
TFE—Transferee.
TFR—Transferor.
T.I.R.—Technical Information Release.
TP—Taxpayer.
TR—Trust.
TT—Trustee.
U.S.C.—United States Code.
X—Corporation.
Y—Corporation.
Z—Corporation.

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Key to Abbreviations:

Ann	Announcement
CD	Court Decision
DO	Delegation Order
EO	Executive Order
PL	Public Law
PTE	Prohibited Transaction Exemption
RP	Revenue Procedure
RR	Revenue Ruling
SPR	Statement of Procedural Rules
TC	Tax Convention
TD	Treasury Decision
TDO	Treasury Department Order

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