

INTERNAL REVENUE BULLETIN



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.

ADMINISTRATIVE

Notice 2026-58, page 503.

This document announces a third notice obsoleting IRB guidance documents. Notice 2025-22, 2025-19 I.R.B. 1427, obsoleted nine I.R.B. guidance documents. Notice 2025-36, 2025-30 I.R.B. 192, obsoleted 83 I.R.B. guidance documents. This notice will obsolete 71 pieces of guidance, which were identified for obsolescence by the Associate Offices.

EMPLOYEE PLANS

Notice 2026-57, page 499.

This notice sets forth updates on the corporate bond monthly yield curve, the corresponding spot segment rates for August 2026 used under § 417(e)(3)(D), the 24-month average segment rates applicable for September 2026, and the 30-year Treasury rates, as reflected by the application of § 430(h)(2)(C)(iv).

INCOME TAX

Notice 2026-54, page 491.

This notice explains the circumstances under which the four-year replacement period under section 1033(e)(2) is extended for livestock sold on account of drought. The Appendix to this notice contains a list of counties that experienced exceptional, extreme, or severe drought conditions

Bulletin No. 2026-42
October 13, 2026

during the 12-month period ending August 31, 2026. Taxpayers may use this list to determine if any extension is available.

Notice 2026-55, page 497.

Notice 2026-55 requests comments on issues arising under § 1400Z-2 of the Internal Revenue Code (Code), as amended by § 70421 of Public Law 119-21, 139 Stat. 72 (July 4, 2025), commonly known as the One, Big, Beautiful Bill Act (OBBBA), regarding investments in businesses located in qualified opportunity zones (QOZs), including on whether additional guidance is needed under § 1400Z-2 to address issues relating to qualifying investments of amounts of eligible gains made by taxpayers in qualified opportunity funds (QOFs) and investments of such funds made by QOFs in qualified opportunity zone businesses (QOZBs).

Rev. Rul. 2026-18, page 488.

Fringe benefits aircraft valuation formula. For purposes of section 1.61-21(g) of the Income Tax Regulations, relating to the rule for valuing non-commercial flights on employer-provided aircraft, the Standard Industry Fare Level (SIFL) cents-per-mile rates and terminal charge in effect for the second half of 2026 are set forth.

Rev. Rul. 2026-19, page 489.

Federal rates; adjusted federal rates; adjusted federal long-term rate, and the long-term tax exempt rate. For purposes of sections 382, 1274, 1288, 7872 and other sections of the Code, tables set forth the rates for October 2026.

The IRS Mission

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

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.

The contents of this publication are not copyrighted and may be reprinted freely. A citation of the Internal Revenue Bulletin as the source would be appropriate.

Part I

Section 61. Gross Income Defined

26 CFR 1.61-21: Taxation of Fringe Benefits

Rev. Rul. 2026-18

For purposes of the taxation of fringe benefits under section 61 of the Internal

Revenue Code, section 1.61-21(g) of the Income Tax Regulations provides a rule for valuing noncommercial flights on employer-provided aircraft. Section 1.61-21(g)(5) provides an aircraft valuation formula to determine the value of such flights. The value of a flight is determined under the base aircraft valuation formula (also known as the Standard Industry Fare Level formula or SIFL) by multiplying the SIFL cents-per-mile

rates applicable for the period during which the flight was taken by the appropriate aircraft multiple provided in section 1.61-21(g)(7) and then adding the applicable terminal charge. The SIFL cents-per-mile rates in the formula and the terminal charge are calculated by the Department of Transportation (DOT) and are reviewed semi-annually. The following chart sets forth the terminal charge and SIFL mileage rates:

<i>Period During Which the Flight Is Taken</i>	<i>Terminal Charge</i>	<i>SIFL Mileage Rates</i>
7/1/26 - 12/31/26	\$58.95	Up to 500 miles = \$.3225 per mile 501-1500 miles = \$.2459 per mile Over 1500 miles = \$.2364 per mile

DRAFTING INFORMATION

The principal author of this revenue ruling is Kathleen Edmondson of the Office

of Associate Chief Counsel (Employee Benefits, Exempt Organizations and Employment Taxes). For further information regarding this revenue ruling, contact

Ms. Edmondson at (202) 317-6798 (not a toll-free number).

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. 2026-19

This revenue ruling provides various prescribed rates for federal income

tax purposes for October 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 appro-

priate 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. 2026-19 TABLE 1
Applicable Federal Rates (AFR) for October 2026
Period for Compounding

	<i>Annual</i>	<i>Semiannual</i>	<i>Quarterly</i>	<i>Monthly</i>
		<i>Short-term</i>		
AFR	4.25%	4.21%	4.19%	4.17%
110% AFR	4.68%	4.63%	4.60%	4.59%
120% AFR	5.11%	5.05%	5.02%	5.00%
130% AFR	5.54%	5.47%	5.43%	5.41%
		<i>Mid-term</i>		
AFR	4.61%	4.56%	4.53%	4.52%
110% AFR	5.08%	5.02%	4.99%	4.97%
120% AFR	5.54%	5.47%	5.43%	5.41%
130% AFR	6.02%	5.93%	5.89%	5.86%
150% AFR	6.96%	6.84%	6.78%	6.74%
175% AFR	8.14%	7.98%	7.90%	7.85%
		<i>Long-term</i>		
AFR	5.22%	5.15%	5.12%	5.10%
110% AFR	5.75%	5.67%	5.63%	5.60%
120% AFR	6.28%	6.18%	6.13%	6.10%
130% AFR	6.81%	6.70%	6.64%	6.61%

REV. RUL. 2026-19 TABLE 2
Adjusted AFR for October 2026
Period for Compounding

	<i>Annual</i>	<i>Semiannual</i>	<i>Quarterly</i>	<i>Monthly</i>
Short-term adjusted AFR	3.23%	3.20%	3.19%	3.18%
Mid-term adjusted AFR	3.49%	3.46%	3.45%	3.44%
Long-term adjusted AFR	3.95%	3.91%	3.89%	3.88%

REV. RUL. 2026-19 TABLE 3

Rates Under Section 382 for October 2026

Adjusted federal long-term rate for the current month	3.95%
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.)	3.95%

REV. RUL. 2026-19 TABLE 4

Appropriate Percentages Under Section 42(b)(1) for October 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	8.15%
Appropriate percentage for the 30% present value low-income housing credit	3.49%

REV. RUL. 2026-19 TABLE 5

Rate Under Section 7520 for October 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	5.60%
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Section 42.—Low-Income Housing Credit

The applicable federal short-term, mid-term, and long-term rates are set forth for the month of October 2026. See Rev. Rul. 2026-19, page 489.

Section 467.—Certain Payments for the Use of Property or Services

The applicable federal short-term, mid-term, and long-term rates are set forth for the month of October 2026. See Rev. Rul. 2026-19, page 489.

Section 483.—Interest on Certain Deferred Payments

The applicable federal short-term, mid-term, and long-term rates are set forth for the month of October 2026. See Rev. Rul. 2026-19, page 489.

Section 280G.—Golden Parachute Payments

The applicable federal short-term, mid-term, and long-term rates are set forth for the month of October 2026. See Rev. Rul. 2026-19, page 489.

Section 468.—Special Rules for Mining and Solid Waste Reclamation and Closing Costs

The applicable federal short-term rates are set forth for the month of October 2026. See Rev. Rul. 2026-19, page 489.

Section 1288.—Treatment of Original Issue Discount on Tax-Exempt Obligations

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of October 2026. See Rev. Rul. 2026-19, page 489.

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

The adjusted applicable federal long-term rate is set forth for the month of October 2026. See Rev. Rul. 2026-19, page 489.

Section 482.—Allocation of Income and Deductions Among Taxpayers

The applicable federal short-term, mid-term, and long-term rates are set forth for the month of October 2026. See Rev. Rul. 2026-19, page 489.

Section 7520.—Valuation Tables

The applicable federal mid-term rates are set forth for the month of October 2026. See Rev. Rul. 2026-19, page 489.

Section 7872.—Treatment of Loans With Below-Market Interest Rates

The applicable federal short-term, mid-term, and long-term rates are set forth for the month of October 2026. See Rev. Rul. 2026-19, page 489.

Part III

Extension of Replacement Period for Livestock Sold on Account of Drought

Notice 2026-54

SECTION 1. PURPOSE

This notice provides guidance regarding an extension of the replacement period under § 1033(e) of the Internal Revenue Code for livestock sold on account of drought in specified counties.

SECTION 2. BACKGROUND

.01 Nonrecognition of Gain on Involuntary Conversion of Livestock. Section 1033(a) generally provides for nonrecognition of gain when property is involuntarily converted and replaced with property that is similar or related in service or use. Section 1033(e)(1) provides that a sale or exchange of livestock (other than poultry) held by a taxpayer for draft, breeding, or dairy purposes in excess of the number that would be sold following the taxpayer's usual business practices is treated as an involuntary conversion if the livestock is sold or exchanged solely on account of drought, flood, or other weather-related conditions.

.02 Replacement Period. Section 1033(a)(2)(A) generally provides that gain from an involuntary conversion is recognized only to the extent the amount realized on the conversion exceeds the cost of replacement property purchased during the replacement period. If a sale or exchange of livestock is treated as an involuntary conversion under § 1033(e)(1) and is solely on account of drought, flood, or other weather-related conditions that result in the area being designated as eligible for assistance by the federal government, § 1033(e)(2)(A) provides that the replacement period ends four years after

the close of the first taxable year in which any part of the gain from the conversion is realized. Section 1033(e)(2)(B) provides that the Secretary may extend this replacement period on a regional basis for such additional time as the Secretary determines appropriate if the weather-related conditions that resulted in the area being designated as eligible for assistance by the federal government continue for more than three years. Section 1033(e)(2) is effective for any taxable year with respect to which the due date (without regard to extensions) for a taxpayer's return is after December 31, 2002.

SECTION 3. EXTENSION OF REPLACEMENT PERIOD UNDER § 1033(e)(2)(B)

Notice 2006-82, 2006-2 C.B. 529, provides for extensions of the replacement period under § 1033(e)(2)(B). If a sale or exchange of livestock is treated as an involuntary conversion on account of drought and the taxpayer's replacement period is determined under § 1033(e)(2)(A), the replacement period will be extended under § 1033(e)(2)(B) and Notice 2006-82 until the end of the taxpayer's first taxable year ending after the first drought-free year for the applicable region. For this purpose, the first drought-free year for the applicable region is the first 12-month period that (1) ends August 31; (2) ends in or after the last year of the taxpayer's four-year replacement period determined under § 1033(e)(2)(A); and (3) does not include any weekly period for which exceptional, extreme, or severe drought is reported for any location in the applicable region. The applicable region is the county that experienced the drought conditions on account of which the livestock was sold or exchanged and all counties that are contiguous to that county.

A taxpayer may determine whether exceptional, extreme, or severe drought is reported for any location in the applicable region by reference to U.S. Drought Mon-

itor maps that are produced on a weekly basis by the National Drought Mitigation Center. U.S. Drought Monitor maps are archived at <https://droughtmonitor.unl.edu/Maps/MapArchive.aspx>.

In addition, Notice 2006-82 provides that the Internal Revenue Service will publish in September of each year a list of counties¹ for which exceptional, extreme, or severe drought was reported during the preceding 12 months. Taxpayers may use this list instead of U.S. Drought Monitor maps to determine whether exceptional, extreme, or severe drought has been reported for any location in the applicable region.

The Appendix to this notice contains the list of counties for which exceptional, extreme, or severe drought was reported during the 12-month period ending August 31, 2026. Under Notice 2006-82, the 12-month period ended on August 31, 2026, is not a drought-free year for an applicable region that includes any county on this list. Accordingly, for a taxpayer who qualified for a four-year replacement period for livestock sold or exchanged on account of drought and whose replacement period is scheduled to expire at the end of 2026 (or, in the case of a fiscal year taxpayer, at the end of the taxable year that includes August 31, 2026), the replacement period will be extended under § 1033(e)(2) and Notice 2006-82 if the applicable region includes any county on this list. This extension will continue until the end of the taxpayer's first taxable year ending after a drought-free year for the applicable region.

SECTION 4. DRAFTING INFORMATION

The principal author of this notice is Lewis Saideman from the Office of Associate Chief Counsel (Income Tax & Accounting). For further information regarding this notice, please contact Mr. Saideman at (202) 317-4718 (not a toll-free call).

¹ While Notice 2006-82 uses the term "counties," this notice lists other applicable regions as well (e.g., boroughs, parishes, planning regions, etc.). Beginning in 2026, U.S. Drought Monitor Mitigation Center's U.S. Drought Monitor began tracking data for Connecticut by planning region.

APPENDIX

Alabama

Counties of Autauga, Baldwin, Barbour, Bibb, Blount, Bullock, Butler, Calhoun, Chambers, Cherokee, Chilton, Choctaw, Clarke, Clay, Cleburne, Coffee, Colbert, Conecuh, Coosa, Covington, Crenshaw, Cullman, Dale, Dallas, DeKalb, Elmore, Escambia, Etowah, Fayette, Franklin, Geneva, Greene, Hale, Henry, Houston, Jackson, Jefferson, Lamar, Lauderdale, Lawrence, Lee, Limestone, Lowndes, Macon, Madison, Marengo, Marion, Marshall, Mobile, Monroe, Montgomery, Morgan, Perry, Pickens, Pike, Randolph, Russell, Saint Clair, Shelby, Sumter, Talladega, Tallapoosa, Tuscaloosa, Walker, Washington, Wilcox, and Winston.

Arizona

Counties of Apache, Cochise, Coconino, Gila, Graham, Greenlee, La Paz, Maricopa, Mohave, Navajo, Pima, Pinal, Santa Cruz, Yavapai, and Yuma.

Arkansas

Counties of Arkansas, Ashley, Baxter, Benton, Boone, Bradley, Calhoun, Carroll, Chicot, Clark, Clay, Cleburne, Cleveland, Columbia, Conway, Craighead, Crawford, Crittenden, Cross, Dallas, Desha, Drew, Faulkner, Franklin, Fulton, Garland, Grant, Greene, Hempstead, Hot Spring, Howard, Independence, Izard, Jackson, Jefferson, Johnson, Lafayette, Lawrence, Lee, Lincoln, Little River, Logan, Lonoke, Madison, Marion, Miller, Mississippi, Monroe, Montgomery, Nevada, Newton, Ouachita, Perry, Phillips, Pike, Poinsett, Polk, Pope, Prairie, Pulaski, Randolph, Saint Francis, Saline, Scott, Searcy, Sebastian, Sevier, Sharp, Stone, Union, Van Buren, Washington, White, Woodruff, and Yell.

California

Counties of Del Norte, Humboldt, Imperial, Inyo, Kern, Los Angeles, Orange, Riverside, San Bernardino, San Diego, Santa Barbara, Siskiyou, and Ventura.

Colorado

Counties of Adams, Alamosa, Arapahoe, Archuleta, Baca, Bent, Boulder, Broomfield, Chaffee, Cheyenne, Clear Creek, Conejos, Costilla, Crowley, Custer, Delta, Denver, Dolores, Douglas, Eagle, El Paso, Elbert, Fremont, Garfield, Gilpin, Grand, Gunnison, Hinsdale, Huerfano, Jackson, Jefferson, Kiowa, Kit Carson, Lake, La Plata, Larimer, Las Animas, Lincoln, Logan, Mesa, Mineral, Moffat, Montezuma, Montrose, Morgan, Otero, Ouray, Park, Phillips, Pitkin, Prowers, Pueblo, Rio Blanco, Rio Grande, Routt, Saguache, San Juan, San Miguel, Sedgwick, Summit, Teller, Washington, Weld, and Yuma.

Connecticut

Planning regions of Southeastern Connecticut and Western Connecticut.

Delaware

Counties of Kent, New Castle, and Sussex.

District of Columbia

District of Columbia.

Florida

Counties of Alachua, Baker, Bay, Bradford, Brevard, Broward, Calhoun, Charlotte, Citrus, Clay, Collier, Columbia, DeSoto, Dixie, Duval, Escambia, Flagler, Franklin, Gadsden, Gilchrist, Glades, Gulf, Hamilton, Hardee, Hendry, Hernando, Highlands, Hillsborough, Holmes, Indian River, Jackson, Jefferson, Lafayette, Lake, Lee, Leon, Levy, Liberty, Madison, Manatee, Marion, Martin, Miami-Dade, Monroe, Nassau, Okaloosa, Okeechobee, Orange, Osceola, Palm Beach, Pasco, Pinellas, Polk, Putnam, Saint Johns, Saint Lucie, Santa Rosa, Sarasota, Seminole, Sumter, Suwannee, Taylor, Union, Volusia, Wakulla, Walton, and Washington.

Georgia

Counties of Appling, Atkinson, Bacon, Baker, Baldwin, Banks, Barrow, Bartow, Ben Hill, Berrien, Bibb, Bleckley, Brantley, Brooks, Bryan, Bulloch, Burke, Butts, Calhoun, Camden, Candler, Carroll, Catoosa, Charlton, Chatham, Chattahoochee, Chattooga, Cherokee, Clarke, Clay, Clayton, Clinch, Cobb, Coffee, Colquitt, Columbia, Cook, Coweta, Crawford, Crisp, Dade, Dawson, Decatur, DeKalb, Dodge, Dooley, Dougherty, Douglas, Early, Echols, Effingham, Elbert, Emanuel, Evans, Fannin, Fayette, Floyd, Forsyth, Franklin, Fulton, Gilmer, Glascock, Glynn, Gordon, Grady, Greene, Gwinnett, Habersham, Hall, Hancock, Haralson, Harris, Hart, Heard, Henry, Houston, Irwin, Jackson, Jasper, Jeff Davis, Jefferson, Jenkins, Johnson, Jones, Lamar, Lanier, Laurens, Lee, Liberty, Lincoln, Long, Lowndes, Lumpkin, McDuffie, McIntosh, Macon, Madison, Marion, Meriwether, Miller, Mitchell, Monroe, Montgomery, Morgan, Murray, Muscogee, Newton, Oconee, Oglethorpe, Paulding, Peach, Pickens, Pierce, Pike, Polk, Pulaski, Putnam, Quitman, Rabun, Randolph, Richmond, Rockdale, Schley, Screven, Seminole, Spalding, Stephens, Stewart, Sumter, Talbot, Taliaferro, Tattnall, Taylor, Telfair, Terrell, Thomas, Tift, Toombs, Towns, Treutlen, Troup, Turner, Twiggs, Union, Upson, Walker, Walton, Ware, Warren, Washington, Wayne, Webster, Wheeler, White, Whitfield, Wilcox, Wilkes, Wilkinson, and Worth.

Hawaii

Counties of Hawaii, Honolulu, Kalawao, and Maui.

Idaho

Counties of Ada, Adams, Bannock, Bear Lake, Benewah, Bingham, Blaine, Boise, Bonner, Bonneville, Boundary, Butte, Camas, Caribou, Cassia, Clark, Clearwater, Custer, Elmore, Franklin, Fremont, Gem, Gooding, Idaho, Jefferson, Jerome, Kootenai, Latah, Lemhi, Lewis, Lincoln,

Madison, Minidoka, Nez Perce, Oneida, Owyhee, Power, Shoshone, Teton, Twin Falls, Valley, and Washington.

Illinois

Counties of Adams, Alexander, Bond, Brown, Bureau, Carroll, Cass, Champaign, Christian, Clark, Clay, Clinton, Coles, Cook, Crawford, Cumberland, De Witt, DeKalb, Douglas, DuPage, Edgar, Edwards, Effingham, Fayette, Ford, Franklin, Fulton, Gallatin, Greene, Grundy, Hamilton, Hancock, Hardin, Henderson, Henry, Iroquois, Jackson, Jasper, Jefferson, Jersey, Jo Daviess, Johnson, Kane, Kankakee, Kendall, Knox, La Salle, Lawrence, Lee, Livingston, Logan, Macon, Macoupin, Madison, Marion, Marshall, Mason, Massac, McDonough, McLean, Menard, Monroe, Montgomery, Morgan, Moultrie, Ogle, Peoria, Perry, Piatt, Pike, Pope, Pulaski, Putnam, Randolph, Richland, Saint Clair, Saline, Sangamon, Schuyler, Scott, Shelby, Stark, Stephenson, Tazewell, Union, Vermilion, Warren, Washington, Wayne, White, Whiteside, Will, Williamson, and Woodford.

Indiana

Counties of Adams, Allen, Benton, Blackford, Boone, Carroll, Cass, Clinton, DeKalb, Delaware, Fountain, Grant, Hamilton, Henry, Howard, Huntington, Jasper, Jay, Madison, Miami, Montgomery, Newton, Parke, Perry, Pulaski, Randolph, Steuben, Tippecanoe, Tipton, Vermillion, Vigo, Wabash, Warren, Wells, White, and Whitley.

Iowa

Counties of Buena Vista, Calhoun, Carroll, Cherokee, Crawford, Davis, Harrison, Henry, Ida, Jefferson, Keokuk, Lee, Lyon, Mahaska, Monona, O'Brien, Osceola, Plymouth, Pottawattamie, Sac, Sioux, Van Buren, Wapello, Washington, and Woodbury.

Kansas

Counties of Barber, Barton, Chautauqua, Cherokee, Cheyenne, Clark, Comanche, Cowley, Crawford, Decatur, Douglas, Edwards, Elk, Ellis, Ellsworth, Finney,

Ford, Gove, Graham, Grant, Gray, Greeley, Hamilton, Harper, Harvey, Haskell, Hodgeman, Jefferson, Johnson, Kearny, Kingman, Kiowa, Labette, Lane, Leavenworth, Lincoln, Logan, McPherson, Meade, Miami, Montgomery, Morton, Neosho, Ness, Norton, Osborne, Pawnee, Phillips, Pratt, Rawlins, Reno, Rice, Rooks, Rush, Russell, Saline, Scott, Sedgwick, Seward, Sheridan, Sherman, Stafford, Stanton, Stevens, Sumner, Thomas, Trego, Wichita, Wilson, and Wyandotte.

Kentucky

Counties of Adair, Allen, Anderson, Ballard, Barren, Bath, Bell, Bourbon, Boyd, Boyle, Breathitt, Breckinridge, Bullitt, Butler, Caldwell, Calloway, Carlisle, Carter, Casey, Christian, Clark, Clay, Clinton, Crittenden, Cumberland, Daviess, Edmonson, Elliott, Estill, Fayette, Fleming, Floyd, Franklin, Fulton, Garrard, Graves, Grayson, Green, Greenup, Hancock, Hardin, Harlan, Harrison, Hart, Henderson, Hickman, Hopkins, Jackson, Jessamine, Johnson, Knott, Knox, Larue, Laurel, Lawrence, Lee, Leslie, Letcher, Lewis, Lincoln, Livingston, Logan, Lyon, Madison, Magoffin, Marion, Marshall, Martin, McCracken, McCreary, McLean, Meade, Menifee, Mercer, Metcalfe, Monroe, Montgomery, Morgan, Muhlenberg, Nelson, Nicholas, Ohio, Owsley, Perry, Pike, Powell, Pulaski, Rockcastle, Rowan, Russell, Scott, Simpson, Spencer, Taylor, Todd, Trigg, Union, Warren, Washington, Wayne, Webster, Whitley, Wolfe, and Woodford.

Louisiana

Parishes of Acadia, Allen, Ascension, Assumption, Avoyelles, Beauregard, Bienville, Bossier, Caddo, Calcasieu, Caldwell, Cameron, Catahoula, Claiborne, Concordia, De Soto, East Carroll, East Feliciana, Evangeline, Franklin, Grant, Iberia, Jackson, Jefferson Davis, Jefferson, La Salle, Lafayette, Lafourche, Lincoln, Livingston, Madison, Morehouse, Natchitoches, Orleans, Ouachita, Plaquemines, Pointe Coupee, Rapides, Red River, Richland, Sabine, Saint Bernard, Saint Charles, Saint Helena, Saint James, Saint John the Baptist, Saint Landry, Saint Martin, Saint

Mary, Saint Tammany, Tangipahoa, Tensas, Terrebonne, Union, Vermilion, Vernon, Washington, Webster, West Carroll, West Feliciana, and Winn.

Maine

Counties of Androscoggin, Aroostook, Cumberland, Franklin, Hancock, Kennebec, Knox, Lincoln, Oxford, Penobscot, Piscataquis, Sagadahoc, Somerset, Waldo, Washington, and York.

Maryland

City of Baltimore. Counties of Allegany, Anne Arundel, Baltimore, Calvert, Caroline, Carroll, Cecil, Charles, Dorchester, Frederick, Garrett, Harford, Howard, Kent, Montgomery, Prince George's, Queen Anne's, Saint Mary's, Somerset, Talbot, Washington, Wicomico, and Worcester.

Massachusetts

Counties of Barnstable, Berkshire, Bristol, Dukes, Essex, Franklin, Hampshire, Middlesex, Nantucket, Norfolk, Plymouth, Suffolk, and Worcester.

Michigan

Counties of Allegan, Arenac, Bay, Clare, Dickinson, Gladwin, Gogebic, Gratiot, Huron, Iron, Isabella, Kent, Lake, Mason, Mecosta, Menominee, Midland, Monroe, Montcalm, Muskegon, Newaygo, Oceana, Ontonagon, Osceola, Ottawa, Saginaw, and Tuscola.

Minnesota

Counties of Aitkin, Anoka, Becker, Beltrami, Benton, Carlton, Carver, Cass, Chisago, Clay, Clearwater, Cook, Crow Wing, Dakota, Dodge, Goodhue, Hennepin, Hubbard, Isanti, Itasca, Kanabec, Koochiching, Lac qui Parle, Lake, Lake of the Woods, Lincoln, Lyon, Mahnomon, Mille Lacs, Morrison, Murray, Nobles, Norman, Olmsted, Otter Tail, Pine, Pipestone, Polk, Ramsey, Red Lake, Rice, Rock, Saint Louis, Scott, Sherburne, Stearns, Todd, Wabasha, Wadena, Washington, Wilkin, Wright, and Yellow Medicine.

Mississippi

Counties of Adams, Alcorn, Amite, Attala, Benton, Bolivar, Calhoun, Carroll, Chickasaw, Choctaw, Claiborne, Clarke, Clay, Coahoma, Copiah, Covington, DeSoto, Forrest, Franklin, George, Greene, Grenada, Hancock, Harrison, Hinds, Holmes, Humphreys, Issaquena, Itawamba, Jackson, Jasper, Jefferson, Jefferson Davis, Jones, Kemper, Lafayette, Lamar, Lauderdale, Lawrence, Leake, Lee, Leflore, Lincoln, Lowndes, Madison, Marion, Marshall, Monroe, Montgomery, Neshoba, Newton, Noxubee, Oktibbeha, Panola, Pearl River, Perry, Pike, Pontotoc, Prentiss, Quitman, Rankin, Scott, Sharkey, Simpson, Smith, Stone, Sunflower, Tallahatchie, Tate, Tippah, Tishomingo, Tunica, Union, Walthall, Warren, Washington, Wayne, Webster, Wilkinson, Winston, Yalobusha, and Yazoo.

Missouri

City of Saint Louis. Counties of Barry, Barton, Bates, Benton, Bollinger, Boone, Buchanan, Butler, Callaway, Camden, Cape Girardeau, Carter, Cass, Cedar, Christian, Clark, Clay, Clinton, Cole, Crawford, Dade, Dallas, Dent, Douglas, Dunklin, Franklin, Gasconade, Greene, Henry, Hickory, Howell, Iron, Jackson, Jasper, Jefferson, Johnson, Knox, Laclede, Lafayette, Lawrence, Lewis, Madison, Maries, Marion, McDonald, Miller, Mississippi, Moniteau, Monroe, Montgomery, New Madrid, Newton, Oregon, Osage, Ozark, Pemiscot, Perry, Phelps, Platte, Polk, Pulaski, Ralls, Ray, Reynolds, Ripley, Saint Charles, Saint Clair, Saint Francois, Saint Louis, Sainte Genevieve, Scott, Shannon, Shelby, Stoddard, Stone, Taney, Texas, Vernon, Warren, Washington, Wayne, Webster, and Wright.

Montana

Counties of Beaverhead, Big Horn, Blaine, Broadwater, Carbon, Carter, Cascade, Chouteau, Custer, Daniels, Dawson, Deer Lodge, Fallon, Fergus, Flathead, Gallatin, Garfield, Glacier, Golden Valley, Granite, Hill, Jefferson, Judith Basin, Lake, Lewis and Clark, Liberty,

Lincoln, Madison, McCone, Meagher, Mineral, Missoula, Musselshell, Park, Petroleum, Phillips, Pondera, Powder River, Powell, Prairie, Ravalli, Richland, Roosevelt, Rosebud, Sanders, Sheridan, Silver Bow, Stillwater, Sweet Grass, Teton, Toole, Treasure, Valley, Wheatland, Wibaux, and Yellowstone.

Nebraska

Counties of Adams, Antelope, Arthur, Banner, Blaine, Boone, Box Butte, Boyd, Brown, Buffalo, Butler, Cedar, Chase, Cherry, Cheyenne, Clay, Colfax, Cuming, Custer, Dakota, Dawes, Dawson, Deuel, Dixon, Dodge, Douglas, Dundy, Fillmore, Franklin, Frontier, Furnas, Gage, Garden, Garfield, Gosper, Grant, Greeley, Hall, Hamilton, Harlan, Hayes, Hitchcock, Holt, Hooker, Howard, Kearney, Keith, Keya Paha, Kimball, Knox, Lancaster, Lincoln, Logan, Loup, Madison, McPherson, Merrick, Morrill, Nance, Perkins, Phelps, Pierce, Platte, Polk, Red Willow, Rock, Saline, Saunders, Scotts Bluff, Seward, Sheridan, Sherman, Sioux, Stanton, Thomas, Thurston, Valley, Washington, Wayne, Webster, Wheeler, and York.

Nevada

Counties of Churchill, Clark, Elko, Esmeralda, Eureka, Humboldt, Lander, Lincoln, Mineral, Nye, Pershing, and White Pine.

New Hampshire

Counties of Belknap, Carroll, Cheshire, Coos, Grafton, Hillsborough, Merrimack, Rockingham, Strafford, and Sullivan.

New Jersey

Counties of Atlantic, Bergen, Burlington, Camden, Cape May, Cumberland, Essex, Gloucester, Hudson, Hunterdon, Mercer, Middlesex, Monmouth, Morris, Ocean, Passaic, Salem, Somerset, Sussex, Union, and Warren.

New Mexico

Counties of Bernalillo, Catron, Chaves, Cibola, Colfax, Curry, DeBaca, Dona Ana, Eddy, Grant, Guadalupe, Harding,

Hidalgo, Lea, Lincoln, Los Alamos, Luna, McKinley, Mora, Otero, Quay, Rio Arriba, Roosevelt, San Juan, San Miguel, Sandoval, Santa Fe, Sierra, Socorro, Taos, Torrance, Union, and Valencia.

New York

Counties of Allegany, Bronx, Cattaraugus, Chautauqua, Clinton, Erie, Essex, Franklin, Genesee, Jefferson, Kings, Livingston, Monroe, Nassau, New York, Niagara, Ontario, Orange, Orleans, Queens, Rensselaer, Richmond, Rockland, Saint Lawrence, Saratoga, Steuben, Suffolk, Sullivan, Ulster, Warren, Washington, Wayne, Westchester, and Wyoming.

North Carolina

Counties of Alamance, Alexander, Alleghany, Anson, Ashe, Avery, Beaufort, Bertie, Bladen, Brunswick, Buncombe, Burke, Cabarrus, Caldwell, Camden, Carteret, Caswell, Catawba, Chatham, Cherokee, Chowan, Clay, Cleveland, Columbus, Craven, Cumberland, Currituck, Dare, Davidson, Davie, Duplin, Durham, Edgecombe, Forsyth, Franklin, Gaston, Gates, Graham, Granville, Greene, Guilford, Halifax, Harnett, Haywood, Henderson, Hertford, Hoke, Hyde, Iredell, Jackson, Johnston, Jones, Lee, Lenoir, Lincoln, Macon, Madison, Martin, McDowell, Mecklenburg, Mitchell, Montgomery, Moore, Nash, New Hanover, Northampton, Onslow, Orange, Pamlico, Pasquotank, Pender, Perquimans, Person, Pitt, Polk, Randolph, Richmond, Robeson, Rockingham, Rowan, Rutherford, Sampson, Scotland, Stanly, Stokes, Surry, Swain, Transylvania, Tyrrell, Union, Vance, Wake, Warren, Washington, Watauga, Wayne, Wilkes, Wilson, Yadkin, and Yancey.

North Dakota

Counties of Adams, Barnes, Billings, Bowman, Burleigh, Cass, Dunn, Emmons, Foster, Golden Valley, Grand Forks, Grant, Griggs, Hettinger, LaMoure, McHenry, McKenzie, McLean, Mercer, Morton, Mountrail, Nelson, Oliver, Pierce, Ransom, Richland, Sheridan, Sioux, Slope, Stark, Steele, Stutsman, Traill, Ward, Wells, and Williams.

Ohio

Counties of Adams, Allen, Auglaize, Belmont, Carroll, Champaign, Clark, Columbiana, Coshocton, Darke, Defiance, Delaware, Erie, Fulton, Guernsey, Hancock, Hardin, Harrison, Henry, Holmes, Huron, Jefferson, Knox, Licking, Logan, Lorain, Lucas, Madison, Marion, Mercer, Monroe, Muskingum, Noble, Ottawa, Paulding, Putnam, Sandusky, Scioto, Seneca, Shelby, Stark, Tuscarawas, Union, Van Wert, Washington, Wayne, Williams, Wood, and Wyandot.

Oklahoma

Counties of Adair, Alfalfa, Atoka, Beaver, Beckham, Blaine, Bryan, Caddo, Canadian, Carter, Cherokee, Choctaw, Cimarron, Cleveland, Coal, Comanche, Cotton, Craig, Creek, Custer, Delaware, Dewey, Ellis, Garfield, Garvin, Grady, Grant, Greer, Harmon, Harper, Haskell, Hughes, Jackson, Jefferson, Johnston, Kay, Kingfisher, Kiowa, Latimer, Le Flore, Lincoln, Logan, Love, Major, Marshall, Mayes, McClain, McCurtain, McIntosh, Murray, Muskogee, Noble, Nowata, Okfuskee, Oklahoma, Okmulgee, Osage, Ottawa, Pawnee, Payne, Pittsburg, Pontotoc, Pottawatomie, Pushmataha, Roger Mills, Rogers, Seminole, Sequoyah, Stephens, Texas, Tillman, Tulsa, Wagoner, Washington, Washita, Woods, and Woodward.

Oregon

Counties of Baker, Benton, Clackamas, Clatsop, Columbia, Coos, Crook, Curry, Deschutes, Douglas, Gilliam, Grant, Harney, Hood River, Jackson, Jefferson, Josephine, Klamath, Lake, Lane, Lincoln, Linn, Malheur, Marion, Morrow, Multnomah, Polk, Sherman, Tillamook, Umatilla, Union, Wallowa, Wasco, Washington, Wheeler, and Yamhill.

Pennsylvania

Counties of Adams, Allegheny, Beaver, Bedford, Berks, Bucks, Cameron, Carbon, Chester, Crawford, Cumberland, Delaware, Elk, Erie, Forest, Franklin, Fulton, Greene, Lancaster, Lebanon, Lehigh, Luzerne, McKean, Monroe, Montgomery, Northampton, Philadelphia, Pike, Potter,

Schuylkill, Somerset, Venango, Warren, Washington, and York.

Rhode Island

Counties of Bristol, Kent, Newport, Providence, and Washington.

South Carolina

Counties of Abbeville, Aiken, Allendale, Anderson, Bamberg, Barnwell, Beaufort, Berkeley, Calhoun, Charleston, Cherokee, Chester, Chesterfield, Clarendon, Colleton, Darlington, Dillon, Dorchester, Edgefield, Fairfield, Florence, Georgetown, Greenville, Greenwood, Hampton, Horry, Jasper, Kershaw, Lancaster, Laurens, Lee, Lexington, Marion, Marlboro, McCormick, Newberry, Oconee, Orangeburg, Pickens, Richland, Saluda, Spartanburg, Sumter, Union, Williamsburg, and York.

South Dakota

Counties of Aurora, Beadle, Bennett, Bon Homme, Brookings, Brule, Buffalo, Butte, Charles Mix, Clay, Corson, Custer, Davison, Deuel, Dewey, Douglas, Edmunds, Fall River, Faulk, Gregory, Hand, Hanson, Harding, Hughes, Hutchinson, Hyde, Jackson, Jerauld, Jones, Kingsbury, Lake, Lawrence, Lincoln, Lyman, McCook, Meade, Mellette, Miner, Minnehaha, Moody, Oglala Lakota, Pennington, Perkins, Potter, Sanborn, Stanley, Sully, Todd, Tripp, Turner, Union, Walworth, Yankton, and Ziebach.

Tennessee

Counties of Anderson, Bedford, Benton, Bledsoe, Blount, Bradley, Campbell, Cannon, Carroll, Carter, Cheatham, Chester, Claiborne, Clay, Cocke, Coffee, Crockett, Cumberland, Davidson, Decatur, DeKalb, Dickson, Dyer, Fayette, Fentress, Franklin, Gibson, Giles, Greene, Grundy, Hamilton, Hancock, Hardeman, Hardin, Hawkins, Haywood, Henderson, Henry, Hickman, Houston, Humphreys, Jackson, Johnson, Knox, Lake, Lauderdale, Lawrence, Lewis, Lincoln, Loudon, Macon, Madison, Marion, Marshall, Maury, McMinn, McNairy, Meigs, Monroe, Montgomery, Moore, Morgan, Obion, Overton, Perry, Pickett, Polk, Putnam,

Rhea, Roane, Robertson, Rutherford, Scott, Sequatchie, Sevier, Shelby, Smith, Stewart, Sullivan, Sumner, Tipton, Trousdale, Unicoi, Union, Van Buren, Warren, Washington, Wayne, Weakley, White, Williamson, and Wilson.

Texas

Counties of Anderson, Andrews, Angelina, Aransas, Archer, Armstrong, Atascosa, Austin, Bailey, Bandera, Bastrop, Baylor, Bee, Bell, Bexar, Blanco, Borden, Bosque, Bowie, Brazoria, Brazos, Brewster, Briscoe, Brooks, Brown, Bureson, Burnet, Caldwell, Calhoun, Callahan, Cameron, Camp, Carson, Cass, Castro, Chambers, Cherokee, Childress, Clay, Cochran, Coke, Coleman, Collin, Collingsworth, Colorado, Comal, Comanche, Concho, Cooke, Coryell, Cottle, Crockett, Crosby, Culberson, Dallam, Dallas, Dawson, Deaf Smith, Delta, Denton, DeWitt, Dickens, Dimmit, Donley, Duval, Eastland, Ector, Edwards, El Paso, Ellis, Falls, Fannin, Fayette, Fisher, Floyd, Foard, Fort Bend, Franklin, Freestone, Frio, Gaines, Galveston, Garza, Gillespie, Glasscock, Goliad, Gonzales, Gray, Grayson, Gregg, Grimes, Guadalupe, Hale, Hall, Hansford, Hardeman, Hardin, Harris, Harrison, Hartley, Haskell, Hays, Hemphill, Henderson, Hidalgo, Hill, Hockley, Hopkins, Houston, Howard, Hudspeth, Hunt, Hutchinson, Jack, Jackson, Jasper, Jeff Davis, Jefferson, Jim Hogg, Jim Wells, Johnson, Jones, Karnes, Kaufman, Kendall, Kenedy, Kent, Kerr, King, Kinney, Kleberg, Knox, La Salle, Lamar, Lamb, Lavaca, Lee, Leon, Liberty, Limestone, Lipscomb, Live Oak, Llano, Loving, Lubbock, Lynn, Madison, Marion, Martin, Matagorda, Maverick, McCulloch, McLennan, McMullen, Medina, Midland, Milam, Mills, Mitchell, Montague, Montgomery, Moore, Morris, Motley, Nacogdoches, Navarro, Newton, Nolan, Nueces, Ochiltree, Oldham, Orange, Panola, Parker, Parmer, Pecos, Polk, Potter, Presidio, Rains, Randall, Reagan, Red River, Reeves, Refugio, Roberts, Robertson, Rockwall, Runnels, Rusk, Sabine, San Augustine, San Jacinto, San Patricio, San Saba, Scurry, Shackelford, Shelby, Sherman, Smith, Somervell, Starr, Stephens, Stonewall, Swisher, Tarrant, Taylor, Terrell, Terry, Titus, Tom Green, Travis, Trinity, Tyler, Upshur, Upton,

Uvalde, Val Verde, Van Zandt, Victoria, Walker, Waller, Washington, Webb, Wharton, Wheeler, Wichita, Wilbarger, Willacy, Williamson, Wilson, Wise, Wood, Yoakum, Zapata, and Zavala.

Utah

Counties of Beaver, Box Elder, Cache, Carbon, Daggett, Davis, Duchesne, Emery, Garfield, Grand, Iron, Juab, Kane, Millard, Morgan, Piute, Rich, Salt Lake, San Juan, Sanpete, Sevier, Summit, Tooele, Uintah, Utah, Wasatch, Washington, Wayne, and Weber.

Vermont

Counties of Addison, Bennington, Caledonia, Chittenden, Essex, Franklin, Grand Isle, Lamoille, Orange, Orleans, Rutland, Washington, Windham, and Windsor.

Virginia

Cities of Alexandria, Bristol, Buena Vista, Charlottesville, Chesapeake, Colonial Heights, Covington, Danville, Emporia, Fairfax, Falls Church, Franklin, Fredericksburg, Galax, Hampton, Harrisonburg, Hopewell, Lexington, Lynchburg, Manassas, Manassas Park, Martinsville, Newport News, Norfolk, Norton, Petersburg, Poquoson, Portsmouth, Radford, Richmond, Roanoke, Salem, Staunton, Suffolk, Virginia Beach, Waynesboro, Williamsburg, and Winchester. Counties of Accomack, Albemarle, Alleghany, Amelia, Amherst, Appomattox, Arlington, Augusta, Bath, Bedford, Bland, Botetourt, Brunswick, Buchanan, Buckingham, Campbell, Caroline, Carroll, Charles City, Charlotte, Chesterfield, Clarke, Craig, Culpeper, Cumberland, Dickenson, Dinwiddie, Essex, Fairfax, Fauquier, Floyd, Fluvanna, Franklin, Frederick, Giles, Gloucester, Goochland, Grayson, Greene, Greensville, Halifax, Hanover, Henrico, Henry, Highland, Isle

of Wight, James City, King and Queen, King George, King William, Lancaster, Lee, Loudoun, Louisa, Lunenburg, Madison, Mathews, Mecklenburg, Middlesex, Montgomery, Nelson, New Kent, Northampton, Northumberland, Nottingham, Orange, Page, Patrick, Pittsylvania, Powhatan, Prince Edward, Prince George, Prince William, Pulaski, Rapahannock, Richmond, Roanoke, Rockbridge, Rockingham, Russell, Scott, Shenandoah, Smyth, Southampton, Spotsylvania, Stafford, Surry, Sussex, Tazewell, Warren, Washington, Westmoreland, Wise, Wythe, and York.

Washington

Counties of Adams, Asotin, Benton, Chelan, Clallam, Clark, Columbia, Cowlitz, Douglas, Ferry, Franklin, Garfield, Grant, Island, Jefferson, King, Kitsap, Kittitas, Klickitat, Lewis, Lincoln, Okanogan, Pend Oreille, Pierce, Skagit, Skamania, Snohomish, Spokane, Stevens, Thurston, Walla Walla, Whatcom, Whitman, and Yakima.

West Virginia

Counties of Barbour, Berkeley, Boone, Braxton, Brooke, Cabell, Calhoun, Clay, Doddridge, Fayette, Gilmer, Grant, Greenbrier, Hampshire, Hancock, Hardy, Harrison, Jackson, Jefferson, Kanawha, Lewis, Lincoln, Logan, Marion, Marshall, Mason, McDowell, Mercer, Mineral, Mingo, Monongalia, Monroe, Morgan, Nicholas, Ohio, Pendleton, Pleasants, Pocahontas, Preston, Putnam, Raleigh, Randolph, Ritchie, Roane, Summers, Taylor, Tucker, Tyler, Upshur, Wayne, Webster, Wetzel, and Wyoming.

Wisconsin

Counties of Ashland, Barron, Bayfield, Buffalo, Burnett, Chippewa, Clark, Door, Douglas, Dunn, Eau Claire, Florence,

Forest, Green, Iron, Lafayette, Langlade, Lincoln, Marathon, Marinette, Menominee, Oconto, Oneida, Pepin, Pierce, Polk, Portage, Price, Rusk, Saint Croix, Sawyer, Shawano, Taylor, Vilas, Washburn, and Waupaca.

Wyoming

Counties of Albany, Big Horn, Campbell, Carbon, Converse, Crook, Fremont, Goshen, Hot Springs, Johnson, Laramie, Lincoln, Natrona, Niobrara, Park, Platte, Sheridan, Sublette, Sweetwater, Teton, Uinta, Washakie, and Weston.

Republic of the Marshall Islands

Atolls of Utirik and Wotje.

Federated States of Micronesia

State of Kapingamarangi.

Commonwealth of Puerto Rico

Municipalities of Adjuntas, Aguas Buenas, Aibonito, Arroyo, Barranquitas, Bayamon, Cabo Rojo, Caguas, Canovanas, Carolina, Catano, Cayey, Ceiba, Ciales, Cidra, Coamo, Comerio, Corozal, Culebra, Dorado, Fajardo, Guanica, Guayama, Guayanilla, Guaynabo, Gurabo, Hormigueros, Humacao, Jayuya, Juana Diaz, Juncos, Lajas, Las Piedras, Loiza, Luquillo, Maricao, Maunabo, Morovis, Naguabo, Naranjito, Orocovis, Patillas, Penuelas, Ponce, Rio Grande, Sabana Grande, Salinas, San German, San Juan, San Lorenzo, Santa Isabel, Toa Alta, Toa Baja, Trujillo Alto, Utuado, Vega Alta, Vega Baja, Vieques, Villalba, Yabucoa, and Yauco.

Virgin Islands of the United States

Islands of Saint Croix, Saint John, and Saint Thomas.

Request for Additional Comments on Issues under § 1400Z-2 Regarding Investments in Qualified Opportunity Funds and Qualified Opportunity Zone Businesses

Notice 2026-55

SECTION 1. PURPOSE

This notice requests comments on issues arising under § 1400Z-2 of the Internal Revenue Code (Code)¹, as amended by § 70421 of Public Law 119-21, 139 Stat. 72 (July 4, 2025), commonly known as the One, Big, Beautiful Bill Act (OBBBA), regarding investments in businesses located in qualified opportunity zones (QOZs), including on whether additional guidance is needed under § 1400Z-2 to address issues relating to qualifying investments of amounts of eligible gains made by taxpayers in qualified opportunity funds (QOFs) and investments of such funds made by QOFs in qualified opportunity zone businesses (QOZBs).²

SECTION 2. BACKGROUND

.01 *Statutory Framework.* Section 13823 of Public Law 115-97, 131 Stat. 2054, 2183-88 (December 22, 2017), commonly known as the Tax Cuts and Jobs Act (TCJA), added §§ 1400Z-1 and 1400Z-2 to the Code. Section 41115 of the Bipartisan Budget Act of 2018 (BBA 2018), Public Law 115-123, 132 Stat. 64, 161 (February 9, 2018), amended § 1400Z-1 to add a special rule for Puerto Rico. Section 70421 of the OBBBA amended prior §§ 1400Z-1 and 1400Z-2 in several ways, including establishing ongoing tax incentives for investing in qualified opportunity funds (QOFs). All references hereinafter in this notice to “prior § 1400Z-1” and “prior § 1400Z-2” refer to §§ 1400Z-1 and 1400Z-2, as in effect after amendment of the Code by both § 13823 of the TCJA,

and by § 41115 of the BBA 2018, but prior to amendment by § 70421 of the OBBBA. All references in this notice to “§ 1400Z-1” and “§ 1400Z-2” refer to §§ 1400Z-1 and 1400Z-2 as amended by § 70421 of the OBBBA.

Section 1400Z-2 allows the deferral of inclusion in gross income for certain realized gains to the extent that corresponding amounts are timely invested in a corporation or partnership that meets the requirements to be certified as a QOF. If certain qualifications and holding period requirements are met, then (i) a portion of such deferred gains may be excluded from gross income, and (ii) gain on the taxpayer’s investment of such amounts in a QOF may be excludable from gross income. Additionally, § 1400Z-2(e)(4) expressly delegates authority to the Secretary of the Treasury or the Secretary’s delegate (Secretary) to prescribe such regulations as may be necessary or appropriate to carry out the purposes of § 1400Z-2, including: rules for the certification of QOFs; rules to ensure a QOF has a reasonable period of time to reinvest the return of capital from investments in QOZ stock and QOZ partnership interests, and to reinvest proceeds received from the sale or disposition of qualified opportunity zone property (QOZP); and rules to prevent abuse.

For amounts invested in QOFs after December 31, 2026, the OBBBA amendments to prior § 1400Z-2(b) generally provide that deferred gain is included in gross income no later than five years after the date of the qualifying investment. If an investment is held for at least five years, its basis is increased by 10 percent of the deferred gain, or by 30 percent in the case of an investment in a qualified rural opportunity fund (QROF).

For investments made after December 31, 2026, the OBBBA also amended § 1400Z-2(c) to provide that for an investment held for at least 10 years for which the taxpayer makes the election under § 1400Z-2(c), the basis of the investment is generally its fair market value on the date of sale or exchange if the investment is sold before the date that is 30 years after the investment date. In any other case, the

basis is its fair market value on the date that is 30 years after the investment date.

In addition, for QOZP acquired after December 31, 2026, the OBBBA amendments to § 1400Z-2(d) replaced the former “December 31, 2017,” acquisition-date references with requirements determined by reference to an “applicable start date” for qualified opportunity zone business property (QOZBP) and an “applicable date” for QOZ stock and QOZ partnership interests.

.02 *Regulations and Other Guidance under §§ 1400Z-1 and 1400Z-2.*

In early 2020, the Department of the Treasury (Treasury Department) and the Internal Revenue Service (IRS) published final regulations (T.D. 9889) in the *Federal Register* (85 F.R. 1866 (Jan. 13, 2020), corrected by 85 F.R. 19082 (Apr. 6, 2020)) under § 1400Z-2 (§ 1400Z-2 regulations). The § 1400Z-2 regulations are comprised of §§ 1.1400Z2(a)-1 through 1.1400Z2(f)-1 and include rules concerning eligible taxpayers and eligible gains, the 180-day investment period, inclusion events that end deferral of gains, the election under § 1400Z-2(c), the 90-percent investment standard for QOFs, and requirements for qualification as a QOZB, QOZB working capital safe harbors, leased property, original use, and substantial improvement of property under § 1400Z-2.

In 2021, the Treasury Department and the IRS published a notice of proposed rulemaking in the *Federal Register* (86 F.R. 19585), which proposed rules for the reduction or elimination of withholding under §§ 1445, 1446(a), or 1446(f) of the Code on transfers that give rise to gain that is deferred under § 1400Z-2(a) and for modifications to the working capital safe harbor.

After the enactment of the OBBBA, the Treasury Department and the IRS published Notice 2025-50, 2025-43 I.R.B. 542 (2025), to provide guidance concerning the definition of a “rural area” under § 1400Z-2(b)(2)(C)(ii) and the application of the reduced substantial-improvement threshold for property in a QOZ comprised entirely of a rural area. In addition,

¹ Unless otherwise specified, all “section” or “§” references are to sections of the Code or the Income Tax Regulations (26 CFR part 1).

² Unless otherwise defined, terms used in this notice have the meanings, as applicable, provided in Notice 2025-50, 2025-43 I.R.B. 542, Rev. Proc. 2026-14, 2026-20 I.R.B. 910, Notice 2026-40, 2026-28 I.R.B. 33, or §§ 1.1400Z2(a)-1 through 1.1400Z2(f)-1 and the regulations thereunder.

the Treasury Department and the IRS published Rev. Proc. 2026-14, 2026-20 I.R.B. 910 (2026), to provide procedures under § 1400Z-1 for State chief executive officers to nominate population census tracts for QOZ designation effective January 1, 2027.

In July 2026, the Treasury Department and the IRS published Notice 2026-40, 2026-28 I.R.B. 33 (2026), to provide transitional guidance concerning the designation rules under § 1400Z-1, investors with gains and qualifying investments that span the December 31, 2026, transition date, the acquisition of QOZP after December 31, 2026, in previously designated QOZs, and the continued operation of QOFs and QOZBs after a previously designated QOZ's designation period expires. On September 11, 2026, the Treasury Department and the IRS published proposed regulations concerning the new information-reporting requirements and updated QOF certification and decertification procedures under §§ 1400Z-2, 6039K, and 6039L (91 F.R. 57968).

SECTION 3. REQUEST FOR COMMENTS

.01 *Comments Regarding Need for Additional Guidance.* The Treasury Department and the IRS request additional comments on all aspects of the implementation of § 1400Z-2 following the amendments made by the OBBBA. Commenters are encouraged to identify provisions of the § 1400Z-2 regulations or other guidance that should be retained, modified, or supplemented, and to describe in technical detail the legal analysis supporting any such changes based on the statutory text of § 1400Z-2 and other applicable provisions of the Code. Additional comments describing common transaction structures or factual examples in which existing guidance produces uncertain results would be particularly helpful. In addition to comments of a general nature, the Treasury Department and the IRS request comments in response to specific questions as discussed below.

(1) *Executive Order 14394.* Section 5(a) and (b) of Executive Order 14394 of March 13, 2026, *Removing Regulatory Barriers to Affordable Home Construction* (91 F.R. 13207), directs the Secretary

and the Secretary of Housing and Urban Development to jointly evaluate Administration actions to better align programs and incentives with Opportunity Zone tax incentives to expand investment in single-family home construction, including considering lawful mechanisms to link grants, financing tools, or other incentives with new or increased investment in QOFs engaged in the development and sale of single-family homes.

(a) Comments are requested on actions, consistent with existing statutory authority, through which the tax incentives provided by § 1400Z-2 could better support Department of Housing and Urban Development (HUD) programs and incentives to expand investment in single-family home construction, including considering lawful mechanisms to link grants, financing tools, or other incentives with new or increased investment in QOFs engaged in the development and sale of single-family homes. Specifically, comments are requested on any opportunities that exist to coordinate § 1400Z-2 with the New Markets Tax Credit under § 45D to promote single-family home construction in census tracts that qualify both as QOZs and as low-income communities for the purposes of the New Markets Tax Credit.

(b) Taking into account the preamble discussions of legal authority published in the *Federal Register* at 84 F.R. 18652, 18660 (May 1, 2019), and at 85 F.R. 1866, 1931-1932 (January 13, 2020), including the conclusion in the preamble to the 2020 final regulations that § 1400Z-2 permits gain deferral only at the QOF-owner level and that asset-level nonrecognition must arise under another provision of subtitle A of the Code (subtitle A), what statutory or legal authority, including § 1400Z-2(e)(4)(B), the broader grants of authority in § 1400Z-2(e)(4) and § 7805(a), or any grant of authority under another provision of the Code, is there that would support regulations under which some or all income or gain realized by a QOF engaged in developing and selling single-family homes would be deferred from inclusion in gross income if the QOF reinvests the proceeds from selling its housing inventory into its trade or business within a reasonable period of time? Commenters recommending any particular interpretation of the law are requested to set forth

their legal analysis clearly and in detail, including how any such rules would interact with otherwise applicable recognition rules under subtitle A and the anti-abuse rule of § 1400Z-2(e)(4)(C). Comments are specifically requested on whether the legal analysis would differ between (i) income or gain from a QOF's direct sale or disposition of housing inventory and (ii) gain from a QOF's sale or disposition of QOZ stock or a QOZ partnership interest in a QOZB engaged in developing and selling single-family homes. Commenters are also requested to provide additional legal analysis regarding the authority under which inclusion in gross income of income or gain from the sale or disposition of housing inventory allocated to a QOF from a QOZB classified as a partnership for Federal income tax purposes could be deferred.

(c) If there were adequate statutory authority to defer inclusion in gross income of any income or gain realized on the sale or disposition of housing inventory, when should the deferred income or gain be included in gross income, and what reinvestment, holding-period, basis, character (that is, ordinary or capital), or other limitations or clarifications would be necessary to tailor any "interim-gain" rule to the limits of that statutory authority? For example, would changes to the definition of QOZBP be required, such as the rules for substantial improvement under § 1400Z-2(d)(2)(D)(ii)?

(d) Should any such deferral be limited to businesses engaged in developing and selling single-family homes, rather than making it available to other inventory selling businesses? What administrable eligibility criteria and anti-abuse safeguards would be necessary to define and enforce that limitation?

(2) *Working capital safe harbor.* An eligible entity must meet certain requirements to be a QOZB, including the requirement of § 1397C(b)(8) of the Code that less than 5 percent of the average of the aggregate unadjusted bases of the entity's property be attributable to non-qualified financial property, as defined in § 1397C(e). See § 1400Z-2(d)(3)(A)(ii). Section 1397C(e) excludes from non-qualified financial property reasonable amounts of working capital that are held in cash, cash equivalents, or debt instru-

ments with a term of 18 months or less. *See* § 1.1400Z2(d)-1(d)(3)(iv). The § 1400Z-2 regulations provide QOZBs with a safe harbor for treating an amount of working capital as reasonable for purposes of § 1397C(e) if certain requirements are satisfied (working capital safe harbor). *See* § 1.1400Z2(d)-1(d)(3)(v) (providing the scope of the working capital safe harbor and conditions for eligibility).

(a) Should a QOZB be permitted to modify a working capital safe harbor plan? If so, under what circumstances should the modifications be permitted? Should a modified plan be required to remain “substantially consistent” with the original plan? How should “substantially consistent” be defined? How should these rules apply when a QOZB has more than one overlapping or sequential application of the working capital safe harbor under § 1.1400Z2(d)-1(d)(3)(v)(E)?

(b) The Treasury Department and the IRS have received questions regarding the expenditure of working capital assets on property that may not be QOZBP. Section 1.1400Z2(d)-1(d)(2) provides that a QOZB must satisfy the 70-percent tangible property standard, which requires that at least 70 percent of the tangible property owned or leased by a QOZB is QOZBP. What additional rules or guidance would be useful in clarifying how expenditures of working capital assets affect the 70-percent tangible property standard?

(3) *Rules for operating businesses.* What additional guidance would help operating businesses to benefit from the tax incentives in § 1400Z-2? For example, is additional guidance needed regarding the use of QOZBP, including inventory, in QOZs?

(4) *Election for investments held for at least 10 years and the 30-year rule.* For qualifying investments made after December 31, 2026, § 1400Z-2(c) provides a fair market value basis rule for a qualifying investment held for at least 10 years, subject to a 30-year limit. What additional guidance is needed concerning the time and manner of making the § 1400Z-2(c) election in the case of an investment that has not been sold or exchanged by the date that is 30 years after the investment was made? What valuation rules or substantiation requirements would be appropriate for determining fair market value on that

date? How should subsequent appreciation or depreciation be treated after basis is determined by reference to fair market value on the 30-year date? What modifications to § 1.1400Z2(c)-1 are needed for QOFs classified as partnerships or S corporations, including rules governing dispositions of QOF assets and interests held through pass-through entities?

(5) *Additional guidance for QOFs, QOZBs, and inclusion events.*

(a) Are additional rules needed regarding corporations and partnerships that are either QOFs, QOZBs, or investors in QOFs?

(b) Should gain arising from an inclusion event be eligible for deferral under § 1.1400Z2(a)-1(b)(11)(iv) only if the inclusion event is treated as a sale or exchange?

(c) Should the rules regarding the inclusion of the deferred gain under § 1400Z-2(b) be clarified in regulations to address situations where there are debt-financed distributions or debt-financed losses that impact the calculation of the deferred gain?

(d) Should the rules regarding disguised sales under § 1.1400Z2(a)-1(c)(2) be modified?

(6) *Opportunity Zone investment in Tribal and Alaska Native communities.* Certain population census tracts designated as QOZs overlap with areas in Tribal and Alaska Native communities, including trust lands, Alaska Native Villages, and Tribal areas in Oklahoma. The OBBBA amendments to § 1400Z-2 provide enhanced benefits for qualifying investments in rural areas. The Treasury Department and the IRS request comments on how the Opportunity Zone incentive has been used in Tribal and Alaska Native communities, as well as any suggested clarifications that may encourage investment in QOZs on Tribal and ANCSA lands.

.02 *Procedures for Submitting Comments.*

(1) *Deadline.* Written comments should be submitted by November 23, 2026. Consideration will be given, however, to any written comment submitted after November 23, 2026, if such consideration will not delay the issuance of guidance.

(2) *Form and manner.* The subject line for the comments should include a refer-

ence to Notice 2026-55. All commenters are strongly encouraged to submit comments electronically. Comments may be submitted in one of two ways:

(a) Electronically via the Federal eRulemaking Portal at <https://www.regulations.gov> (type IRS-2026-1156 in the search field on the <https://www.regulations.gov> homepage to find this notice and submit comments); or

(b) By mail to: Internal Revenue Service, CC:PA:LPD:PR (Notice 2026-55), Room 5203, P.O. Box 7604, Ben Franklin Station, Washington, DC 20044.

(3) *Publication of comments.* The Treasury Department and the IRS will publish for public availability any comment submitted electronically or on paper to the IRS’s public docket on <https://www.regulations.gov>.

SECTION 4. DRAFTING AND CONTACT INFORMATION

The principal author of this notice is the Office of Associate Chief Counsel (Income Tax & Accounting).

Update for Weighted Average Interest Rates, Yield Curves, and Segment Rates

Notice 2026-57

This notice provides guidance on the corporate bond monthly yield curve, the corresponding spot segment rates used under § 417(e)(3), and the 24-month average segment rates under § 430(h)(2) of the Internal Revenue Code. In addition, this notice provides guidance as to the interest rate on 30-year Treasury securities under § 417(e)(3)(A)(ii)(II) as in effect for plan years beginning before 2008 and the 30-year Treasury weighted average rate under § 431(c)(6)(E)(ii)(I).

YIELD CURVE AND SEGMENT RATES

Section 430 specifies the minimum funding requirements that apply to sin-

gle-employer plans (except for CSEC plans under § 414(y)) pursuant to § 412. Section 430(h)(2) specifies the interest rates that must be used to determine a plan's target normal cost and funding target. Under this provision, present value is generally determined using three 24-month average interest rates ("segment rates"), each of which applies to cash flows during specified periods. To the extent provided under § 430(h)(2)(C)(iv), these segment rates are adjusted by the applicable percentage of the 25-year average segment rates for the period ending September 30 of the year preceding the calendar year in which the plan year begins.¹ However, an election may be made under § 430(h)(2)(D)(ii) to use the monthly yield curve in place of the segment rates.

Section 1.430(h)(2)-1(d) provides rules for determining the monthly corporate bond yield curve, and § 1.430(h)

(2)-1(c) provides rules for determining the 24-month average corporate bond segment rates used to compute the target normal cost and the funding target. Consistent with the methodology specified in § 1.430(h)(2)-1(d), the monthly corporate bond yield curve derived from August 2026 data is in Table 2026-8 at the end of this notice. The spot first, second, and third segment rates for the month of August 2026 are, respectively, 4.65, 5.75, and 6.73.

The 24-month average segment rates determined under § 430(h)(2)(C)(i) through (iii) must be adjusted pursuant to § 430(h)(2)(C)(iv) to be within the applicable minimum and maximum percentages of the corresponding 25-year average segment rates. Those percentages are 95% and 105% for plan years beginning in 2025, 2026 and 2027. For this purpose, any 25-year average seg-

ment rate that is less than 5% is deemed to be 5%. The 25-year average segment rates for plan years beginning in 2025 and 2026 were published in Notice 2024-67, 2024-41 I.R.B. 726 and Notice 2025-47, 2025-40 I.R.B. 441, respectively. For plan years beginning in 2027, based on the segment rates applicable for October 2001 to September 2026, the 25-year averages for the period ending September 30, 2026, of the first, second, and third segment rates are 3.13, 4.91, and 5.61 percent, respectively.

24-MONTH AVERAGE CORPORATE BOND SEGMENT RATES

The three 24-month average corporate bond segment rates applicable for September 2026 without adjustment for the 25-year average segment rate limits are as follows:

<i>24-Month Average Segment Rates Without 25-Year Average Adjustment</i>			
Applicable Month	First Segment	Second Segment	Third Segment
September 2026	4.36	5.32	6.02

The adjusted 24-month average segment rates set forth in the chart below reflect § 430(h)(2)(C)(iv) of the Code. The

24-month averages applicable for September 2026, adjusted to be within the applicable minimum and maximum percent-

ages of the corresponding 25-year average segment rates in accordance with § 430(h)(2)(C)(iv), are as follows:

<i>Adjusted 24-Month Average Segment Rates</i>				
For Plan Years Beginning In	Applicable Month	First Segment	Second Segment	Third Segment
2025	September 2026	4.75	5.31	6.02
2026	September 2026	4.75	5.25	5.99
2027	September 2026	4.75	5.25	5.89

30-YEAR TREASURY SECURITIES INTEREST RATES

Section 431 specifies the minimum funding requirements that apply to multiemployer plans pursuant to § 412. Section 431(c)(6)(B) specifies a minimum amount for the full-funding limitation described in § 431(c)(6)(A), based on the plan's current liability. Section 431(c)(6)

(E)(ii)(I) provides that the interest rate used to calculate current liability for this purpose must be no more than 5 percent above and no more than 10 percent below the weighted average of the rates of interest on 30-year Treasury securities during the four-year period ending on the last day before the beginning of the plan year. Notice 88-73, 1988-2 C.B. 383, provides guidelines for determining the weighted

average interest rate. The rate of interest on 30-year Treasury securities for August 2026 is 5.23 percent. The Service determined this rate as the average of the daily determinations of yield on the 30-year Treasury bond maturing in May 2056 determined each day through August 12, 2026 and the yield on the 30-year Treasury bond maturing in August 2056 determined each day for the balance of

¹ Pursuant to § 433(h)(3)(A), the third segment rate determined under § 430(h)(2)(C) is used to determine the current liability of a CSEC plan (which is used to calculate the minimum amount of the full funding limitation under § 433(c)(7)(C)).

the month. For plan years beginning in September 2026, the weighted average of the rates of interest on 30-year Treasury securities and the permissible range of rates used to calculate current liability are as follows:

For Plan Years Beginning In September 2026	<i>Treasury Weighted Average Rates</i>	
	30-Year Treasury Weighted Average	Permissible Range 90% to 105%
	4.63	4.16 to 4.86

MINIMUM PRESENT VALUE SEGMENT RATES

In general, the applicable interest rates

under § 417(e)(3)(D) are segment rates computed without regard to a 24-month average. Section 1.417(e)-1(d)(3) provides guidelines for determining the minimum

present value segment rates. Pursuant to that section, the minimum present value segment rates determined for August 2026 are as follows:

Month	<i>Minimum Present Value Segment Rates</i>		
	First Segment	Second Segment	Third Segment
August 2026	4.65	5.75	6.73

DRAFTING INFORMATION

The principal author of this notice is Tom Morgan of the Office of Associ-

ate Chief Counsel (Employee Benefits, Exempt Organizations, and Employment Taxes). However, other personnel from the IRS participated in the development

of this guidance. For further information regarding this notice, contact Mr. Morgan at 202-317-6700 or Tony Montanaro at 626-927-1475 (not toll-free calls).

Table 2026-8
Monthly Yield Curve for August 2026
Derived from August 2026 Data

<i>Maturity</i>	<i>Yield</i>	<i>Maturity</i>	<i>Yield</i>	<i>Maturity</i>	<i>Yield</i>	<i>Maturity</i>	<i>Yield</i>	<i>Maturity</i>	<i>Yield</i>
0.5	4.13	20.5	6.24	40.5	6.79	60.5	6.92	80.5	6.98
1.0	4.31	21.0	6.26	41.0	6.79	61.0	6.92	81.0	6.98
1.5	4.46	21.5	6.28	41.5	6.80	61.5	6.92	81.5	6.98
2.0	4.59	22.0	6.31	42.0	6.80	62.0	6.92	82.0	6.99
2.5	4.68	22.5	6.34	42.5	6.81	62.5	6.92	82.5	6.99
3.0	4.75	23.0	6.36	43.0	6.81	63.0	6.93	83.0	6.99
3.5	4.81	23.5	6.39	43.5	6.81	63.5	6.93	83.5	6.99
4.0	4.86	24.0	6.41	44.0	6.82	64.0	6.93	84.0	6.99
4.5	4.92	24.5	6.44	44.5	6.82	64.5	6.93	84.5	6.99
5.0	4.97	25.0	6.46	45.0	6.83	65.0	6.93	85.0	6.99
5.5	5.03	25.5	6.49	45.5	6.83	65.5	6.94	85.5	6.99
6.0	5.09	26.0	6.51	46.0	6.83	66.0	6.94	86.0	6.99
6.5	5.15	26.5	6.53	46.5	6.84	66.5	6.94	86.5	7.00
7.0	5.21	27.0	6.56	47.0	6.84	67.0	6.94	87.0	7.00
7.5	5.28	27.5	6.58	47.5	6.84	67.5	6.94	87.5	7.00
8.0	5.34	28.0	6.60	48.0	6.85	68.0	6.95	88.0	7.00
8.5	5.40	28.5	6.61	48.5	6.85	68.5	6.95	88.5	7.00
9.0	5.46	29.0	6.63	49.0	6.85	69.0	6.95	89.0	7.00
9.5	5.52	29.5	6.64	49.5	6.86	69.5	6.95	89.5	7.00
10.0	5.58	30.0	6.65	50.0	6.86	70.0	6.95	90.0	7.00
10.5	5.63	30.5	6.66	50.5	6.86	70.5	6.95	90.5	7.00
11.0	5.68	31.0	6.67	51.0	6.87	71.0	6.95	91.0	7.00
11.5	5.73	31.5	6.68	51.5	6.87	71.5	6.96	91.5	7.01
12.0	5.77	32.0	6.68	52.0	6.87	72.0	6.96	92.0	7.01
12.5	5.81	32.5	6.69	52.5	6.88	72.5	6.96	92.5	7.01
13.0	5.85	33.0	6.70	53.0	6.88	73.0	6.96	93.0	7.01
13.5	5.89	33.5	6.71	53.5	6.88	73.5	6.96	93.5	7.01
14.0	5.92	34.0	6.71	54.0	6.88	74.0	6.96	94.0	7.01
14.5	5.95	34.5	6.72	54.5	6.89	74.5	6.97	94.5	7.01
15.0	5.98	35.0	6.73	55.0	6.89	75.0	6.97	95.0	7.01
15.5	6.00	35.5	6.73	55.5	6.89	75.5	6.97	95.5	7.01
16.0	6.03	36.0	6.74	56.0	6.90	76.0	6.97	96.0	7.01
16.5	6.05	36.5	6.74	56.5	6.90	76.5	6.97	96.5	7.01
17.0	6.08	37.0	6.75	57.0	6.90	77.0	6.97	97.0	7.02
17.5	6.10	37.5	6.76	57.5	6.90	77.5	6.97	97.5	7.02
18.0	6.12	38.0	6.76	58.0	6.90	78.0	6.98	98.0	7.02
18.5	6.14	38.5	6.77	58.5	6.91	78.5	6.98	98.5	7.02
19.0	6.17	39.0	6.77	59.0	6.91	79.0	6.98	99.0	7.02
19.5	6.19	39.5	6.78	59.5	6.91	79.5	6.98	99.5	7.02
20.0	6.21	40.0	6.78	60.0	6.91	80.0	6.98	100.0	7.02

Eliminating Unnecessary IRS Internal Revenue Bulletin Guidance

Notice 2026-58

SECTION 1. PURPOSE

This notice continues the process of eliminating extraneous and unnecessary items of guidance published in the Internal Revenue Bulletin (I.R.B.) by identifying and obsoleting 71 revenue rulings, revenue procedures, notices, and announcements previously published in the I.R.B. (I.R.B. guidance documents).

SECTION 2. BACKGROUND

On January 31, 2025, the President issued Executive Order 14192, *Unleashing Prosperity Through Deregulation* (E.O. 14192). The purpose of E.O. 14192 includes reducing the economic burden caused by regulation. To further this goal, E.O. 14192 directs agencies to, among other requirements, identify ten existing regulations to be repealed for each regulation publicly proposed for notice and comment or otherwise promulgated.

On February 19, 2025, the President issued Executive Order 14219, *Ensuring Lawful Governance and Implementing the President's 'Department of Government Efficiency' Deregulatory Initiative* (E.O. 14219). The purpose of E.O. 14219 includes eliminating “overbearing and burdensome” regulations and other guidance documents, and “[e]nding Federal overreach.” To further these goals, E.O. 14219 directs agency heads to coordinate with the Department of Government Efficiency (DOGE) Team Leads and the Office of Management and Budget to identify regulations and other guidance documents to be eliminated.

Accordingly, the Department of the Treasury (Treasury Department) and the Internal Revenue Service (IRS) have undertaken a review of regulations and I.R.B. guidance issued under the Internal Revenue Code¹ to identify guidance to be eliminated. This review is ongoing. Notice

2025-22, 2025-19 I.R.B. 1427, obsoleted nine I.R.B. guidance documents. Notice 2025-36, 2025-30 I.R.B. 192, obsoleted 83 I.R.B. guidance documents.

This notice obsoletes 71 I.R.B. guidance documents. These 71 guidance documents no longer provide useful information, and clarifying their status as obsolete will streamline administration of the tax laws; reduce the volume of guidance that taxpayers and their advisors need to review for compliance with the tax laws; and increase clarity of the tax law. The Treasury Department and the IRS anticipate revoking or obsoleting additional similar guidance documents in the near future.

SECTION 3. OBSOLETE GUIDANCE

.01 Section 9674(a) of the American Rescue Plan Act of 2021, Public Law 117-2, 153 Stat. 4 (2021) (ARP) was repealed by section 70432 of Public Law 119-21, 139 Stat. 72 (2025), commonly known as the One, Big, Beautiful Bill Act. The following guidance is obsolete because it provides transition periods for IRS enforcement and administration of the minimum reporting threshold in section 6050W(e) for Form 1099-K, *Payment Card and Third Party Network Transactions*, based on the now-repealed section 9674(a) of the ARP:

(1) Notice 2024-85, *Revised Timeline Regarding Implementation of Amended Section 6050W(e)*, 2024-51 I.R.B. 1349. This notice provides that calendar years 2024 and 2025 are transition periods for implementing the now-repealed section 9674(a) of the ARP.

(2) Notice 2023-74, *Revised Timeline Regarding Implementation of Amended Section 6050W(e)*, 2023-51 I.R.B. 1484. This notice provides that calendar year 2023 is a transition period for implementing the now-repealed section 9674(a) of the ARP.

(3) Notice 2023-10, *Revised Timeline Regarding Implementation of Amended Section 6050W(e)*, 2023-3 I.R.B. 403. This notice provides that calendar year 2022 is a transition period for implement-

ing the now-repealed section 9674(a) of the ARP.

.02 The following guidance is obsolete because it concerns Code sections that were repealed by section 13404(a) of Public Law 115-97, 131 Stat. 2054 (2017), commonly known as the Tax Cuts and Jobs Act (TCJA):

(1) Notice 2010-17, *Qualified School Construction Bond Allocations for 2010*, 2010-14 I.R.B. 519. This notice provides the face amount of qualified school construction bonds allocated by the Treasury Department to each state and large local education agency for 2010 under now-repealed section 54F(d).

(2) Notice 2008-70, *Qualified Forestry Conservation Bonds*, 2008-36 I.R.B. 575. This notice solicits applications for authority to issue qualified forestry conservation bonds under now-repealed section 54B(c).

(3) Notice 2007-56, *Change of Address for Submission of CREBs Applications*, 2007-27 I.R.B. 15. This notice changes the address to submit by mail applications for allocation of the available volume cap for clean renewable energy bonds under now-repealed section 54.

(4) Announcement 2010-54, *Applications from Cooperative Electrical Companies for Authority to Issue New Clean Renewable Energy Bonds Now Being Accepted by the IRS*, 2010-38 I.R.B. 386. This announcement solicits applications from cooperative electrical companies for previously unallocated volume cap authority to issue new clean renewable energy bonds under now-repealed section 54C.

.03 The following guidance was obsoleted by the enactment of section 2053(c) (1)(D) (disallowing an estate tax deduction for interest attributable to extensions of time for payment of tax under section 6166) in section 503(b)(1) of the Taxpayer Relief Act of 1997, Public Law 105-34, 111 Stat. 788 (1997):

(1) Rev. Rul. 78-125, *Interest on Installment Payment of Tax*, 1978-1 C.B. 292. This revenue ruling holds that interest payable on estate tax installments under section 6166 is deductible as an administration expense under section 2053(a)(2).

¹ Unless otherwise specified, all “section” or “§” references are to sections of the Internal Revenue Code (Code) or the Internal Revenue Regulations (CFR Title 26).

(2) Rev. Proc. 81-27, 1981-27 I.R.B. 20. This revenue procedure sets forth the procedure to be followed by an estate when installment payments due under sections 6166 or 6166A are recomputed because of a reduction in the estate tax caused by the payment of interest on the tax due.

.04 The following guidance is obsolete because it relates to Code sections that have been amended or repealed:

(1) Rev. Rul. 90-85, *Passive Losses and Tax Shelter Registration*, 1990-42 I.R.B. 5. This revenue ruling holds that representations concerning certain losses of a passive activity under section 469(c) have no effect on the computation of an investor's tax shelter ratio for purposes of section 6111. Section 6111 was amended by section 815(a) of the American Jobs Creation Act of 2004, Public Law 108-357, 118 Stat. 1418 (2004).

(2) Rev. Rul. 82-174, *Windfall Profit Tax; Deduction; Accrual Method of Accounting*, 1982-42 I.R.B. 6. This revenue ruling addresses when an accrual method producer of crude oil may deduct the windfall profit tax under section 4995. The revenue ruling also addresses when cash method producers of crude oil are required to reduce their deduction for refunds or credits of the windfall profit tax. Section 4995 was repealed by section 1941(a) of the Omnibus Trade and Competitiveness Act of 1988, Public Law 100-418, 102 Stat. 1107 (1988) (1988 Omnibus Act).

(3) Rev. Rul. 81-99, *Windfall Profit Tax; When Deductible*, 1981-13 I.R.B. 32. This revenue ruling addresses when a cash method producer of crude oil may deduct the windfall profits tax imposed under section 4995. Section 4995 was repealed by section 1941(a) of the 1988 Omnibus Act.

(4) Rev. Rul. 75-112, *Ratable Inclusion of Interest; Church Bonds*, 1975-1 C.B. 274. This revenue ruling generally concludes that the original issue discount ratable inclusion rules in section 1232(a) (3) apply to bonds that are issued by a church and provide for a redemption price in excess of the issue price. Section 1232 was repealed by section 42(a)(1) of the Deficit Reduction Act of 1984, Public Law 98-369, 98 Stat. 494 (1984) (DEFRA). However, see section 1272 for the original

issue discount inclusion rules that apply to bonds and other debt instruments.

(5) Rev. Rul. 56-60, 1956-1 C.B. 443. This revenue ruling holds that the alternate valuation date election cannot be taken in circumstances where the gross estate on the date of death is below the statutory exemption. This rule is now addressed in section 2032(c), which was amended by section 1023(a) of DEFRA, and § 20.2032-1(b)(1), which provide that the election must decrease the gross estate and the estate tax.

(6) Rev. Rul. 55-333, 1955-1 C.B. 449. This revenue ruling holds that section 811(j) of the Internal Revenue Code of 1939 does not limit application thereof to the estates of decedents that have decreased in value during the one-year period following the date of death. This guidance was obsoleted when section 1023(a) of DEFRA amended section 2032(c).

(7) Rev. Rul. 54-106, 1954-1 C.B. 28. This revenue ruling generally concludes that bonds issued by a municipality for the purpose of financing the acquisition or construction of municipally owned industrial plants for lease to private enterprises constitute obligations of a political subdivision within the meaning of section 22(b)(4) of the Internal Revenue Code of 1939. The analysis in this revenue ruling was obsoleted by the enactment of statutes governing the tax-exemption of industrial development bonds in section 107 of the Revenue and Expenditure Control Act of 1968, Public Law 90-364, 82 Stat. 251 (1968).

(8) Notice 2010-51, *Information Reporting Under the Amendments to Section 6041 for Payments to Corporations and Payments of Gross Proceeds and With Respect to Property*, 2010-29 I.R.B. 83. This notice solicits public comments regarding guidance to be provided to payors and other persons affected by the amendments to section 6041 by section 9006 of the Patient Protection and Affordable Care Act of 2010, Public Law 111-148, 124 Stat. 119 (2010), which expanded the information reporting requirements under that section to apply to payments made by corporations and to include payments of gross proceeds with respect to property. This amendment was repealed by section 2(a) of the Compre-

hensive 1099 Taxpayer Protection and Repayment of Exchange Subsidy Overpayments Act of 2011, Public Law 112-9, 125 Stat. 36 (2011).

(9) Notice 98-57, *D.C. Enterprise Zone/Census Tracts*, 1998-47 I.R.B. 9. This notice provides the identification of those census tracts in the District of Columbia constituting the District of Columbia Enterprise Zone for purposes of section 1400 and the DC Zone for purposes of section 1400B. Sections 1400 and 1400B were repealed by division T, title IV, section 401(d)(4)(A) of the Consolidated Appropriations Act, 2018, Public Law 115-141, 132 Stat. 348 (2018).

(10) Notice 96-8, *Cash Balance Pension Plans*, 1996-6 I.R.B. 23. This notice provides guidance concerning the requirements of sections 411(a) and 417(e) with respect to the determination of the amount of a single sum distribution from a cash balance plan. This guidance was obsoleted by section 701(b) of the Pension Protection Act of 2006, Public Law 109-280, 120 Stat. 780 (2006), which enacted section 411(a)(13) and (b)(5) of the Code.

(11) Notice 93-7, *Changes in Withholding on Gambling Winnings*, 1993-3 I.R.B. 14. This notice announced an increase to the withholding rate and gambling proceeds threshold under section 3402(q) made by the 1992 Energy Policy Act of 1992, Public Law 102-486, 106 Stat. 2776 (1992). The withholding rate change it announced was subsequently changed by section 101(c)(8) of the Economic Growth and Tax Relief Reconciliation Act of 2001, Public Law 107-16, 115 Stat. 38 (2001), making this notice obsolete.

.06 Rev. Proc. 98-47, *Business Expense; Environmental Remediation Costs; Election*, 1998-37 I.R.B. 8. This revenue procedure provides procedures to make the election to deduct qualified environmental remediation expenditures under section 198. Pursuant to section 198(h), section 198 is not applicable to expenditures paid or incurred after December 31, 2011, so the guidance is obsolete.

.07 The following guidance is obsolete because the subject matter is now addressed by final regulations:

(1) Rev. Rul. 2000-4, *Business Expenses, Capital Expenditures; ISO 9000 Costs*, 2000-4 I.R.B. 331. This revenue ruling describes when costs incurred

to obtain, maintain, and renew ISO 9000 certification are deductible as ordinary and necessary business expenses under section 162 or must be capitalized under section 263(a). This issue is now addressed in §§ 1.263(a)-4(d)(4)(i) (memberships and privileges) and 1.263(a)-4(d)(4)(ii) Example 4 (business process certification).

(2) Rev. Rul. 98-25, *Business Expenses; Storage Tanks*, 1998-19 I.R.B. 4. This revenue ruling addresses whether costs incurred to replace underground storage tanks containing waste products (including the cost of removing, cleaning, and disposing of the old tanks, and acquiring, installing, and filling the new tanks) are deductible as ordinary and necessary business expenses under section 162 or must be capitalized under section 263(a). This issue is now addressed in §§ 1.162-3 (non-incidental materials and supplies) and 1.263(a)-2 (amounts paid to acquire or produce tangible property).

(3) Rev. Rul. 94-12, *Incidental Repairs as Business Expenses*, 1994-8 I.R.B. 5. This revenue ruling holds that *Indopco, Inc. v. Commissioner*, 503 U.S. 79 (1992), does not affect the treatment of incidental repair costs as business expenses, which are generally deductible under section 162. This issue is now addressed in §§ 1.162-4 (repair and maintenance) and 1.263(a)-3 (amounts paid to improve tangible property).

(4) Rev. Rul. 89-23, *Inventories; Package Design Costs*, 1989-10 I.R.B. 4. This revenue ruling addresses whether costs incurred in connection with the development and design of package designs must be capitalized under section 263A. This issue is now addressed in §§ 1.263(a)-4(b)(3)(v) (creation of package design) and 1.263A-1 (uniform capitalization of costs).

(5) Rev. Rul. 88-77, *Partnerships; Basis; Liabilities*, 1988-38 I.R.B. 8. This revenue ruling defines “liabilities of a partnership” or “partnership liabilities” within the meaning of section 752 as excluding accrued but unpaid expenses and accounts payable. This definition is now in § 1.752-1(a).

(6) Rev. Rul. 88-57, *Capital Expenditures; Rehabilitation of Railroad Cars*, 1988-28 I.R.B. 4. This revenue ruling addresses whether cyclical expenditures for major rehabilitations of railroad

freight-train cars are deductible as ordinary and necessary business expenses under section 162 or must be capitalized under section 263(a). This issue is now addressed in §§ 1.263(a)-3(k)(5) (rebuild to like-new condition) and 1.263(a)-3(k)(7) Example 7 (rebuild of property to like-new condition before end of class life).

(7) Rev. Rul. 70-248, 1970-1 C.B. 172. This revenue ruling addresses whether an amount paid as consideration for the assignment of a California “on sale” liquor business license is a capital investment and whether the amount is subject to a deduction for depreciation or obsolescence. This issue is now addressed in §§ 1.263(a)-4(d)(5)(i) (certain rights obtained from a government agency) and 1.263(a)-4(d)(5)(ii) Example 1 (business license).

(8) Rev. Rul. 69-615, 1969-2 C.B. 26. This revenue ruling addresses whether fees paid to a registrar and transfer agent for the maintenance of capital stock records, not related to the original issue of the stock, merger, consolidation, or stock dividends, are deductible as ordinary and necessary business expenses under section 162 or must be capitalized under section 263(a). This issue is now addressed in § 1.263(a)-5(c)(7) (registrar and transfer agent fees for the maintenance of capital stock records).

(9) Rev. Rul. 69-330, 1969-1 C.B. 51. This revenue ruling addresses whether legal and accounting expenditures incurred by a corporation in connection with the registration of its stock with the Securities and Exchange Commission (SEC) are deductible as ordinary and necessary business expenses under section 162 or must be capitalized under section 263(a). This issue is now addressed in §§ 1.263(a)-5(a)(8) (requiring the capitalization of amounts paid to facilitate a stock issuance) and 1.263(a)-5(l) Example 1 (payments to outside counsel to assist in registering stock with the SEC).

(10) Rev. Rul. 68-607, 1968-2 C.B. 115. This revenue ruling addresses whether expenditures made by a taxpayer for improvements on a state-owned highway right-of-way to provide ingress and egress to the taxpayer’s shopping center developed on leased land are capital expenditures under section 263 and whether the expenditures are amortizable over the term of the lease under section 167. This

issue is now addressed in §§ 1.263(a)-4(d)(8) (certain benefits arising from the provision, production, or improvement of real property) and 1.263(a)-4(d)(8)(v) Example 3 (dedicated improvements).

(11) Rev. Rul. 56-290, 1956-1 C.B. 445. This revenue ruling holds that, if a decedent’s income is reported on a joint return filed by the decedent and the decedent’s spouse, only a portion of the joint tax liability reported on that return is deductible as a debt of the decedent under section 2053 for estate tax purposes. The deductible portion is determined by calculating each spouse’s separate tax liability, as if they had filed separately, and multiplying the joint tax liability by the ratio of the decedent’s separate tax liability to the total of the separate tax liabilities. This rule is now addressed by § 20.2053-6(f).

(12) Rev. Rul. 57-78, 1957-1 C.B. 300. This revenue ruling holds that, in computing the separate tax liabilities of spouses (as described in Rev. Rul. 56-290), the decedent’s separate income tax liability is computed on the decedent’s income for the portion of the year prior to the date of death, and the spouse’s separate tax liability is computed on the spouse’s income for the entire year. This rule is now addressed by § 20.2053-6(f).

(13) Rev. Rul. 55-334, 1955-1 C.B. 449. This revenue ruling holds that the tax due with respect to gifts made by the decedent and paid by his executors is deductible under section 812(b) of the Internal Revenue Code of 1939 as a tax accrued prior to the decedent’s death, constituting an enforceable obligation of the decedent existing at the time of death. This rule is now addressed by §§ 20.2012-1(a) and 20.2053-6(d).

(14) Rev. Rul. 54-135, 1954-1 C.B. 205. This revenue ruling holds that where a donor endorses a certificate of stock and delivers it to his bank or broker with direction to have it transferred to a donee, the gift is completed for gift tax purposes on the date the stock is transferred to the donee on the books of the corporation. This rule is now provided in § 25.2511-2(h).

.08 The following guidance is obsolete because it relates to past years and is not applicable to current or future years:

(1) Rev. Rul. 2003-6, *Employee Stock Ownership Plans; Delayed Effective Date; Abuse*, 2003-3 I.R.B. 286. This rev-

enue ruling identifies as a listed transaction all transactions attempting to avoid the effective date of section 409(p) by using employee stock ownership plans formed on or before March 14, 2001.

(2) Rev. Proc. 2019-30, 2019-33 I.R.B. 638. This revenue procedure provides simplified procedures for an insurance company to obtain automatic consent to change its methods of accounting for discounting unpaid losses and expenses unpaid, estimated salvage recoverable, and unearned premiums attributable to title insurance, as applicable, to comply with section 846, as amended by the TCJA. The procedures provided in this revenue procedure apply only to taxable years beginning after December 31, 2017, and ending on or before December 31, 2019.

(3) Rev. Proc. 2009-43, *Revocation of Elections by Multiemployer Defined Benefit Pension Plans to Freeze Funded Status Under Section 204 of WREDA*, 2009-40 I.R.B. 460. The revenue procedure provides that the IRS will automatically approve a revocation request if certain requirements are met, including a deadline for making a decision to revoke; notice to employees and other interested parties; and consistent treatment of participating employers during the plan year. The revocation period has closed.

(4) Rev. Proc. 2008-47, 2008-31 I.R.B. 272. This revenue procedure describes the conditions under which modifications to certain subprime mortgage loans will not cause the IRS to challenge the tax status of certain securitization vehicles that hold the loans or to assert that those modifications create a liability for tax on a prohibited transaction. This revenue procedure applies only to transactions occurring on or before July 31, 2010.

(5) Notice 2013-56, *Transitional Penalty Relief and Schedule for Notices of Incorrect Name/TIN Combinations for Information Returns Relating to Payment Card and Third Party Network Transactions*, 2013-39 I.R.B. 262. This notice provides guidance on the issuance of CPA2100/2100As based on Forms 1099-K filed for calendar year 2012 and provides penalty relief for certain name/taxpayer identification number (TIN) mismatches for calendar year 2012 and 2013 payments.

(6) Notice 2012-34, *Basis Reporting by Securities Brokers and Basis Determination for Debt Instruments and Options*, 2012-21 I.R.B. 937. This notice delays the proposed effective dates for reporting for debt instruments and options by brokers and others under sections 6045(g), 6045(h), 6045A, and 6045B from January 1, 2013, to January 1, 2014.

(7) Notice 2012-11, *Transitional Relief for Section 6045B Issuer Returns and Statements for 2011 Organizational Actions*, 2012-5 I.R.B. 346. This notice provides reporting and penalty relief for 2011 for issuers who must furnish statements describing any organizational action that affects the basis of a specified security.

(8) Notice 2011-89, *Transitional Penalty Relief for Information Reporting Relating to Payment Card and Third Party Network Transactions*, 2011-46 I.R.B. 748. This notice provides that the IRS will not impose penalties under sections 6721 and 6722 on payors that must file Forms 1099-K for reportable payments made in calendar year 2011 if they make good-faith efforts when filing the Forms.

(9) Notice 2011-18, *Postponing Filing Date for Section 6045B Issuer Return*, 2011-11 I.R.B. 549. This notice provides transitional relief for 2011 from information reporting requirements in section 6045B applying to issuers of stock with respect to organizational actions that affect the basis of the stock if the issuer files the return with the IRS or makes it publicly available by January 17, 2012.

(10) Notice 2009-42, *Extension of Date for Multiemployer Plans to Elect Relief Under Sections 204 and 205 of WREDA*, 2009-20 I.R.B. 1011. The notice provides guidance to multiemployer plans making elections described in sections 204 and 205 of the Worker, Retiree, and Employer Recovery Act of 2008, Public Law 110-458, 122 Stat. 5092 (2008) (WREDA). This guidance only relates to actions that could be taken in 2008 and 2009.

(11) Notice 2009-31, *Election and Notice Procedures for Multiemployer Plans Under Sections 204 and 205 of WREDA*, 2009-16 I.R.B. 856. The notice provides guidance for sponsors of multi-

employer defined benefit plans relating to the elections described in sections 204 and 205 of the WREDA, and on the notice required to be provided if a plan sponsor makes an election under section 204. The election period has closed.

(12) Notice 2007-76, *Qualified Transportation Fringes*, 2007-40 I.R.B. 735. This notice delays the effective date of Revenue Ruling 2006-57, 2006-47 I.R.B. 911 (regarding the use of smartcards or other electronic media to provide qualified transportation fringes), to January 1, 2009.

(13) Notice 2002-33, *Suspension of Requirement to File Form 8390 (Information Return for Determination of Life Insurance Company Earnings Rate Under Section 809)*, 2002-21 I.R.B. 989. This notice temporarily suspends the requirement that mutual life insurance companies and the 50 largest stock life insurance companies file Form 8390, *Information Return for Determination of Life Insurance Company Earnings Rate Under Section 809*, due to the addition of section 809(j) to the Code by section 611(a) of the Job Creation and Workers Assistance Act of 2002, Public Law 107-147, 116 Stat. 21 (2002). The suspension provided in this notice applies only to filings required with respect to calendar years 2002 and 2003.

(14) Notice 97-65, *Income Tax Return Preparer Penalties—1997 Federal Income Tax Returns Due Diligence Requirements for Earned Income Credit (EIC)*, 1997-51 I.R.B. 14. This notice provides the due diligence requirements for return preparers for 1997 Federal income tax returns and claims for refund that involve the Earned Income Tax Credit.

(15) Notice 89-36, *Election to Treat Certain Pre-1987 Investment Interest as a Passive Activity Deduction*, 1989-13 I.R.B. 6. This notice provides guidance on making an election under section 1005(c) (11) of the Technical and Miscellaneous Revenue Act of 1988, Public Law 100-647, 102 Stat. 3342 (1988), to treat certain pre-1987 investment interest as interest expense properly allocable to a passive activity. The election had to be made by the later of either the due date for a taxpayer's 1988 tax return (including any extensions of time to file) or August 15, 1989.

(16) Notice 88-48, *Penalty for Failure by Income Tax Return Preparer to Sign Return*, 1988-16 I.R.B. 28. This notice provides relief from section 6695(b) penalties for preparers of 1987 Forms 1041 where the preparer uses a facsimile signature to sign the return and certain conditions are met.

.09 The following guidance is obsolete because it requested comments from the public and the public comments are no longer needed:

(1) Notice 2009-79, *Modifications of Commercial Mortgage Loans Held by an Investment Trust*, 2009-40 I.R.B. 454. This notice requests comments by November 14, 2009, on whether guidance related to modifications of commercial loans held by investment trusts similar to the changes permitted under § 1.860G-2(b) (3) is appropriate and the extent to which the requested changes are consistent with the rules regarding fixed investment trusts under § 301.7701-4(c). The Treasury Department and the IRS received several public comments in response to this notice but have published no guidance on the subject.

(2) Notice 2009-19, *Information Reporting of Payments Made in Settlement of Payment Card and Third Party Network Transactions*, 2009-10 I.R.B. 660. This notice requested comments by March 18, 2009, before issuing a proposed rulemaking under section 6050W. Proposed regulations (REG-139255-08, 74 F.R. 61294) and final regulations (TD 9496, 75 F.R. 49821) have been issued, and comments received in response to this notice were considered when developing the proposed regulations.

(3) Notice 2008-2, *Timing, Character, Source and Other Issues Respecting Prepaid Forward Contracts and Similar Arrangements*, 2008-2 I.R.B. 252. This notice requests comments by May 13, 2008, on whether the parties to a prepaid forward contract should be required to accrue income or expense during the term of the contract and related matters. The Treasury Department and the IRS received several public comments in response to this notice but have published no guidance on the subject.

(4) Notice 2006-34, *Taxation of Cross Licensing Arrangements*, 2006-14 I.R.B. 705. This notice requests comments by

May 31, 2006, regarding certain transactions, referred to as cross licenses, for consideration in formulating guidance. Rev. Proc. 2007-23, 2007-10 I.R.B. 675, was subsequently issued in response to those comments.

(5) Notice 2004-6, *Request for Comments Concerning the Application of Sections 162 and 263 to Tangible Property*, 2004-3 I.R.B. 308. This notice requests comments by March 1, 2004, regarding the IRS's intention to propose regulations that clarify the application of sections 162 and 263 to expenditures paid or incurred to repair, improve, or rehabilitate tangible property. Two sets of proposed regulations (71 F.R. 48590 (withdrawn) and 73 F.R. 12838), temporary regulations (TD 9564, 76 F.R. 81060), and two sets of final regulations (TD 9636, 78 F.R. 57686, and TD 9689, 79 F.R. 48661) have been issued, and comments received in response to this notice were considered when developing the proposed regulations.

(6) Notice 96-7, *Requests for Comments on Further Capitalization Guidance*, 1996-6 I.R.B. 22. This notice requests public comment by May 6, 1996, on approaches the IRS should consider to address issues raised under sections 162 and 263 particularly in light of *Indopco vs. Commissioner*, 503 U.S. 79 (1992). An advanced notice of proposed rulemaking (67 F.R. 3461), proposed regulations (67 F.R. 77701), and final regulations (TD 9107, 69 F.R. 436) have been issued.

(7) Announcement 98-77, 1998-34 I.R.B. 30. This announcement requests comments by September 30, 1998, on proposed training materials discussing the application of section 119 to the provision of employee meals in the hospitality industry. The training materials were withdrawn by Announcement 99-77, 1999-32 I.R.B. 243 (*acquiescing* in *Boyd Gaming Corp. v. Comm'r*, 177 F.3d 1096 (9th Cir. 1999)), and the comments were considered mooted by the decision in *Boyd Gaming*.

.10 The following guidance is obsolete by its own terms:

(1) Rev. Proc. 2014-18, *Simplified Method for Certain Taxpayers to Obtain an Extension of Time*, 2014-7 I.R.B. 513. This revenue procedure provides a simplified method for certain taxpayers to obtain an extension of time to make a portabil-

ity election under section 2020(c)(5)(A), by which a decedent's unused exclusion amount becomes available to the surviving spouse's subsequent transfers during life or death. The guidance expired on December 31, 2014.

(2) Rev. Proc. 86-48, 1986-52 I.R.B. 20. This revenue procedure permits taxpayers that made an election under section 179 to expense all or a portion of the cost of a passenger automobile that was placed in service after June 18, 1984, and before January 1, 1986, to amend their return and modify their election to reduce the expense election to the maximum amount allowable under section 280F(a)(2) for the taxable year in which the property is placed in service.

(3) Notice 2001-79, *Rent Holidays for Qualified Airplane Leases*, 2001-50 I.R.B. 576. The notice provides that certain rent holidays will be disregarded in applying the uneven rent test in § 1.467-3(c) (4) with respect to certain aircraft leases entered into or modified between September 11, 2001, and June 28, 2002, for purposes of determining whether the leases are disqualified leasebacks or long-term agreements under section 467(b)(4) subject to constant rental accrual under section 467(b)(2).

(4) Announcement 90-39, *Due Date for Reporting and Paying Estate Tax Extended for Qualified Domestic Trusts*, 1990-12 I.R.B. 26. This document announces an extension of the due date for reporting and paying estate tax for a qualified domestic trust. The time for filing under the extension has expired, and § 20.2056A-11 provides current guidance as to due dates.

.11 The following guidance is obsolete because it was affected by the release of subsequent guidance documents:

(1) Rev. Proc. 2004-68, 2004-50 I.R.B. 969. This revenue procedure provides that certain transactions with brief asset holding periods are not reportable transactions for purposes of disclosure rules under § 1.6011-4(b)(7) but may be reportable transactions for purposes of the disclosure rules under § 1.6011-4(b)(2), (b)(3), (b)(4), (b)(5), or (b)(6). Final regulations published in the *Federal Register* (TD 9350, 72 F.R. 43146) on August 3, 2007, removed this category of reportable transaction.

(2) Rev. Proc. 2004-67, 2004-50 I.R.B. 967. This guidance provides that certain book-tax differences are not taken into account in determining whether a transaction is a transaction with a significant book-tax difference, which was a reportable transaction for purposes of the disclosures rules under § 1.6011-4(b)(6). This category of reportable transaction was removed for disclosures after January 6, 2006, by Notice 2006-6, *Notification of Removal of the Transaction with a Significant Book-Tax Difference Category of Reportable Transaction Under § 1.6011-4*, 2006-5 I.R.B. 385, and final regulations published in the *Federal Register* (TD 9350, 72 F.R. 43146) on August 3, 2007.

(3) Notice 2017-8, *Transaction of Interest – Section 831(b) Micro-captive Transactions*, 2017-3 I.R.B. 423. This notice modified Notice 2016-66, *Transaction of Interest – Section 831(b) Micro-captive Transactions*, 2016-47 I.R.B. 745, and extended the time for participants and material advisors to file disclosure statements with regard to transactions described in Notice 2016-66. Notice 2016-66 was obsoleted in a notice of proposed rulemaking published in the *Federal Register* (REG-109309-22, 88 F.R. 21547) on April 11, 2023.

(4) Announcement 2006-50, *Announcement that Identifies Specified Covered Services Eligible for Services Cost Method Under Section 482 Regulations*, 2006-34 I.R.B. 321. This announcement provides, and requests comments on, a proposed revenue procedure that would identify particular services that are eligible to be evaluated at cost under § 1.482-9T. The revenue procedure in this announcement was published as Rev. Proc. 2007-13, 2007-3 I.R.B. 295.

(5) Announcement 99-1, *Modification of Rev. Proc. 65-17*, 1999-2 I.R.B. 41. This announcement requests comments on a proposed update to Rev. Proc. 65-17, 1965-1 C.B. 833, which provided procedures by which taxpayers could conform their accounts to reflect section 482 adjustments. Rev. Proc. 65-17 was subsequently superseded by Rev. Proc. 99-32, 1999-34 I.R.B. 296.

.12 Rev. Proc. 59-31, 1959-2 C.B. 949. This revenue procedure sets forth the procedure to be followed with respect to (1)

establishing the tax-exempt status of charitable organizations created or organized under the laws of Canada or Honduras and (2) the deductibility of contributions thereto pursuant to the tax convention between the United States and Canada, 1943 C.B. 526, the United States-Canada Supplementary Income Tax Convention, 1957-2 C.B. 1014, and the United States-Honduras Income Tax Convention, 1957-2 C.B. 1033. The treaties underlying this guidance are no longer in force.

.13 The following guidance is obsolete because it relates to the Home Affordable Modification Program (HAMP), which expired in 2016:

(1) Notice 2009-36, *Payments Made to a REMIC Pursuant to the Home Affordable Modification Program*, 2009-17 I.R.B. 883. This notice provides that the Treasury Department and the IRS intend to issue regulations regarding the application of section 860G(d) to certain amounts that may be paid to real estate mortgage investment conduits (REMICs) as part of the HAMP.

(2) Rev. Proc. 2009-23, 2009-17 I.R.B. 884. This revenue procedure describes the conditions under which modifications to residential mortgage loans pursuant to the HAMP will not cause the IRS to challenge the tax status of REMICs or fixed investment trusts or to assert that those modifications to mortgages held by a REMIC give rise to a prohibited transaction.

.14 Notice 2001-7, *Reporting of Gross Proceeds Payments to Attorneys*, 2001-4 I.R.B. 374. This notice announced that the IRS intended to delay the proposed effective date of regulations that had been proposed under section 6045(f). The final regulations were published in the *Federal Register* (TD 9270, 71 F.R. 39548-01) in 2006, obsoleting this notice.

SECTION 4. EFFECT ON OTHER DOCUMENTS

- (1) Rev. Rul. 2003-6 is obsoleted.
- (2) Rev. Rul. 2000-4 is obsoleted.
- (3) Rev. Rul. 98-25 is obsoleted.
- (4) Rev. Rul. 94-12 is obsoleted.
- (5) Rev. Rul. 90-85 is obsoleted.
- (6) Rev. Rul. 89-23 is obsoleted.
- (7) Rev. Rul. 88-77 is obsoleted.
- (8) Rev. Rul. 88-57 is obsoleted.
- (9) Rev. Rul. 82-174 is obsoleted.

- (10) Rev. Rul. 81-99 is obsoleted.
- (11) Rev. Rul. 78-125 is obsoleted.
- (12) Rev. Rul. 75-112 is obsoleted.
- (13) Rev. Rul. 70-248 is obsoleted.
- (14) Rev. Rul. 69-615 is obsoleted.
- (15) Rev. Rul. 69-330 is obsoleted.
- (16) Rev. Rul. 68-607 is obsoleted.
- (17) Rev. Rul. 57-78 is obsoleted.
- (18) Rev. Rul. 56-290 is obsoleted.
- (19) Rev. Rul. 56-60 is obsoleted.
- (20) Rev. Rul. 55-334 is obsoleted.
- (21) Rev. Rul. 55-333 is obsoleted.
- (22) Rev. Rul. 54-135 is obsoleted.
- (23) Rev. Rul. 54-106 is obsoleted.
- (24) Rev. Proc. 2019-30 is obsoleted.
- (25) Rev. Proc. 2014-18 is obsoleted.
- (26) Rev. Proc. 2009-43 is obsoleted.
- (27) Rev. Proc. 2009-23 is obsoleted.
- (28) Rev. Proc. 2008-47 is obsoleted.
- (29) Rev. Proc. 2004-68 is obsoleted.
- (30) Rev. Proc. 2004-67 is obsoleted.
- (31) Rev. Proc. 98-47 is obsoleted.
- (32) Rev. Proc. 86-48 is obsoleted.
- (33) Rev. Proc. 81-27 is obsoleted.
- (34) Rev. Proc. 59-31 is obsoleted.
- (35) Notice 2024-85 is obsoleted.
- (36) Notice 2023-74 is obsoleted.
- (37) Notice 2023-10 is obsoleted.
- (38) Notice 2017-8 is obsoleted.
- (39) Notice 2013-56 is obsoleted.
- (40) Notice 2012-34 is obsoleted.
- (41) Notice 2012-11 is obsoleted.
- (42) Notice 2011-89 is obsoleted.
- (43) Notice 2011-18 is obsoleted.
- (44) Notice 2010-51 is obsoleted.
- (45) Notice 2010-17 is obsoleted.
- (46) Notice 2009-79 is obsoleted.
- (47) Notice 2009-42 is obsoleted.
- (48) Notice 2009-36 is obsoleted.
- (49) Notice 2009-31 is obsoleted.
- (50) Notice 2009-19 is obsoleted.
- (51) Notice 2008-70 is obsoleted.
- (52) Notice 2008-2 is obsoleted.
- (53) Notice 2007-76 is obsoleted.
- (54) Notice 2007-56 is obsoleted.
- (55) Notice 2006-34 is obsoleted.
- (56) Notice 2004-6 is obsoleted.
- (57) Notice 2002-33 is obsoleted.
- (58) Notice 2001-79 is obsoleted.
- (59) Notice 2001-7 is obsoleted.
- (60) Notice 98-57 is obsoleted.
- (61) Notice 97-65 is obsoleted.
- (62) Notice 96-8 is obsoleted.
- (63) Notice 96-7 is obsoleted.
- (64) Notice 93-7 is obsoleted.
- (65) Notice 89-36 is obsoleted.
- (66) Notice 88-48 is obsoleted.

(67) Announcement 2010-54 is obsoleted.
(68) Announcement 2006-50 is obsoleted.
(69) Announcement 99-1 is obsoleted.
(70) Announcement 98-77 is obsoleted.
(71) Announcement 90-39 is obsoleted.

SECTION 5. DRAFTING INFORMATION

This notice was drafted by the Office
of the Associate Chief Counsel (Procedure

and Administration). For further information, contact the Office of the Associate Chief Counsel (Procedure and Administration) at (202) 317-3400 (not a toll-free number).

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.
FR—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.

Numerical Finding List¹

Bulletin 2026–42

Announcements:

2026-11, 2026-29 I.R.B. 49
2026-12, 2026-29 I.R.B. 50
2026-13, 2026-32 I.R.B. 173
2026-14, 2026-34 I.R.B. 180
2026-15, 2026-35 I.R.B. 214
2026-16, 2026-39 I.R.B. 413

Notices:

2026-39, 2026-27 I.R.B. 1
2026-38, 2026-28 I.R.B. 30
2026-40, 2026-28 I.R.B. 33
2026-41, 2026-29 I.R.B. 39
2026-42, 2026-29 I.R.B. 41
2026-43, 2026-29 I.R.B. 42
2026-21, 2026-30 I.R.B. 51
2026-44, 2026-32 I.R.B. 143
2026-28, 2026-34 I.R.B. 177
2026-46, 2026-35 I.R.B. 182
2026-48, 2026-35 I.R.B. 185
2026-49, 2026-35 I.R.B. 198
2026-50, 2026-36 I.R.B. 242
2026-51, 2026-38 I.R.B. 314
2026-47, 2026-41 I.R.B. 461
2026-53, 2026-41 I.R.B. 462
2026-54, 2026-42 I.R.B. 491
2026-55, 2026-42 I.R.B. 497
2026-57, 2026-42 I.R.B. 499
2026-58, 2026-42 I.R.B. 503

Proposed Regulations:

REG-101355-26, 2026-37 I.R.B. 249
REG-103844-26, 2026-37 I.R.B. 275
REG-115145-25, 2026-37 I.R.B. 298
CC-00349938-26, 2026-38 I.R.B. 317
REG-107855-25, 2026-38 I.R.B. 333
REG-117130-25, 2026-38 I.R.B. 343
REG-119882-25, 2026-38 I.R.B. 355
REG-115646-25, 2026-39 I.R.B. 414
REG-119986-25, 2026-39 I.R.B. 440
REG-117273-25, 2026-40 I.R.B. 450

Revenue Procedures:

2026-25, 2026-29 I.R.B. 45
2026-18, 2026-30 I.R.B. 53
2026-26, 2026-31 I.R.B. 131
2026-32, 2026-32 I.R.B. 146
2026-28, 2026-33 I.R.B. 175
2026-30, 2026-35 I.R.B. 212
2026-32, 2026-39 I.R.B. 406
2026-29, 2026-41 I.R.B. 470

Revenue Rulings:

2026-12, 2026-28 I.R.B. 27
2026-13, 2026-32 I.R.B. 132
2026-14, 2026-35 I.R.B. 181
2026-15, 2026-36 I.R.B. 216
2026-16, 2026-36 I.R.B. 237
2026-17, 2026-37 I.R.B. 247
2026-18, 2026-42 I.R.B. 488
2026-19, 2026-42 I.R.B. 489

Treasury Decisions:

10051, 2026-31 I.R.B. 118
10052, 2026-31 I.R.B. 121
10050, 2026-32 I.R.B. 134
10053, 2026-36 I.R.B. 237
10054, 2026-39 I.R.B. 372

¹ A cumulative list of all revenue rulings, revenue procedures, Treasury decisions, etc., published in Internal Revenue Bulletins 2026–27 through 2026–52 is in Internal Revenue Bulletin 2025–52, dated December 21, 2025.

Finding List of Current Actions on Previously Published Items¹

Bulletin 2026–42

¹ A cumulative list of all revenue rulings, revenue procedures, Treasury decisions, etc., published in Internal Revenue Bulletins 2026–27 through 2026–52 is in Internal Revenue Bulletin 2025–52, dated December 21, 2025.

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