Section 1274 -- Determination of Issue Price in the Case of Certain Debt Instruments Issued for Property

(Also Sections 42 280G 382 467 468 482 483 1288 7520 7872)

Rev. Rul. 2020-26

This revenue ruling provides various prescribed rates for federal income tax purposes for December 2020 (the current month). Table 1 contains the short-term, midterm, and long-term applicable federal rates (AFR) for the current month for purposes of section 1274(d) of the Internal Revenue Code. Table 2 contains the short-term, midterm, and long-term adjusted applicable federal rates (adjusted AFR) for the current month for purposes of section 1288(b). Table 3 sets forth the adjusted federal long-term rate and the long-term tax-exempt rate described in section 382(f). Table 4 contains the appropriate percentages for determining the low-income housing credit described in section 42(b)(1) for buildings placed in service during the current month. However, under section 42(b)(2), the applicable percentage for non-federally subsidized new buildings placed in service after July 30, 2008, shall not be less than 9%. Finally, Table 5 contains the federal rate for determining the present value of an annuity, an interest for life or for a term of years, or a remainder or a reversionary interest for purposes of section 7520

REV. RUL. 2020-26 TABLE 1

Applicable Federal Rates (AFR) for December 2020

2

	Period for Compounding					
	<u>Annual</u>	Semiannual	Quarterly	Monthly		
	Short-term					
. ==						
AFR	0.15%	0.15%	0.15%	0.15%		
110% AFR	0.17%	0.17%	0.17%	0.17%		
120% AFR	0.18%	0.18%	0.18%	0.18%		
130% AFR	0.20%	0.20%	0.20%	0.20%		
	NA: d 4 a mas					
	<u>Mid-term</u>					
AFR	0.48%	0.48%	0.48%	0.48%		
110% AFR	0.53%	0.53%	0.53%	0.53%		
120% AFR	0.58%	0.58%	0.58%	0.58%		
130% AFR	0.62%	0.62%	0.62%	0.62%		
150% AFR	0.02 %	0.72%	0.72%	0.02 %		
	0.72%	0.72%	0.72%			
175% AFR	0.64%	0.04%	0.64%	0.84%		
	Long-term					
	<u>Long-term</u>					
AFR	1.31%	1.31%	1.31%	1.31%		
110% AFR	1.45%	1.44%	1.44%	1.44%		
120% AFR	1.58%	1.57%	1.57%	1.56%		
130% AFR	1.71%	1.70%	1.70%	1.69%		
100/0/11/11	1.7 1 /0	1.7070	1.7070	1.0070		

REV. RUL. 2020-26 TABLE 2

Adjusted AFR for December 2020

	Period for Compounding				
	<u>Annual</u>	Semiannual	Quarterly	Monthly	
Short-term adjusted AFR	0.11%	0.11%	0.11%	0.11%	
Mid-term adjusted AFR	0.36%	0.36%	0.36%	0.36%	
Long-term adjusted AFR	0.99%	0.99%	0.99%	0.99%	

REV. RUL. 2020-26 TABLE 3

Rates Under Section 382 for December 2020

Adjusted federal long-term rate for the current month

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.)

.99%

.99%

REV. RUL. 2020-26 TABLE 4

Appropriate Percentages Under Section 42(b)(1) for December 2020 Note: Under section 42(b)(2), the applicable percentage for non-federally subsidized new buildings placed in service after July 30, 2008, shall not be less than 9%.

Appropriate percentage for the 70% present value low-income housing credit	7.20%
Appropriate percentage for the 30% present value low-income housing credit	3.09%

REV. RUL. 2020-26 TABLE 5

Rate Under Section 7520 for December 2020

Applicable federal rate for determining the present value of an annuity, an interest for life or a term of years, or a remainder or reversionary interest

.6%