

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. 2023-5

This revenue ruling provides various prescribed rates for federal income tax purposes for March 2023 (the current month). Table 1 contains the short-term, mid-term, and long-term applicable federal rates (AFR) for the current month for purposes of section 1274(d) of the Internal Revenue Code. Table 2 contains the short-term, mid-term, and long-term adjusted applicable federal rates (adjusted AFR) for the current month for purposes of section 1288(b). Table 3 sets forth the adjusted federal long-term rate and the long-term tax-exempt rate described in section 382(f). Table 4 contains the appropriate percentages for determining the low-income housing credit described in section 42(b)(1) for buildings placed in service during the current month. However, under section 42(b)(2), the applicable percentage for non-federally subsidized new buildings placed in service after July 30, 2008, shall not be less than 9%. Finally, Table 5 contains the federal rate for determining the present value of an annuity, an interest for life or for a term of years, or a remainder or a reversionary interest for purposes of section 7520.

REV. RUL. 2023-5 TABLE 1

Applicable Federal Rates (AFR) for March 2023

	<u>Annual</u>	<u>Period for Compounding</u>		<u>Monthly</u>
		<u>Semiannual</u>	<u>Quarterly</u>	
<u>Short-term</u>				
AFR	4.50%	4.45%	4.43%	4.41%
110% AFR	4.96%	4.90%	4.87%	4.85%
120% AFR	5.41%	5.34%	5.30%	5.28%
130% AFR	5.87%	5.79%	5.75%	5.72%
<u>Mid-term</u>				
AFR	3.70%	3.67%	3.65%	3.64%
110% AFR	4.08%	4.04%	4.02%	4.01%
120% AFR	4.45%	4.40%	4.38%	4.36%
130% AFR	4.83%	4.77%	4.74%	4.72%
150% AFR	5.59%	5.51%	5.47%	5.45%
175% AFR	6.52%	6.42%	6.37%	6.34%
<u>Long-term</u>				
AFR	3.74%	3.71%	3.69%	3.68%
110% AFR	4.12%	4.08%	4.06%	4.05%
120% AFR	4.50%	4.45%	4.43%	4.41%
130% AFR	4.88%	4.82%	4.79%	4.77%

REV. RUL. 2023-5 TABLE 2

Adjusted AFR for March 2023

	<u>Period for Compounding</u>			
	<u>Annual</u>	<u>Semiannual</u>	<u>Quarterly</u>	<u>Monthly</u>
Short-term adjusted AFR	3.41%	3.38%	3.37%	3.36%
Mid-term adjusted AFR	2.81%	2.79%	2.78%	2.77%
Long-term adjusted AFR	2.84%	2.82%	2.81%	2.80%

REV. RUL. 2023-5 TABLE 3

Rates Under Section 382 for March 2023

Adjusted federal long-term rate for the current month	2.84%
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.)	2.92%

REV. RUL. 2023-5 TABLE 4

Appropriate Percentages Under Section 42(b)(1) for March 2023

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	7.86%
Appropriate percentage for the 30% present value low-income housing credit	3.37%

REV. RUL. 2023-5 TABLE 5

Rate Under Section 7520 for March 2023

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	4.40%
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