

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. [2019-08](#)

This revenue ruling provides various prescribed rates for federal income tax purposes for April 2019 (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. 2019-08 TABLE 1

## Applicable Federal Rates (AFR) for April 2019

|                   | <u>Annual</u> | <u>Period for Compounding</u> |                  | <u>Monthly</u> |
|-------------------|---------------|-------------------------------|------------------|----------------|
|                   |               | <u>Semiannual</u>             | <u>Quarterly</u> |                |
| <u>Short-term</u> |               |                               |                  |                |
| AFR               | 2.52%         | 2.50%                         | 2.49%            | 2.49%          |
| 110% AFR          | 2.77%         | 2.75%                         | 2.74%            | 2.73%          |
| 120% AFR          | 3.02%         | 3.00%                         | 2.99%            | 2.98%          |
| 130% AFR          | 3.28%         | 3.25%                         | 3.24%            | 3.23%          |
| <u>Mid-term</u>   |               |                               |                  |                |
| AFR               | 2.55%         | 2.53%                         | 2.52%            | 2.52%          |
| 110% AFR          | 2.80%         | 2.78%                         | 2.77%            | 2.76%          |
| 120% AFR          | 3.06%         | 3.04%                         | 3.03%            | 3.02%          |
| 130% AFR          | 3.32%         | 3.29%                         | 3.28%            | 3.27%          |
| 150% AFR          | 3.84%         | 3.80%                         | 3.78%            | 3.77%          |
| 175% AFR          | 4.48%         | 4.43%                         | 4.41%            | 4.39%          |
| <u>Long-term</u>  |               |                               |                  |                |
| AFR               | 2.89%         | 2.87%                         | 2.86%            | 2.85%          |
| 110% AFR          | 3.18%         | 3.16%                         | 3.15%            | 3.14%          |
| 120% AFR          | 3.47%         | 3.44%                         | 3.43%            | 3.42%          |
| 130% AFR          | 3.76%         | 3.73%                         | 3.71%            | 3.70%          |

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## REV. RUL. 2019-08 TABLE 2

## Adjusted AFR for April 2019

|                            | <u>Period for Compounding</u> |                   |                  |                |
|----------------------------|-------------------------------|-------------------|------------------|----------------|
|                            | <u>Annual</u>                 | <u>Semiannual</u> | <u>Quarterly</u> | <u>Monthly</u> |
| Short-term<br>adjusted AFR | 1.91%                         | 1.90%             | 1.90%            | 1.89%          |
| Mid-term<br>adjusted AFR   | 1.93%                         | 1.92%             | 1.92%            | 1.91%          |
| Long-term<br>adjusted AFR  | 2.19%                         | 2.18%             | 2.17%            | 2.17%          |

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## REV. RUL. 2019-08 TABLE 3

## Rates Under Section 382 for April 2019

|  |       |
|--|-------|
| Adjusted federal long-term rate for the current month  | 2.19% |
| 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.) | 2.20% |

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## REV. RUL. 2019-08 TABLE 4

Appropriate Percentages Under Section 42(b)(1) for April 2019  
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 | 7.63% |
| Appropriate percentage for the 30% present value low-income housing credit | 3.27% |

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REV. RUL. 2019-08 TABLE 5

Rate Under Section 7520 for April 2019

|   |      |
|---|------|
| 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 | 3.0% |
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