

3. Adding a new sentence at the end of paragraph (m).

The revisions and addition read as follows:

§1.1502-13 Intercompany transactions.

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(f) * * *

(5) * * *

(ii) * * *

(C) *Section 338(h)(10) and section 336(e)—(1) In general.* This paragraph (f)(5)(ii)(C) applies to a deemed liquidation of T under section 332 as the result of an election under section 338(h)(10) or section 336(e). * * *

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(m) *Effective/applicability date.* * * * Paragraph (f)(5)(ii)(C) of this section is applicable to any qualified stock disposition (as defined in §1.336-1(b)(6)) for which the disposition date (as defined in §1.336-1(b)(8)) is on or after May 15, 2013.

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Steven T. Miller,
*Deputy Commissioner for
Services and Enforcement.*

Approved May 9, 2013

Mark J. Mazur,
*Assistant Secretary
of the Treasury (Tax Policy).*

(Filed by the Office of the Federal Register on May 10, 2013, 4:15 p.m., and published in the issue of the Federal Register for May 15, 2013, 78 FR 28467)

Section 338.—Certain Stock Purchases Treated as Asset Acquisitions

Final regulations under section 336(e) of the Code provide for an election to treat the sale, exchange, or distribution of at least 80 percent of the stock of a domestic subsidiary corporation or a subchapter S corporation as a sale of the corporation's assets, rather than a sale of its stock. See T.D. 9619, page 1212.

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 June 2013. See Rev. Rul. 2013-12, page 1237.

Section 412.—Minimum Funding Standards

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of June 2013. See Rev. Rul. 2013-12, page 1237.

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

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of June 2013. See Rev. Rul. 2013-12, page 1237.

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

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of June 2013. See Rev. Rul. 2013-12, page 1237.

Section 482.—Allocation of Income and Deductions Among Taxpayers

Federal short-term, mid-term, and long-term rates are set forth for the month of June 2013. See Rev. Rul. 2013-12, page 1237.

Section 483.—Interest on Certain Deferred Payments

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of June 2013. See Rev. Rul. 2013-12, page 1237.

Section 642.—Special Rules for Credits and Deductions

Federal short-term, mid-term, and long-term rates are set forth for the month of June 2013. See Rev. Rul. 2013-12, page 1237.

Section 807.—Rules for Certain Reserves

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of June 2013. See Rev. Rul. 2013-12, page 1237.

Section 846.—Discounted Unpaid Losses Defined

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of June 2013. See Rev. Rul. 2013-12, page 1237.

Section 901.—Taxes of Foreign Countries and of Possessions of United States

Final regulations under section 336(e) of the Code provide for an election to treat the sale, exchange, or distribution of at least 80 percent of the stock of a domestic subsidiary corporation or a subchapter S corporation as a sale of the corporation's assets, rather than a sale of its stock. See T.D. 9619, page 1212.

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

(Also Sections 42, 280G, 382, 412, 467, 468, 482, 483, 642, 807, 846, 1288, 7520, 7872.)

Federal rates; adjusted federal rates; adjusted federal long-term rate and the long-term exempt rate. For purposes of sections 382, 642, 1274, 1288, and other sections of the Code, tables set forth the rates for June 2013.

Rev. Rul. 2013-12

This revenue ruling provides various prescribed rates for federal income tax purposes for June 2013 (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, with respect to housing credit dollar amount allocations made before January 1, 2014, 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. 2013-12 TABLE 1				
Applicable Federal Rates (AFR) for June 2013				
	<i>Period for Compounding</i>			
	<i>Annual</i>	<i>Semiannual</i>	<i>Quarterly</i>	<i>Monthly</i>
<i>Short-term</i>				
AFR	.18%	.18%	.18%	.18%
110% AFR	.20%	.20%	.20%	.20%
120% AFR	.22%	.22%	.22%	.22%
130% AFR	.23%	.23%	.23%	.23%
<i>Mid-term</i>				
AFR	.95%	.95%	.95%	.95%
110% AFR	1.05%	1.05%	1.05%	1.05%
120% AFR	1.14%	1.14%	1.14%	1.14%
130% AFR	1.24%	1.24%	1.24%	1.24%
150% AFR	1.44%	1.43%	1.43%	1.43%
175% AFR	1.67%	1.66%	1.66%	1.65%
<i>Long-term</i>				
AFR	2.47%	2.45%	2.44%	2.44%
110% AFR	2.72%	2.70%	2.69%	2.68%
120% AFR	2.96%	2.94%	2.93%	2.92%
130% AFR	3.22%	3.19%	3.18%	3.17%

REV. RUL. 2013-12 TABLE 2				
Adjusted AFR for June 2013				
	<i>Period for Compounding</i>			
	<i>Annual</i>	<i>Semiannual</i>	<i>Quarterly</i>	<i>Monthly</i>
Short-term adjusted AFR	.18%	.18%	.18%	.18%
Mid-term adjusted AFR	.95%	.95%	.95%	.95%
Long-term adjusted AFR	2.47%	2.45%	2.44%	2.44%

REV. RUL. 2013-12 TABLE 3	
Rates Under Section 382 for June 2013	
Adjusted federal long-term rate for the current month	2.47%
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.)	2.70%

REV. RUL. 2013-12 TABLE 4

Appropriate Percentages Under Section 42(b)(1) for June 2013

Note: Under Section 42(b)(2), the applicable percentage for non-federally subsidized new buildings placed in service after July 30, 2008, with respect to housing credit dollar amount allocations made before January 1, 2014, shall not be less than 9%.

Appropriate percentage for the 70% present value low-income housing credit	7.39%
Appropriate percentage for the 30% present value low-income housing credit	3.17%

REV. RUL. 2013-12 TABLE 5

Rate Under Section 7520 for June 2013

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	1.2%
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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 June 2013. See Rev. Rul. 2013-12, page 1237.

Section 1502.—Regulations

Final regulations under section 336(e) of the Code provide for an election to treat the sale, exchange,

or distribution of at least 80 percent of the stock of a domestic subsidiary corporation or a subchapter S corporation as a sale of the corporation's assets, rather than a sale of its stock. See T.D. 9619, page 1212.

Section 7520.—Valuation Tables

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of June 2013. See Rev. Rul. 2013-12, page 1237.

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

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of June 2013. See Rev. Rul. 2013-12, page 1237.