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VIII. RELIANCE

This notice does not provide guidance under § 4980I upon which taxpayers may rely.

IX. NO INFERENCE

No inference should be drawn from any provision of this notice concerning any provision of § 4980I other than those addressed in this notice or concerning any other section of the Affordable Care Act or COBRA.

X. DRAFTING INFORMATION

The principal author of this notice is Karen Levin of the Office of Associate

Chief Counsel (Tax Exempt and Government Entities). For further information regarding this notice contact Ms. Levin at (202) 317-5500 (not toll-free numbers).

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).

Rev. Rul. 2015-4

This revenue ruling provides various prescribed rates for federal income tax purposes for March 2015 (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, 2015 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. 2015-4 TABLE 1				
Applicable Federal Rates (AFR) for March 2015				
	<i>Annual</i>	<i>Period for Compounding</i>	<i>Quarterly</i>	<i>Monthly</i>
		<i>Semiannual</i>		
		<i>Short-term</i>		
AFR	.40%	.40%	.40%	.40%
110% AFR	.44%	.44%	.44%	.44%
120% AFR	.48%	.48%	.48%	.48%
130% AFR	.52%	.52%	.52%	.52%
		<i>Mid-term</i>		
AFR	1.47%	1.46%	1.46%	1.46%
110% AFR	1.62%	1.61%	1.61%	1.60%
120% AFR	1.76%	1.75%	1.75%	1.74%
130% AFR	1.91%	1.90%	1.90%	1.89%
150% AFR	2.20%	2.19%	2.18%	2.18%
175% AFR	2.58%	2.56%	2.55%	2.55%
		<i>Long-term</i>		
AFR	2.19%	2.18%	2.17%	2.17%
110% AFR	2.41%	2.40%	2.39%	2.39%
120% AFR	2.64%	2.62%	2.61%	2.61%
130% AFR	2.85%	2.83%	2.82%	2.81%

REV. RUL. 2015-4 TABLE 2

Adjusted AFR for March 2015

	<i>Period for Compounding</i>			
	<i>Annual</i>	<i>Semiannual</i>	<i>Quarterly</i>	<i>Monthly</i>
Short-term adjusted AFR	.36%	.36%	.36%	.36%
Mid-term adjusted AFR	1.14%	1.14%	1.14%	1.14%
Long-term adjusted AFR	2.19%	2.18%	2.17%	2.17%

REV. RUL. 2015-4 TABLE 3

Rates Under Section 382 for March 2015

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.)	2.67%

REV. RUL. 2015-4 TABLE 4

Appropriate Percentages Under Section 42(b)(1) for March 2015

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, 2015, shall not be less than 9%.

Appropriate percentage for the 70% present value low-income housing credit	7.42%
Appropriate percentage for the 30% present value low-income housing credit	3.18%

REV. RUL. 2015-4 TABLE 5

Rate Under Section 7520 for March 2015

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	1.8%
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