Part III. Administrative, Procedural, and Miscellaneous

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

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

Rev. Rul. 2017–12

This revenue ruling provides various prescribed rates for federal income tax purposes for June 2017 (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.

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**REV. RUL. 2017–12 TABLE 1**
Applicable Federal Rates (AFR) for June 2017
Period for Compounding

<table>
<thead>
<tr>
<th>Rate</th>
<th>Annual</th>
<th>Semiannual</th>
<th>Quarterly</th>
<th>Monthly</th>
</tr>
</thead>
<tbody>
<tr>
<td>Short-term AFR</td>
<td>1.18%</td>
<td>1.18%</td>
<td>1.18%</td>
<td>1.18%</td>
</tr>
<tr>
<td>110% AFR</td>
<td>1.30%</td>
<td>1.30%</td>
<td>1.30%</td>
<td>1.30%</td>
</tr>
<tr>
<td>120% AFR</td>
<td>1.43%</td>
<td>1.42%</td>
<td>1.42%</td>
<td>1.42%</td>
</tr>
<tr>
<td>130% AFR</td>
<td>1.54%</td>
<td>1.53%</td>
<td>1.53%</td>
<td>1.53%</td>
</tr>
<tr>
<td>Mid-term AFR</td>
<td>1.96%</td>
<td>1.95%</td>
<td>1.95%</td>
<td>1.94%</td>
</tr>
<tr>
<td>110% AFR</td>
<td>2.16%</td>
<td>2.15%</td>
<td>2.14%</td>
<td>2.14%</td>
</tr>
<tr>
<td>120% AFR</td>
<td>2.35%</td>
<td>2.34%</td>
<td>2.33%</td>
<td>2.33%</td>
</tr>
<tr>
<td>130% AFR</td>
<td>2.56%</td>
<td>2.54%</td>
<td>2.53%</td>
<td>2.53%</td>
</tr>
<tr>
<td>150% AFR</td>
<td>2.95%</td>
<td>2.93%</td>
<td>2.92%</td>
<td>2.91%</td>
</tr>
<tr>
<td>175% AFR</td>
<td>3.44%</td>
<td>3.41%</td>
<td>3.40%</td>
<td>3.39%</td>
</tr>
<tr>
<td>Long-term AFR</td>
<td>2.68%</td>
<td>2.66%</td>
<td>2.65%</td>
<td>2.65%</td>
</tr>
<tr>
<td>110% AFR</td>
<td>2.95%</td>
<td>2.93%</td>
<td>2.92%</td>
<td>2.91%</td>
</tr>
<tr>
<td>120% AFR</td>
<td>3.22%</td>
<td>3.19%</td>
<td>3.18%</td>
<td>3.17%</td>
</tr>
<tr>
<td>130% AFR</td>
<td>3.49%</td>
<td>3.46%</td>
<td>3.45%</td>
<td>3.44%</td>
</tr>
</tbody>
</table>

**REV. RUL. 2017–12 TABLE 2**
Adjusted AFR for June 2017
Period for Compounding

<table>
<thead>
<tr>
<th>Rate</th>
<th>Annual</th>
<th>Semiannual</th>
<th>Quarterly</th>
<th>Monthly</th>
</tr>
</thead>
<tbody>
<tr>
<td>Short-term adjusted AFR</td>
<td>.88%</td>
<td>.88%</td>
<td>.88%</td>
<td>.88%</td>
</tr>
<tr>
<td>Mid-term adjusted AFR</td>
<td>1.46%</td>
<td>1.45%</td>
<td>1.45%</td>
<td>1.45%</td>
</tr>
<tr>
<td>Long-term adjusted AFR</td>
<td>1.99%</td>
<td>1.98%</td>
<td>1.98%</td>
<td>1.97%</td>
</tr>
</tbody>
</table>

**REV. RUL. 2017–12 TABLE 3**
Rates Under Section 382 for June 2017

Adjusted federal long-term rate for the current month

1.99%

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.)

2.09%
REV. RUL. 2017–12 TABLE 4
Appropriate Percentages Under Section 42(b)(1) for June 2017
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%.

<table>
<thead>
<tr>
<th>Percentage</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>7.53%</td>
<td>Appropriate percentage for the 70% present value low-income housing credit</td>
</tr>
<tr>
<td>3.23%</td>
<td>Appropriate percentage for the 30% present value low-income housing credit</td>
</tr>
</tbody>
</table>

REV. RUL. 2017–12 TABLE 5
Rate Under Section 7520 for June 2017
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

<table>
<thead>
<tr>
<th>Rate</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.4%</td>
<td>For determining the present value of an annuity, an interest for life or a term of years, or a remainder or reversionary interest</td>
</tr>
</tbody>
</table>

Section 42.—Low-income Housing Credit

Section 280G.—Golden Parachute Payments

Section 382.—Limitation on Net Operating Loss Carryforwards and Certain Built-In Losses Following Ownership Change

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

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

Section 482.—Allocation of Income and Deductions Among Taxpayers

Section 483.—Interest on Certain Deferred Payments

Section 484.—Special Rules for Credits and Deductions

Section 1288.—Treatment of Original Issue Discount on Tax-Exempt Obligations

Section 7520.—Valuation Tables

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