

term, and long-term rates are set forth for the month of February 1999. See Rev. Rul. 99-8, page 10.

Section 1001.—Determination of Amount of and Recognition of Gain or Loss

26 CFR 1.1001-1: *Computation of gain or loss.*

Tax consequences when a single member domestic limited liability company that is disregarded as an entity separate from its owner becomes an entity with more than one owner that is classified as a partnership. See Rev. Rul. 99-5, page 8.

Section 1012.—Basis of Property—Cost

26 CFR 1.1012-1: *Basis of property.*

Tax consequences when a single member domestic limited liability company that is disregarded as an entity separate from its owner becomes an entity with more than one owner that is classified as a partnership. See Rev. Rul. 99-5, page 8.

Tax consequences if one person purchases all of the ownership interests in a domestic limited liability

company that is classified as a partnership. See Rev. Rul. 99-6, page 6.

Section 1223.—Basis Period of Property

26 CFR 1.1223-1: *Determination of period for which capital assets are held.*

Tax consequences when a single member domestic limited liability company that is disregarded as an entity separate from its owner becomes an entity with more than one owner that is classified as a partnership. See Rev. Rul. 99-5, page 8.

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 1274, 1288, 382, and other

sections of the Code, tables set forth the rates for February 1999.

Rev. Rul. 99-8

This revenue ruling provides various prescribed rates for federal income tax purposes for February 1999 (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)(2) for buildings placed in service during the current month. 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. 99-8 TABLE 1

Applicable Federal Rates (AFR) for February 1999

Period for Compounding

	<i>Annual</i>	<i>Semiannual</i>	<i>Quarterly</i>	<i>Monthly</i>
<i>Short-Term</i>				
AFR	4.62%	4.57%	4.54%	4.53%
110% AFR	5.09%	5.03%	5.00%	4.98%
120% AFR	5.56%	5.48%	5.44%	5.42%
130% AFR	6.03%	5.94%	5.90%	5.87%
<i>Mid-Term</i>				
AFR	4.71%	4.66%	4.63%	4.62%
110% AFR	5.20%	5.13%	5.10%	5.08%
120% AFR	5.67%	5.59%	5.55%	5.53%
130% AFR	6.15%	6.06%	6.01%	5.98%
150% AFR	7.11%	6.99%	6.93%	6.89%
175% AFR	8.33%	8.16%	8.08%	8.02%
<i>Long-Term</i>				
AFR	5.24%	5.17%	5.14%	5.12%
110% AFR	5.77%	5.69%	5.65%	5.62%
120% AFR	6.30%	6.20%	6.15%	6.12%
130% AFR	6.83%	6.72%	6.66%	6.63%

REV. RUL. 99-8 TABLE 2
Adjusted AFR for February 1999

Period for Compounding

	<i>Annual</i>	<i>Semiannual</i>	<i>Quarterly</i>	<i>Monthly</i>
Short-term adjusted AFR	3.13%	3.11%	3.10%	3.09%
Mid-term adjusted AFR	3.87%	3.83%	3.81%	3.80%
Long-term adjusted AFR	4.71%	4.66%	4.63%	4.62%

REV. RUL. 99-8 TABLE 3

Rates Under Section 382 for February 1999

Adjusted federal long-term rate for the current month	4.71%
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.)	4.71%

REV. RUL. 99-8 TABLE 4

Appropriate Percentages Under Section 42(b)(2) for February 1999

Appropriate percentage for the 70% present value low-income housing credit	8.16%
Appropriate percentage for the 30% present value low-income housing credit	3.50%

REV. RUL. 99-8 TABLE 5

Rate Under Section 7520 for February 1999

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	5.6%
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