

# Part I. Rulings and Decisions Under the Internal Revenue Code of 1986

## Section 42.—Low-Income Housing Credit

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of December 1999. See Rev. Rul. 99-48 on this page.

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## Section 280G.—Golden Parachute Payments

Federal short-term, mid-term, and long-term rates are set forth for the month of December 1999. See Rev. Rul. 99-48 on this page.

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## 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 December 1999. See Rev. Rul. 99-48 on this page.

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## Section 412.—Minimum Funding Standards

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of December 1999. See Rev. Rul. 99-48 on this page.

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A revenue procedure describes certain changes to the funding method used to determine the minimum funding standard for defined benefit plans for plan years beginning on or after January 1, 1999. See Rev. Proc. 99-45, page 603.

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## 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 December 1999. See Rev. Rul. 99-48 on this page.

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## 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 December 1999. See Rev. Rul. 99-48 on this page.

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## 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 December 1999. See Rev. Rul. 99-48 on this page.

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## 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 December 1999. See Rev. Rul. 99-48 on this page.

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## Section 642.—Special Rules for Credits and Deductions

Federal short-term, mid-term, and long-term rates are set forth for the month of December 1999. See Rev. Rul. 99-48 on this page.

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## 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 December 1999. See Rev. Rul. 99-48 on this page.

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## 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 December 1999. See Rev. Rul. 99-48 on this page.

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## 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 December 1999.

### Rev. Rul. 99-48

This revenue ruling provides various prescribed rates for federal income tax purposes for December 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. 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. Finally, Table 6 contains the 2000 interest rate for purposes of sections 846 and 807.

REV. RUL. 99-48 TABLE 1

Applicable Federal Rates (AFR) for December 1999

*Period for Compounding*

	<i>Annual</i>	<i>Semiannual</i>	<i>Quarterly</i>	<i>Monthly</i>
<i>Short-Term</i>				
AFR	5.74%	5.66%	5.62%	5.59%
110% AFR	6.33%	6.23%	6.18%	6.15%
120% AFR	6.91%	6.79%	6.73%	6.70%
130% AFR	7.50%	7.36%	7.29%	7.25%
<i>Mid-Term</i>				
AFR	6.20%	6.11%	6.06%	6.03%
110% AFR	6.83%	6.72%	6.66%	6.63%
120% AFR	7.46%	7.33%	7.26%	7.22%
130% AFR	8.10%	7.94%	7.86%	7.81%
150% AFR	9.38%	9.17%	9.07%	9.00%
175% AFR	10.98%	10.69%	10.55%	10.46%
<i>Long-Term</i>				
AFR	6.47%	6.37%	6.32%	6.29%
110% AFR	7.13%	7.01%	6.95%	6.91%
120% AFR	7.79%	7.64%	7.57%	7.52%
130% AFR	8.45%	8.28%	8.20%	8.14%

REV. RUL. 99-48 TABLE 2

Adjusted AFR for December 1999

*Period for Compounding*

	<i>Annual</i>	<i>Semiannual</i>	<i>Quarterly</i>	<i>Monthly</i>
Short-term adjusted AFR	4.02%	3.98%	3.96%	3.95%
Mid-term adjusted AFR	4.76%	4.70%	4.67%	4.65%
Long-term adjusted AFR	5.72%	5.64%	5.60%	5.57%

REV. RUL. 99-48 TABLE 3

Rates Under Section 382 for December 1999

Adjusted federal long-term rate for the current month	5.72%
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.)	5.72%

REV. RUL. 99-48 TABLE 4

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

Appropriate percentage for the 70% present value low-income housing credit	8.49%
Appropriate percentage for the 30% present value low-income housing credit	3.64%

REV. RUL. 99-48 TABLE 5

Rate Under Section 7520 for December 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

7.4%

REV. RUL. 99-48 TABLE 6

Rate under Sections 846 and 807

Applicable rate of interest for 2000 for purposes of sections 846 and 807

6.09%

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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 December 1999. See Rev. Rul. 99-48, page 600.

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**Section 7520.—Valuation Tables**

The adjusted applicable federal short-term, mid-term, and long-term rates are set forth for the month of December 1999. See Rev. Rul. 99-48, page 600.

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**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 December 1999. See Rev. Rul. 99-48, page 600.