

November 20, 1997

MEMO TO TAX SERVICES

Attached is an advance copy of Rev. Rul. 97-49 relating to applicable federal rates. This rev. rul. will appear in Internal Revenue Bulletin 1997-50, dated December 8, 1997.

You may release this rev. rul. immediately.

Communications

Division

Part I

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. 97-49

This revenue ruling provides various prescribed rates for federal income tax purposes for December 1997 (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 1997 interest rate for sections 846 and 807.

REV. RUL. 97-49 TABLE 1

Applicable Federal Rates (AFR) for December 1997
Period for Compounding

Annual Semiannual Quarterly Monthly

Short-Term

AFR	5.68%	5.60%	5.56%	5.54%
110% AFR	6.25%	6.16%	6.11%	6.08%
120% AFR	6.83%	6.72%	6.66%	6.63%
130% AFR	7.41%	7.28%	7.21%	7.17%

Mid-Term

AFR	6.02%	5.93%	5.89%	5.86%
110% AFR	6.63%	6.52%	6.47%	6.43%
120% AFR	7.25%	7.12%	7.06%	7.02%
130% AFR	7.86%	7.71%	7.64%	7.59%
150% AFR	9.10%	8.90%	8.80%	8.74%
175% AFR	10.65%	10.38%	10.25%	10.16%

Long-Term

AFR	6.31%	6.21%	6.16%	6.13%
110% AFR	6.95%	6.83%	6.77%	6.73%
120% AFR	7.59%	7.45%	7.38%	7.34%
130% AFR	8.23%	8.07%	7.99%	7.94%

REV. RUL. 97-49 TABLE 2

Adjusted AFR for December 1997
Period for Compounding

Annual Semiannual Quarterly Monthly

Short-term

adjusted AFR	3.92%	3.88%	3.86%	3.85%
--------------	-------	-------	-------	-------

Mid-term

adjusted AFR	4.37%	4.32%	4.30%	4.28%
--------------	-------	-------	-------	-------

Long-term
adjusted AFR 5.23% 5.16% 5.13% 5.11%

REV. RUL. 97-49 TABLE 3

Rates Under Section 382 for December 1997

Adjusted federal long-term rate for the current month	5.23%
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.)	5.27%

REV. RUL. 97-49 TABLE 4

Appropriate Percentages Under Section 42(b)(2) for December 1997

Appropriate percentage for the 70% present value low-income housing credit	8.45%
Appropriate percentage for the 30% present value low-income housing credit	3.62%

REV. RUL. 97-49 TABLE 5

Rate Under Section 7520 for December 1997

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	7.2%
--	-------------

REV. RUL. 97-49 TABLE 6

Rate under Sections 846 and 807

Applicable rate of interest for 1997 for purposes of sections 846 and 807	6.31%
--	--------------