

## 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. 2005-23

This revenue ruling provides various prescribed rates for federal income tax purposes for April 2005 (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. 2005-23 TABLE 1

## Applicable Federal Rates (AFR) for April 2005

	<u>Annual</u>	<u>Period for Compounding</u>		<u>Monthly</u>
		<u>Semiannual</u>	<u>Quarterly</u>	
<u>Short-term</u>				
AFR	3.35%	3.32%	3.31%	3.30%
110% AFR	3.68%	3.65%	3.63%	3.62%
120% AFR	4.02%	3.98%	3.96%	3.95%
130% AFR	4.37%	4.32%	4.30%	4.28%
<u>Mid-term</u>				
AFR	4.09%	4.05%	4.03%	4.02%
110% AFR	4.51%	4.46%	4.44%	4.42%
<b>120% AFR</b>	<b>4.92%</b>	<b>4.86%</b>	<b>4.83%</b>	<b>4.81%</b>
130% AFR	5.34%	5.27%	5.24%	5.21%
150% AFR	6.17%	6.08%	6.03%	6.00%
175% AFR	7.22%	7.09%	7.03%	6.99%
<u>Long-term</u>				
AFR	4.68%	4.63%	4.60%	4.59%
110% AFR	5.15%	5.09%	5.06%	5.04%
120% AFR	5.64%	5.56%	5.52%	5.50%
130% AFR	6.11%	6.02%	5.98%	5.95%

## REV. RUL. 2005-23 TABLE 2

## Adjusted AFR for April 2005

	<u>Period for Compounding</u>			
	<u>Annual</u>	<u>Semiannual</u>	<u>Quarterly</u>	<u>Monthly</u>
Short-term adjusted AFR	2.40%	2.39%	2.38%	2.38%
Mid-term adjusted AFR	3.03%	3.01%	3.00%	2.99%
Long-term adjusted AFR	4.19%	4.15%	4.13%	4.11%

## REV. RUL. 2005-23 TABLE 3

## Rates Under Section 382 for April 2005

Adjusted federal long-term rate for the current month	4.19%
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.)	4.20%

## REV. RUL. 2005-23 TABLE 4

## Appropriate Percentages Under Section 42(b)(2) for April 2005

Appropriate percentage for the 70% present value low-income housing credit	8.02%
Appropriate percentage for the 30% present value low-income housing credit	3.44%

## REV. RUL. 2005-23 TABLE 5

## Rate Under Section 7520 for April 2005

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	5.00%
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