

July 2010 <u>www.ssd.com</u>

# Applicable Federal Rates and Housing Tax Credit Applicable Percentages for August 2010

The US Treasury (Internal Revenue Service) issues a revenue ruling each month with interest rates. The current revenue ruling is Rev. Rul. 2010-19. Highlighted below are the various applicable federal rates and housing tax credit applicable percentages for August 2010 for your reference and use, as listed in this ruling. We hope you will find this a useful reference.

This revenue ruling provides various prescribed rates for federal income tax purposes for August 2010 (the current month). Table 1 contains the short-term, midterm 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 nonfederally subsidized new buildings placed in service after July 30, 2008 and before December 31, 2013 shall not be less than 9 percent. 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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For more than 20 years, Squire Sanders lawyers have made a difference by helping clients locate financially sound investment opportunities and structure stable funding sources for today's development transactions. We are a national leader in legal services for community development and affordable housing finance including low-income housing tax credits, historic tax credits, housing bonds, New Markets Tax Credits and other community and economic development programs.

#### Contacts:

<u>Jeffrey Drew Butt</u> +1.813.202.1304

+1.561.650.7200

Todd L. Cooper +1.513.361.1239

Robert J. Eidnier +1.216.479.8676

Holly H. Heer +1.614.365.2716

Robert D. Labes +1.216.479.8601

#### Rev. Rul. 2010-19 TABLE 1

AFR for August 2010

Period for Compounding					
	Annual	Semiannual	Quarterly	Monthly	
Short-term	1				
AFR	.53%	.53%	.53%	.53%	
110% AFR	.58%	.58%	.58%	.58%	
120% AFR	.64%	.64%	.64%	.64%	
130% AFR	.69%	.69%	.69%	.69%	
Mid-term					
AFR	2.18%	2.17%	2.16%	2.16%	
110% AFR	2.40%	2.39%	2.38%	2.38%	
120% AFR	2.62%	2.60%	2.59%	2.59%	
130% AFR	2.84%	2.82%	2.81%	2.80%	
150% AFR	3.29%	3.26%	3.25%	3.24%	
175% AFR	3.84%	3.80%	3.78%	3.77%	
Long-term					
AFR	3.79%	3.75%	3.73%	3.72%	
110% AFR	4.17%	4.13%	4.11%	4.09%	
120% AFR	4.55%	4.50%	4.47%	4.46%	
130% AFR	4.94%	4.88%	4.85%	4.83%	

# Rev. Rul. 2010-19 TABLE 2

Adjusted AFR for August 2010

Period for Compounding						
	Annual	Semiannual	Quarterly	Monthly		
Short-term adjusted AFR	.58%	.58%	.58%	.58%		
Mid-term adjusted AFR	1.93%	1.92%	1.92%	1.91%		
Long-term adjusted AFR	3.98%	3.94%	3.92%	3.91%		

### Rev. Rul. 2010-19 TABLE 3

Rates Under Section 382(f) for August 2010

Adjusted federal long-term rate for the current month	3.98%
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)	

### Rev. Rul. 2010-19 TABLE 4

Appropriate Percentages Under Section 42(b)(1) for August 2010

Note: Under Section 42(b)(2), the applicable percentage for nonfederally subsidized new buildings placed in service after July 30, 2008 and before December 31, 2013 shall not be less than 9 percent.

<u>David L. Lapides</u> +1.813.202.1319

<u>Steven F. Mount</u> +1.614.365.2727

Erik J. Rickard +1.614.365.2808

Michael D. Saad +1.614.365.2735

Andréa C. Townsend +1.213.689.5157

Bryan J. Venesy +1.614.365.2708 +1.513.361.1218

<u>Philip R. Westerman</u> +1.614.365.2836

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Appropriate percentage for the 70% present value low-income housing credit	7.69%
Appropriate percentage for the 30% present value low-income housing credit	3.30%

## Rev. Rul. 2010-19 TABLE 5

Rate Under Section 7520 for August 2010

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	2.6%

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