

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

Federal short-term, mid-term, and long-term rates are set forth for the month of June 2001. See Rev. Rul. 2001–27, beginning on this page.

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## Section 704(c).—Contributed Property

26 CFR 1.704–3: *Contributed property.*

Can a Qualified Master Feeder-Structure aggregate built-in gains and losses from contributed securities for purposes of making section 704(c) and reverse section 704(c) allocations? See Rev. Proc. 2001–36, page 1326.

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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 June 2001. See Rev. Rul. 2001–27, beginning 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 June 2001. See Rev. Rul. 2001–27, beginning on this page.

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## Section 942.—Foreign Trading Gross Receipts

This revenue procedure addresses elections under sections 942 and 943 of the Internal Revenue Code and under section 5(c)(2) of Pub. L. No. 106–519, 114 Stat. 2423. See Rev. Proc. 2001–37, page 1327.

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## Section 943.—Other Definitions and Special Rules

This revenue procedure addresses elections under sections 942 and 943 of the Internal Revenue Code and under section 5(c)(2) of Pub. L. No. 106–519, 114 Stat. 2423. See Rev. Proc. 2001–37, page 1327.

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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**

## 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 June 2001. See Rev. Rul. 2001–27, beginning on this page.

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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 June 2001. See Rev. Rul. 2001–27, beginning 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 June 2001. See Rev. Rul. 2001–27, beginning 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 June 2001. See Rev. Rul. 2001–27, beginning 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 June 2001. See Rev. Rul. 2001–27, beginning on this page.

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**the long-term exempt rate.** For purposes of sections 382, 1274, 1288, and other sections of the Code, tables set forth the rates for June 2001.

**Rev. Rul. 2001-27**

This revenue ruling provides various prescribed rates for federal income tax purposes for June 2001 (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 ap-

propriate 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. 2001-27 TABLE 1				
Applicable Federal Rates (AFR) for June 2001				
	<i>Period for Compounding</i>			
	<i>Annual</i>	<i>Semiannual</i>	<i>Quarterly</i>	<i>Monthly</i>
<i>Short-Term</i>				
AFR	4.15%	4.11%	4.09%	4.08%
110% AFR	4.57%	4.52%	4.49%	4.48%
120% AFR	4.99%	4.93%	4.90%	4.88%
130% AFR	5.41%	5.34%	5.30%	5.28%
<i>Mid-Term</i>				
AFR	5.02%	4.96%	4.93%	4.91%
110% AFR	5.53%	5.46%	5.42%	5.40%
120% AFR	6.04%	5.95%	5.91%	5.88%
130% AFR	6.55%	6.45%	6.40%	6.36%
150% AFR	7.58%	7.44%	7.37%	7.33%
175% AFR	8.87%	8.68%	8.59%	8.53%
<i>Long-Term</i>				
AFR	5.75%	5.67%	5.63%	5.60%
110% AFR	6.34%	6.24%	6.19%	6.16%
120% AFR	6.92%	6.80%	6.74%	6.71%
130% AFR	7.51%	7.37%	7.30%	7.26%

REV. RUL. 2001-27 TABLE 2				
Adjusted AFR for June 2001				
	<i>Period for Compounding</i>			
	<i>Annual</i>	<i>Semiannual</i>	<i>Quarterly</i>	<i>Monthly</i>
<i>Short-term</i>				
adjusted AFR	3.46%	3.43%	3.42%	3.41%
<i>Mid-term</i>				
adjusted AFR	3.99%	3.95%	3.93%	3.92%
<i>Long-term</i>				
adjusted AFR	5.01%	4.95%	4.92%	4.90%

REV. RUL. 2001-27 TABLE 3	
Rates Under Section 382 for June 2001	
Adjusted federal long-term rate for the current month	5.01%
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.)	5.01%

REV. RUL. 2001-27 TABLE 4

Appropriate Percentages Under Section 42(b)(2) for June 2001

Appropriate percentage for the 70% present value low-income housing credit	8.26%
Appropriate percentage for the 30% present value low-income housing credit	3.54%

REV. RUL. 2001-27 TABLE 5

Rate Under Section 7520 for June 2001

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	6.0%
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