APPENDIX B (Exemption only for individual nationals)

The following qualified income tax treaties cover only individual nationals of the treaty country and exempt all such individual nationals from the tax imposed by section 5000C:

|--|

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. 2015–8

This revenue ruling provides various prescribed rates for federal income tax

purposes for May 2015 (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 shortterm, 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 longterm tax-exempt rate described in section 382(f). Table 4 contains the appropriate percentages for determining the lowincome 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 non-federally subsidized new buildings placed in service after July 30, 2008, with respect to housing credit dollar amount allocations made before January 1, 2015 shall not be less than 9%.

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. 2015–8 TABLE 1		
	Applicat	ble Federal Rates (AFR) for M	lay 2015	
		Period for Compounding		
	Annual	Semiannual	Quarterly	Monthly
		Short-term		
AFR	.43%	.43%	.43%	.43%
110% AFR	.47%	.47%	.47%	.47%
120% AFR	.52%	.52%	.52%	.52%
130% AFR	.56%	.56%	.56%	.56%
		Mid-term		
AFR	1.53%	1.52%	1.52%	1.52%
110% AFR	1.68%	1.67%	1.67%	1.66%
120% AFR	1.83%	1.82%	1.82%	1.81%
130% AFR	1.99%	1.98%	1.98%	1.97%
150% AFR	2.29%	2.28%	2.27%	2.27%
175% AFR	2.68%	2.66%	2.65%	2.65%
		Long-term		
AFR	2.30%	2.29%	2.28%	2.28%
110% AFR	2.54%	2.52%	2.51%	2.51%
120% AFR	2.77%	2.75%	2.74%	2.73%
130% AFR	3.00%	2.98%	2.97%	2.96%

	REV. RU	JL. 2015–8 TABLE 2			
	Adjuste	d AFR for May 2015			
Period for Compounding					
	Annual	Semiannual	Quarterly	Monthly	
Short-term adjusted AFR	.43%	.43%	.43%	.43%	
Mid-term adjusted AFR	1.43%	1.42%	1.42%	1.42%	
Long-term adjusted AFR	2.30%	2.29%	2.28%	2.28%	

REV. RUL. 2015–8 TABLE 3 Rates Under Section 382 for May 2015	
Adjusted federal long-term rate for the current month	2.30%
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.)	2.47%

REV. RUL. 2015–8 TABLE 4 Appropriate Percentages Under Section 42(b)(1) for May 2015

Note: Under section 42(b)(2), the applicable percentage for non-federally subsidized new buildings placed in service after July 30, 2008, with respect to housing credit dollar amount allocations made before January 1, 2015, shall not be less than 9%.

Appropriate percentage for the 70% present value loW-income housing credit	7.44%
Appropriate percentage for the 30% present value loW-income housing credit	3.19%

REV. RUL. 2015–8 TABLE 5 Rate Under Section 7520 for May 2015

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

1.8%