#### Part 1

#### Section 6621,--Determination of Rate of Interest

26 CFR 301.6621-1: Interest rate.

#### Rev. Rul. 2008-47

Section 6621 of the Internal Revenue Code establishes the rates for interest on tax overpayments and tax underpayments. Under section 6621(a)(1), the overpayment rate is the sum of the federal short-term rate plus 3 percentage points (2 percentage points in the case of a corporation), except the rate for the portion of a corporate overpayment of tax exceeding \$10,000 for a taxable period is the sum of the federal short-term rate plus 0.5 of a percentage point. Under section 6621(a)(2), the underpayment rate is the sum of the federal short-term rate plus 3 percentage points.

Section 6621(c) provides that for purposes of interest payable under section 6601 on any large corporate underpayment, the underpayment rate under section 6621(a)(2) is determined by substituting "5 percentage points" for "3 percentage points." See section 6621(c) and section 301.6621-3 of the Regulations on Procedure and Administration for the definition of a large corporate underpayment and for the rules for determining the applicable date. Section 6621(c) and section 301.6621-3 are generally effective for periods after December 31, 1990.

Section 6621(b)(1) provides that the Secretary will determine the federal shortterm rate for the first month in each calendar quarter. Section 6621(b)(2)(A) provides that the federal short-term rate determined under section 6621(b)(1) for any month applies during the first calendar quarter beginning after that month. Section 6621(b)(3) provides that the federal short-term rate for any month is the federal short-term rate determined during that month by the Secretary in accordance with section 1274(d), rounded to the nearest full percent (or, if a multiple of 1/2 of 1 percent, the rate is increased to the next highest full percent).

Notice 88-59, 1988-1 C.B. 546, announced that, in determining the quarterly interest rates to be used for overpayments and underpayments of tax under section 6621, the Internal Revenue Service will use the federal short-term rate based on daily compounding because that rate is most consistent with section 6621 which, pursuant to section 6622, is subject to daily compounding.

Rounded to the nearest full percent, the federal short-term rate based on daily compounding determined during the month of July 2008 is 3 percent. Accordingly, an overpayment rate of 6 percent (5 percent in the case of a corporation) and an underpayment rate of 6 percent are established for the calendar quarter beginning October 1, 2008. The overpayment rate for the portion of a corporate overpayment exceeding \$10,000 for the calendar quarter beginning October 1, 2008, is 3.5 percent. The underpayment rate for large corporate underpayments for the calendar quarter beginning October 1, 2008, is 8 percent. These rates apply to amounts bearing interest during that calendar quarter.

Interest factors for daily compound interest for annual rates of 3.5 percent, 5 percent, 6 percent, and 8 percent are published in Tables 12, 63, 65, and 69 of Rev. Proc. 95-17, 1995-1 C.B. 556, 566, 617, 617, and 623.

Annual interest rates to be compounded daily pursuant to section 6622 that apply for prior periods are set forth in the tables accompanying this revenue ruling.

## **DRAFTING INFORMATION**

The principal author of this revenue ruling is Deborah Colbert-James of the Office of Associate Chief Counsel (Procedure & Administration). For further information regarding this revenue ruling, contact Ms. Colbert-James at (202) 622-8143 (not a toll-free call).

#### TABLE OF INTEREST RATES

## PERIODS BEFORE JUL. 1, 1975 - PERIODS ENDING DEC. 31, 1986

### OVERPAYMENTS AND UNDERPAYMENTS

PERIOD			RATE	In 1 DAILY					
Before	Jul. 1, 1975				6%	Table	2,	pg.	557
Jul. 1,	1975Jan. 3	31,	1976		9%	Table	4,	pg.	559
Feb. 1,	1976Jan. 3	31,	1978		7%	Table	3,	pg.	558
Feb. 1,	1978Jan. 3	31,	1980		6%	Table	2,	pg.	557
Feb. 1,	1980Jan. 3	31,	1982	1	2%	Table	5,	pg.	560
Feb. 1,	1982Dec. 3	31,	1982	2	0%	Table	6,	pg.	560
Jan. 1,	1983Jun. 3	30,	1983	1	6%	Table	37,	pg.	591
Jul. 1,	1983Dec. 3	31,	1983	1	1%	Table	27,	pg.	581
Jan. 1,	1984Jun. 3	30,	1984	1	1%	Table	75,	pg.	629
Jul. 1,	1984Dec. 3	31,	1984	1	1%	Table	75,	pg.	629
Jan. 1,	1985Jun. 3	30,	1985	1	3%	Table	31,	pg.	585
Jul. 1,	1985Dec. 3	31,	1985	1	1%	Table	27,	pg.	581
Jan. 1,	1986Jun. 3	30,	1986	1	0%	Table	25	pg.	579
Jul. 1,	1986Dec. 3	31,	1986		9%	Table	23,	pg.	577

### TABLE OF INTEREST RATES

FROM JAN. 1, 1987 - Dec. 31, 1998

# OVERPAYMENTS UNDERPAYMENTS

						199	5 -	·1 C	L.B	3.	199	5 -	-1 (	C.E	3.
						RAT	Έ	TAE	BLE	PG	RAT	E	TAE	3LE	PG
Jan.	1,	1987Mar.	31,	1987		8%		21		575	9%		23		577
Apr.	1,	1987Jun.	30,	1987		8%		21		575	9%		23		577
Jul.	1,	1987Sep.	30,	1987		8%		21		575	9%		23		577
Oct.	1,	1987Dec.	31,	1987		9%		23		577	10%		25		579
Jan.	1,	1988Mar.	31,	1988	1	. 0 응		73		627	11%		75		629
Apr.	1,	1988Jun.	30,	1988		9%		71		625	10%		73		627
Jul.	1,	1988Sep.	30,	1988		9%		71		625	10%		73		627
Oct.	1,	1988Dec.	31,	1988	1	.0왕		73		627	11%		75		629
Jan.	1,	1989Mar.	31,	1989	1	.0왕		25		579	11%		27		581
Apr.	1,	1989Jun.	30,	1989	1	.1%		27		581	12%		29		583
Jul.	1,	1989Sep.	30,	1989	1	.1%		27		581	12%		29		583
Oct.	1,	1989Dec.	31,	1989	1	.0왕		25		579	11%		27		581
Jan.	1,	1990Mar.	31,	1990	1	.0왕		25		579	11%		27		581
Apr.	1,	1990Jun.	30,	1990	1	.0왕		25		579	11%		27		581
Jul.	1,	1990Sep.	30,	1990	1	.0왕		25		579	11%		27		581
Oct.	1,	1990Dec.	31,	1990	1	.0왕		25		579	11%		27		581
Jan.	1,	1991Mar.	31,	1991	1	.0왕		25		579	11%		27		581
Apr.	1,	1991Jun.	30,	1991		9%		23		577	10%		25		579
Jul.	1,	1991Sep.	30,	1991		9%		23		577	10%		25		579

Jan. Apr. Jul. Oct. Jan. Apr. Jul. Oct. Jan. Apr. Jul. Oct. Jan. Jul. Oct. Jan.	1, 1, 1, 1, 1, 1, 1, 1, 1,	1991Dec. 1992Mar. 1992Jun. 1992Sep. 1992Dec. 1993Mar. 1993Jun. 1993Dec. 1994Mar. 1994Jun. 1994Sep. 1994Dec. 1995Mar. 1995Jun.	31, 30, 31, 31, 30, 31, 31, 30, 31, 31,		9877666666667889	23 69 67 65 17 17 17 17 12 21 22	577 623 621 621 671 571 571 571 573 575 575	10%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%	25 71 69 67 19 19 19 23 23 25	579 625 623 621 573 573 573 573 573 577 577
Jul. Oct. Jan. Apr. Jul. Oct. Jan. Apr. Jul. Oct. Jan. Apr. Jul. Oct. Jan. Apr.	1, 1, 1, 1, 1, 1, 1, 1,	1995Sep. 1995Dec. 1996Mar. 1996Jun. 1996Sep. 1996Dec. 1997Mar. 1997Jun. 1997Sep. 1997Dec. 1998Mar. 1998Sep. 1998Sep. 1998Dec.	31, 31, 30, 31, 31, 30, 31, 31, 30, 30,	1995 1996 1996 1996 1996 1997 1997 1997 1998 1998 1998	8 8 8 8 8 8 8 8 8 8 8 8 8 8 7 7 7	21 21 69 67 69 21 21 21 21 19	575 575 623 621 623 575 575 575 573 573	999899999999888	23 23 71 69 71 23 23 23 21 21 21	577 577 625 623 625 577 577 577 577 575 575

## TABLE OF INTEREST RATES FROM JANUARY 1, 1999 - PRESENT

### NONCORPORATE OVERPAYMENTS AND UNDERPAYMENTS

					1:	995-1 C.B	
					RATE	TABLE	PAGE
Jan.	1,	1999Mar.	31,	1999	7%	19	573
Apr.	1,	1999Jun.	30,	1999	88	21	575
Jul.	1,	1999Sep.	30,	1999	88	21	575
Oct.	1,	1999Dec.	31,	1999	88	21	575
Jan.	1,	2000Mar.	31,	2000	88	69	623
Apr.	1,	2000Jun.	30,	2000	9%	71	625
Jul.	1,	2000Sep.	30,	2000	9%	71	625

Oct.	1,	2000Dec	31,	2000	9%	71	625
Jan.	1,	2001Mar.	31,	2001	9%	23	577
		2001Jun.			8%	21	575
		2001Sep.			7%	19	573
		2001Dec.			7%	19	573
Jan.	1,	2002Mar.	31,	2002	6%	17	571
Apr.	1,	2002Jun.	30,	2002	6%	17	571
Jul.	1,	2002Sep.	30,	2002	6%	17	571
			31,		6%	17	571
Jan.	1,	2003Mar.	31,	2003	5%	15	569
Apr.	1,	2003Jun.	30,	2003	5%	15	569
Jul.	1,	2003Sep.	30,	2003	5%	15	569
		2003Dec.			4%	13	567
		2004Mar.			4%	61	615
		2004Jun.			5%	63	617
Jul.	1,	2004Sep.	30,	2004	4%	61	615
	-	2004Dec.	-		5%	63	617
		2005Mar.	-		5%	15	569
		2005Jun.			6%	17	571
		2005Sep.			6%	17	571
	-	2005Dec.	-		7%	19	573
			-	2006	7%	19	573
		2006Jun.			7%	19	573
		2006Sep.			8%	21	575
		2006Dec.			8%	21	575
		2007Mar.			8%	21	575
		2007Jun.			8%	21	575
		2007Sep.			88	21	575
		2007Dec.	-		88	21	575
		2008Mar.			7%	67	621
		2008Jun.			6 %	65	619
		2008Sep.			5%	63	617
Oct.	1,	2008Dec.	31,	2008	6%	65	619

### TABLE OF INTEREST RATES

## FROM JANUARY 1, 1999 - PRESENT

### CORPORATE OVERPAYMENTS AND UNDERPAYMENTS

				OVERPAYMENTS		UNDERPAYMENTS			
				199	5-1 C.I	3.	1995-1	1 C.B.	
				RATE	TABLE	PG	RATE	TABLE	PG
Jan. 1, Apr. 1, Jul. 1, Oct. 1, Jan. 1, Apr. 1, Jul. 1, Oct. 1, Jan. 1,	1999Mar. 1999Jun. 1999Sep. 1999Dec. 2000Mar. 2000Jun. 2000Sep. 2000Dec. 2001Mar.	31, 30, 30, 31, 31, 30, 31, 31,	1999 1999 1999 2000 2000 2000 2000 2001	6%%7%%7%%8%%8%8%8%8%8%	17 19 19 67 69 69	571 573 573 573 621 623 623 623 575	7888899999	19 21 21 21 69 71 71 71 23	573 575 575 575 623 625 625 625 577
Apr. 1, Jul. 1, Oct. 1, Jan. 1, Apr. 1, Jul. 1, Oct. 1,		30, 30, 31, 31, 30, 30,	2001 2001 2001 2002 2002 2002 2002	7%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%	19 17 17 15 15 15	573 571 571 569 569 569 569	8 % % % % % % % % % % % % % % % % % % %	21 19 19 17 17 17	575 573 573 571 571 571
Jan. 1, Apr. 1, Jul. 1, Oct. 1, Jan. 1, Apr. 1,	2003Mar. 2003Jun. 2003Sep. 2003Dec. 2004Mar. 2004Jun.	31, 30, 30, 31, 31, 30,	2003 2003 2003 2003 2004 2004	4% 4% 4% 3% 4%	13 13 13 11 59 61	567 567 565 613 615	5 5 5 4 4 5	15 15 15 13 61 63	569 569 569 567 615 617
Jul. 1, Oct. 1, Jan. 1, Apr. 1, Jul. 1, Oct. 1, Jan. 1, Apr. 1, Jul. 1, Oct. 1, Jul. 1, Oct. 1, Jul. 1, Oct. 1, Jul. 1, Apr. 1, Jul. 1,	2005Jun. 2005Sep. 2005Dec. 2006Mar. 2006Jun. 2006Sep. 2006Dec. 2007Mar.	30, 31, 30, 30, 31, 31, 30, 31, 30, 31, 30,	2004 2005 2005 2005 2005 2006 2006 2006 2006	3 4 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8	59 61 13 15 17 17 17 19 19 19	613 615 567 569 571 571 573 573 573 573	455667778888888	61 63 15 17 17 19 19 21 21 21 21	615 617 569 571 573 573 575 575 575 575

Oct.	1,	2007Dec.	31,	2007	7%	19	573	8%	21	575
Jan.	1,	2008Mar.	31,	2008	6%	65	619	7%	67	621
Apr.	1,	2008Jun.	30,	2008	5%	63	617	6%	65	619
Jul.	1,	2008Sep.	30,	2008	4%	61	615	5%	63	617
Oct.	1,	2008Dec.	31,	2008	5%	63	617	6%	65	619

# TABLE OF INTEREST RATES FOR LARGE CORPORATE UNDERPAYMENTS

## FROM JANUARY 1, 1991 - PRESENT

					1995-: RATE	1 C.B. TABLE	PG
Apr. Jul. Oct. Jan. Apr.	1, 1, 1, 1,	1991Mar. 1991Jun. 1991Sep. 1991Dec. 1992Mar. 1992Jun. 1992Sep.	30, 30, 31, 31, 30,	1991 1991 1991 1992 1992	13% 12% 12% 12% 11% 10%	31 29 29 29 75 73	585 583 583 583 629 627 627
Jan. Apr.	1, 1,	1992Dec. 1993Mar. 1993Jun.	31, 30,	1993 1993	9% 9% 9%	71 23 23	625 577 577
Oct. Jan.	1, 1,	1993Sep. 1993Dec. 1994Mar. 1994Jun.	31, 31,	1993 1994	9% 9% 9% 9%	23 23 23 23	577 577 577 577
Jul. Oct. Jan.	1, 1, 1,	1994Sep. 1994Dec. 1995Mar.	30, 31, 31,	1994 1994 1995	10% 11% 11%	25 27 27	579 581 581
Jul. Oct.	1,	1995Jun. 1995Sep. 1995Dec. 1996Mar.	30, 31,	1995 1995	12% 11% 11% 11%	29 27 27 75	583 581 581 629
Apr. Jul. Oct.	1, 1, 1,	1996Jun. 1996Sep. 1996Dec. 1997Mar.	30, 30, 31,	1996 1996 1996	10% 11% 11% 11%	73 75 75 27	627 629 629 581
Apr. Jul. Oct.	1, 1, 1,	1997Jun. 1997Sep. 1997Dec. 1998Mar.	30, 30, 31,	1997 1997 1997	11% 11% 11% 11%	27 27 27 27 27	581 581 581 581
Apr. Jul. Oct. Jan.	1, 1, 1,	1998Jun. 1998Sep. 1998Dec. 1999Mar. 1999Jun.	30, 30, 31, 31,	1998 1998 1998 1999	10% 10% 10% 9% 10%	25 25 25 25 23 25	579 579 579 577 579

# TABLE OF INTEREST RATES FOR CORPORATE OVERPAYMENTS EXCEEDING \$10,000

## FROM JANUARY 1, 1995 - PRESENT

						1995-1 C.B.			
						RATE	TABLE	PG	
Jan.	1,	1995Mar.	31,	1995		6.5%	18	572	
Apr.	1,	1995Jun.	30,	1995		7.5%	20	574	
Jul.	1,	1995Sep.	30,	1995		6.5%	18	572	
Oct.	1,	1995Dec.	31,	1995		6.5%	18	572	

Jan.		1996Mar.	31,	1996	6.5%	66	620
Apr.	1,	1996Jun.	30,	1996	5.5%	64	618
Jul.	1,	1996Sep.	30,	1996	6.5%	66	620
Oct.	1,	1996Dec.	31,	1996	6.5%	66	620
Jan.	1,	1997Mar.	31,	1997	6.5%	18	572
Apr.	1,	1997Jun.	30,	1997	6.5%	18	572
Jul.	1,	1997Sep.	30,	1997	6.5%	18	572
Oct.	1,	1997Dec.	31,	1997	6.5%	18	572
Jan.	1,	1998Mar.	31,	1998	6.5%	18	572
Apr.	1,	1998Jun.	30,	1998	5.5%	16	570
Jūl.	1.	1998Sep.	30,	1998	5.5%	16	570
Oct.	1,	1998Dec.	31,	1998	5.5%	16	570
Jan.	1,	1999Mar.	31,	1999	4.5%	14	568
Apr.	1,	1999Jun.	30,	1999	5.5%	16	570
Jūl.	1,	1999Sep.	30,	1999	5.5%	16	570
Oct.	1,	1999Dec.	31,	1999	5.5%	16	570
Jan.	1,	2000Mar.	31,	2000	5.5%	64	618
Apr.		2000Jun.	30,	2000	6.5%	66	620
Jul.	1,		-	2000	6.5%	66	620
Oct.	1,	_		2000	6.5%	66	620
Jan.	-	2001Mar.		2001	6.5%	18	572
Apr.		2001Jun.		2001	5.5%	16	570
Jul.		2001Sep.			4.5%	14	568
Oct.		2001Dec.		2001	4.5%	14	568
Jan.	-	2002Mar.	-	2002	3.5%	12	566
Apr.		2002Jun.			3.5%	12	566
Jul.	1,				3.5%	12	566
Oct.	1,	_		2002	3.5%	12	566
Jan.	-	2003Mar.		2003	2.5%	10	564
Apr.		2003Jun.		2003	2.5%	10	564
Jul.	1,			2003	2.5%	10	564
Oct.	1,	_		2003	1.5%	8	562
Jan.	-	2004Mar.		2004	1.5%	56	610
Apr.		2004 Jun.			2.5%	58	612
Jul.		2004 Sep.			1.5%	56	610
Oct.		2004 - Dec.			2.5%	58	612
Jan.	1,				2.5%	10	564
		2005Jun.			3.5%	12	566
		2005 Sep.			3.5%	12	566
		2005 Dep. 2005-Dec.			4.5%	14	568
		2006Mar.			4.5%	14	568
		2006 - Jun.			4.5%	14	568
		2006 Sep.			5.5%	16	570
		2006 Dec.			5.5%	16	570
		2000 Bec. 2007Mar.			5.5%	16	570
Apr.		2007 Jun.		2007	5.5%	16	570
		2007 - Sep.			5.5%	16	570
		2007Sep. 2007Dec.			5.5%	16	570
		2007Bec. 2008Mar.			4.5%	62	616
		2008Mar. 2008Jun.			3.5%	60	614
		2008Sep.			2.5%	58	612
		2008Sep. 2008Dec.			3.5%	12	566
oct.	Τ,	2000 -Dec.	J _ ,	2000	ە د . د	14	200