Section 6621. -- Determination of Interest Rate

26 CFR 301.6621-1: Interest rate.

Interest rates; underpayments and overpayments. The rate of interest determined under section 6621 of the Code for the calendar quarter beginning October 1, 2006, will be 8 percent for overpayments (7 percent in the case of a corporation), 8 percent for underpayments, and 10 percent for large corporate underpayments. The rate of interest paid on the portion of a corporate overpayment exceeding \$10,000 will be 5.5 percent.

Rev. Rul. 2006-49

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 for interest computations made after December 31, 1994. 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 short-term 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 such month.

Section 6621(b)(3) provides that the federal short-term rate for any month is the federal short-term rate determined during such month by the Secretary in accordance with § 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 2006 is 5 percent. Accordingly, an overpayment rate of 8 percent (7 percent in the case of a corporation) and an underpayment rate of 8 percent are established for the calendar quarter beginning October 1, 2006. The overpayment rate for the portion of a corporate overpayment exceeding \$10,000 for the calendar quarter beginning October 1, 2006, is 5.5 percent. The

underpayment rate for large corporate underpayments for the calendar quarter beginning October 1, 2006, is 10 percent. These rates apply to amounts bearing interest during that calendar quarter.

Interest factors for daily compound interest for annual rates of 5.5 percent, 7 percent, 8 percent, and 10 percent are published in Tables 16, 19, 21, and 25 of Rev. Proc. 95-17, 1995-1 C.B. 556, 570, 573, 575, and 579.

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 Crystal Foster of the Office of Associate Chief Counsel (Procedure & Administration). For further information regarding this revenue ruling, contact Ms. Foster at (202) 622-7198 (not a toll-free call).

TABLE OF INTEREST RATES

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

OVERPAYMENTS AND UNDERPAYMENTS

PERIOD				In 1995-1 C.F RATE DAILY RATE TAB						
Before J	ul. 1, 1975				6%	Т	able	2,	pg.	557
Jul. 1,	1975Jan. 3	31,	1976		9%	T	able	4,	pg.	559
Feb. 1,	1976Jan. 3	31,	1978		7%	T	able	3,	pg.	558
Feb. 1,	1978Jan. 3	31,	1980		6%	T	able	2,	pg.	557
Feb. 1,	1980Jan. 3	31,	1982	1	.2%	T	able	5,	pg.	560
Feb. 1,	1982Dec. 3	31,	1982	2	0%	Т	able	6,	pg.	560
Jan. 1,	1983Jun. 3	30,	1983	1	.6%	Т	able	37,	pg.	591
Jul. 1,	1983Dec. 3	31,	1983	1	.1%	Т	able	27,	pg.	581
Jan. 1,	1984Jun. 3	30,	1984	1	.1%	Т	able	75,	pg.	629
Jul. 1,	1984Dec. 3	31,	1984	1	.1%	Т	able	75,	pg.	629
Jan. 1,	1985Jun. 3	30,	1985	1	.3%	Т	able	31,	pg.	585
Jul. 1,	1985Dec. 3	31,	1985	1	.1%	Т	able	27,	pg.	581
Jan. 1,	1986Jun. 3	30,	1986	1	.0%	Т	able	25	pg.	579
Jul. 1,	1986Dec. 3	31,	1986		9%	Т	able	23,	pg.	577

TABLE OF INTEREST RATES

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

OVERPAYMENTS UNDERPAYMENTS

							_					_			
						1995-1 C.B.			199	5 -	1 (. E	8.		
						RAT	Έ	TAE	$_{ m LE}$	PG	RAT:	Е	TAE	ЗLЕ	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	.0왕		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.	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 67 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	88878888888777888888887778	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

						1995-1 C.B	•
					RATE	TABLE	PAGE
Jan.	1,	1999Mar.	31,	1999	7%	19	573
Apr.	1,	1999Jun.	30,	1999	8%	21	575
Jul.	1,	1999Sep.	30,	1999	8%	21	575
Oct.	1,	1999Dec.	31,	1999	8%	21	575
Jan.	1,	2000Mar.	31,	2000	8%	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
		2001Mar.			9%	23	577
		2001Jun.			8%	21	575
		2001Sep.			7%	19	573
		2001Dec.			7%	19	573
	-	2002Mar.	-		6%	17	571
Apr.	1,	2002Jun.	30,	2002	6%	17	571
Jūl.	1,	2002Sep.	30,	2002	6%	17	571
Oct.	1,	2002Dec.	31,	2002	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
Oct.	1,	2003Dec.	31,	2003	4%	13	567
		2004-—Mar.			4%	61	615
		2004Jun.			5%	63	617
Jul.	1,	2004Sep.	30,	2004	4%	61	615
Oct.	1,	2004Dec.	31,	2004	5%	63	617
		2005—-Mar.	-		5%	15	569
_		2005Jun.			6%	17	571
		2005Sep.			6%	17	571
	-	2005Dec.	-		7%	19	573
		2006Mar.			7%	19	573
_	-	2006Jun.	-		7%	19	573
		2006Sep.			8%	21	575
Oct.	1,	2006Dec.	31,	2006	8%	21	575

TABLE OF INTEREST RATES FROM JANUARY 1, 1999 - PRESENT

CORPORATE OVERPAYMENTS AND UNDERPAYMENTS

				,	OVERPAYMENTS				UNDERPAYMENTS			
				•	199	5-1 C.E	3.	1995-	1 C.B.			
				RA	TE	TABLE	PG	RATE	TABLE	PG		
•	999Mar. 999Jun.	•			6% 7%	17 19	571 573	7% 8%	19 21	573 575		
_	999Sep.	-			7% 7%	19	573	8%	21	575		
•	999Dec.	-			7%	19	573	8%	21	575		
Jan. 1, 2	000Mar.	31,	2000		7%	67	621	8%	69	623		
Apr. 1, 2	000Jun.	30,	2000		8%	69	623	9%	71	625		

		2000Sep. 2000Dec.			8 % 8 %	69 69	623 623	9% 9%	71 71	625 625
	-	2001Mar.	-		8%	21	575	9%	23	577
Apr.		2001Jun.		2001	7%	19	573	8%	21	575
_	-	2001Sep.	-	2001	6%	17	571	7%	19	573
		2001Dec.			6%	17	571	7%	19	573
Jan.	-	2002Mar.	-	2002	5%	15	569	6%	17	571
Apr.		2002Jun.		2002	5%	15	569	6%	17	571
Jul.		2002Sep.			5%	15	569	6%	17	571
		2002Dec.		2002	5%	15	569	6%	17	571
Jan.	1,	2003Mar.	31,	2003	4%	13	567	5%	15	569
Apr.	1,	2003Jun.	30,	2003	4%	13	567	5%	15	569
Jūl.	1,	2003Sep.	30,	2003	4%	13	567	5%	15	569
Oct.	1,	2003Dec.	31,	2003	3%	11	565	4%	13	567
Jan.	1,	2004-—Mar.	31,	2004	3%	59	613	4%	61	615
Apr.	1,	2004Jun.	30,	2004	4%	61	615	5%	63	617
Jul.	1,	2004Sep.	30,	2004	3%	59	613	4%	61	615
Oct.	1,	2004Dec.	31,	2004	4%	61	615	5%	63	617
Jan.	1,	2005Mar.	31,	2005	4%	13	567	5%	15	569
Apr.	1,	2005Jun.	30,	2005	5%	15	569	6%	17	571
Jul.	1,	2005Sep.	30,	2005	5%	15	569	6%	17	571
Oct.	1,	2005Dec.	31,	2005	6%	17	571	7%	19	573
Jan.	1,	2006Mar.	31,	2006	6%	17	571	7%	19	573
Apr.	1,	2006Jun.	30,	2006	6%	17	571	7%	19	573
Jul.	1,	2006Sep.	30,	2006	7%	19	573	8%	21	575
Oct.	1,	2006Dec.	31,	2006	7%	19	573	8%	21	575
			TAB1	LE OF	INTEREST	RATI	ES FOR			

FROM JANUARY 1, 1991 - PRESENT

LARGE CORPORATE UNDERPAYMENTS

						1 C.B. TABLE	
	-	1991Mar.	-			31	
_		1991Jun.				29	
		1991Sep.					
Oct.	1,	1991Dec.	31,	1991	12%	29	583
Jan.	1,	1992Mar.	31,	1992	11%	75	629
Apr.	1,	1992Jun.	30,	1992	10%	73	627
Jul.	1,	1992Sep.	30,	1992	10%	73	627
Oct.	1,	1992Dec.	31,	1992	9%	71	625
Jan.	1,	1993Mar.	31,	1993	9%	23	577
Apr.	1,	1993Jun.	30,	1993	9%	23	577
Jul.	1,	1993Sep.	30,	1993	9%	23	577
Oct.	1,	1993Dec.	31,	1993	9%	23	577
Jan.	1,	1994Mar.	31,	1994	9%	23	577
Apr.	1,	1994Jun.	30,	1994	9%	23	577
Jūl.	1,	1994Sep.	30,	1994	10%	25	579
Oct.	1,	1994Dec.	31,	1994	11%	27	581
		1995Mar.			11%	27	581
		1995Jun.			12%		583

- 1	-	1005 0	2.0	1005	110	0.17	E 0.1
		1995Sep.			11%	27	581
		1995Dec.			11%	27	581
		1996Mar.			11%	75	629
		1996Jun.			10%	73	627
Jul.	1,	1996Sep.	30,	1996	11%	75	629
Oct.	1,	1996Dec.	31,	1996	11%	75	629
Jan.	1,	1997Mar.	31,	1997	11%	27	581
		1997Jun.			11%	27	581
		1997Sep.			11%	27	581
		1997Dec.			11%	27	581
		1998Mar.			11%	27	581
		1998Jun.			10%	25	579
		1998Sep.			10%	25	579
		1998Dec.			10%	25	579
		1999Mar.			9%	23	577
		1999Jun.			10%	25	579
		1999Sep.			10%	25	579
	-	1999Dec.	-		10%	25	579
Jan.	1,	2000Mar.	31,	2000	10%	73	627
Apr.	1,	2000Jun.	30,	2000	11%	75	629
Jul.	1,	2000Sep.	30,	2000	11%	75	629
		2000Dec.			11%	75	629
		2001Mar.			11%	27	581
	-	2001Jun.	-		10%	25	579
_		2001Sep.			9%	23	577
		2001Dec.			9%	23	577
		2002Mar.			8%	21	575
		2002 - Jun.			8%	21	575
		2002 Sun. 2002Sep.			8%	21	575
					8%		
		2002Dec.				21	575
		2003Mar.			7%	19	573
		2003Jun.			7%	19	573
		2003Sep.			7%	19	573
		2003Dec.			6%	17	571
	-	2004-—Mar.	-		6%	65	619
		2004Jun.			7%	67	621
Jul.	1,	2004Sep.	30,	2004	6%	65	619
Oct.	1,	2004Dec.	31,	2004	7%	67	621
Jan.	1,	2005Mar.	31,	2005	7%	19	573
Apr.	1,	2005Jun.	30,	2005	8%	21	575
	-	2005Sep.	-	2005	8%	21	575
Oct.		2005Dec.		2005	9%	23	577
Jan.			31,	2006	9%	23	577
Apr.	-	2006—Jun.		2006	9%	23	577
		2006 San. 2006-Sep.			10%	25	579
		2006Sep. 2006Dec.			10%	25	579
oct.	- ,	ZOOO DEC.	J ± ,	2000	T O .0	ر ک	212

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

FROM JANUARY 1, 1995 - PRESENT

						RATE	TABLE	PG
Apr. Jul. Oct. Jan.	111111111111111111111111111111111111111	1995Mar. 1995Jun. 1995Dec. 1995Dec. 1996Mar. 1996Sep. 1996Dec. 1997Mar. 1997Jun. 1997Sep. 1997Dec. 1998Mar. 1998Jun. 1998Sep. 1998Dec. 1999Mar. 1999Sep. 1999Dec. 2000Mar. 2000Jun. 2000Sep. 2001Mar. 2001Jun. 2001Sep. 2001Dec. 2001Dec. 2002Mar. 2002Sep. 2002Dec. 2003Mar. 2003Jun.	30, 31, 31, 30, 31, 30, 31, 30, 31, 30, 31, 30, 31, 30, 31, 30, 31, 30, 31, 30, 31, 31, 30, 31, 31, 30, 31, 31, 31, 31, 31, 31, 31, 31, 31, 31	1995 1995 1996 1996 1996 1997 1997 1997 1998 1998 1998 1999 1999		E % % % % % % % % % % % % % % % % % % %	TABLE 18 20 18 18 66 64 66 68 18 18 18 16 16 16 16 66 66 18 18 11 12 12 12 10 10	PG 572 574 572 572 618 620 572 572 570 570 570 570 570 570 570 570
Jul. Oct. Jan.	1, 1, 1,	2003 - Sep. 2003 - Sep. 2003 - Dec. 2004 - Mar. 2004 - Jun.	30, 31, 31,	2003 2003 2004		2.5% 1.5% 1.5% 2.5%	10 8562 56610 58	564
Jul.	1,	2004Sep. 2004Dec.	30,	2004		1.5% 2.5%	56 58612	610
Jan. Apr. Jul. Oct. Jan. Apr. Jul.	1, 1, 1, 1, 1,	2005—-Mar. 2005—-Jun. 2005—-Sep. 2005Dec. 2006Mar. 2006—-Jun. 2006—-Sep. 2006Dec.	31, 30, 30, 31, 31, 30,	2005 2005 2005 2005 2006 2006 2006		2 . 5 % % 3 . 5 % % 4 . 5 % % 4 . 5 % % 5	10 12 12 14 14 14 14 16	564 566 568 568 568 570 570