Part 1

Section 6621.--Determination of Rate of Interest

26 CFR 301.6621-1: Interest rate.

Rev. Rul. 2008-54

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)(2)(B) provides that in determining the addition to tax under section 6654 for failure to pay estimated tax for any taxable year, the federal short-term rate that applies during the third month following the taxable year also applies during the first 15 days of the fourth month following the taxable year. 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.

The federal short-term rate determined in accordance with section 1274(d) during October 2008 is the rate published in Revenue Ruling 2008-50 to take effect beginning November 1, 2008. The federal short-term rate, rounded to the nearest full percent, based on daily compounding determined during the month of October 2008 is 2 percent. Accordingly, an overpayment rate of 5 percent (4 percent in the case of a corporation) and an underpayment rate of 5 percent are established for the calendar quarter beginning January 1, 2009. The overpayment rate for the portion of a corporate overpayment exceeding \$10,000 for the calendar quarter beginning January 1, 2009, is 2.5 percent. The underpayment rate for large corporate underpayments for the calendar quarter beginning January 1, 2009, is 7 percent. These rates apply to amounts bearing interest during that calendar quarter.

Under section 6621(b)(2)(B), the 5 percent rate also applies to estimated tax underpayments for the first calendar quarter in 2009 and for the first 15 days in April 2009.

Interest factors for daily compound interest for annual rates of 2.5 percent, 4 percent, 5 percent, and 7 percent are published in Tables 10, 13, 15, and 19 of Rev. Proc. 95-17, 1995-1 C.B. 556, 564, 567, 569, and 573.

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

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TABLE OF INTEREST RATES

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

OVERPAYMENTS AND UNDERPAYMENTS

PERIOD		RATE	In 1995-1 C.B. DAILY RATE TABLE
Before Jul. 1, 1975		6%	Table 2, pg. 557
Jul. 1, 1975Jan. 31,		9%	Table 4, pg. 559
Feb. 1, 1976Jan. 31,	1978	7%	Table 3, pg. 558
Feb. 1, 1978Jan. 31,	1980	6%	Table 2, pg. 557
Feb. 1, 1980Jan. 31,	1982	12%	Table 5, pg. 560
Feb. 1, 1982Dec. 31,	1982	20%	Table 6, pg. 560
Jan. 1, 1983Jun. 30,	1983	16%	Table 37, pg. 591
Jul. 1, 1983Dec. 31,	1983	11%	Table 27, pg. 581
Jan. 1, 1984Jun. 30,	1984	11%	Table 75, pg. 629
Jul. 1, 1984Dec. 31,	1984	11%	Table 75, pg. 629
Jan. 1, 1985Jun. 30,	1985	13%	Table 31, pg. 585
Jul. 1, 1985Dec. 31,	1985	11%	Table 27, pg. 581
Jan. 1, 1986Jun. 30,	1986	10%	Table 25 pg. 579
Jul. 1, 1986Dec. 31,	1986	9%	Table 23, pg. 577

TABLE OF INTEREST RATES

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

						OVERPAYMENTS				UNDERPAYMENTS		
						199 RAT	_		C.B. BLE PG	1995 RATE		.B. LE PG
Jan	1	1987Mar.	31	1987		8%		21	575	9%	23	577
	-	1987Jun.	-			8%		21	575	9%	23	577
_		1987Sep.				8%		21	575	9 %	23	577
		1987Dec.				9%		23	577	10%	25	579
	-	1988Mar.	-			10%		73	627	11%	75	629
	-	1988Jun.	-		•	9%		71	625	10%	73	627
_		1988Sep.				9%		71	625	10%	73	627
		1988Dec.				10%	•	73	627	11%	75	629
	-	1989Mar.	-			10%	2	25	579	11%	27	581
Apr.	1,	1989Jun.	30,	1989		11%	2	27	581	12%	29	583
Jūl.	1,	1989Sep.	30,	1989		11%	2	27	581	12%	29	583
Oct.	1,	1989Dec.	31,	1989		10%	2	25	579	11%	27	581
Jan.	1,	1990Mar.	31,	1990		10%	2	25	579	11%	27	581
Apr.	1,	1990Jun.	30,	1990		10%	2	25	579	11%	27	581
Jul.	1,	1990Sep.	30,	1990		10%	2	25	579	11%	27	581
Oct.	1,	1990Dec.	31,	1990		10%	2	25	579	11%	27	581
Jan.	1,	1991Mar.	31,	1991		10%	2	25	579	11%	27	581
_	-	1991Jun.	-			9%		23	577	10%	25	579
Jul.	1,	1991Sep.	30,	1991		9%	2	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

					19	995-1 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	88	21	575
Oct.	1,	1999Dec.	31,	1999	88	21	575
Jan.	1,	2000Mar.	31,	2000	88	69	623
Apr.	1,	2000Jun.	30,	2000	9왕	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
Apr. 1, 2001Jun. 30, 2001	8%	21	575
Jul. 1, 2001Sep. 30, 2001	7%	19	573
Oct. 1, 2001Dec. 31, 2001	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
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
Jan. 1, 2004Mar. 31, 2004	4%	61	615
Apr. 1, 2004Jun. 30, 2004	5%	63	617
Jul. 1, 2004Sep. 30, 2004	4%	61	615
Oct. 1, 2004Dec. 31, 2004	5%	63	617
Jan. 1, 2005Mar. 31, 2005	5%	15	569
Apr. 1, 2005Jun. 30, 2005	6%	17	571
Jul. 1, 2005Sep. 30, 2005	6%	17	571
Oct. 1, 2005Dec. 31, 2005	7%	19	573
Jan. 1, 2006Mar. 31, 2006	7%	19	573
Apr. 1, 2006Jun. 30, 2006	7%	19	573
Jul. 1, 2006Sep. 30, 2006	8%	21	575
Oct. 1, 2006Dec. 31, 2006	8%	21	575
Jan. 1, 2007Mar. 31, 2007	8%	21	575
Apr. 1, 2007Jun. 30, 2007	8%	21	575
Jul. 1, 2007Sep. 30, 2007	8%	21	575
Oct. 1, 2007Dec. 31, 2007	8%	21	575
Jan. 1, 2008Mar. 31, 2008	7%	67	621
Apr. 1, 2008Jun. 30, 2008	6%	65	619
Jul. 1, 2008Sep. 30, 2008	5%	63	617
Oct. 1, 2008Dec. 31, 2008	6%	65	619
Jan. 1, 2009Mar. 31, 2009	5%	15	569

TABLE OF INTEREST RATES

FROM JANUARY 1, 1999 - PRESENT

CORPORATE OVERPAYMENTS AND UNDERPAYMENTS

		OVE	RPAYMEI	NTS	UNDE	RPAYMEI	NTS
		199	5-1 C.	В.	1995-	1 C.B.	
		RATE	TABLE	PG	RATE	TABLE	PG
Jan. 1, 1999Mar. 31	•	6%	17	571	7%	19	573
Apr. 1, 1999Jun. 30	•	7%	19	573	88	21	575
Jul. 1, 1999Sep. 30	•	7%	19	573	88	21	575
Oct. 1, 1999Dec. 31		7% - °	19	573	88	21	575
Jan. 1, 2000Mar. 31		7%	67	621	88	69	623
Apr. 1, 2000Jun. 30		88	69	623	9%	71	625
Jul. 1, 2000Sep. 30		88	69	623	9%	71	625
Oct. 1, 2000Dec. 31	•	88	69	623	9%	71	625
Jan. 1, 2001Mar. 31		88	21	575	9%	23	577
Apr. 1, 2001Jun. 30		7%	19	573	88	21	575
Jul. 1, 2001Sep. 30	•	6%	17	571	7%	19	573
Oct. 1, 2001Dec. 31	•	6%	17	571	7%	19	573
Jan. 1, 2002Mar. 31		5%	15	569	6%	17	571
Apr. 1, 2002Jun. 30		5%	15	569	6%	17	571
Jul. 1, 2002Sep. 30	•	5%	15	569	6%	17	571
Oct. 1, 2002Dec. 31		5%	15	569	6%	17	571
Jan. 1, 2003Mar. 31	•	4%	13	567	5%	15	569
Apr. 1, 2003Jun. 30		4%	13	567	5%	15	569
Jul. 1, 2003Sep. 30		4%	13	567	5%	15	569
Oct. 1, 2003Dec. 31		3%	11	565	4%	13	567
Jan. 1, 2004Mar. 31	•	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		7%	19	573	8%	21	575
Oct. 1, 2006Dec. 31		7%	19	573	8%	21	575
Jan. 1, 2007Mar. 31		7%	19	573	8%	21	575
Apr. 1, 2007Jun. 30	•	7%	19	573	8%	21	575
Jul. 1, 2007Sep. 30		7%	19	573	8%	21	575
-							

Oct. 1,	2007Dec.	31,	2007	7%	19	573	88	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
Jan. 1,	2009Mar.	31,	2009	4%	13	567	5%	15	569

TABLE OF INTEREST RATES FOR LARGE CORPORATE UNDERPAYMENTS

FROM JANUARY 1, 1991 - PRESENT

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

Jul. Oct.		1999Sep. 1999Dec.			10% 10%	25 25	579 579
		2000Mar.			10%	73	627
-	-	2000Jun.	-		11%	75	629
	-	2000Sep.	-		11%	75	629
Oct.	•	2000Dec.			11%	75	629
Jan.	-	2001Mar.	-		11%	27	581
Apr.	-	2001Jun.			10%	25	579
	1,	-			9%	23	577
Oct.	1,				9%	23	577
Jan.		2002Mar.			88	21	575
Apr.		2002Jun.			8%	21	575
Jul.		2002Sep.			8%	21	575
Oct.	-	2002Dec.	-		8%	21	575
Jan.	-		31,		7%	19	573
-	-	2003Jun.	-		7%	19	573
		2003Sep.			7%	19	573
		2003Dec.			6% 6%	17	571
		2004 Mar.			6% 7%	65 67	619 621
Apr. Jul.		2004Jun. 2004Sep.			7% 6%	6 <i>7</i> 65	619
Oct.		2004Sep. 2004Dec.			7%	67	621
	•		31,		7% 7%	19	573
		2005Mar. 2005Jun.			7 % 8 %	21	575
	1,				8%	21	575
		2005 Sep. 2005-Dec.			9%	23	577
Jan.	-	2005 Dec. 2006Mar.	-		9%	23	577
Apr.	•	2006Jun.	-		9%	23	577
Jul.	-	2006 Sep.	-		10%	25	579
Oct.	-	2006 Dec.	-		10%	25	579
	-	2007Mar.	-		10%	25	579
		2007-Jun.			10%	25	579
_	1,				10%	25	579
		2007Dec.			10%	25	579
Jan.		2008Mar.			9%	71	625
Apr.	•	2008Jun.			8%	69	623
Jul.	•	2008Sep.			7%	67	621
Oct.		2008Dec.			8%	69	623
Jan.		2009Mar.	-		7%	19	573
	•		•				

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.	-		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.		1997Sep.			6.5%	18	572
Oct.		1997Dec.			6.5%	18	572
Jan.	-	1998Mar.	-		6.5%	18	572
Apr.		1998Jun.			5.5%	16	570
Jul.		1998Sep.			5.5%	16	570
Oct.		1998Dec.			5.5%	16	570
Jan.		1999Mar.			4.5%	14	568
Apr.		1999Jun.			5.5%	16	570
Jul.		1999Sep.			5.5%	16	570
Oct.		1999Dec.			5.5%	16	570
Jan.	-	2000Mar.	-		5.5%	64	618
Apr.		2000 - Jun.			6.5%	66	620
Jul.		2000 San.			6.5%	66	620
Oct.		2000 Sep. 2000-Dec.			6.5%	66	620
Jan.		2000Bec. 2001Mar.			6.5%	18	572
						16	570
Apr.		2001Jun.			5.5%		
Jul.	-	2001Sep.			4.5%	14	568
Oct.		2001Dec.			4.5%	14	568
Jan.		2002Mar.			3.5%	12	566
Apr.		2002Jun.			3.5%	12	566
Jul.	-	2002Sep.			3.5%	12	566
Oct.		2002Dec.			3.5%	12	566
Jan.		2003Mar.			2.5%	10	564
Apr.		2003Jun.			2.5%	10	564
Jul.		2003Sep.			2.5%	10	564
Oct.		2003Dec.			1.5%	8	562
Jan.		2004Mar.			1.5%	56	610
Apr.		2004Jun.			2.5%	58	612
Jul.		2004Sep.			1.5%	56	610
Oct.	-	2004Dec.	-		2.5%	58	612
Jan.		2005Mar.			2.5%	10	564
Apr.	1,	2005Jun.	30,	2005	3.5%	12	566
Jul.	1,	2005Sep.	30,	2005	3.5%	12	566
Oct.	1,	2005Dec.	31,	2005	4.5%	14	568
Jan.	1,	2006Mar.	31,	2006	4.5%	14	568
Apr.	1,	2006Jun.	30,	2006	4.5%	14	568
Jul.	1,	2006Sep.	30,	2006	5.5%	16	570
Oct.	1,	2006Dec.	31,	2006	5.5%	16	570
Jan.	1,	2007Mar.	31,	2007	5.5%	16	570
Apr.	1,	2007Jun.	30,	2007	5.5%	16	570
		2007Sep.			5.5%	16	570
		2007Dec.			5.5%	16	570
		2008Mar.			4.5%	62	616
		2008Jun.			3.5%	60	614
		2008Sep.			2.5%	58	612
		2008Dec.			3.5%	60	614
	-	2009Mar.	-		2.5%	10	564
•	_,		/				