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, 2004, will be 5 percent for overpayments (4 percent in the case of a corporation), 5 percent for underpayments, and 7 percent for large corporate underpayments. The rate of interest paid on the portion of a corporate overpayment exceeding \$10,000 will be 2.5 percent.

Rev. Rul. 2004-92

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 \S 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 2004 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 October 1, 2004. The overpayment rate for the portion of a corporate overpayment exceeding \$10,000 for the calendar quarter beginning October 1, 2004, is 2.5 percent. The underpayment rate for large corporate underpayments for the calendar quarter beginning October 1, 2004, is 7 percent. These rates apply to amounts bearing interest during that calendar quarter.

Interest factors for daily compound interest for annual rates of 2.5 percent, 4 percent, 5 percent, and 7 percent are published in Tables 58, 61, 63, and 67 of Rev. Proc. 95-17, 1995-1 C.B. 556, 612, 615, 617, and 621.

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) 622-7326 (not a toll-free call).

TABLE OF INTEREST RATES

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

OVERPAYMENTS AND UNDERPAYMENTS

PERIO	OD					RATE	In 1 DAILY			
Befor	re i	Jul. 1, 1975	5			6%	Table	2,	pg.	557
Jul.	1,	1975Jan.	31,	1976		9%	Table	4,		
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	2	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

						1995	5 - ⁻	1 C	R		1995		1 (7 -	S
						RATE	_	rabi			RATE				PG
Jan.	1.	1987Mar.	31.	1987		8%		21		575	9%	_	23		577
Apr.	-	1987Jun.	-			8%		21		575	9%		23		577
Jul.		1987Sep.		1987		8%		21		575	9%		23		577
Oct.	-	1987Dec.	-	1987		9%		23		577	10%		25		579
Jan.	-	1988Mar.	-	1988	1	.0%		73	6	527	11%		75		629
Apr.		1988Jun.		1988		9%		71	6	525	10%		73		627
Jul.		1988Sep.		1988		9%		71	6	525	10%		73		627
Oct.	1,	1988Dec.	31,	1988	1	.0%	•	73	6	527	11%		75		629
Jan.	1,	1989Mar.	31,	1989	1	.0%	:	25	5	579	11%		27		581
Apr.	1,	1989Jun.	30,	1989	1	.1%	2	27	5	81	12%		29		583
Jul.	1,	1989Sep.	30,	1989	1	.1%	2	27	5	581	12%		29		583
Oct.	1,	1989Dec.	31,	1989	1	. 0 응	2	25	5	579	11%		27		581
Jan.	1,	1990Mar.	31,	1990	1	. 0 응	2	25	5	579	11%		27		581
Apr.	1,	1990Jun.	30,	1990		.0%		25	5	579	11%		27		581
Jul.	1,	1990Sep.	30,	1990	1	. 0 %	2	25	5	579	11%		27		581
Oct.	-	1990Dec.	-	1990		. 0 응		25	5	579	11%		27		581
Jan.	1,	1991Mar.	31,	1991	1	.0%	2	25		579	11%		27		581
Apr.	•	1991Jun.	•	1991		9%		23		577	10%		25		579
Jul.		1991Sep.				9%		23		577	10%		25		579
Oct.	•	1991Dec.	•	1991		9%		23		577	10%		25		579
Jan.	-	1992Mar.	-	1992		8%		69		523	9%		71		625
Apr.	1,	1992Jun.	-	1992		7%		67		521	8%		69		623
Jul.		1992Sep.		1992		7%		67		521	88		69		623
Oct.	-	1992Dec.	-	1992		6%		65		519	7%		67		621
Jan.	•	1993Mar.	•	1993		6%		17		571	7%		19		573
Apr.		1993Jun.		1993		6%		17		571	7%		19		573
Jul.	1,	1993Sep.	30,	1993		6%		17	5	571	7%		19		573

Oct.	1.	1993Dec.	31.	1993	6%	17	5'	71	7%	1	9	573
	-	1994Mar.	-		6%	17	_	71	7%	_	9	573
Apr.	-	1994Jun.	-		6%	17	5'	71	7%	1	9	573
		1994Sep.		1994	7%	19	5'	73	8%	2	1	575
Oct.		1994Dec.			8%	21	. 5'	75	9%	2	3	577
Jan.	-	1995Mar.	-	1995	8%	21	5'	75	9%	2	3	577
Apr.	-	1995Jun.		1995	9%	23	5'	77	10왕	2	5	579
		1995Sep.		1995	8%	21	. 5'	75	9%	2	3	577
		1995Dec.		1995	8%	21	. 5'	75	9%	2	3	577
	-	1996Mar.	-	1996	8%	69	6:	23	9%	7	1	625
Apr.	1,	1996Jun.	30,	1996	7%	67	6:	21	8%	6	9	623
Jūl.		1996Sep.		1996	8%	69	6:	23	9%	7	1	625
		1996Dec.		1996	8%	69	6:	23	9%	7	1	625
Jan.	1,	1997Mar.	31,	1997	8%	21	. 5'	75	9%	2	3	577
Apr.	1,	1997Jun.	30,	1997	8%	21	. 5'	75	9%	2	3	577
Jūl.	1,	1997Sep.	30,	1997	8%	21	. 5'	75	9%	2	3	577
Oct.	1,	1997Dec.	31,	1997	8%	21	. 5'	75	9%	2	3	577
Jan.	1,	1998Mar.	31,	1998	8%	21	. 5'	75	9%	2	3	577
Apr.	1,	1998Jun.	30,	1998	7%	19	5'	73	8%	2	1	575
Jul.	1,	1998Sep.	30,	1998	7%	19	5'	73	8%	2	1	575
Oct.	1,	1998Dec.	31,	1998	7%	19	5'	73	8%	2	1	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
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,	2004-—Mar.	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

TABLE OF INTEREST RATES FROM JANUARY 1, 1999 - PRESENT CORPORATE OVERPAYMENTS AND UNDERPAYMENTS

						OVE	RPAYMEN	NTS	UNDERPAYMENTS			
						199	5-1 C.E	3.	1995-			
					R.A	ATE	TABLE	PG	RATE	TABLE	PG	
Jan.	1,	1999Mar.	31,	1999		6%	17	571	7%	19	573	
Apr.	1,	1999Jun.	30,	1999		7%	19	573	8%	21	575	
Jūl.	1,	1999Sep.	30,	1999		7%	19	573	8%	21	575	
Oct.	1,	1999Dec.	31,	1999		7%	19	573	8%	21	575	
Jan.	1,	2000Mar.	31,	2000		7%	67	621	8%	69	623	
Apr.	1,	2000Jun.	30,	2000		8%	69	623	9%	71	625	
Jul.	1,	2000Sep.	30,	2000		8%	69	623	9%	71	625	
Oct.	1,	2000Dec.	31,	2000		8%	69	623	9%	71	625	
Jan.	1,	2001Mar.	31,	2001		8%	21	575	9%	23	577	
Apr.	1,	2001Jun.	30,	2001		7%	19	573	8%	21	575	
Jul.	1,	2001Sep.	30,	2001		6%	17	571	7%	19	573	
Oct.	1,	2001Dec.	31,	2001		6%	17	571	7%	19	573	

Jan.	1,	2002Mar.	31,	2002	5%	1!	5 5	69	6%	17	571
Apr.	1,	2002Jun.	30,	2002	5%	1!	5 5	69	6%	17	571
Jul.	1,	2002Sep.	30,	2002	5%	1!	5 5	69	6%	17	571
Oct.	1,	2002Dec.	31,	2002	5왕	1!	5 5	69	6%	17	571
Jan.	1,	2003Mar.	31,	2003	4 %	13	3 5	67	5%	15	569
Apr.	1,	2003Jun.	30,	2003	4 %	13	3 5	67	5%	15	569
Jul.	1,	2003Sep.	30,	2003	4 %	13	3 5	67	5%	15	569
Oct.	1,	2003Dec.	31,	2003	3%	1:	1 5	65	4 %	13	567
Jan.	1,	2004-—Mar.	31,	2004	3%	5	9 6	13	4 %	61	615
Apr.	1,	2004Jun.	30,	2004	4 %	6.	16	15	5%	63	617
Jul.	1,	2004Sep.	30,	2004	3%	5	9 6	13	4 %	61	615
Oct.	1,	2004Dec.	31,	2004	4 %	61	1 6	15	5%	63	617

TABLE OF INTEREST RATES FOR LARGE CORPORATE UNDERPAYMENTS

FROM JANUARY 1, 1991 - PRESENT

						1 C.B. TABLE	PG
Jan.	1,	1991Mar.	31,	1991	13%	31	585
Apr.	1,	1991Jun.	30,	1991	12%	29	583
Jul.	1,	1991Sep.	30,	1991	12%	29	583
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%	_	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
Jul.	1,	1994Sep.	30,	1994	10%	25	579
Oct.	1,	1994Dec.	31,	1994	11%	27	581
Jan.	1,	1995Mar.	31,	1995	11%	27	581
Apr.	1,	1995Jun.	30,	1995	12%	29	583
Jul.	1,	1995Sep.	30,	1995	11%	27	581
Oct.	1,	1995Dec.	31,	1995	11%	27	581
Jan.	1,	1996Mar.	31,	1996	11%	75	629
Apr.	1,	1996Jun.	30,	1996	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
Apr.	1,	1997Jun.	30,	1997	11%	27	581
Jul.	1,	1997Sep.	30,	1997	11%	27	581
Oct.	1,	1997Dec.	31,	1997	11%	27	581
		1998Mar.			11%	27	581
Apr.	1,	1998Jun.	30,	1998	10%	25	579
		1998Sep.			10%	25	579
		1998Dec.			10%	25	579
		1999Mar.			9%	23	577
Apr.	1,	1999Jun.	30,	1999	10%	25	579
Jul.	1,	1999Sep.	30,	1999	10%	25	579
		1999Dec.			10%	25	579
	•	2000Mar.	•		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
Apr.	1,	2001Jun.	30,	2001	10%	25	579
Jul.	1,	2001Sep.	30,	2001	9%	23	577
		2001Dec.			9%	23	577
Jan.	1,	2002Mar.	31,	2002	8%	21	575
Apr.	1,	2002Jun.	30,	2002	8%	21	575
Jul.	1,	2002Sep.	30,	2002	8%	21	575
Oct.	1,	2002Dec.	30,	2002	8%	21	575
Jan.	1,	2003Mar.	31,	2003	7%	19	573
Apr.	1,	2003Jun.	30,	2003	7%	19	573
		2003Sep.			7%	19	573
Oct.	1,	2003Dec.	31,	2003	6%	17	571
Jan.	1,	2004-—Mar.	31,	2004	6%	65	619
Apr.	1,	2004Jun.	30,	2004	7%	67	621
Jul.	1,	2004Sep.	30,	2004	6%	65	619
Oct.	1,	2004Dec.	31,	2004	7%	67	621

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

FROM JANUARY 1, 1995 - PRESENT

						1995-1 C.B.		
						RATE	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.	1,	1996Mar.	31,	1996		6.5%	66	620
Apr.	1,	1996Jun.	30,	1996		5.5%	64	618
Jūl.	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
Jūl.	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
Jul.	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
Jul.	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.	1,	2000Jun.	30,	2000	6	.5%	66	620
Jul.	1,	2000Sep.	30,	2000	6	.5%	66	620
Oct.	1,	2000Dec.	31,	2000	6	.5%	66	620
Jan.	1,	2001Mar.	31,	2001	6	.5%	18	572
Apr.	1,	2001Jun.	30,	2001	5	.5%	16	570
Jul.	1,	2001Sep.	30,	2001	4	.5%	14	568
Oct.	1,	2001Dec.	31,	2001	4	.5%	14	568
Jan.	1,	2002Mar.	31,	2002	3	.5%	12	566
Apr.	1,	2002Jun.	30,	2002	3	.5%	12	566
Jul.	1,	2002Sep.	30,	2002	3	.5%	12	566
Oct.	1,	2002Dec.	31,	2002	3	.5%	12	566
Jan.	1,	2003Mar.	31,	2003	2	.5%	10	564
Apr.	1,	2003Jun.	30,	2003	2	.5%	10	564
Jul.	1,	2003Sep.	30,	2003	2	.5%	10	564
Oct.	1,	2003Dec.	31,	2003	1	.5%	8562	
Jan.	1,	2004-—Mar.	31,	2004	1	.5%	56610	
Apr.	1,	2004Jun.	30,	2004	2	.5%	58	612
Jūl.	1,	2004Sep.	30,	2004	1	.5%	56	610
Oct.	1,	2004Dec.	31,	2004	2	.5%	58612	