Part 1

Section 6621. -- Determination of Rate of Interest

26 CFR 301.6621-1: Interest rate.

Rev. Rul. 2008-27

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 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 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 April 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 July 1, 2008. The overpayment rate for the

portion of a corporate overpayment exceeding \$10,000 for the calendar quarter beginning July 1, 2008, is 2.5 percent. The underpayment rate for large corporate underpayments for the calendar quarter beginning July 1, 2008, 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 Wendy Kribell of the Office of Associate Chief Counsel (Procedure & Administration). For further information regarding this revenue ruling, contact Ms. Kribell at (202) 622-4570 (not a toll-free call).

TABLE OF INTEREST RATES

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

OVERPAYMENTS AND UNDERPAYMENTS

PERIOD					RATE	D	In 1 AILY			
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

						199	5-	1 (C.B		199	5 -	1 (C.E	3.
						RAT	Έ	TAE	ЗLЕ	PG	RAT	Ε	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	-	10%		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	-	10%		73		627	11%		75		629
Jan.	1,	1989Mar.	31,	1989	-	10%		25		579	11%		27		581
Apr.	1,	1989Jun.	30,	1989	-	11%		27		581	12%		29		583
Jul.	1,	1989Sep.	30,	1989	-	11%		27		581	12%		29		583
Oct.	1,	1989Dec.	31,	1989	-	10%		25		579	11%		27		581
Jan.	1,	1990Mar.	31,	1990	-	10%		25		579	11%		27		581
Apr.	1,	1990Jun.	30,	1990	-	10%		25		579	11%		27		581
Jul.	1,	1990Sep.	30,	1990	-	10%		25		579	11%		27		581
Oct.	1,	1990Dec.	31,	1990	-	10%		25		579	11%		27		581
Jan.	1,	1991Mar.	31,	1991	_	10%		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

		1991Dec. 1992Mar.	-	1991 1992	9% 8%	2: 6:		77 23	109 99	-	
Apr.	1,	1992Jun.	30,	1992	7%	6	7 62	21	88	k 69	623
Jūl.	1,	1992Sep.	30,	1992	7%	6	7 62	21	88	£ 69	623
Oct.	1,	1992Dec.	31,	1992	6%	6	5 61	L9	78	k 67	621
Jan.	1,	1993Mar.	31,	1993	6%	1	7 5	71	7 8	s 19	573
Apr.	1,	1993Jun.	30,	1993	6%	1	7 5	71	78	t 19	573
Jul.	1,	1993Sep.	30,	1993	6%	1	7 5	71	78	t 19	573
Oct.	1,	1993Dec.	31,	1993	6%	1	7 5	71	78	t 19	573
Jan.	1,	1994Mar.	31,	1994	6%	1	7 5	71	78	t 19	573
Apr.	1,	1994Jun.	30,	1994	6%	1	7 5	71	7 8	k 19	573
Jul.	1,	1994Sep.	30,	1994	7%	1	9 57	73	88	k 21	575
Oct.	1,	1994Dec.	31,	1994	8%	2	1 57	75	98	k 23	577
Jan.	1,	1995Mar.	31,	1995	8%	2	1 57	75	98	k 23	577
Apr.		1995Jun.		1995	9%	2	3 57	77	108		579
Jul.	1,	1995Sep.	30,	1995	8%	2	1 57	75	98		_
Oct.	1,	1995Dec.	31,	1995	8%	2	1 57	75	98		577
Jan.	-	1996Mar.	-	1996	8%	6	9 62	23	98	–	
Apr.		1996Jun.		1996	7%	6	7 62	21	88		623
Jul.	1,	1996Sep.	30,	1996	8%	6	9 62	23	98		
Oct.	•	1996Dec.	,	1996	8%	6	9 62	23	98	f 71	625
Jan.		1997Mar.		1997	8%	2	1 57	75	98	-	_
Apr.	1,	1997Jun.	30,	1997	8%	2	1 57	75	98	k 23	577
Jul.	1,	1997Sep.	30,	1997	8%	2	1 57	75	98	-	
Oct.	1,	1997Dec.	31,	1997	8%	2	1 57	75	98	k 23	577
	•	1998Mar.	•	1998	8%	2	1 57	75	98	k 23	577
Apr.	1,	1998Jun.	30,	1998	7%	1	9 57	73	88		575
Jul.	1,	1998Sep.	30,	1998	7%	1	-	73	8 8		
Oct.	1,	1998Dec.	31,	1998	7%	1	9 57	73	88	s 21	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.	•	2001Mar.	-		9%	23	577
Apr.	-	2001Jun.	-		8%	21	575
		2001Sep.			7%	19	573
Oct.		2001Dec.			7%	19	573
Jan.		2002Mar.			6%	17	571
Apr.	1,	2002Jun.	30,	2002	6%	17	571
Jūl.		2002Sep.			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
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
		2007Mar.			8%	21	575
Apr.		2007- Jun.			8%	21	575
Jul.	1,	2007Sep.	30,	2007	8%	21	575
Oct.	1,	2007Dec.	31,	2007	8%	21	575
		2008Mar.			7%	67	621
_		2008Jun.			6%	65	619
Jul.	1,	2008Sep.	30,	2008	5%	63	617

TABLE OF INTEREST RATES

FROM JANUARY 1, 1999 - PRESENT

CORPORATE OVERPAYMENTS AND UNDERPAYMENTS

OVERPAYMENTS	UNDERPAYMENTS						
1995-1 C.B.	1995-1 C.B.						

RATE TABLE PG RATE TABLE PG

TABLE OF INTEREST RATES FOR LARGE CORPORATE UNDERPAYMENTS

FROM JANUARY 1, 1991 - PRESENT

Jan. 1, 1991--Mar. 31, 1991 13% 31 585

Apr. 1,	1991Jun.	30,	1991	12%	29	583
	1991Sep.			12%	29	583
	1991Dec.			12%	29	583
•		-				
	1992Mar.			11%	75	629
_	1992Jun.			10%	73	627
Jul. 1,	1992Sep.	30,	1992	10%	73	627
	1992Dec.			9%	71	625
	1993Mar.			9%	23	577
				9%	23	577
_	1993Jun.					
	1993Sep.			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
_	1994Sep.			10%		579
				11%		581
	1994Dec.					
	1995Mar.			11%	<i>- '</i>	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
	1996Mar.			11%	75	629
•	1996Jun.	-		10%	73	627
_						
	1996Sep.			11%		629
	1996Dec.			11%		629
	1997Mar.			11%	27	581
Apr. 1,	1997Jun.	30,	1997	11%	27	581
Jul. 1,	1997Sep.	30,	1997	11%	27	581
	1997Dec.			11%	27	581
	1998Mar.			11%	27	581
	1998Jun.			10%	25	579
	1998Sep.			_ 0 0	25	579
	1998Dec.			10%	25	579
Jan. 1,	1999Mar.	31,	1999	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%		627
	2000 - Jun.			11%	75 75	
				_		629
	2000Sep.			11%	75	629
	2000Dec.			11%		629
Jan. 1,	2001Mar.	31,	2001	11%	27	581
Apr. 1,	2001Jun.	30,	2001	10%	25	579
Jul. 1,	2001Sep.	30,	2001	9%	23	577
	2001Dec.			9%	23	577
	2002 Mar.			8%	21	575
_	2002Jun.			8%	21	575
	2002Sep.			8%	21	575
	2002Dec.			8%	21	575
Jan. 1,	2003Mar.	31,	2003	7%	19	573
Apr. 1,	2003Jun.	30,	2003	7%	19	573
_	2003Sep.			7%	19	573
	2003Dec.			6%	17	571
	2003 Bec. 2004Mar.			6%	65	619
_	2004—Jun.			7% co.	67 65	621
Jul. 1,	2004Sep.	3U,	∠∪∪4	6%	65	619

Oct 1.	2004Dec.	31.	2004	7%	67	621
•	2005—-Mar.	,		7%	19	573
,	2005—-Jun.	,		8%	21	575
_	2005—Sep.	-		8%	21	575
	2005Dec.			9%	23	577
,	2006Mar.	,		9%	23	577
-	2006—-Jun.	-		9%	23	577
_	2006Sep.	-		10%	25	579
	2006Dec.			10%	25	579
•	2007Mar.	•		10%	25	579
Apr. 1,	2007Jun.	30,	2007	10%	25	579
_	2007Sep.	-		10%	25	579
-	2007Dec.			10%	25	579
Jan. 1,	2008Mar.	31,	2008	9%	71	625
Apr. 1,	2008Jun.	30,	2008	8%	69	623
Jul. 1,	2008Sep.	30,	2008	7%	67	621

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

FROM JANUARY 1, 1995 - PRESENT

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
		2003Mar.			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	
		2004-—Mar.			1.5%	56610	
Apr.	1,	2004Jun.	30,	2004	2.5%	58	612
	-	2004Sep.	-		1.5%	56	610
Oct.	1,	2004Dec.	31,	2004		58612	
		2005—-Mar.			2.5%	10	564
		2005Jun.			3.5%	12	566
		2005Sep.			3.5%	12	
		2005Dec.			4.5%	14	568
	-	2006Mar.	-		4.5%	14	568
_		2006Jun.			4.5%	14	568
		2006Sep.			5.5%	16	
	-	2006Dec.	-		5.5%	16	570
	-	2007Mar.	-		5.5%	16	570
_		2007Jun.			5.5%	16	570
		2007Sep.			5.5%	16	
	-	2007Dec.	-		5.5%	16	570
	-	2008Mar.	-		4.5%	62	616
_		2008Jun.			3.5%	60	614
Jul.	1,	2008Sep.	30,	2008	2.5%	58	612