Part 1

Section 6621. -- Determination of Rate of Interest

26 CFR 301.6621-1: Interest rate.

Rev. Rul. 2008-10

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)(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.

Rounded to the nearest full percent, the federal short-term rate based on daily compounding determined during the month of January 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 April 1, 2008. The overpayment rate for the portion of a corporate overpayment exceeding \$10,000 for the calendar quarter beginning April 1, 2008, is 3.5 percent. The underpayment rate for large corporate underpayments for the calendar quarter beginning April 1, 2008, is 8 percent. These rates apply to amounts bearing interest during that calendar quarter.

Under section 6621(b)(2)(B), the 7 percent rate that applies to estimated tax underpayments for the first calendar quarter in 2008, as provided in Rev. Rul. 2007-68, 2007-52 I.R.B. 1236, also applies to estimated tax underpayments for the first 15 days in April 2008.

Interest factors for daily compound interest for annual rates of 3.5 percent, 5 percent, 6 percent, and 8 percent are published in Tables 60, 63, 65, and 69 of Rev. Proc. 95-17, 1995-1 C.B. 556, 614, 617, 619, 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 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	In 1 DAILY			
Before J	ul. 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	12%	Table	5,	pg.	560
Feb. 1,	1982Dec. 3	31,	1982	20%	Table	6,	pg.	560
Jan. 1,	1983Jun. 3	30,	1983	16%	Table	37,	pg.	591
Jul. 1,	1983Dec. 3	31,	1983	11%	Table	27,	pg.	581
Jan. 1,	1984Jun. 3	30,	1984	11%	Table	75,	pg.	629
Jul. 1,	1984Dec. 3	31,	1984	11%	Table	75,	pg.	629
Jan. 1,	1985Jun. 3	30,	1985	13%	Table	31,	pg.	585
Jul. 1,	1985Dec. 3	31,	1985	11%	Table	27,	pg.	581
Jan. 1,	1986Jun. 3	30,	1986	10%	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.B		199	5 -	1 (C.E	3.
						RAT	Έ	TAE	ЗLЕ	PG	RAT	Ε	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	-	L0왕		73		627	11%		75		629
Apr.	1,	1988Jun.	30,	1988		9%		71		625	10%		73		627
Jul.	1,	1988Sep.	30,			9%		71		625	10%		73		627
		1988Dec.	-		-	L0왕		73		627	11%		75		629
Jan.	1,	1989Mar.	31,	1989		L0왕		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	-	L0왕		25		579	11%		27		581
		1990Mar.	-	1990	-	L0왕		25		579	11%		27		581
Apr.	1,	1990Jun.	30,	1990		L0왕		25		579	11%		27		581
Jul.	1,	1990Sep.	30,	1990	-	L0왕		25		579	11%		27		581
Oct.	1,	1990Dec.	31,	1990		L0왕		25		579	11%		27		581
		1991Mar.	-	1991	-	L0왕		25		579	11%		27		581
_		1991Jun.				9%		23		577	10%		25		579
Jul.	1,	1991Sep.	30,	1991		9%		23		577	10%		25		579

Jan. 1, 1992Mar. 31, 1992 8% 69 623 9% 71 Apr. 1, 1992Jun. 30, 1992 7% 67 621 8% 69	625 623 623 621
Jul. 1, 1992Sep. 30, 1992 7% 67 621 8% 69	621
Oct. 1, 1992Dec. 31, 1992 6% 65 619 7% 67	~
Jan. 1, 1993Mar. 31, 1993 6% 17 571 7% 19	573
Apr. 1, 1993Jun. 30, 1993 6% 17 571 7% 19	573
Jul. 1, 1993Sep. 30, 1993 6% 17 571 7% 19	573
Oct. 1, 1993Dec. 31, 1993 6% 17 571 7% 19	573
Jan. 1, 1994Mar. 31, 1994 6% 17 571 7% 19	573
Apr. 1, 1994Jun. 30, 1994 6% 17 571 7% 19	573
Jul. 1, 1994Sep. 30, 1994 7% 19 573 8% 21	575
Oct. 1, 1994Dec. 31, 1994 8% 21 575 9% 23	577
Jan. 1, 1995Mar. 31, 1995 8% 21 575 9% 23	577
Apr. 1, 1995Jun. 30, 1995 9% 23 577 10% 25	579
Jul. 1, 1995Sep. 30, 1995 8% 21 575 9% 23	577
Oct. 1, 1995Dec. 31, 1995 8% 21 575 9% 23	577
Jan. 1, 1996Mar. 31, 1996 8% 69 623 9% 71	625
Apr. 1, 1996Jun. 30, 1996 7% 67 621 8% 69	623
Jul. 1, 1996Sep. 30, 1996 8% 69 623 9% 71	625
Oct. 1, 1996Dec. 31, 1996 8% 69 623 9% 71	625
Jan. 1, 1997Mar. 31, 1997 8% 21 575 9% 23	577
Apr. 1, 1997Jun. 30, 1997 8% 21 575 9% 23	577
Jul. 1, 1997Sep. 30, 1997 8% 21 575 9% 23	577
Oct. 1, 1997Dec. 31, 1997 8% 21 575 9% 23	577
Jan. 1, 1998Mar. 31, 1998 8% 21 575 9% 23	577
Apr. 1, 1998Jun. 30, 1998 7% 19 573 8% 21	575
Jul. 1, 1998Sep. 30, 1998 7% 19 573 8% 21	575
Oct. 1, 1998Dec. 31, 1998 7% 19 573 8% 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	98	71	625
Jan.	1,	2001Mar.	31,	2001	98	23	577
Apr.	1,	2001Jun.	30,	2001	88	: 21	575
		2001Sep.			78	19	573
Oct.	1,	2001Dec.	31,	2001	78	19	573
Jan.	1,	2002Mar.	31,	2002	68	17	571
Apr.	1,	2002Jun.	30,	2002	68	17	571
		2002Sep.			68	17	571
		2002Dec.			68	17	571
		2003Mar.			58	15	569
		2003Jun.			5%	: 15	569
Jul.		2003Sep.			5%	: 15	569
Oct.		2003Dec.			4 8	13	567
Jan.	1,	2004-—Mar.	31,	2004	4 %	61	615
Apr.	1,	2004Jun.	30,	2004	5%	63	617
		2004Sep.			4 %	61	615
Oct.		2004Dec.			5%	63	617
Jan.	1,	2005Mar.	31,	2005	58	15	569
Apr.	1,	2005Jun.	30,	2005	68	: 17	571
		2005Sep.			68	: 17	571
		2005Dec.			78	19	573
Jan.	1,	2006Mar.	31,	2006	78	19	573
Apr.	1,	2006Jun.	30,	2006	78	19	573
Jūl.	1,	2006Sep.	30,	2006	88	21	575
		2006Dec.	31,	2006	88	21	575
Jan.	1,	2007Mar.	31,	2007	88	21	575
Apr.	1,	2007- Jun.	30,	2007	88	21	575
Jūl.		2007Sep.			88	21	575
Oct.	1,	2007Dec.	31,	2007	88	21	575
Jan.	-	2008Mar.	-		78	67	621
Apr.	1,	2008Jun.	30,	2008	68	65	619
_							

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

Jan. Apr. Jul. Oct. Jan. Apr. Jul. Oct. Jan. Apr. Jul. Oct. Jan. Apr. Jul. Oct. Jan. Apr. Jul. Apr. Jul. Apr. Apr. Apr.	1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1	1999Jun. 1999Sep. 1999Dec. 2000Mar. 2000Sep. 2000Dec. 2001Mar. 2001Jun. 2001Sep. 2001Dec. 2002Mar. 2002Jun. 2002Sep. 2002Dec. 2003Mar. 2003Dec. 2003Dec. 2003Dec. 2004Mar. 2004Jun.	30, 30, 31, 30, 31, 30, 31, 30, 31, 30, 31, 31, 30, 31, 30,	1999 1999 1999 1999 2000 2000 2000 2001 2001	67777888876655554443334	17 19 19 67 69 69 21 17 15 15 15 13 13 11 59 61	571 573 573 573 621 623 623 575 571 569 569 567 567 567 567 565 613	7888899998776666555445.	19 21 21 21 71 71 23 19 17 17 17 15 15 13 63	573 575 575 575 625 625 577 573 571 571 571 569 569 5615
Jul. Oct.	1, 1,	2004Sep. 2004Dec.	31,	2004 2004	3% 4%	59 61	613 615	4% 5%	61 63	615 617
Jan. Apr. Jul.	1, 1, 1,	2005Mar. 2005Jun. 2005Sep.	-	2005 2005 2005	4% 5% 5%	13 15 15	567 569 569	5 % 6 %	15 17 17	569 571 571
Oct. Jan. Apr. Jul.	1, 1, 1, 1,	2005Dec. 2006Mar. 2006Jun. 2006Sep.	31, 31, 30,	2005 2006 2006 2006	6 % 6 % 7 %	17 17 17 19	571 571 571 573	7% 7% 7% 7% 8%	19 19 19 21	573 573 573 575
Oct. Jan. Apr. Jul. Oct.	1, 1, 1, 1,	2006Dec. 2007Mar. 2007Jun. 2007Sep. 2007Dec.	31, 31, 30, 30,	2006 2007 2007 2007 2007	7% 7% 7% 7% 7%	19 19 19 19	573 573 573 573 573	% % % % % % % % % % %	21 21 21 21 21	575 575 575 575 575
Jan. Apr.	1,	2007 Dec. 2008 Mar. 2008 Jun.	31,	2008	7% 6% 5%	65 63	619 617	7% 6%	67 65	621 619

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
		1992Mar.			11%	75	629
					10%	73	
_		1992Jun.					627
		1992Sep.			10%	73	627
		1992Dec.			9%	71	625
Jan.	1,	1993Mar.	31,	1993	9%	23	577
Apr.	1,	1993Jun.	30,	1993	9%	23	577
_		1993Sep.			9%	23	577
		1993Dec.			9%	23	577
		1994Mar.			9%	23	577
					9%	23	577
_		1994Jun.					
		1994Sep.			10%	25	579
		1994Dec.			11%	27	581
		1995Mar.			11%	27	581
Apr.	1,	1995Jun.	30,	1995	12%	29	583
Jul.	1,	1995Sep.	30,	1995	11%	27	581
		1995Dec.			11%	27	581
		1996Mar.			11%	75	629
		1996Jun.			10%	73	627
		1996Sep.			11%	75 75	629
	-	_	-				
		1996Dec.	-		11%	75	629
		1997Mar.			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
		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%		
		2001Jun.			10%		
		2001 Sun.			9%	23	
		2001Dec.			9%	23	
		2002Mar.			8%	21	
		2002Jun.			8%	21	
		2002Sep.			8%	21	575
Oct.	1,	2002Dec.	31,	2002	8%	21	575
Jan.	1,	2003Mar.	31,	2003	7%	19	573
		2003Jun.			7%	19	
		2003Sep.			7%	19	
		2003 Bep. 2003Dec.			7 °	17	
					6%		
		2004Mar.				65 67	
		2004—-Jun.			7%	67	
		2004Sep.			6%	65	
		2004Dec.			7%	67	
Jan.	1,	2005—-Mar.	31,	2005	7%	19	573

Apr. 1,	2005Jun.	30,	2005	88	21	575
Jul. 1,	2005Sep.	30,	2005	8%	21	575
Oct. 1,	2005Dec.	31,	2005	9%	23	577
Jan. 1,	2006Mar.	31,	2006	9%	23	577
Apr. 1,	2006Jun.	30,	2006	9%	23	577
Jul. 1,	2006Sep.	30,	2006	10%	25	579
Oct. 1,	2006Dec.	31,	2006	10%	25	579
Jan. 1,	2007Mar.	31,	2007	10%	25	579
Apr. 1,	2007Jun.	30,	2007	10%	25	579
Jul. 1,	2007Sep.	30,	2007	10%	25	579
Oct. 1,	2007Dec.	31,	2007	10%	25	579
Jan. 1,	2008Mar.	31,	2008	9%	71	625
Apr. 1,	2008Jun.	30,	2008	8%	69	623

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

FROM JANUARY 1, 1995 - PRESENT

						199	5-1 (C.B	
						RATE	TABLE	3	PG
Apr.	1,	1995Mar. 1995Jun. 1995Sep.	30,	1995		6.5% 7.5% 6.5%			572 574 572
Oct.	1,	1995Dec.	31,	1995		6.5%	18		572
Apr. Jul.	1,	1996Mar. 1996Jun. 1996Sep.	30, 30,	1996 1996		6.5% 5.5% 6.5%	66 64 66		620 618 620
Jan.	1,	1996Dec. 1997Mar. 1997Jun.	31,	1997		6.5% 6.5% 6.5%	66 18 18		620572572
Oct.	1,	1997Sep. 1997Dec. 1998Mar.	31,	1997		6.5% 6.5% 6.5%	18 18 18		572572572
Apr. Jul.	1,	1998Jun. 1998Sep.	30, 30,	1998 1998		5.5% 5.5%	16 16		570 570
Jan.	1,	1998Dec. 1999Mar. 1999Jun.	31,	1999		5.5% 4.5% 5.5%	16 14 16		570568570
Jul. Oct.	1, 1,	1999Sep. 1999Dec. 2000Mar.	30, 31,	1999 1999		5.5% 5.5% 5.5%	16 16 64		570 570 618
Apr. Jul. Oct.	1, 1, 1,	2000Jun. 2000Sep. 2000Dec.	30, 30, 31,	2000 2000 2000		6.5% 6.5% 6.5%	66 66 66		620 620 620
Apr. Jul.	1, 1,	2001Mar. 2001Jun. 2001Sep. 2001Dec.	30, 30,	2001 2001		6.5% 5.5% 4.5% 4.5%	18 16 14 14		572 570 568 568

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