Part 1

Section 6621.--Determination of Rate of Interest

26 CFR 301.6621-1: Interest rate.

Rev. Rul. 2009-7

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 January 2009 is the rate published in Revenue Ruling 2009-5 to take effect beginning February 1, 2009. The federal short-term rate, rounded to the nearest full percent, based on daily compounding determined during the month of January 2009 is 1 percent. Accordingly, an overpayment rate of 4 percent (3 percent in the case of a corporation) and an underpayment rate of 4 percent are established for the calendar quarter beginning April 1, 2009. The overpayment rate for the portion of a corporate overpayment exceeding \$10,000 for the calendar quarter beginning April 1, 2009, is 1.5 percent. The underpayment rate for large corporate underpayments for the calendar quarter beginning April 1, 2009, is 6 percent. These rates apply to amounts bearing interest during that calendar quarter.

Under section 6621(b)(2)(B), the rate for determining the addition to tax for failure to pay estimated tax for the first 15 days in April 2009 is the 5 percent rate that applied to underpayments of tax during the first calendar quarter in 2009.

Interest factors for daily compound interest for annual rates of 1.5 percent, 3 percent, 4 percent, and 6 percent are published in Tables 8, 11, 13, and 17 of Rev. Proc. 95-17, 1995-1 C.B. 556, 562, 565, 567, and 571.

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 Deborah Colbert-James of the Office of Associate Chief Counsel (Procedure & Administration). For further information regarding this revenue ruling, contact Ms. Colbert-James at (202) 622-8143 (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 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			MENTS	UNDER	ENTS	
						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

9%	71	625
		577
		575
		573
		573
		571
		571
		571
	17	571
5%	15	569
5%	15	569
5%	15	569
4%	13	567
4%	61	615
5%	63	617
4%	61	615
5%	63	617
	15	569
	17	571
		571
	19	573
	19	573
	19	573
		575
		575
		575
		575
		575
		575
		621
		619
		617
		619
		569
48	13	567
	5% 5% 4% 4% 5% 4%	9% 23 21 19 17 17 17 15 13 14 15 16 17 17 17 17 17 19 10 10 10 10 11 12 12 13 14 15 16 17 19 19 11 12 12 12 13 14 15 15 16 17 19 19 19 19 10 10 11 12 12 13 14 15 16

TABLE OF INTEREST RATES

FROM JANUARY 1, 1999 - PRESENT

CORPORATE OVERPAYMENTS AND UNDERPAYMENTS

		OVE	OVERPAYMENTS			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	8%	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
Apr.	1,	2009-Jun. 3	30, 2	2009	3%	11	565	4%	13	567

TABLE OF INTEREST RATES FOR LARGE CORPORATE UNDERPAYMENTS

FROM JANUARY 1, 1991 - PRESENT

					1995- RATE	1 C.B. TABLE	PG
Apr. Jul. Oct. Jan. Apr. Jul.	1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1	1991Mar. 1991Jun. 1991Sep. 1991Dec. 1992Mar. 1992Sep. 1992Dec. 1993Mar. 1993Jun. 1993Sep. 1994Mar. 1994Sep. 1994Dec. 1994Dec. 1995Mar. 1995Jun. 1995Sep. 1996Mar. 1996Sep. 1996Dec. 1996Dec. 1997Jun. 1997Sep.	30, 31, 31, 30, 31, 30, 31, 30, 31, 30, 31, 30, 31, 30, 31, 30, 31, 30, 31, 30,	1991 1991 1992 1992 1992 1992 1993 1993	RATE 13% 12% 12% 12% 10% 10% 9%% 9%% 10% 11% 11% 11% 11%	TABLE 31 29 29 75 73 71 23 23 23 23 23 25 27 27 75 75 75 75 77 27 27	585 583 583 583 627 6227 577 577 577 577 581 582 622 622 622 622 622 622 622 623 623 62
Jan. Apr. Jul. Oct.	1, 1, 1, 1,	1997Dec. 1998Mar. 1998Jun. 1998Sep. 1998Dec. 1999Mar.	31, 30, 30, 31,	1998 1998 1998 1998	11% 11% 10% 10% 10% 9%	27 25 25 25	581 581 579 579 579 577

Apr.	1,	1999Jun.	30,	1999	10%	25	579
Jul.	1,	1999Sep.	30,	1999	10%	25	579
Oct.	1,	1999Dec.			10%	25	579
Jan.	1,		31,		10%	73	627
Apr.	1,		30,		11%	75	629
Jul.	1,				11%	75	629
Oct.	1,		31,		11%	75	629
Jan.	1,		31,		11%	27	581
Apr.	1,	2001Jun.	30,	2001	10%	25	579
Jul.	1,	2001Sep.	30,	2001	9%	23	577
Oct.	1,				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.	31,	2002	8%	21	575
Jan.	1,	2003Mar.	31,	2003	7%	19	573
Apr.	1,	2003Jun.	30,	2003	7%	19	573
Jul.	1,	2003Sep.	30,	2003	7%	19	573
Oct.	1,	2003Dec.	31,	2003	6%	17	571
Jan.	1,	2004Mar.	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
Jan.	1,	2005Mar.	31,	2005	7%	19	573
Apr.	1,	2005Jun.	30,	2005	8%	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
Jūl.	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
Jūl.	1,	2007Sep.	30,	2007	10%	25	579
Oct.	1,	-		2007	10%	25	579
Jan.	1,	2008Mar.	31,	2008	9%	71	625
Apr.	1,	2008Jun.	30,	2008	88	69	623
Jul.	1,		-		7%	67	621
Oct.	1,		31,	2008	8%	69	623
Jan.			31,		7%	19	573
Apr.		2009—Jun. 3			6%	17	571
F = 1	,		- , -	-			- · -

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

FROM JANUARY 1, 1995 - PRESENT

						199	5-1 C.	В.
						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
	1995Dec.			6.5%	18	572
	1996Mar.			6.5%	66	620
_	1996Jun.			5.5%	64	618
	1996Sep.			6.5%	66	620
Oct. 1,	1996Dec.	31,	1996	6.5%	66	620
Jan. 1.	1997Mar.	31.	1997	6.5%	18	572
	1997Jun.			6.5%	18	572
_						
	1997Sep.			6.5%	18	572
	1997Dec.			6.5%	18	572
Jan. 1,	1998Mar.	31,	1998	6.5%	18	572
Apr. 1,	1998Jun.	30,	1998	5.5%	16	570
_	1998Sep.			5.5%	16	570
	1998Dec.			5.5%	16	570
	1999Mar.			4.5%	14	568
_	1999Jun.			5.5%	16	570
Jul. 1,	1999Sep.	30,	1999	5.5%	16	570
Oct. 1,	1999Dec.	31,	1999	5.5%	16	570
	2000Mar.			5.5%	64	618
-	2000Jun.	-		6.5%	66	620
		-				
	2000Sep.			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
_	2001Sep.			4.5%	14	568
	2001Dec.			4.5%	14	568
	2001 Bec. 2002Mar.			3.5%	12	566
_	2002Jun.			3.5%	12	566
	2002Sep.			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
_	2003Sep.			2.5%	10	564
	2003Dec.			1.5%	8	562
				1.5%		610
	2004Mar.					
_	2004Jun.			2.5%	58	612
	2004Sep.			1.5%	56	610
Oct. 1,	2004Dec.	31,	2004	2.5%	58	612
Jan. 1,	2005Mar.	31,	2005	2.5%	10	564
	2005Jun.			3.5%	12	566
	2005Sep.			3.5%	12	566
	2005Dec.			4.5%	14	
						568
	2006Mar.			4.5%	14	568
	2006Jun.			4.5%	14	568
Jul. 1,	2006Sep.	30,	2006	5.5%	16	570
Oct. 1,	2006Dec.	31,	2006	5.5%	16	570
	2007Mar.			5.5%	16	570
	2007Jun.			5.5%	16	570
	2007 Sep.			5.5%	16	570
	2007Dec.			5.5%	16	570
	2008Mar.			4.5%	62	616
	2008Jun.			3.5%		614
Jul. 1,	2008Sep.	30,	2008	2.5%	58	612
Oct. 1,	2008Dec.	31,	2008	3.5%	60	614
•		-				

Jan. 1, 200--Mar. 31, 2009 Apr. 1, 2009--Jun. 30, 2009

 2.5%
 10
 564

 1.5%
 8
 562