Part 1

Section 6621.--Determination of Rate of Interest

26 CFR 301.6621-1: Interest rate.

Rev. Rul. 2009-27

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.

The federal short-term rate determined in accordance with section 1274(d) during July 2009 is the rate published in Revenue Rule 2009-22 to take effect beginning August 1, 2009. The federal short-term rate, rounded to the nearest full percent, the federal short-term rate based on daily compounding determined during the month of July 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 October 1, 2009. The overpayment rate for the portion of a corporate overpayment exceeding \$10,000 for the calendar quarter beginning October 1, 2009, is 1.5 percent. The underpayment rate for large corporate underpayments for the calendar quarter beginning October 1, 2009, is 6 percent. These rates apply to amounts bearing interest during that calendar quarter.

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 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	2	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

					OVER:	PAYM	UNDERI	PAYMENTS		
	-	1987Mar.	-		1995 RATE 8%	TAB 21	LE PG 575	1995- RATE 9%	TAE	BLE PG 577
_		1987Jun.			88	21	575	9%	23	577
		1987Sep.		1987	88	21	575	9%	23	577
Oct.		1987Dec.			9%	23	577	10%	25	579
Jan.	-	1988Mar.	-	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
_		1991Sep.		1991	9%	23	577	10%	25	579

Oct. 1,	1991Dec.	31,	1991		9%		23	577	10%	:	25	579
Jan. 1,	1992Mar.	31,	1992		8%	(59	623	9%	•	71	625
Apr. 1,	1992Jun.	30,	1992	1	7%	(57	621	8%	(69	623
Jul. 1,	1992Sep.	30,	1992	1	7%	(57	621	8%	(69	623
Oct. 1,	1992Dec.	31,	1992		6%	(55	619	7%	(67	621
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%	2	21	575	9%	:	23	577
Jan. 1,	1995Mar.	31,	1995		8%	2	21	575	9%	:	23	577
Apr. 1,	1995Jun.	30,	1995		9%	2	23	577	10%	:	25	579
Jul. 1,	1995Sep.	30,	1995		8%	2	21	575	9%	:	23	577
Oct. 1,	1995Dec.	31,	1995		8%	2	21	575	9%	:	23	577
Jan. 1,	1996Mar.	31,	1996		8%	(59	623	9%	•	71	625
Apr. 1,	1996Jun.	30,	1996	,	7%	(57	621	8%	(69	623
Jul. 1,	1996Sep.	30,	1996		8%	(59	623	9%	•	71	625
Oct. 1,	1996Dec.	31,	1996		8%	(59	623	9%	•	71	625
Jan. 1,	1997Mar.	31,	1997		8%	2	21	575	9%	2	23	577
Apr. 1,	1997Jun.	30,	1997		8%	:	21	575	9%	2	23	577
Jul. 1,	1997Sep.	30,	1997		8%	:	21	575	9%	2	23	577
Oct. 1,	1997Dec.	31,	1997		8%	:	21	575	9%	2	23	577
Jan. 1,	1998Mar.	31,	1998		8%	:	21	575	9%	2	23	577
Apr. 1,	1998Jun.	30,	1998	,	7%		19	573	8%	2	21	575
Jul. 1,	1998Sep.	30,	1998		7%		19	573	8%		21	575
Oct. 1,	1998Dec.	31,	1998	'	7%		19	573	8%	2	21	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
		1999Jun.			8%	21	575
Jul.		1999Sep.			8%	21	575
Oct.		1999Dec.			8%	21	575
		2000Mar.			8%	69	623
		2000 - Jun.			9%	71	625
		2000 Sun. 2000Sep.			9%	71	625
		2000 Sep. 2000Dec.			9%	71	625
		2000Bec. 2001Mar.			9%	23	577
		2001Mar. 2001Jun.			8%	21	575
		20015dir. 2001Sep.			0% 7%	19	573
		2001Sep. 2001Dec.			7% 7%	19	
					7% 6%		573 571
		2002Mar.				17	571
		2002Jun.			6% c%	17	571
		2002Sep.			6% 6%	17	571
		2002Dec.			6%	17	571
		2003Mar.			5%	15	569
		2003Jun.			5%	15	569
		2003Sep.			5%	15	569
		2003Dec.			4%	13	567
		2004Mar.			4%	61	615
		2004Jun.			5%	63	617
		2004Sep.			4%	61	615
		2004Dec.			5%	63	617
		2005Mar.			5%	15	569
		2005Jun.			6%	17	571
		2005Sep.			6%	17	571
		2005Dec.			7%	19	573
		2006Mar.			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.		2008Jun.			6%	65	619
		2008Sep.			5%	63	617
Oct.		2008Dec.			6%	65	619
Jan.		2009Mar.			5%	15	569
		2009Jun.			4%	13	567
		2009Sep.			4%	13	567
		2009Dec.			4%	13	567
555.	- /	_000	J + 1	_ 0 0 0	- 0		J J ,

TABLE OF INTEREST RATES

FROM JANUARY 1, 1999 - PRESENT

CORPORATE OVERPAYMENTS AND UNDERPAYMENTS

				OVE	OVERPAYMENTS			UNDERPAYMEN		
				199 RATE	5-1 C.E TABLE		1995-1 RATE	C.B. TABLE	PG	
Jan. 1, 19	99Mar.	31,	1999	6%	17	571	7%	19	573	
	99Jun.			7%	19	573	8%	21	575	
	99Sep.			7%	19	573	8%	21	575	
	99Dec.			7%	19	573	8%	21	575	
-	00Mar.	-		7%	67	621	8%	69	623	
	00Jun.			8%	69	623	9%	71	625	
	00Sep.			8%	69	623	9%	71	625	
	00Dec.			8%	69	623	9%	71	625	
	01Mar.			8%	21	575	9%	23	577	
	01Jun.			7%	19	573	8%	21	575	
Jul. 1, 20				6%	17	571	7%	19	573	
	01Dec.			6%	17	571	7 %	19	573	
	02Mar.			5%	15	569	6%	17	571	
	02Jun.			5 %	15	569	6%	17	571	
Jul. 1, 20				5 %	15	569	6%	17	571	
Oct. 1, 20				5 %	15	569	6%	17	571	
Jan. 1, 20				4%	13	567	5%	15	569	
	03Jun.			4%	13	567	5%	15	569	
Jul. 1, 20				4%	13	567	5%	15	569	
Oct. 1, 20				3%	11	565	4%	13	567	
Jan. 1, 20				3%	59	613	4%	61	615	
	04Mar. 04Jun.			4%	61	615	5%	63	617	
Jul. 1, 20				3%	59	613	4%	61	615	
	04Sep.			4%	61	615	5%	63	617	
	05Mar.			4% 4%	13	567	5% 5%	15	569	
	05Mar.			5%	15	569	5% 6%	17	571	
_				5% 5%	15	569	6%	17	571	
Jul. 1, 20	05Sep.			5°	15 17	571	7%	19	573	
Oct. 1, 20 Jan. 1, 20		-		6%	17	571	7% 7%	19	573	
Apr. 1, 20				6%	17	571	7% 7%	19	573	
-		-		7%	19	573	7 % 8 %	21	575	
	06Sep.			7% 7%	19	573	8%	21	575	
Oct. 1, 20							8%			
Jan. 1, 20 Apr. 1, 20				7% 7%	19 10	573		21	575	
-		-			19	573	8%	21	575	
Jul. 1, 20				7% 7%	19 10	573 573	88 09	21	575 575	
Oct. 1, 20		-		7% 69	19 65	573	8% 7%	21	575	
Jan. 1, 20				6% = 9	65 63	619	7% 6%	67	621	
Apr. 1, 20				5% 4°	63 61	617	6% = %	65	619	
Jul. 1, 20				4%	61	615	5%	63 65	617	
Oct. 1, 20	usDec.	,⊥۵	∠∪∪8	5%	63	617	6%	65	619	

Jan.	1,	2009Mar.	31,	2009	4%	13	567	5%	15	569
Apr.	1,	2009Jun.	30,	2009	3%	11	565	4%	13	567
Jul.	1,	2009Sep.	30,	2009	3%	11	565	4%	13	567
Oct.	1,	2009Dec.	31,	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
Jul. Oct. Jan. Apr. Jul. Oct. Jan. Apr. Jul. Oct. Jan. Apr. Jul. Apr. Jul. Apr. Apr.	1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1	1991Sep. 1991Dec. 1992Mar. 1992Sep. 1992Dec. 1993Mar. 1993Jun. 1993Sep. 1993Dec. 1994Mar. 1994Sep. 1994Dec. 1995Mar. 1995Sep. 1995Dec. 1996Mar.	30, 31, 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% 11% 10% 9% 9% 9% 9% 10% 11% 11% 11% 11% 10%	TABLE 31 29 29 75 73 73 71 23 23 23 23 23 27 27 27 27 75 73	585 583 583 583 627 627 577 577 577 577 577 581 581 582 627
Oct. Jan. Apr. Jul. Oct. Jan. Apr. Jul. Oct.	1, 1, 1, 1, 1, 1, 1, 1,	1997Dec. 1998Mar. 1998Jun. 1998Sep. 1998Dec. 1999Mar. 1999Jun. 1999Sep. 1999Dec. 2000Mar. 2000Jun.	31, 30, 30, 31, 30, 31, 30, 31, 30, 31, 30,	1996 1997 1997 1997 1998 1998 1998 1998 1999 1999	11% 11% 11% 11% 11% 11% 10% 10% 10% 10%	75 75 27 27 27 27 25 25 25 25 25 25 75 75	629 581 581 581 579 579 579 579 579 629 629

Oct. 1, 2006Dec. 31, 2006 Jan. 1, 2007Mar. 31, 2007 Apr. 1, 2007Jun. 30, 2007 Jul. 1, 2007Sep. 30, 2007	9988887776676778899900000987876668%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%	23 21 21 21 21 19 19 17 65 67 67 21 23 23 25 25 25 25 25 27 67 69	5777555555555555555555555555555555555
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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
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
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.		1997Jun.		1997	6.5%	18	572
Jul.	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
Jūl.	1.	1998Sep.	30,	1998	5.5%	16	570
Oct.	1,	1998Dec.	31,	1998	5.5%	16	570
Jan.	1,	1999Mar.	-	1999	4.5%	14	568
Apr.	1,	1999Jun.		1999	5.5%	16	570
Jul.	1,	1999Sep.		1999	5.5%	16	570
Oct.	1,	1999Dec.		1999	5.5%	16	570
Jan.	1,	2000Mar.	-	2000	5.5%	64	618
Apr.	1,			2000	6.5%	66	620
Jul.	1,			2000	6.5%	66	620
Oct.		2000 Bep. 2000Dec.		2000	6.5%	66	620
Jan.		2000Bec. 2001Mar.		2000	6.5%	18	572
				2001	5.5%		
Apr.	-	2001Jun.	-			16	570
Jul.		2001Sep.		2001	4.5%	14	568
Oct.		2001Dec.		2001	4.5%	14	568
Jan.		2002Mar.		2002	3.5%	12	566
Apr.		2002Jun.		2002	3.5%	12	566
Jul.	1,	_		2002	3.5%	12	566
Oct.		2002Dec.		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%	8	562
Jan.	1,	2004Mar.	31,	2004	1.5%	56	610
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%	58	612
Jan.	1,	2005Mar.	31,	2005	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.		2006Mar.		2006	4.5%	14	568
Apr.	1,		-		4.5%	14	568
		2006Sep.			5.5%	16	570
Oct.		2006Dec.			5.5%	16	570
Jan.		2007Mar.			5.5%	16	570
	-	2007Jun.			5.5%	16	570
		2007 Sep.			5.5%	16	570
Oct.	-	2007 Dec.	-		5.5%	16	570
Jan.	-	2007 Bec. 2008Mar.		2007	4.5%	62	616
	-	2008 - Jun.		2008	3.5%	60	614
				2008	2.5%	58	
		2008Sep.					612
Oct.	-	2008Dec.			3.5%	60	614
		2009Mar.			2.5%	10	564
		2009Jun.			1.5%	8	562
		2009Sep.			1.5%	8	562
uct.	⊥,	2009Dec.	3⊥,	2009	1.5%	8	562