SECTION 1274.--DETERMINATION OF ISSUE PRICE IN THE CASE OF CERTAIN DEBT INSTRUMENTS ISSUED FOR PROPERTY

(Also sections 42, 280G, 382, 467, 468, 482, 483, 1288, 7520, 7872)

Rev. Rule. 2025-19

This revenue ruling provides various prescribed rates for federal income tax purposes for October 2025 (the current month). Table 1 contains the short-term, midterm, and long-term applicable federal rates (AFR) for the current month for purposes of section 1274(d) of the Internal Revenue Code. Table 2 contains the short-term, midterm, and long-term adjusted applicable federal rates (adjusted AFR) for the current month for purposes of section 1288(b). Table 3 sets forth the adjusted federal longterm rate and the long-term tax-exempt rate described in section 382(f). Table 4 contains the appropriate percentages for determining the low-income housing credit described in section 42(b)(1) for buildings placed in service during the current month. However, under section 42(b)(2), the applicable percentage for non-federally subsidized new buildings placed in service after July 30, 2008, shall not be less than 9%. Finally, Table 5 contains the federal rate for determining the present value of an annuity, an interest for life or for a term of years, or a remainder or a reversionary interest for purposes of section 7520.

Source: IRS

REV. RUL. 2025-19 TABLE 1

Applicable Federal Rates for October 2025

	PERIOD FOR COMPOUNDING			
	Annual	Semiannual	Quarterly	Monthly
Short Term				
AFR	3.81%	3.77%	3.75%	3.74%
110% AFR	4.19%	4.15%	4.13%	4.11%
120% AFR	4.57%	4.52%	4.49%	4.48%
130% AFR	4.96%	4.90%	4.87%	4.85%
Mid-Term				
AFR	3.87%	3.83%	3.81%	3.80%
110% AFR	4.25%	4.21%	4.19%	4.17%
120% AFR	4.65%	4.60%	4.57%	4.56%
130% AFR	5.04%	4.98%	4.95%	4.93%
150% AFR	5.83%	5.75%	5.71%	5.68%
175% AFR	6.81%	6.70%	6.64%	6.61%
Long Term				
AFR	4.73%	4.68%	4.65%	4.64%
110% AFR	5.22%	5.15%	5.12%	5.10%
120% AFR	5.70%	5.62%	5.58%	5.56%
130% AFR	6.17%	6.08%	6.03%	6.00%

REV. RUL. 2025-19 TABLE 2

Adjusted AFR for October 2025

	PERIOD FOR COMPOUNDING			
	Annual	Semiannual	Quarterly	Monthly
Short-term adjusted AFR	2.88%	2.86%	2.85%	2.84%
Mid-term adjusted AFR	2.93%	2.91%	2.90%	2.89%
Long-term adjusted AFR	3.58%	3.55%	3.53%	3.52%

REV. RUL. 2025-19 TABLE 3

Rates Under Section 382 for October 2025

Adjusted federal long-term rate for the current month	3.58%
Long-term tax-exempt rate for ownership changes during the current month (the highest of the adjusted federal long-term rates for the current month and the prior two months.)	3.65%

REV. RUL. 2025-19 TABLE 4

Appropriate Percentages Under Section 42(b)(1) for October 2025

Note: Under section 42(b)(2), the applicable percentage for non-federally subsidized new buildings placed in service after July 30, 2008, shall not be less than 9%.

Appropriate percentage for the 70% present value low-income housing credit	8.00%
Appropriate percentage for the 30% present value low-income housing credit	3.43%

REV. RUL. 2025-19 TABLE 5

Rate Under Section 7520 for October 2025

Applicable federal rate for determining the present value of an annuity, an interest for life or a term of years, or a remainder or reversionary interest	4.60%