



# News Release

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## IRS ANNOUNCES DECLINE IN QUARTERLY INTEREST RATES

Washington --The Internal Revenue Service today announced that interest rates for the calendar quarter beginning July 1, 2001, will drop one percentage point to seven (7) percent for overpayments (six (6) percent in the case of a corporation), seven (7) percent for underpayments, and nine (9) percent for large corporate underpayments. The overpayment rate for the portion of a corporate overpayment exceeding \$10,000 will be four and one-half (4.5) percent.

Under the Internal Revenue Code, the rate of interest is determined on a quarterly basis. For taxpayers other than corporations, the overpayment and underpayment rate is the federal short-term rate plus 3 percentage points. Generally, in the case of a corporation, the underpayment rate is the federal short-term rate plus 3 percentage points and the overpayment rate is the federal short-term rate plus 2 percentage points. The rate for large corporate underpayments is the federal short-term rate plus 5 percentage points. The rate on the portion of a corporate overpayment of tax exceeding \$10,000 for a taxable period is the federal short-term rate plus one-half (0.5) of a percentage point.

The interest rates announced today are computed from the federal short-term rate based on daily compounding determined during April 2001.

Rev. Rul. 2001-32, announcing the new rates of interest, is attached and will appear in Internal Revenue Bulletin No. 2001-26, dated June 25, 2001.

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Part I

Section 6621.-- Determination of Interest Rate

26 CFR 301.6621-1: Interest rate.

Rev. Rul. 2001-32

Section 6621 of the Internal Revenue Code establishes the rates for interest on tax overpayments and tax underpayments. Under sec. 6621(a)(1), the overpayment rate beginning July 1, 2001, 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 for interest computations made after December 31, 1994. Under sec. 621(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 sec. 6601 on any large corporate underpayment, the underpayment rate under sec. 6621(a)(2) is determined by substituting "5 percentage points" for "3 percentage points." See sec. 6621(c) and sec. 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 sec. 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 sec. 6621(b)(1) for any month applies during the first calendar quarter beginning after such month.

Section 6621(b)(3) provides that the federal short-term rate for any month is the federal short-term rate determined during such month by the Secretary in accordance with sec. 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 sec. 6621, the Internal Revenue Service will use the federal short-term rate based on daily compounding because that rate is most consistent with sec. 6621 which, pursuant to sec. 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 2001 is 4 percent. Accordingly, an overpayment rate of 7 percent (6 percent in the case of a corporation) and an underpayment rate of 7 percent are established for the calendar quarter beginning July 1, 2001. The overpayment rate for the portion of a corporate overpayment exceeding \$10,000 for the

calendar quarter beginning July 1, 2001, is 4.5 percent. The underpayment rate for large corporate underpayments for the calendar quarter beginning July 1, 2001, is 9 percent. These rates apply to amounts bearing interest during that calendar quarter.

Interest factors for daily compound interest for annual rates of 4.5 percent, 6 percent, 7 percent, and 9 percent are published in Tables 14, 17, 19, and 23 of Rev. Proc. 95-17, 1995-1 C.B. 556, 568, 571, 573, and 577.

Annual interest rates to be compounded daily pursuant to sec. 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 Raymond Bailey of the Office of Associate Chief Counsel (Procedure & Administration), Administrative Provisions & Judicial Practice Division. For further information regarding this revenue ruling, contact Mr. Bailey on (202) 622-6226 (not a toll-free call).

## TABLE OF INTEREST RATES

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

## OVERPAYMENTS AND UNDERPAYMENTS

In 1995-1 C.B.

PERIOD	RATE	DAILY RATE TABLE
Before Jul. 1, 1975	6%	Table 2, pg. 557
Jul. 1, 1975--Jan. 31, 1976	9%	Table 4, pg. 559
Feb. 1, 1976--Jan. 31, 1978	7%	Table 3, pg. 558
Feb. 1, 1978--Jan. 31, 1980	6%	Table 2, pg. 557
Feb. 1, 1980--Jan. 31, 1982	12%	Table 5, pg. 560
Feb. 1, 1982--Dec. 31, 1982	20%	Table 6, pg. 560
Jan. 1, 1983--Jun. 30, 1983	16%	Table 37, pg. 591
Jul. 1, 1983--Dec. 31, 1983	11%	Table 27, pg. 581
Jan. 1, 1984--Jun. 30, 1984	11%	Table 75, pg. 629
Jul. 1, 1984--Dec. 31, 1984	11%	Table 75, pg. 629
Jan. 1, 1985--Jun. 30, 1985	13%	Table 31, pg. 585
Jul. 1, 1985--Dec. 31, 1985	11%	Table 27, pg. 581
Jan. 1, 1986--Jun. 30, 1986	10%	Table 25 pg. 579
Jul. 1, 1986--Dec. 31, 1986	9%	Table 23, pg. 577

TABLE OF INTEREST RATES  
FROM JAN.1, 1987 - Dec.31, 1998

			OVERPAYMENTS	•	UNDERPAYMENTS		
			1995-1 C.B.		1995-1 C.B.		
			RATE TABLE	PG	RATE TABLE	PG	
Jan. 1, 1987--Mar. 31, 1987			8%	21	575	9%	23 577
Apr. 1, 1987--Jun. 30, 1987			8%	21	575	9%	23 577
Jul. 1, 1987--Sep. 30, 1987			8%	21	575	9%	23 577
Oct. 1, 1987--Dec. 31, 1987			9%	23	577	10%	25 579
Jan. 1, 1988--Mar. 31, 1988			10%	73	627	11%	75 629
Apr. 1, 1988--Jun. 30, 1988			9%	71	625	10%	73 627
Jul. 1, 1988--Sep. 30, 1988			9%	71	625	10%	73 627
Oct. 1, 1988--Dec. 31, 1988			10%	73	627	11%	75 629
Jan. 1, 1989--Mar. 31, 1989			10%	25	579	11%	27 581
Apr. 1, 1989--Jun. 30, 1989			11%	27	581	12%	29 583
Jul. 1, 1989--Sep. 30, 1989			11%	27	581	12%	29 583
Oct. 1, 1989--Dec. 31, 1989			10%	25	579	11%	27 581
Jan. 1, 1990--Mar. 31, 1990			10%	25	579	11%	27 581
Apr. 1, 1990--Jun. 30, 1990			10%	25	579	11%	27 581
Jul. 1, 1990--Sep. 30, 1990			10%	25	579	11%	27 581
Oct. 1, 1990--Dec. 31, 1990			10%	25	579	11%	27 581
Jan. 1, 1991--Mar. 31, 1991			10%	25	579	11%	27 581
Apr. 1, 1991--Jun. 30, 1991			9%	23	577	10%	25 579
Jul. 1, 1991--Sep. 30, 1991			9%	23	577	10%	25 579
Oct. 1, 1991--Dec. 31, 1991			9%	23	577	10%	25 579
Jan. 1, 1992--Mar. 31, 1992			8%	69	623	9%	71 625
Apr. 1, 1992--Jun. 30, 1992			7%	67	621	8%	69 623
Jul. 1, 1992--Sep. 30, 1992			7%	67	621	8%	69 623
Oct. 1, 1992--Dec. 31, 1992			6%	65	619	7%	67 621
Jan. 1, 1993--Mar. 31, 1993			6%	17	571	7%	19 573
Apr. 1, 1993--Jun. 30, 1993			6%	17	571	7%	19 573
Jul. 1, 1993--Sep. 30, 1993			6%	17	571	7%	19 573
Oct. 1, 1993--Dec. 31, 1993			6%	17	571	7%	19 573
Jan. 1, 1994--Mar. 31, 1994			6%	17	571	7%	19 573
Apr. 1, 1994--Jun. 30, 1994			6%	17	571	7%	19 573
Jul. 1, 1994--Sep. 30, 1994			7%	19	573	8%	21 575
Oct. 1, 1994--Dec. 31, 1994			8%	21	575	9%	23 577
Jan. 1, 1995--Mar. 31, 1995			8%	21	575	9%	23 577
Apr. 1, 1995--Jun. 30, 1995			9%	23	577	10%	25 579
Jul. 1, 1995--Sep. 30, 1995			8%	21	575	9%	23 577
Oct. 1, 1995--Dec. 31, 1995			8%	21	575	9%	23 577
Jan. 1, 1996--Mar. 31, 1996			8%	69	623	9%	71 625
Apr. 1, 1996--Jun. 30, 1996			7%	67	621	8%	69 623
Jul. 1, 1996--Sep. 30, 1996			8%	69	623	9%	71 625
Oct. 1, 1996--Dec. 31, 1996			8%	69	623	9%	71 625
Jan. 1, 1997--Mar. 31, 1997			8%	21	575	9%	23 577
Apr. 1, 1997--Jun. 30, 1997			8%	21	575	9%	23 577

Jul. 1, 1997--Sep. 30, 1997	8%	21	575	9%	23	577
Oct. 1, 1997--Dec. 31, 1997	8%	21	575	9%	23	577
Jan. 1, 1998--Mar. 31, 1998	8%	21	575	9%	23	577
Apr. 1, 1998--Jun. 30, 1998	7%	19	573	8%	21	575
Jul. 1, 1998--Sep. 30, 1998	7%	19	573	8%	21	575
Oct. 1, 1998--Dec. 31, 1998	7%	19	573	8%	21	575

TABLE OF INTEREST RATES  
FROM JANUARY 1, 1999 - PRESENT  
NONCORPORATE OVERPAYMENTS AND UNDERPAYMENTS

	1995-1 C.B.		
	RATE	TABLE	PAGE
Jan. 1, 1999--Mar. 31, 1999	7%	19	573
Apr. 1, 1999--Jun. 30, 1999	8%	21	575
Jul. 1, 1999--Sep. 30, 1999	8%	21	575
Oct. 1, 1999--Dec. 31, 1999	8%	21	575
Jan. 1, 2000--Mar. 31, 2000	8%	69	623
Apr. 1, 2000--Jun. 30, 2000	9%	71	625
Jul. 1, 2000--Sep. 30, 2000	9%	71	625
Oct. 1, 2000--Dec. 31, 2000	9%	71	625
Jan. 1, 2001--Mar. 31, 2001	9%	23	577
Apr. 1, 2001--Jun. 30, 2001	8%	21	575
Jul. 1, 2001--Sep. 30, 2001	7%	19	573

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. 1, 1999--Mar. 31, 1999	6%	17 571	7% 19 573
Apr. 1, 1999--Jun. 30, 1999	7%	19 573	8% 21 575
Jul. 1, 1999--Sep. 30, 1999	7%	19 573	8% 21 575
Oct. 1, 1999--Dec. 31, 1999	7%	19 573	8% 21 575
Jan. 1, 2000--Mar. 31, 2000	7%	67 621	8% 69 623
Apr. 1, 2000--Jun. 30, 2000	8%	69 623	9% 71 625
Jul. 1, 2000--Sep. 30, 2000	8%	69 623	9% 71 625
Oct. 1, 2000--Dec. 31, 2000	8%	69 623	9% 71 625
Jan. 1, 2001--Mar. 31, 2001	8%	21 575	9% 23 577

Apr. 1, 2001--Jun. 30, 2001	7%	19	573	8%	21	575
Jul. 1, 2001--Sep. 30, 2001	6%	17	571	7%	19	573

TABLE OF INTEREST RATES FOR LARGE CORPORATE UNDERPAYMENTS  
FROM JANUARY 1, 1991 - PRESENT

1995-1 C.B.

RATE TABLE PG

Jan. 1, 1991--Mar. 31, 1991	13%	31	585
Apr. 1, 1991--Jun. 30, 1991	12%	29	583
Jul. 1, 1991--Sep. 30, 1991	12%	29	583
Oct. 1, 1991--Dec. 31, 1991	12%	29	583
Jan. 1, 1992--Mar. 31, 1992	11%	75	629
Apr. 1, 1992--Jun. 30, 1992	10%	73	627
Jul. 1, 1992--Sep. 30, 1992	10%	73	627
Oct. 1, 1992--Dec. 31, 1992	9%	71	625
Jan. 1, 1993--Mar. 31, 1993	9%	23	577
Apr. 1, 1993--Jun. 30, 1993	9%	23	577
Jul. 1, 1993--Sep. 30, 1993	9%	23	577
Oct. 1, 1993--Dec. 31, 1993	9%	23	577
Jan. 1, 1994--Mar. 31, 1994	9%	23	577
Apr. 1, 1994--Jun. 30, 1994	9%	23	577
Jul. 1, 1994--Sep. 30, 1994	10%	25	579
Oct. 1, 1994--Dec. 31, 1994	11%	27	581
Jan. 1, 1995--Mar. 31, 1995	11%	27	581
Apr. 1, 1995--Jun. 30, 1995	12%	29	583
Jul. 1, 1995--Sep. 30, 1995	11%	27	581
Oct. 1, 1995--Dec. 31, 1995	11%	27	581
Jan. 1, 1996--Mar. 31, 1996	11%	75	629
Apr. 1, 1996--Jun. 30, 1996	10%	73	627
Jul. 1, 1996--Sep. 30, 1996	11%	75	629
Oct. 1, 1996--Dec. 31, 1996	11%	75	629
Jan. 1, 1997--Mar. 31, 1997	11%	27	581
Apr. 1, 1997--Jun. 30, 1997	11%	27	581
Jul. 1, 1997--Sep. 30, 1997	11%	27	581
Oct. 1, 1997--Dec. 31, 1997	11%	27	581
Jan. 1, 1998--Mar. 31, 1998	11%	27	581
Apr. 1, 1998--Jun. 30, 1998	10%	25	579
Jul. 1, 1998--Sep. 30, 1998	10%	25	579
Oct. 1, 1998--Dec. 31, 1998	10%	25	579
Jan. 1, 1999--Mar. 31, 1999	9%	23	577
Apr. 1, 1999--Jun. 30, 1999	10%	25	579
Jul. 1, 1999--Sep. 30, 1999	10%	25	579
Oct. 1, 1999--Dec. 31, 1999	10%	25	579
Jan. 1, 2000--Mar. 31, 2000	10%	73	627
Apr. 1, 2000--Jun. 30, 2000	11%	75	629
Jul. 1, 2000--Sep. 30, 2000	11%	75	629
Oct. 1, 2000--Dec. 31, 2000	11%	75	629
Jan. 1, 2001--Mar. 31, 2001	11%	27	581
Apr. 1, 2001--Jun. 30, 2001	10%	25	579
Jul. 1, 2001--Sep. 30, 2001	9%	23	577

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

FROM JANUARY 1, 1995 - PRESENT  
1995-1 C.B.

	RATE	TABLE	PG
Jan. 1, 1995--Mar. 31, 1995	6.5%	18	572
Apr. 1, 1995--Jun. 30, 1995	7.5%	20	574
Jul. 1, 1995--Sep. 30, 1995	6.5%	18	572
Oct. 1, 1995--Dec. 31, 1995	6.5%	18	572
Jan. 1, 1996--Mar. 31, 1996	6.5%	66	620
Apr. 1, 1996--Jun. 30, 1996	5.5%	64	618
Jul. 1, 1996--Sep. 30, 1996	6.5%	66	620
Oct. 1, 1996--Dec. 31, 1996	6.5%	66	620
Jan. 1, 1997--Mar. 31, 1997	6.5%	18	572
Apr. 1, 1997--Jun. 30, 1997	6.5%	18	572
Jul. 1, 1997--Sep. 30, 1997	6.5%	18	572
Oct. 1, 1997--Dec. 31, 1997	6.5%	18	572
Jan. 1, 1998--Mar. 31, 1998	6.5%	18	572
Apr. 1, 1998--Jun. 30, 1998	5.5%	16	570
Jul. 1, 1998--Sep. 30, 1998	5.5%	16	570
Oct. 1, 1998--Dec. 31, 1998	5.5%	16	570
Jan. 1, 1999--Mar. 31, 1999	4.5%	14	568
Apr. 1, 1999--Jun. 30, 1999	5.5%	16	570
Jul. 1, 1999--Sep. 30, 1999	5.5%	16	570
Oct. 1, 1999--Dec. 31, 1999	5.5%	16	570
Jan. 1, 2000--Mar. 31, 2000	5.5%	64	618
Apr. 1, 2000--Jun. 30, 2000	6.5%	66	620
Jul. 1, 2000--Sep. 30, 2000	6.5%	66	620
Oct. 1, 2000--Dec. 31, 2000	6.5%	66	620
Jan. 1, 2001--Mar. 31, 2001	6.5%	18	572
Apr. 1, 2001--Jun. 30, 2001	5.5%	16	570
Jul. 1, 2001--Sep. 30, 2001	4.5%	14	568