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the executor elects to treat as qualified terminable interest property. The remaining portion of the trust passes as of D's date of death to a trust for the benefit of C, D's child. The trust terms otherwise provide S with a qualifying income interest for life under section 2056(b)(7)(B)(ii). S dies on February 10, 1998. On April 1, 1998, D's executor files D's estate tax return on which an election is made to treat a portion of the trust as qualified terminable interest property under section 2056(b)(7). S's estate tax return is filed on November 10, 1998. The value on the date of S's death of the portion of the trust for which D's executor made a QTIP election is includible in S's gross estate under section 2044.

[T.D. 8522, 59 FR 9646, Mar. 1, 1994, as amended by T.D. 8779, 63 FR 44393, Aug. 19, 1998]

§ 20.2044-2 Effective dates.

Except as specifically provided in *Example 7* of § 20.2044-1(e), the provisions of § 20.2044-1 are effective with respect to estates of a decedent-spouse dying after March 1, 1994. With respect to estates of decedent-spouses dying on or before such date, taxpayers may rely on any reasonable interpretation of the statutory provisions. For these purposes, the provisions of § 20.2044-1 (as well as project LR-211-76, 1984-1 C.B., page 598, see § 601.601(d)(2)(ii)(b) of this chapter), are considered a reasonable interpretation of the statutory provisions.

[T.D. 8522, 59 FR 9647, Mar. 1, 1994]

§ 20.2045-1 Applicability to pre-existing transfers or interests.

Sections 2034 through 2042 are applicable regardless of when the interests and events referred to in those sections were created or took place, except as otherwise provided in those sections and the regulations thereunder.

[T.D. 6334, 23 FR 8904, Nov. 15, 1958; 25 FR 14021, Dec. 31, 1960. Redesignated by T.D. 8522, 59 FR 9646, Mar. 1, 1994]

§ 20.2046-1 Disclaimed property.

(a) This section shall apply to the disclaimer or renunciation of an interest in the person disclaiming by a transfer made after December 31, 1976. For rules relating to when the transfer creating the interest occurs, see § 25.2518-2(c)(3) and (c)(4) of this chapter. If a qualified disclaimer is made with respect to such a transfer, the

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Federal estate tax provisions are to apply with respect to the property interest disclaimed as if the interest had never been transferred to the person making the disclaimer. See section 2518 and the corresponding regulations for rules relating to a qualified disclaimer.

(b) The first and second sentences of this section are applicable for transfers creating the interest to be disclaimed made on or after December 31, 1997.

[T.D. 8744, 62 FR 68184, Dec. 31, 1997]

ACTUARIAL TABLES APPLICABLE BEFORE MAY 1, 1999

§ 20.2031-7A Valuation of annuities, interests for life or term of years, and remainder or reversionary interests for estates of decedents for which the valuation date of the gross estate is before May 1, 1999.

(a) *Valuation of annuities, interests for life or term of years, and remainder or reversionary interests for estates of decedents for which the valuation date of the gross estate is before January 1, 1952.* Except as otherwise provided in § 20.2031-7(b), if the valuation date of the decedent's gross estate is before January 1, 1952, the present value of annuities, life estates, terms for years, remainders, and reversions is their present value determined under this section. If the valuation of the interest involved is dependent upon the continuation or termination of one or more lives or upon a term certain concurrent with one or more lives, the factor for the present value is computed on the basis of interest at the rate of 4 percent a year, compounded annually, and life contingencies as to each life involved from values that are based on the Actuaries' or Combined Experience Table of Mortality, as extended. This table and related factors are described in former § 81.10 (as contained in the 26 CFR part 81 edition revised as of April 1, 1958). The present value of an interest measured by a term of years is computed on the basis of interest at the rate of 4 percent a year.

(b) *Valuation of annuities, interests for life or term of years, and remainder or reversionary interests for estates of decedents for which the valuation date of the gross estate is after December 31, 1951, and before January 1, 1971.* Except as

otherwise provided in § 20.2031-7(b), if the valuation date for the decedent's gross estate is after December 31, 1951, and before January 1, 1971, the present value of annuities, life estates, terms of years, remainders, and reversions is their present value determined under this section. If the valuation of the interest involved is dependent upon the continuation or termination of one or more lives, or upon a term certain concurrent with one or more lives, the factor for the present value is computed on the basis of interest at the rate of $3\frac{1}{2}$ percent a year, compounded annually, and life contingencies as to each life involved are taken from U.S. Life Table 38. This table and related factors are set forth in former § 20.2031-7 (as contained in the 26 CFR part 20 edition revised as of April 1, 1984). Special factors involving one and two lives may be found in or computed with the use of tables contained in the publication entitled "Actuarial Values for Estate and Gift Tax," Internal Revenue Service Publication Number 11 (Rev. 5-59). This publication is no longer available for purchase from the Superintendent of Documents. However, it may be obtained by requesting a copy from: CC:DOM:CORP:T:R (IRS Publication 11), room 5228, Internal Revenue Service, POB 7604, Ben Franklin Station, Washington, DC 20044. The present value of an interest measured by a term of years is computed on the basis of interest at the rate of $3\frac{1}{2}$ percent a year.

(c) *Valuation of annuities, interests for life or term of years, and remainder or reversionary interests for estates of decedents for which the valuation date of the gross estate is after December 31, 1970, and before December 1, 1983.* Except as otherwise provided in § 20.2031-7(b), if the valuation date of the decedent's gross estate is after December 31, 1970, and before December 1, 1983, the present value of annuities, life estates, terms of years, remainders, and reversions is their present value determined under this section. If the valuation of the interest involved is dependent upon the continuation of or termination of one or more lives or upon a term certain concurrent with one or more lives, the factor for the present value is computed on the basis of interest at the

rate of 6 percent a year, compounded annually, and life contingencies are determined as to each male and female life involved, from values that are set forth in Table LN. Table LN contains values that are taken from the life table for total males and the life table for total females appearing as Tables 2 and 3, respectively, in United States Life Tables: 1959-1960, published by the Department of Health and Human Services, Public Health Service. Table LN and related factors are set forth in former § 20.2031-10 (as contained in the 26 CFR part 20 edition revised as of April 1, 1994). Special factors involving one and two lives may be found in or computed with the use of tables contained in Internal Revenue Service Publication 723, "Actuarial Values I: Valuation of Last Survivor Charitable Remainders," (12-70), and Internal Revenue Service Publication 723A, "Actuarial Values II: Factors at 6 Percent Involving One and Two Lives," (12-70). These publications are no longer available for purchase from the Superintendent of Documents. However, a copy of each may be obtained from: CC:DOM:CORP:T:R (IRS Publication 723/723A), room 5228, Internal Revenue Service, POB 7604, Ben Franklin Station, Washington, DC 20044.

(d) *Valuation of annuities, interests for life or term of years, and remainder or reversionary interests for estates of decedents for which the valuation date of the gross estate is after November 30, 1983, and before May 1, 1989—(1) In general.* (i) Except as otherwise provided in § 20.2031-7(b), if the decedent died after November 30, 1983, and the valuation date for the gross estate is before May 1, 1989, the fair market value of annuities, life estates, terms of years, remainders, and reversions is their present value determined under this section. If the decedent died after November 30, 1983, and before August 9, 1984, or, in cases where the valuation date of the decedent's gross estate is before May 1, 1989, if, on December 1, 1983, the decedent was mentally incompetent so that the disposition of the decedent's property could not be changed, and the decedent died on or after December 1, 1983, without having regained competency to dispose of the decedent's property, or if the decedent died

within 90 days of the date on which the decedent first regained competency, the fair market value of annuities, life estates, terms for years, remainders, and reversions included in the gross estate of such decedent is their present value determined under either this section or § 20.2031-7A(c), at the option of the taxpayer. The value of annuities issued by companies regularly engaged in their sale, and of insurance policies on the lives of persons other than the decedent, is determined under § 20.2031-8. The fair market value of a remainder interest in a charitable remainder unitrust, as defined in § 1.664-3 of this chapter, is its present value determined under § 1.664-4 of this chapter. The fair market value of a life interest or term for years in a charitable remainder unitrust is the fair market value of the property as of the date of valuation less the fair market value of the remainder interest on such date determined under § 1.664-4 of this chapter. The fair market value of the interests in a pooled income fund, as defined in § 1.642(c)-5 of this chapter, is their value determined under § 1.642(c)-6 of this chapter.

(ii) The present value of an annuity, life estate, remainder, or reversion determined under this section which is dependent on the continuation or termination of the life of one person is computed by the use of Table A in paragraph (d)(6) of this section. The present value of an annuity, term for years, remainder, or reversion dependent on a term certain is computed by the use of Table B in paragraph (d)(6) of this section. If the interest to be valued is dependent upon more than one life or there is a term certain concurrent with one or more lives, see paragraph (d)(5) of this section. For purposes of the computations described in this section, the age of a person is to be taken as the age of that person at his or her nearest birthday.

(iii) In all examples set forth in this section, the decedent is assumed to have died on or after August 9, 1984, with the valuation date of the decedent's gross estate before May 1, 1989, and to have been competent to change the disposition of the property on December 1, 1983.

(2) *Annuities.* (i) If an annuity is payable annually at the end of each year during the life of an individual (as for example if the first payment is due one year after the decedent's death), the amount payable annually is multiplied by the figure in column 2 of Table A opposite the number of years in column 1 nearest the age of the individual whose life measures the duration of the annuity. If the annuity is payable annually at the end of each of year for a definite number of years, the amount payable annually is multiplied by the figure in column 2 of Table B opposite the number of years in column 1 representing the duration of the annuity. The application of this paragraph (d)(2)(i) may be illustrated by the following examples:

Example (1). The decedent received, under the terms of the decedent's father's will an annuity of \$10,000 a year payable annually for the life of the decedent's elder brother. At the time the decedent died, an annual payment had just been made. The brother at the decedent's death was 40 years eight months old. By reference to Table A, the figure in column 2 opposite 41 years, the number nearest to the brother's actual age, is found to be 9.1030. The present value of the annuity at the date of the decedent's death is, therefore, \$91,030 (\$10,000×9.1030).

Example (2). The decedent was entitled to receive an annuity of \$10,000 a year payable annually throughout a term certain. At the time the decedent died, the annual payment had just been made and five more annual payments were still to be made. By reference to Table B, it is found that the figure in column 2 opposite five years is 3.7908. The present value of the annuity is, therefore, \$37,908 (\$10,000×3.7908).

(ii) If an annuity is payable at the end of semiannual, quarterly, monthly, or weekly periods during the life of an individual (as for example if the first payment is due one month after the decedent's death), the aggregate amount to be paid within a year is first multiplied by the figure in column 2 of Table A opposite the number of years in column 1 nearest the age of the individual whose life measures the duration of the annuity. The product so obtained is then multiplied by whichever of the following factors is appropriate:

1.0244	for semiannual payments,
1.0368	for quarterly payments,
1.0450	for monthly payments,
1.0482	for weekly payments.

If the annuity is payable at the end of semiannual, quarterly, monthly, or weekly periods for a definite number of years, the aggregate amount to be paid within a year is first multiplied by the figure in column 2 of Table B opposite the number of years in column 1 representing the duration of the annuity. The product so obtained is then multiplied by whichever of the above factors is appropriate. The application of this paragraph (d)(2)(ii) may be illustrated by the following example:

Example. The facts are the same as those contained in example (1) set forth in paragraph (d)(2)(i) of this section, except that the annuity is payable semiannually. The aggregate annual amount, \$10,000, is multiplied by the factor 9.1030 and the product multiplied by 1.0244. The present value of the annuity at the date of the decedent's death is, therefore, \$93,251.13 (\$10,000×9.1030×1.0244).

(iii)(A) If the first payment of an annuity for the life of an individual is due at the beginning of the annual or other payment period rather than at the end (as for example if the first payment is to be made immediately after the decedent's death), the value of the annuity is the sum of (A) the first payment plus (B) the present value of a similar annuity, the first payment of which is not to be made until the end of the payment period, determined as provided in paragraphs (d)(2)(i) or (ii) of this section. The application of this paragraph (d)(2)(iii)(A) may be illustrated by the following example:

Example. The decedent was entitled to receive an annuity of \$50 a month during the life of another person. The decedent died on the date the payment was due. At the date of the decedent's death, the person whose life measures the duration of the annuity was 50 years of age. The value of the annuity at the date of the decedent's death is \$50 plus the product of \$50×12×8.4743 (see Table A)×1.0450 (See paragraph (d)(2)(ii) of this section). That is \$50 plus \$5,313.39, or \$5,363.39.

(B) If the first payment of an annuity for a definite number of years is due at the beginning of the annual or other payment period, the applicable factor is the product of the factor shown in Table B multiplied by whichever of the following factors is appropriate:

1.1000 for annual payments,
1.0744 for semiannual payments,
1.0618 for quarterly payments,

1.0534 for monthly payments,
1.0502 for weekly payments.

The application of this paragraph (d)(2)(iii)(B) may be illustrated by the following example:

Example. The decedent was the beneficiary of an annuity of \$50 a month. On the day a payment was due, the decedent died. There were 300 payments to be made, including the payment due. The value of the annuity as of the date of decedent's death is the product of \$50×12×9.0770 (see Table B)×1.0534, or \$5,737.03.

(3) *Life estates and terms for years.* If the interest to be valued is the right of a person for his or her life, or for the life of another person, to receive the income of certain property or to use nonincome-producing property, the value of the interest is the value of the property multiplied by the figure in column 3 of Table A opposite the number of years nearest to the actual age of the measuring life. If the interest to be valued is the right to receive income of property or to use nonincome-producing property for a term of years, column 3 of Table B is used. The application of this paragraph (d)(3) may be illustrated by the following example:

Example. The decedent or the decedent's estate was entitled to receive the income from a fund of \$50,000 during the life of the decedent's elder brother. Upon the brother's death, the remainder is to go to B. The brother was 31 years, five months old at the time of decedent's death. By reference to Table A the figure in column 3 opposite 31 years is found to be 0.95254. The present value of the decedent's interest is, therefore, \$47,627 (\$50,000×0.95254).

(4) *Remainders or reversionary interests.* If a decedent had, at the time of the decedent's death, a remainder or a reversionary interest in property to take effect after an estate for the life of another, the present value of the decedent's interest is obtained by multiplying the value of the property by the figure in column 4 of Table A opposite the number of years nearest to the actual age of the person whose life measures the preceding estate. If the remainder or reversion is to take effect at the end of the term for years, column 4 of Table B is used. The application of this paragraph (d)(4) may be illustrated by the following example:

Example. The decedent was entitled to receive certain property worth \$50,000 upon the

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death of the decedent's elder sister, to whom the income was bequeathed for life. At the time of the decedent's death, the elder sister was 31 years five months old. By reference to Table A the figure in column 4 opposite 31 years is found to be .04746. The present value of the remainder interest at the date of the decedent's death is, therefore, \$2,373 (\$50,000×.04746).

(5) *Actuarial computations by the Internal Revenue Service.* If the valuation of the interest involved is dependent upon the continuation or the termination of more than one life or upon a term certain concurrent with one or more lives a special factor must be used. The factor is to be computed on the basis of interest at the rate of 10 percent a year, compounded annually, and life contingencies determined, as to each person involved, from the values of *lx* that are set forth in column 2 of Table LN of paragraph (d)(6). Table LN contains values of *lx* taken from the life table for the total population appearing as Table 1 of United States Life Tables: 1969-71, published by the Department of Health and Human Services, Public Health Service. Many special factors involving one and two lives may be found in or computed with the use of the tables contained in Internal Revenue Service Publication 723E, "Actuarial Values II: Factors at 10 Percent Involving One and Two Lives," (12-83). This publication is no longer available for purchase from the Superintendent of Documents. However, it may be obtained by requesting a copy from: CC:DOM:CORP:T:R (IRS Publication 723E), room 5228, Internal Revenue Service, POB 7604, Ben Franklin Station, Washington, DC 20044. However, if a special factor is required in the case of an actual decedent, the Commissioner will furnish the factor to the executor upon request. The request must be accompanied by a statement of the date of birth of each person, the duration of whose life may affect the value of the interest, and by copies of the relevant instruments. Special factors are not furnished for prospective transfers.

(6) *Tables.* The following tables shall be used in the application of the provisions of this section:

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TABLE A—SINGLE LIFE, UNISEX, 10 PERCENT—
TABLE SHOWING THE PRESENT WORTH OF AN
ANNUITY, OF A LIFE ESTATE, AND A REMAIN-
DER INTEREST—APPLICABLE FOR TRANSFERS
AFTER NOVEMBER 30, 1983, AND BEFORE
MAY 1, 1989

(1) Age	(2) An- nuity	(3) Life estate	(4) Re- mainder
0	9.7188	.97188	.02812
1	9.8988	.98988	.01012
2	9.9017	.99017	.00983
3	9.9008	.99008	.00992
4	9.8981	.98981	.01019
5	9.8938	.98938	.01062
6	9.8884	.98884	.01116
7	9.8822	.98822	.01178
8	9.8748	.98748	.01252
9	9.8663	.98663	.01337
10	9.8565	.98565	.01435
11	9.8453	.98453	.01547
12	9.8329	.98329	.01671
13	9.8198	.98198	.01802
14	9.8066	.98066	.01934
15	9.7937	.97937	.02063
16	9.7815	.97815	.02185
17	9.7700	.97700	.02300
18	9.7590	.97590	.02410
19	9.7480	.97480	.02520
20	9.7365	.97365	.02635
21	9.7245	.97245	.02755
22	9.7120	.97120	.02880
23	9.6986	.96986	.03014
24	9.6841	.96841	.03159
25	9.6678	.96678	.03322
26	9.6495	.96495	.03505
27	9.6290	.96290	.03710
28	9.6062	.96062	.03938
29	9.5813	.95813	.04187
30	9.5543	.95543	.04457
31	9.5254	.95254	.04746
32	9.4942	.94942	.05058
33	9.4608	.94608	.05392
34	9.4250	.94250	.05750
35	9.3868	.93868	.06132
36	9.3460	.93460	.06540
37	9.3026	.93026	.06974
38	9.2567	.92567	.07433
39	9.2083	.92083	.07917
40	9.1571	.91571	.08429
41	9.1030	.91030	.08970
42	9.0457	.90457	.09543
43	8.9855	.89855	.10145
44	8.9221	.89221	.10779
45	8.8558	.88558	.11442
46	8.7863	.87863	.12137
47	8.7137	.87137	.12863
48	8.6374	.86374	.13626
49	8.5578	.85578	.14422
50	8.4743	.84743	.15257
51	8.3874	.83874	.16126
52	8.2969	.82969	.17031
53	8.2028	.82028	.17972
54	8.1054	.81054	.18946
55	8.0046	.80046	.19954
56	7.9006	.79006	.20994
57	7.7931	.77931	.22069
58	7.6822	.76822	.23178
59	7.5675	.75675	.24325
60	7.4491	.74491	.25509
61	7.3267	.73267	.26733
62	7.2002	.72002	.27998
63	7.0696	.70696	.29304
64	6.9352	.69352	.30648

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TABLE A—SINGLE LIFE, UNISEX, 10 PERCENT—
TABLE SHOWING THE PRESENT WORTH OF AN
ANNUITY, OF A LIFE ESTATE, AND A REMAIN-
DER INTEREST—APPLICABLE FOR TRANSFERS
AFTER NOVEMBER 30, 1983, AND BEFORE
MAY 1, 1989—Continued

(1) Age	(2) An- nuity	(3) Life estate	(4) Re- mainder
65	6.7970	.67970	.32030
66	6.6551	.66551	.33449
67	6.5098	.65098	.34902
68	6.3610	.63610	.36390
69	6.2086	.62086	.37914
70	6.0522	.60522	.39478
71	5.8914	.58914	.41086
72	5.7261	.57261	.42739
73	5.5571	.55571	.44429
74	5.3862	.53862	.46138
75	5.2149	.52149	.47851
76	5.0441	.50441	.49559
77	4.8742	.48742	.51258
78	4.7049	.47049	.52951
79	4.5357	.45357	.54643
80	4.3659	.43659	.56341
81	4.1967	.41967	.58033
82	4.0295	.40295	.59705
83	3.8642	.38642	.61358
84	3.6998	.36998	.63002
85	3.5359	.35359	.64641
86	3.3764	.33764	.66236
87	3.2262	.32262	.67738
88	3.0859	.30859	.69141
89	2.9526	.29526	.70474
90	2.8221	.28221	.71779
91	2.6955	.26955	.73045
92	2.5771	.25771	.74229
93	2.4692	.24692	.75308
94	2.3728	.23728	.76272
95	2.2887	.22887	.77113
96	2.2181	.22181	.77819
97	2.1550	.21550	.78450
98	2.1000	.21000	.79000
99	2.0486	.20486	.79514
100	1.9975	.19975	.80025
101	1.9532	.19532	.80468
102	1.9054	.19054	.80946
103	1.8437	.18437	.81563
104	1.7856	.17856	.82144
105	1.6962	.16962	.83038
106	1.5488	.15488	.84512
107	1.3409	.13409	.86591
108	1.0068	.10068	.89932
1094545	.04545	.95455

TABLE B—TERM CERTAIN, UNISEX, 10 PER-
CENT—TABLE SHOWING THE PRESENT WORTH
OF AN ANNUITY FOR A TERM CERTAIN, OF AN
INCOME INTEREST FOR A TERM CERTAIN, AND
OF A REMAINDER INTEREST POSTPONED FOR A
TERM CERTAIN—APPLICABLE FOR TRANSFERS
AFTER NOVEMBER 30, 1983, AND BEFORE
MAY 1, 1989

(1) Number of years	(2) An- nuity	(3) Term certain	(4) Re- mainder
19091	.090909	.909091
2	1.7355	.173554	.826446
3	2.4869	.248685	.751315
4	3.1699	.316987	.683013

TABLE B—TERM CERTAIN, UNISEX, 10 PER-
CENT—TABLE SHOWING THE PRESENT WORTH
OF AN ANNUITY FOR A TERM CERTAIN, OF AN
INCOME INTEREST FOR A TERM CERTAIN, AND
OF A REMAINDER INTEREST POSTPONED FOR A
TERM CERTAIN—APPLICABLE FOR TRANSFERS
AFTER NOVEMBER 30, 1983, AND BEFORE
MAY 1, 1989—Continued

(1) Number of years	(2) An- nuity	(3) Term certain	(4) Re- mainder
5	3.7908	.379079	.620921
6	4.3553	.435526	.564474
7	4.8684	.486842	.513158
8	5.3349	.533493	.466507
9	5.7590	.575902	.424098
10	6.1446	.614457	.385543
11	6.4951	.649506	.350494
12	6.8137	.681369	.318631
13	7.1034	.710336	.289664
14	7.3667	.736669	.263331
15	7.6061	.760608	.239392
16	7.8237	.782371	.217629
17	8.0216	.802155	.197845
18	8.2014	.820141	.179859
19	8.3649	.836492	.163508
20	8.5136	.851356	.148644
21	8.6487	.864869	.135131
22	8.7715	.877154	.122846
23	8.8832	.888322	.111678
24	8.9847	.898474	.101526
25	9.0770	.907704	.092296
26	9.1609	.916095	.083905
27	9.2372	.923722	.076278
28	9.3066	.930657	.069343
29	9.3696	.936961	.063039
30	9.4269	.942691	.057309
31	9.4790	.947901	.052099
32	9.5264	.952638	.047362
33	9.5694	.956943	.043057
34	9.6086	.960857	.039143
35	9.6442	.964416	.035584
36	9.6765	.967651	.032349
37	9.7059	.970592	.029408
38	9.7327	.973265	.026735
39	9.7570	.975696	.024304
40	9.7791	.977905	.022095
41	9.7991	.979914	.020086
42	9.8174	.981740	.018260
43	9.8340	.983400	.016600
44	9.8491	.984909	.015091
45	9.8628	.986281	.013719
46	9.8753	.987528	.012472
47	9.8866	.988662	.011338
48	9.8969	.989693	.010307
49	9.9063	.990630	.009370
50	9.9140	.991481	.008519
51	9.9226	.992256	.007744
52	9.9296	.992960	.007040
53	9.9360	.993600	.006400
54	9.9418	.994182	.005818
55	9.9471	.994711	.005289
56	9.9519	.995191	.004809
57	9.9563	.995629	.004371
58	9.9603	.996026	.003974
59	9.9639	.996387	.003613
60	9.9672	.996716	.003284

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TABLE LN—APPLICABLE FOR TRANSFERS AFTER NOVEMBER 30, 1983, AND BEFORE MAY 1, 1989

(1) Age X	(2) lx
0	100,000
1	97,998
2	97,876
3	97,792
4	97,724
5	97,668
6	97,619
7	97,573
8	97,531
9	97,494
10	97,460
11	97,430
12	97,401
13	97,367
14	97,322
15	97,261
16	97,181
17	97,083
18	96,970
19	96,846
20	96,716
21	96,580
22	96,438
23	96,292
24	96,145
25	96,000
26	95,859
27	95,721
28	95,586
29	95,448
30	95,307
31	95,158
32	95,003
33	94,840
34	94,666
35	94,482
36	94,285
37	94,073
38	93,843
39	93,593
40	93,322
41	93,028
42	92,712
43	92,368
44	91,995
45	91,587
46	91,144
47	90,662
48	90,142
49	89,579
50	88,972
51	88,315
52	87,605
53	86,838
54	86,007
55	85,110
56	84,142
57	83,103
58	81,988
59	80,798
60	79,529
61	78,181
62	76,751
63	75,236
64	73,631
65	71,933
66	70,139
67	68,246
68	66,254
69	64,166

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TABLE LN—APPLICABLE FOR TRANSFERS AFTER NOVEMBER 30, 1983, AND BEFORE MAY 1, 1989—Continued

(1) Age X	(2) lx
70	61,984
71	59,715
72	57,360
73	54,913
74	52,363
75	49,705
76	46,946
77	44,101
78	41,192
79	38,245
80	35,285
81	32,323
82	29,375
83	26,469
84	23,638
85	20,908
86	18,282
87	15,769
88	13,407
89	11,240
90	9,297
91	7,577
92	6,070
93	4,773
94	3,682
95	2,786
96	2,068
97	1,511
98	1,087
99	772
100	542
101	375
102	257
103	175
104	117
105	78
106	52
107	34
108	22
109	14
110	0

(e) *Valuation of annuities, interests for life or term of years, and remainder or reversionary interests for estates of decedents for which the valuation date of the gross estate is after April 30, 1989, and before May 1, 1999—(1) In general.* Except as otherwise provided in § 20.2031-7(b) and § 20.7520-3(b) (pertaining to certain limitations on the use of prescribed tables), if the valuation date for the gross estate of the decedent is after April 30, 1989, and before May 1, 1999, the fair market value of annuities, life estates, terms of years, remainders, and reversionary interests is the present value of the interests determined by use of standard or special section 7520 actuarial factors and the valuation methodology described in § 20.2031-7(d). These factors are derived by using the appropriate section 7520 interest rate and, if

applicable, the mortality component for the valuation date of the interest that is being valued. See §§ 20.7520-1 through 20.7520-4. See paragraph (e)(4) of this section for determination of the appropriate table for use in valuing these interests.

(2) *Transitional rule.* (i) If the valuation date is after April 30, 1989, and before June 10, 1994, a taxpayer can rely on Notice 89-24 (1989-1 C.B. 660), or Notice 89-60 (1989-1 C.B. 700). See § 601.601(d)(2)(ii)(b) of this chapter.

(ii) If a decedent dies after April 30, 1989, and if on May 1, 1989, the decedent was mentally incompetent so that the disposition of the decedent's property could not be changed, and the decedent dies without having regained competency to dispose of the decedent's property or dies within 90 days of the date on which the decedent first regains competency, the fair market value of annuities, life estates, terms for years, remainders, and reversions included in the gross estate of the decedent is their present value determined either under this section or under the corresponding section applicable at the time the decedent became mentally incompetent, at the option of the decedent's executor. For example, see paragraph (d) of this section.

(3) *Publications and actuarial computations by the Internal Revenue Service.* Many standard actuarial factors not included in paragraph (e)(4) of this section or in § 20.2031-7(d)(6) are included in Internal Revenue Service Publication 1457, "Actuarial Values, Alpha Volume," (8-89). Publication 1457 also includes examples that illustrate how to compute many special factors for more unusual situations. Publication

1457 is no longer available for purchase from the Superintendent of Documents, United States Government Printing Office, Washington, DC 20402. However, pertinent factors in this publication may be obtained from: CC:DOM:CORP:R (IRS Publication 1457), room 5226, Internal Revenue Service, POB 7604, Ben Franklin Station, Washington, DC 20044. If a special factor is required in the case of an actual decedent, the Internal Revenue Service may furnish the factor to the executor upon a request for a ruling. The request for a ruling must be accompanied by a recitation of the facts including a statement of the date of birth for each measuring life, the date of the decedent's death, any other applicable dates, and a copy of the will, trust, or other relevant documents. A request for a ruling must comply with the instructions for requesting a ruling published periodically in the Internal Revenue Bulletin (see §§ 601.201 and 601.601(d)(2)(ii)(b) of this chapter) and include payment of the required user fee.

(4) *Actuarial tables.* Except as provided in § 20.7520-3(b) (pertaining to certain limitations on the use of prescribed tables), Life Table 80CNSMT and Table S (Single life remainder factors applicable where the valuation date is after April 30, 1989, and before May 1, 1999), contained in this paragraph (e)(4), and Table B, Table J, and Table K set forth in § 20.2031-7(d)(6) must be used in the application of the provisions of this section when the section 7520 interest rate component is between 4.2 and 14 percent. Table S and Table 80CNSMT are as follows:

TABLE S—BASED ON LIFE TABLE 80CNSMT SINGLE LIFE REMAINDER FACTORS
[Applicable After April 30, 1989, and Before May 1, 1999]

Age	Interest rate									
	4.2%	4.4%	4.6%	4.8%	5.0%	5.2%	5.4%	5.6%	5.8%	6.0%
007389	.06749	.06188	.05695	.05261	.04879	.04541	.04243	.03978	.03744
106494	.05832	.05250	.04738	.04287	.03889	.03537	.03226	.02950	.02705
206678	.05999	.05401	.04874	.04410	.03999	.03636	.03314	.03028	.02773
306897	.06200	.05587	.05045	.04567	.04143	.03768	.03435	.03139	.02875
407139	.06425	.05796	.05239	.04746	.04310	.03922	.03578	.03271	.02998
507401	.06669	.06023	.05451	.04944	.04494	.04094	.03738	.03421	.03137
607677	.06928	.06265	.05677	.05156	.04692	.04279	.03911	.03583	.03289
707968	.07201	.06521	.05918	.05381	.04903	.04477	.04097	.03757	.03453
808274	.07489	.06792	.06172	.05621	.05129	.04689	.04297	.03945	.03630
908597	.07794	.07079	.06443	.05876	.05370	.04917	.04511	.04148	.03821
1008936	.08115	.07383	.06730	.06147	.05626	.05159	.04741	.04365	.04027
1109293	.08453	.07704	.07035	.06436	.05900	.05419	.04988	.04599	.04250

TABLE S—BASED ON LIFE TABLE 80CNSMT SINGLE LIFE REMAINDER FACTORS—Continued

[Applicable After April 30, 1989, and Before May 1, 1999]

Age	Interest rate									
	4.2%	4.4%	4.6%	4.8%	5.0%	5.2%	5.4%	5.6%	5.8%	6.0%
1209666	.08807	.08040	.07354	.06739	.06188	.05693	.05248	.04847	.04486
1310049	.09172	.08387	.07684	.07053	.06487	.05977	.05518	.05104	.04731
1410437	.09541	.08738	.08017	.07370	.06788	.06263	.05791	.05364	.04978
1510827	.09912	.09090	.08352	.07688	.07090	.06551	.06064	.05623	.05225
1611220	.10285	.09445	.08689	.08008	.07394	.06839	.06337	.05883	.05472
1711615	.10661	.09802	.09028	.08330	.07699	.07129	.06612	.06144	.05719
1812017	.11043	.10165	.09373	.08656	.08009	.07422	.06890	.06408	.05969
1912428	.11434	.10537	.09726	.08992	.08327	.07724	.07177	.06679	.06226
2012850	.11836	.10919	.10089	.09337	.08654	.08035	.07471	.06959	.06492
2113282	.12248	.11311	.10462	.09692	.08991	.08355	.07775	.07247	.06765
2213728	.12673	.11717	.10848	.10059	.09341	.08686	.08090	.07546	.07049
2314188	.13113	.12136	.11248	.10440	.09703	.09032	.08418	.07858	.07345
2414667	.13572	.12575	.11667	.10839	.10084	.09395	.08764	.08187	.07659
2515167	.14051	.13034	.12106	.11259	.10486	.09778	.09130	.08536	.07991
2615690	.14554	.13517	.12569	.11703	.10910	.10184	.09518	.08907	.08346
2716237	.15081	.14024	.13056	.12171	.11359	.10614	.09930	.09302	.08724
2816808	.15632	.14555	.13567	.12662	.11831	.11068	.10366	.09720	.09125
2917404	.16208	.15110	.14104	.13179	.12329	.11547	.10827	.10163	.09551
3018025	.16808	.15692	.14665	.13721	.12852	.12051	.11313	.10631	.10002
3118672	.17436	.16300	.15255	.14291	.13403	.12584	.11827	.11127	.10480
3219344	.18090	.16935	.15870	.14888	.13980	.13142	.12367	.11650	.10985
3320044	.18772	.17598	.16514	.15513	.14587	.13730	.12936	.12201	.11519
3420770	.19480	.18287	.17185	.16165	.15221	.14345	.13533	.12780	.12080
3521522	.20215	.19005	.17884	.16846	.15883	.14989	.14159	.13388	.12670
3622299	.20974	.19747	.18609	.17552	.16571	.15660	.14812	.14022	.13287
3723101	.21760	.20516	.19360	.18286	.17288	.16358	.15492	.14685	.13933
3823928	.22572	.21311	.20139	.19048	.18032	.17085	.16201	.15377	.14607
3924780	.23409	.22133	.20945	.19837	.18804	.17840	.16939	.16097	.15310
4025658	.24273	.22982	.21778	.20654	.19605	.18624	.17706	.16847	.16043
4126560	.25163	.23858	.22639	.21499	.20434	.19436	.18502	.17627	.16806
4227486	.26076	.24758	.23525	.22370	.21289	.20276	.19326	.18434	.17597
4328435	.27013	.25683	.24436	.23268	.22172	.21143	.20177	.19270	.18416
4429407	.27975	.26633	.25373	.24191	.23081	.22038	.21057	.20134	.19265
4530402	.28961	.27608	.26337	.25142	.24019	.22962	.21966	.21028	.20144
4631420	.29970	.28608	.27326	.26120	.24983	.23913	.22904	.21951	.21053
4732460	.31004	.29632	.28341	.27123	.25975	.24892	.23870	.22904	.21991
4833521	.32058	.30679	.29379	.28151	.26992	.25897	.24862	.23883	.22957
4934599	.33132	.31746	.30438	.29201	.28032	.26926	.25879	.24888	.23949
5035695	.34224	.32833	.31518	.30273	.29094	.27978	.26921	.25918	.24966
5136809	.35335	.33940	.32619	.31367	.30180	.29055	.27987	.26973	.26010
5237944	.36468	.35070	.33744	.32486	.31292	.30158	.29081	.28057	.27083
5339098	.37622	.36222	.34892	.33629	.32429	.31288	.30203	.29170	.28186
5440269	.38794	.37393	.36062	.34795	.33590	.32442	.31349	.30308	.29316
5541457	.39985	.38585	.37252	.35983	.34774	.33621	.32522	.31474	.30473
5642662	.41194	.39796	.38464	.37193	.35981	.34824	.33720	.32666	.31658
5743884	.42422	.41028	.39697	.38426	.37213	.36053	.34945	.33885	.32872
5845123	.43668	.42279	.40951	.39682	.38468	.37307	.36196	.35132	.34114
5946377	.44931	.43547	.42224	.40958	.39745	.38584	.37471	.36405	.35383
6047643	.46206	.44830	.43513	.42250	.41040	.39880	.38767	.37699	.36674
6148916	.47491	.46124	.44814	.43556	.42350	.41192	.40080	.39012	.37985
6250196	.48783	.47427	.46124	.44874	.43672	.42518	.41408	.40340	.39314
6351480	.50081	.48736	.47444	.46201	.45006	.43856	.42749	.41684	.40658
6452770	.51386	.50054	.48773	.47540	.46352	.45208	.44105	.43043	.42019
6554069	.52701	.51384	.50115	.48892	.47713	.46577	.45480	.44422	.43401
6655378	.54029	.52727	.51472	.50262	.49093	.47965	.46876	.45824	.44808
6756697	.55368	.54084	.52845	.51648	.50491	.49373	.48293	.47248	.46238
6858026	.56717	.55453	.54231	.53049	.51905	.50800	.49729	.48694	.47691
6959358	.58072	.56828	.55624	.54459	.53330	.52238	.51179	.50154	.49160
7060689	.59427	.58205	.57021	.55874	.54762	.53683	.52638	.51624	.50641
7162014	.60778	.59578	.58415	.57287	.56193	.55131	.54100	.53099	.52126
7263334	.62123	.60948	.59808	.58700	.57624	.56579	.55563	.54577	.53617
7364648	.63465	.62315	.61198	.60112	.59056	.58029	.57030	.56059	.55113
7465961	.64806	.63682	.62590	.61527	.60492	.59485	.58504	.57550	.56620
7567274	.66149	.65054	.63987	.62948	.61936	.60950	.59990	.59053	.58140
7668589	.67495	.66429	.65390	.64377	.63390	.62427	.61487	.60570	.59676
7769903	.68841	.67806	.66796	.65811	.64849	.63910	.62993	.62097	.61223
7871209	.70182	.69179	.68199	.67242	.66307	.65393	.64501	.63628	.62775
7972500	.71507	.70537	.69588	.68660	.67754	.66867	.65999	.65151	.64321
8073768	.72809	.71872	.70955	.70058	.69180	.68320	.67479	.66655	.65849

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TABLE S—BASED ON LIFE TABLE 80CNSMT SINGLE LIFE REMAINDER FACTORS—Continued

[Applicable After April 30, 1989, and Before May 1, 1999]

Age	Interest rate									
	4.2%	4.4%	4.6%	4.8%	5.0%	5.2%	5.4%	5.6%	5.8%	6.0%
8175001	.74077	.73173	.72288	.71422	.70573	.69741	.68926	.68128	.67345
8276195	.75306	.74435	.73582	.72746	.71926	.71123	.70335	.69562	.68804
8377346	.76491	.75654	.74832	.74026	.73236	.72460	.71699	.70952	.70219
8478456	.77636	.76831	.76041	.75265	.74503	.73756	.73021	.72300	.71592
8579530	.78743	.77971	.77212	.76466	.75733	.75014	.74306	.73611	.72928
8680560	.79806	.79065	.78337	.77621	.76917	.76225	.75544	.74875	.74216
8781535	.80813	.80103	.79404	.78717	.78041	.77375	.76720	.76076	.75442
8882462	.81771	.81090	.80420	.79760	.79111	.78472	.77842	.77223	.76612
8983356	.82694	.82043	.81401	.80769	.80147	.79533	.78929	.78334	.77747
9084225	.83593	.82971	.82357	.81753	.81157	.80570	.79991	.79420	.78857
9185058	.84455	.83861	.83276	.82698	.82129	.81567	.81013	.80466	.79927
9285838	.85263	.84696	.84137	.83585	.83040	.82503	.81973	.81449	.80933
9386557	.86009	.85467	.84932	.84405	.83884	.83370	.82862	.82360	.81865
9487212	.86687	.86169	.85657	.85152	.84653	.84160	.83673	.83192	.82717
9587801	.87298	.86801	.86310	.85825	.85345	.84872	.84404	.83941	.83484
9688322	.87838	.87360	.86888	.86420	.85959	.85502	.85051	.84605	.84165
9788795	.88328	.87867	.87411	.86961	.86515	.86074	.85639	.85208	.84782
9889220	.88769	.88323	.87883	.87447	.87016	.86589	.86167	.85750	.85337
9989612	.89176	.88745	.88318	.87895	.87478	.87064	.86656	.86251	.85850
10089977	.89555	.89136	.88722	.88313	.87908	.87506	.87109	.86716	.86327
10190326	.89917	.89511	.89110	.88712	.88318	.87929	.87543	.87161	.86783
10290690	.90294	.89901	.89513	.89128	.88746	.88369	.87995	.87624	.87257
10391076	.90694	.90315	.89940	.89569	.89200	.88835	.88474	.88116	.87760
10491504	.91138	.90775	.90415	.90058	.89704	.89354	.89006	.88661	.88319
10592027	.91681	.91337	.90996	.90658	.90322	.89989	.89659	.89331	.89006
10692763	.92445	.92130	.91816	.91506	.91197	.90890	.90586	.90284	.89983
10793799	.93523	.93249	.92977	.92707	.92438	.92170	.91905	.91641	.91378
10895429	.95223	.95018	.94814	.94611	.94409	.94208	.94008	.93809	.93611
10997985	.97893	.97801	.97710	.97619	.97529	.97438	.97348	.97259	.97170

TABLE S—BASED ON LIFE TABLE 80CNSMT SINGLE LIFE REMAINDER FACTORS

[Applicable After April 30, 1989, and Before May 1, 1999]

Age	Interest rate									
	6.2%	6.4%	6.6%	6.8%	7.0%	7.2%	7.4%	7.6%	7.8%	8.0%
003535	.03349	.03183	.03035	.02902	.02783	.02676	.02579	.02492	.02413
102486	.02292	.02119	.01963	.01824	.01699	.01587	.01486	.01395	.01312
202547	.02345	.02164	.02002	.01857	.01727	.01609	.01504	.01408	.01321
302640	.02429	.02241	.02073	.01921	.01785	.01662	.01552	.01451	.01361
402753	.02535	.02339	.02163	.02005	.01863	.01735	.01619	.01514	.01418
502883	.02656	.02453	.02269	.02105	.01956	.01822	.01700	.01590	.01490
603026	.02790	.02578	.02387	.02215	.02060	.01919	.01792	.01677	.01572
703180	.02935	.02714	.02515	.02336	.02174	.02027	.01894	.01773	.01664
803347	.03092	.02863	.02656	.02469	.02300	.02146	.02007	.01881	.01766
903528	.03263	.03025	.02810	.02615	.02438	.02278	.02133	.02000	.01880
1003723	.03449	.03201	.02977	.02774	.02590	.02423	.02271	.02133	.02006
1103935	.03650	.03393	.03160	.02949	.02757	.02583	.02424	.02279	.02147
1204160	.03865	.03598	.03356	.03136	.02936	.02755	.02589	.02438	.02299
1304394	.04088	.03811	.03560	.03331	.03123	.02934	.02761	.02603	.02458
1404629	.04312	.04025	.03764	.03527	.03311	.03113	.02933	.02768	.02617
1504864	.04536	.04238	.03968	.03721	.03496	.03290	.03103	.02930	.02773
1605099	.04759	.04451	.04170	.03913	.03679	.03466	.03270	.03090	.02926
1705333	.04982	.04662	.04370	.04104	.03861	.03638	.03434	.03247	.03075
1805570	.05207	.04875	.04573	.04296	.04044	.03812	.03599	.03404	.03225
1905814	.05438	.05095	.04781	.04494	.04231	.03990	.03769	.03565	.03378
2006065	.05677	.05321	.04996	.04698	.04424	.04173	.03943	.03731	.03535
2106325	.05922	.05554	.05217	.04907	.04623	.04362	.04122	.03901	.03697
2206594	.06178	.05797	.05447	.05126	.04831	.04559	.04309	.04078	.03865
2306876	.06446	.06051	.05688	.05355	.05048	.04766	.04505	.04265	.04042
2407174	.06729	.06321	.05945	.05599	.05281	.04987	.04715	.04465	.04233
2507491	.07031	.06609	.06219	.05861	.05530	.05224	.04941	.04680	.04438
2607830	.07355	.06918	.06515	.06142	.05799	.05481	.05187	.04915	.04662
2708192	.07702	.07250	.06832	.06446	.06090	.05759	.05454	.05170	.04906
2808577	.08071	.07603	.07171	.06772	.06402	.06059	.05740	.05445	.05170
2908986	.08464	.07981	.07534	.07120	.06736	.06380	.06049	.05742	.05465
3009420	.08882	.08383	.07921	.07492	.07095	.06725	.06381	.06061	.05763

TABLE S—BASED ON LIFE TABLE 80CNSMT SINGLE LIFE REMAINDER FACTORS—Continued

[Applicable After April 30, 1989, and Before May 1, 1999]

Age	Interest rate									
	6.2%	6.4%	6.6%	6.8%	7.0%	7.2%	7.4%	7.6%	7.8%	8.0%
3109881	.09327	.08812	.08335	.07891	.07479	.07095	.06738	.06405	.06095
3210369	.09797	.09267	.08774	.08315	.07888	.07491	.07120	.06774	.06451
3310885	.10297	.09750	.09241	.08767	.08325	.07913	.07529	.07170	.06834
3411430	.10824	.10261	.09736	.09246	.08790	.08363	.07964	.07592	.07243
3512002	.11380	.10800	.10259	.09754	.09282	.08841	.08428	.08041	.07679
3612602	.11963	.11366	.10809	.10288	.09800	.09344	.08917	.08516	.08140
3713230	.12574	.11961	.11387	.10850	.10347	.09876	.09433	.09018	.08628
3813887	.13214	.12584	.11994	.11441	.10922	.10436	.09978	.09549	.09145
3914573	.13883	.13237	.12630	.12061	.11527	.11025	.10553	.10109	.09690
4015290	.14583	.13920	.13297	.12712	.12162	.11644	.11157	.10698	.10266
4116036	.15312	.14633	.13994	.13393	.12827	.12294	.11792	.11318	.10871
4216810	.16071	.15375	.14720	.14103	.13522	.12973	.12456	.11967	.11505
4317614	.16858	.16146	.15475	.14842	.14245	.13682	.13149	.12645	.12169
4418447	.17675	.16948	.16261	.15613	.15000	.14421	.13873	.13355	.12864
4519310	.18524	.17780	.17078	.16414	.15787	.15192	.14630	.14096	.13591
4620204	.19402	.18644	.17926	.17247	.16604	.15995	.15418	.14870	.14350
4721128	.20311	.19538	.18806	.18112	.17454	.16830	.16238	.15676	.15141
4822080	.21249	.20462	.19716	.19007	.18335	.17696	.17090	.16513	.15964
4923059	.22214	.21413	.20653	.19930	.19244	.18591	.17970	.17379	.16816
5024063	.23206	.22391	.21617	.20881	.20180	.19514	.18879	.18274	.17697
5125095	.24225	.23398	.22610	.21861	.21147	.20466	.19818	.19199	.18609
5226157	.25275	.24436	.23636	.22874	.22147	.21453	.20791	.20159	.19556
5327249	.26357	.25505	.24694	.23919	.23180	.22474	.21799	.21154	.20537
5428369	.27466	.26604	.25782	.24995	.24244	.23526	.22839	.22181	.21552
5529518	.28605	.27734	.26900	.26103	.25341	.24611	.23912	.23243	.22601
5630695	.29774	.28893	.28050	.27242	.26469	.25728	.25019	.24338	.23685
5731902	.30973	.30084	.29232	.28415	.27632	.26881	.26161	.25469	.24805
5833138	.32203	.31306	.30446	.29621	.28829	.28069	.27339	.26637	.25962
5934402	.33461	.32558	.31691	.30859	.30059	.29290	.28550	.27839	.27155
6035690	.34745	.33836	.32963	.32124	.31317	.30540	.29792	.29073	.28379
6136999	.36050	.35137	.34259	.33414	.32601	.31817	.31062	.30334	.29633
6238325	.37374	.36458	.35576	.34726	.33907	.33117	.32356	.31621	.30912
6339669	.38717	.37799	.36913	.36060	.35236	.34441	.33674	.32933	.32217
6441031	.40078	.39159	.38272	.37415	.36588	.35789	.35016	.34270	.33548
6542416	.41464	.40545	.39656	.38798	.37968	.37166	.36390	.35639	.34912
6643825	.42876	.41958	.41070	.40211	.39380	.38576	.37797	.37043	.36312
6745260	.44315	.43399	.42513	.41655	.40824	.40019	.39238	.38482	.37749
6846720	.45779	.44868	.43985	.43129	.42299	.41494	.40713	.39956	.39221
6948197	.47263	.46357	.45478	.44625	.43798	.42995	.42215	.41458	.40722
7049686	.48760	.47861	.46988	.46140	.45316	.44516	.43738	.42983	.42248
7151182	.50265	.49374	.48508	.47666	.46847	.46051	.45276	.44523	.43790
7252685	.51778	.50896	.50038	.49203	.48390	.47599	.46829	.46079	.45349
7354194	.53298	.52426	.51578	.50751	.49946	.49161	.48397	.47652	.46926
7455714	.54832	.53972	.53134	.52317	.51520	.50744	.49986	.49247	.48527
7557250	.56382	.55536	.54710	.53904	.53118	.52351	.51601	.50870	.50156
7658803	.57951	.57120	.56308	.55515	.54740	.53984	.53245	.52522	.51817
7760369	.59535	.58720	.57923	.57144	.56383	.55639	.54912	.54200	.53504
7861942	.61126	.60329	.59549	.58787	.58040	.57310	.56596	.55896	.55212
7963508	.62713	.61935	.61174	.60428	.59698	.58983	.58283	.57597	.56925
8065059	.64285	.63527	.62785	.62058	.61345	.60646	.59961	.59290	.58632
8166579	.65827	.65090	.64368	.63659	.62965	.62283	.61615	.60959	.60316
8268061	.67332	.66616	.65914	.65226	.64550	.63886	.63235	.62595	.61968
8369499	.68793	.68099	.67418	.66749	.66092	.65447	.64813	.64191	.63579
8470896	.70213	.69541	.68881	.68233	.67595	.66969	.66353	.65748	.65153
8572256	.71596	.70947	.70308	.69681	.69063	.68456	.67859	.67271	.66693
8673569	.72931	.72305	.71688	.71081	.70484	.69896	.69318	.68748	.68188
8774818	.74204	.73599	.73003	.72417	.71839	.71271	.70711	.70159	.69616
8876011	.75419	.74836	.74261	.73695	.73137	.72588	.72046	.71512	.70986
8977169	.76599	.76037	.75484	.74938	.74400	.73870	.73347	.72831	.72323
9078302	.77755	.77215	.76683	.76158	.75640	.75129	.74625	.74128	.73638
9179395	.78870	.78352	.77842	.77337	.76840	.76349	.75864	.75385	.74913
9280423	.79920	.79423	.78933	.78449	.77971	.77499	.77033	.76572	.76118
9381377	.80894	.80417	.79946	.79481	.79022	.78568	.78120	.77677	.77239
9482247	.81784	.81325	.80873	.80425	.79983	.79547	.79115	.78688	.78266
9583033	.82586	.82145	.81709	.81278	.80852	.80431	.80014	.79602	.79195
9683729	.83298	.82872	.82451	.82034	.81622	.81215	.80812	.80414	.80019
9784361	.83944	.83532	.83124	.82721	.82322	.81927	.81537	.81151	.80769
9884929	.84525	.84126	.83730	.83339	.82952	.82569	.82190	.81815	.81443
9985454	.85062	.84674	.84290	.83910	.83534	.83161	.82792	.82427	.82066

Internal Revenue Service, Treasury

§ 20.2031-7A

TABLE S—BASED ON LIFE TABLE 80CNSMT SINGLE LIFE REMAINDER FACTORS—Continued

[Applicable After April 30, 1989, and Before May 1, 1999]

Age	Interest rate									
	6.2%	6.4%	6.6%	6.8%	7.0%	7.2%	7.4%	7.6%	7.8%	8.0%
10085942	.85561	.85184	.84810	.84440	.84074	.83711	.83352	.82997	.82644
10186408	.86037	.85670	.85306	.84946	.84589	.84236	.83886	.83539	.83196
10286894	.86534	.86177	.85823	.85473	.85126	.84782	.84442	.84104	.83770
10387408	.87060	.86714	.86371	.86032	.85695	.85362	.85031	.84703	.84378
10487980	.87644	.87311	.86980	.86653	.86328	.86005	.85686	.85369	.85054
10588684	.88363	.88046	.87731	.87418	.87108	.86800	.86494	.86191	.85890
10689685	.89389	.89095	.88804	.88514	.88226	.87940	.87656	.87374	.87094
10791117	.90858	.90600	.90344	.90089	.89836	.89584	.89334	.89085	.88838
10893414	.93217	.93022	.92828	.92634	.92442	.92250	.92060	.91870	.91681
10997081	.96992	.96904	.96816	.96729	.96642	.96555	.96468	.96382	.96296

TABLE S—BASED ON LIFE TABLE 80CNSMT SINGLE LIFE REMAINDER FACTORS

[Applicable After April 30, 1989, and Before May 1, 1999]

Age	Interest rate									
	8.2%	8.4%	8.6%	8.8%	9.0%	9.2%	9.4%	9.6%	9.8%	10.0%
002341	.02276	.02217	.02163	.02114	.02069	.02027	.01989	.01954	.01922
101237	.01170	.01108	.01052	.01000	.00953	.00910	.00871	.00834	.00801
201243	.01172	.01107	.01048	.00994	.00944	.00899	.00857	.00819	.00784
301278	.01203	.01135	.01073	.01016	.00964	.00916	.00872	.00832	.00795
401332	.01253	.01182	.01116	.01056	.01001	.00951	.00904	.00862	.00822
501400	.01317	.01241	.01172	.01109	.01051	.00998	.00949	.00904	.00862
601477	.01390	.01310	.01238	.01171	.01110	.01054	.01002	.00954	.00910
701563	.01472	.01389	.01312	.01242	.01178	.01118	.01064	.01013	.00966
801660	.01564	.01477	.01396	.01322	.01254	.01192	.01134	.01081	.01031
901770	.01669	.01577	.01492	.01414	.01342	.01276	.01216	.01159	.01107
1001891	.01785	.01688	.01599	.01517	.01442	.01372	.01308	.01249	.01194
1102026	.01915	.01814	.01720	.01634	.01555	.01481	.01414	.01351	.01293
1202173	.02056	.01950	.01852	.01761	.01678	.01601	.01529	.01463	.01402
1302326	.02204	.02092	.01989	.01895	.01807	.01726	.01651	.01582	.01517
1402478	.02351	.02234	.02126	.02027	.01935	.01850	.01771	.01698	.01630
1502628	.02495	.02372	.02259	.02155	.02058	.01969	.01886	.01810	.01738
1602774	.02635	.02507	.02388	.02279	.02178	.02084	.01997	.01917	.01842
1702917	.02772	.02637	.02513	.02399	.02293	.02194	.02103	.02018	.01940
1803059	.02907	.02767	.02637	.02517	.02406	.02302	.02207	.02118	.02035
1903205	.03046	.02899	.02763	.02637	.02521	.02412	.02312	.02218	.02131
2003355	.03188	.03035	.02892	.02760	.02638	.02524	.02419	.02320	.02229
2103509	.03334	.03173	.03024	.02886	.02758	.02638	.02527	.02424	.02328
2203669	.03487	.03318	.03162	.03017	.02882	.02757	.02640	.02532	.02430
2303837	.03646	.03470	.03306	.03154	.03013	.02881	.02759	.02644	.02538
2404018	.03819	.03634	.03463	.03303	.03155	.03016	.02888	.02767	.02655
2504214	.04006	.03812	.03633	.03465	.03309	.03164	.03029	.02902	.02784
2604428	.04210	.04008	.03820	.03644	.03481	.03328	.03186	.03052	.02928
2704662	.04434	.04223	.04025	.03841	.03670	.03509	.03360	.03219	.03088
2804915	.04677	.04456	.04249	.04056	.03876	.03708	.03550	.03403	.03264
2905189	.04941	.04709	.04493	.04291	.04102	.03925	.03760	.03604	.03458
3005485	.05226	.04984	.04757	.04546	.04348	.04162	.03988	.03825	.03671
3105805	.05535	.05282	.05045	.04824	.04616	.04421	.04238	.04067	.03905
3206149	.05867	.05603	.05356	.05124	.04906	.04702	.04510	.04329	.04160
3306520	.06226	.05950	.05692	.05449	.05221	.05007	.04806	.04616	.04438
3406916	.06609	.06322	.06052	.05799	.05560	.05336	.05125	.04926	.04738
3507339	.07020	.06720	.06439	.06174	.05925	.05690	.05469	.05260	.05063
3607787	.07455	.07143	.06850	.06573	.06313	.06068	.05836	.05617	.05411
3708262	.07917	.07593	.07287	.06999	.06727	.06470	.06228	.05999	.05783
3808765	.08407	.08069	.07751	.07451	.07167	.06899	.06646	.06407	.06180
3909296	.08925	.08574	.08243	.07931	.07635	.07356	.07092	.06841	.06604
4009858	.09472	.09109	.08765	.08440	.08132	.07841	.07565	.07303	.07055
4110449	.10050	.09673	.09316	.08978	.08658	.08355	.08067	.07794	.07535
4211069	.10656	.10265	.09895	.09544	.09212	.08896	.08596	.08312	.08041
4311718	.11291	.10887	.10503	.10140	.09794	.09466	.09154	.08858	.08576
4412399	.11958	.11540	.11143	.10766	.10407	.10067	.09743	.09434	.09141
4513111	.12656	.12224	.11814	.11423	.11052	.10699	.10362	.10042	.09736
4613856	.13387	.12941	.12516	.12113	.11728	.11362	.11013	.10680	.10363
4714633	.14150	.13690	.13252	.12835	.12438	.12059	.11697	.11352	.11022
4815442	.14945	.14471	.14020	.13589	.13179	.12787	.12412	.12055	.11713
4916280	.15769	.15281	.14816	.14373	.13949	.13544	.13157	.12787	.12433

TABLE S—BASED ON LIFE TABLE 80CNSMT SINGLE LIFE REMAINDER FACTORS—Continued

[Applicable After April 30, 1989, and Before May 1, 1999]

Age	Interest rate									
	8.2%	8.4%	8.6%	8.8%	9.0%	9.2%	9.4%	9.6%	9.8%	10.0%
5017147	.16622	.16121	.15643	.15186	.14749	.14331	.13931	.13548	.13182
5118045	.17507	.16993	.16501	.16030	.15580	.15150	.14737	.14342	.13963
5218979	.18427	.17899	.17394	.16911	.16448	.16004	.15579	.15172	.14780
5319947	.19383	.18842	.18324	.17828	.17352	.16896	.16458	.16038	.15635
5420950	.20372	.19819	.19288	.18779	.18291	.17822	.17372	.16940	.16524
5521986	.21397	.20831	.20288	.19767	.19266	.18785	.18322	.17878	.17450
5623058	.22457	.21879	.21324	.20791	.20278	.19785	.19310	.18854	.18414
5724167	.23554	.22965	.22399	.21854	.21329	.20824	.20338	.19870	.19419
5825314	.24690	.24090	.23512	.22956	.22420	.21904	.21407	.20927	.20464
5926497	.25863	.25252	.24664	.24097	.23550	.23023	.22515	.22024	.21551
6027712	.27068	.26448	.25849	.25272	.24716	.24178	.23659	.23158	.22674
6128956	.28304	.27674	.27067	.26480	.25913	.25366	.24837	.24325	.23831
6230228	.29567	.28929	.28312	.27717	.27141	.26584	.26045	.25524	.25020
6331525	.30857	.30211	.29586	.28982	.28397	.27832	.27284	.26754	.26240
6432851	.32176	.31522	.30890	.30278	.29685	.29111	.28555	.28016	.27493
6534209	.33528	.32868	.32229	.31610	.31010	.30429	.29865	.29317	.28787
6635604	.34918	.34253	.33609	.32983	.32377	.31788	.31217	.30663	.30124
6737037	.36347	.35678	.35028	.34398	.33786	.33191	.32614	.32053	.31508
6838508	.37815	.37142	.36489	.35854	.35237	.34638	.34055	.33488	.32937
6940008	.39313	.38638	.37982	.37344	.36724	.36120	.35533	.34961	.34405
7041533	.40838	.40162	.39504	.38864	.38241	.37634	.37043	.36468	.35907
7143076	.42382	.41705	.41047	.40405	.39780	.39171	.38578	.38000	.37436
7244638	.43945	.43269	.42611	.41969	.41344	.40733	.40138	.39558	.38991
7346218	.45527	.44854	.44197	.43556	.42931	.42321	.41725	.41143	.40575
7447823	.47137	.46466	.45812	.45173	.44549	.43940	.43345	.42763	.42195
7549459	.48777	.48112	.47462	.46826	.46205	.45598	.45004	.44424	.43856
7651127	.50452	.49793	.49148	.48517	.47900	.47297	.46706	.46129	.45563
7752823	.52157	.51505	.50867	.50243	.49632	.49033	.48447	.47873	.47311
7854541	.53885	.53242	.52613	.51996	.51392	.50800	.50220	.49652	.49094
7956267	.55621	.54989	.54369	.53762	.53166	.52582	.52009	.51448	.50897
8057987	.57354	.56733	.56125	.55527	.54941	.54366	.53802	.53248	.52705
8159685	.59065	.58457	.57860	.57274	.56699	.56134	.55579	.55035	.54499
8261351	.60746	.60151	.59567	.58993	.58429	.57875	.57331	.56796	.56270
8362978	.62387	.61806	.61236	.60675	.60123	.59581	.59047	.58523	.58007
8464567	.63992	.63426	.62869	.62321	.61783	.61253	.60731	.60218	.59713
8566125	.65565	.65014	.64472	.63938	.63413	.62896	.62387	.61886	.61392
8667636	.67092	.66557	.66030	.65511	.65000	.64496	.64000	.63511	.63030
8769081	.68554	.68034	.67522	.67018	.66520	.66031	.65548	.65071	.64602
8870468	.69957	.69453	.68956	.68466	.67983	.67507	.67037	.66574	.66117
8971821	.71326	.70838	.70357	.69882	.69414	.68952	.68495	.68045	.67601
9073153	.72676	.72204	.71739	.71280	.70827	.70379	.69938	.69502	.69071
9174447	.73986	.73532	.73083	.72640	.72202	.71770	.71343	.70921	.70504
9275669	.75225	.74787	.74354	.73927	.73504	.73087	.72674	.72267	.71864
9376807	.76379	.75957	.75540	.75127	.74719	.74317	.73918	.73524	.73135
9477849	.77437	.77030	.76627	.76229	.75835	.75446	.75061	.74680	.74303
9578792	.78394	.78001	.77611	.77226	.76845	.76468	.76096	.75727	.75362
9679630	.79244	.78863	.78485	.78112	.77742	.77377	.77015	.76657	.76303
9780391	.80016	.79646	.79280	.78917	.78559	.78203	.77852	.77504	.77160
9881076	.80712	.80352	.79996	.79643	.79294	.78948	.78606	.78267	.77931
9981709	.81354	.81004	.80657	.80313	.79972	.79635	.79302	.78971	.78644
10082296	.81950	.81609	.81270	.80934	.80602	.80273	.79947	.79624	.79304
10182855	.82518	.82185	.81854	.81526	.81201	.80880	.80561	.80245	.79932
10283438	.83110	.82785	.82462	.82142	.81826	.81512	.81200	.80892	.80586
10384056	.83737	.83420	.83106	.82795	.82487	.82181	.81878	.81577	.81279
10484743	.84433	.84127	.83822	.83521	.83221	.82924	.82630	.82338	.82048
10585591	.85295	.85001	.84709	.84419	.84132	.83846	.83563	.83282	.83003
10686816	.86540	.86266	.85993	.85723	.85454	.85187	.84922	.84659	.84397
10788592	.88348	.88105	.87863	.87623	.87384	.87147	.86911	.86676	.86443
10891493	.91306	.91119	.90934	.90749	.90566	.90383	.90201	.90020	.89840
10996211	.96125	.96041	.95956	.95872	.95788	.95704	.95620	.95537	.95455

TABLE S—BASED ON LIFE TABLE 80CNSMT SINGLE LIFE REMAINDER FACTORS

[Applicable After April 30, 1989, and Before May 1, 1999]

Age	Interest rate									
	10.2%	10.4%	10.6%	10.8%	11.0%	11.2%	11.4%	11.6%	11.8%	12.0%
001891	.01864	.01838	.01814	.01791	.01770	.01750	.01732	.01715	.01698

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TABLE S—BASED ON LIFE TABLE 80CNSMT SINGLE LIFE REMAINDER FACTORS—Continued

[Applicable After April 30, 1989, and Before May 1, 1999]

Age	Interest rate									
	10.2%	10.4%	10.6%	10.8%	11.0%	11.2%	11.4%	11.6%	11.8%	12.0%
100770	.00741	.00715	.00690	.00667	.00646	.00626	.00608	.00590	.00574
200751	.00721	.00693	.00667	.00643	.00620	.00600	.00580	.00562	.00544
300760	.00728	.00699	.00671	.00646	.00622	.00600	.00579	.00560	.00541
400786	.00752	.00721	.00692	.00665	.00639	.00616	.00594	.00573	.00554
500824	.00788	.00755	.00724	.00695	.00668	.00643	.00620	.00598	.00578
600869	.00832	.00796	.00764	.00733	.00705	.00678	.00654	.00630	.00608
700923	.00883	.00846	.00811	.00779	.00749	.00720	.00694	.00669	.00646
800986	.00943	.00904	.00867	.00833	.00801	.00771	.00743	.00716	.00692
901059	.01014	.00972	.00933	.00897	.00863	.00831	.00801	.00773	.00747
1001142	.01095	.01051	.01009	.00971	.00935	.00901	.00869	.00840	.00812
1101239	.01189	.01142	.01098	.01057	.01019	.00983	.00950	.00918	.00889
1201345	.01292	.01243	.01197	.01154	.01113	.01075	.01040	.01007	.00975
1301457	.01401	.01349	.01300	.01255	.01212	.01172	.01135	.01100	.01067
1401567	.01508	.01453	.01402	.01354	.01309	.01267	.01227	.01190	.01155
1501672	.01610	.01552	.01498	.01448	.01400	.01356	.01314	.01275	.01238
1601772	.01707	.01646	.01589	.01536	.01486	.01439	.01396	.01354	.01315
1701866	.01798	.01734	.01674	.01618	.01566	.01516	.01470	.01427	.01386
1801958	.01886	.01818	.01755	.01697	.01641	.01590	.01541	.01495	.01452
1902050	.01974	.01903	.01837	.01775	.01717	.01662	.01611	.01563	.01517
2002143	.02064	.01989	.01919	.01854	.01793	.01735	.01681	.01630	.01582
2102238	.02154	.02075	.02002	.01933	.01868	.01807	.01750	.01696	.01646
2202336	.02247	.02164	.02087	.02014	.01946	.01882	.01821	.01764	.01711
2302438	.02345	.02257	.02176	.02099	.02027	.01959	.01895	.01835	.01778
2402550	.02451	.02359	.02273	.02192	.02115	.02044	.01976	.01913	.01853
2502673	.02569	.02472	.02381	.02295	.02214	.02138	.02067	.01999	.01936
2602811	.02701	.02598	.02502	.02411	.02326	.02246	.02170	.02098	.02031
2702965	.02849	.02741	.02639	.02543	.02452	.02367	.02287	.02211	.02140
2803134	.03013	.02898	.02790	.02689	.02593	.02503	.02418	.02338	.02262
2903322	.03193	.03072	.02958	.02851	.02750	.02654	.02564	.02479	.02398
3003527	.03391	.03264	.03143	.03030	.02923	.02821	.02726	.02635	.02550
3103753	.03610	.03475	.03348	.03228	.03115	.03008	.02907	.02811	.02720
3204000	.03849	.03707	.03573	.03446	.03326	.03213	.03105	.03004	.02907
3304269	.04111	.03961	.03819	.03685	.03558	.03438	.03325	.03217	.03115
3404561	.04394	.04236	.04087	.03946	.03812	.03685	.03565	.03451	.03342
3504877	.04702	.04535	.04378	.04229	.04087	.03953	.03826	.03706	.03591
3605215	.05031	.04856	.04690	.04533	.04384	.04242	.04108	.03980	.03859
3705578	.05384	.05200	.05025	.04860	.04703	.04553	.04411	.04276	.04148
3805965	.05761	.05568	.05385	.05211	.05045	.04888	.04738	.04595	.04460
3906379	.06165	.05962	.05770	.05587	.05412	.05247	.05089	.04939	.04795
4006820	.06596	.06383	.06181	.05989	.05806	.05631	.05465	.05307	.05155
4107288	.07054	.06832	.06620	.06418	.06226	.06042	.05868	.05701	.05541
4207784	.07539	.07306	.07085	.06873	.06671	.06479	.06295	.06119	.05952
4308308	.08052	.07808	.07576	.07355	.07143	.06941	.06748	.06564	.06387
4408861	.08594	.08340	.08097	.07865	.07644	.07432	.07230	.07036	.06851
4509445	.09167	.08901	.08648	.08406	.08174	.07953	.07741	.07538	.07343
4610060	.09770	.09494	.09230	.08977	.08735	.08503	.08281	.08068	.07865
4710707	.10406	.10119	.09843	.09579	.09327	.09085	.08853	.08630	.08417
4811386	.11073	.10774	.10487	.10213	.09949	.09697	.09455	.09222	.08999
4912094	.11769	.11458	.11160	.10874	.10600	.10337	.10084	.09842	.09609
5012831	.12494	.12172	.11862	.11565	.11280	.11006	.10743	.10490	.10247
5113600	.13251	.12917	.12596	.12288	.11991	.11706	.11432	.11169	.10915
5214405	.14044	.13698	.13366	.13046	.12738	.12442	.12157	.11883	.11619
5315247	.14875	.14517	.14172	.13841	.13522	.13215	.12919	.12635	.12360
5416124	.15740	.15370	.15014	.14671	.14341	.14023	.13717	.13421	.13136
5517039	.16642	.16261	.15893	.15539	.15198	.14868	.14551	.14244	.13948
5617991	.17583	.17190	.16811	.16445	.16092	.15752	.15423	.15106	.14799
5718984	.18564	.18160	.17769	.17392	.17029	.16677	.16338	.16010	.15692
5820018	.19587	.19172	.18770	.18382	.18007	.17645	.17295	.16956	.16628
5921093	.20652	.20225	.19812	.19414	.19028	.18655	.18294	.17945	.17606
6022206	.21753	.21316	.20893	.20483	.20087	.19703	.19332	.18972	.18624
6123353	.22890	.22442	.22009	.21589	.21182	.20788	.20407	.20037	.19678
6224532	.24059	.23601	.23158	.22728	.22311	.21907	.21515	.21135	.20767
6325742	.25260	.24793	.24339	.23900	.23473	.23060	.22658	.22268	.21890
6426987	.26495	.26019	.25556	.25107	.24671	.24248	.23837	.23438	.23050
6528271	.27771	.27286	.26815	.26357	.25912	.25480	.25059	.24651	.24254
6629601	.29093	.28600	.28120	.27654	.27200	.26760	.26331	.25913	.25507
6730978	.30462	.29961	.29474	.29000	.28539	.28090	.27653	.27227	.26813
6832401	.31879	.31371	.30877	.30396	.29927	.29471	.29027	.28593	.28171
6933863	.33336	.32822	.32322	.31835	.31359	.30896	.30445	.30005	.29576

TABLE S—BASED ON LIFE TABLE 80CNSMT SINGLE LIFE REMAINDER FACTORS—Continued

[Applicable After April 30, 1989, and Before May 1, 1999]

Age	Interest rate									
	10.2%	10.4%	10.6%	10.8%	11.0%	11.2%	11.4%	11.6%	11.8%	12.0%
7035361	.34829	.34310	.33804	.33311	.32830	.32361	.31903	.31457	.31021
7136886	.36349	.35826	.35316	.34818	.34332	.33858	.33394	.32942	.32500
7238439	.37899	.37373	.36858	.36356	.35866	.35387	.34919	.34461	.34015
7340021	.39479	.38950	.38432	.37927	.37433	.36950	.36478	.36016	.35565
7441639	.41096	.40565	.40046	.39538	.39042	.38556	.38081	.37616	.37161
7543301	.42758	.42226	.41706	.41198	.40699	.40212	.39734	.39267	.38809
7645009	.44467	.43937	.43417	.42908	.42410	.41921	.41443	.40974	.40514
7746761	.46221	.45693	.45175	.44667	.44170	.43682	.43203	.42734	.42274
7848548	.48013	.47488	.46973	.46468	.45972	.45486	.45009	.44541	.44082
7950356	.49826	.49306	.48795	.48294	.47802	.47319	.46845	.46379	.45922
8052171	.51647	.51133	.50628	.50132	.49644	.49166	.48695	.48233	.47779
8153974	.53457	.52950	.52451	.51961	.51479	.51006	.50541	.50083	.49633
8255753	.55245	.54745	.54254	.53771	.53296	.52828	.52369	.51917	.51472
8357500	.57001	.56510	.56026	.55551	.55083	.54623	.54170	.53724	.53285
8459216	.58726	.58245	.57770	.57304	.56844	.56391	.55945	.55506	.55074
8560906	.60428	.59956	.59492	.59034	.58583	.58139	.57702	.57270	.56845
8662555	.62088	.61627	.61173	.60725	.60284	.59849	.59420	.58997	.58580
8764139	.63683	.63233	.62790	.62352	.61921	.61495	.61076	.60661	.60253
8865666	.65221	.64783	.64350	.63923	.63502	.63086	.62675	.62270	.61871
8967163	.66730	.66304	.65882	.65466	.65055	.64650	.64249	.63854	.63463
9068646	.68226	.67812	.67402	.66998	.66599	.66204	.65814	.65430	.65049
9170093	.69686	.69285	.68888	.68496	.68108	.67725	.67347	.66973	.66604
9271466	.71073	.70684	.70300	.69920	.69545	.69173	.68806	.68444	.68085
9372750	.72370	.71994	.71622	.71254	.70890	.70530	.70174	.69822	.69474
9473931	.73562	.73198	.72838	.72481	.72129	.71780	.71434	.71093	.70755
9575001	.74644	.74291	.73941	.73595	.73253	.72914	.72579	.72247	.71919
9675953	.75606	.75262	.74923	.74586	.74253	.73924	.73598	.73275	.72955
9776819	.76481	.76147	.75816	.75489	.75165	.74844	.74526	.74211	.73899
9877599	.77270	.76944	.76621	.76302	.75986	.75672	.75362	.75054	.74750
9978319	.77998	.77680	.77365	.77053	.76744	.76437	.76134	.75833	.75535
10078987	.78673	.78362	.78054	.77748	.77446	.77146	.76849	.76555	.76263
10179622	.79315	.79010	.78708	.78409	.78113	.77819	.77528	.77239	.76953
10280283	.79983	.79685	.79390	.79097	.78807	.78519	.78234	.77951	.77671
10380983	.80690	.80399	.80111	.79825	.79541	.79260	.78981	.78705	.78430
10481760	.81475	.81192	.80912	.80633	.80357	.80083	.79810	.79541	.79273
10582726	.82451	.82178	.81907	.81638	.81371	.81106	.80843	.80582	.80322
10684137	.83879	.83623	.83368	.83115	.82863	.82614	.82366	.82119	.81874
10786211	.85981	.85751	.85523	.85297	.85071	.84847	.84624	.84403	.84182
10889660	.89481	.89304	.89127	.88950	.88775	.88601	.88427	.88254	.88081
10995372	.95290	.95208	.95126	.95045	.94964	.94883	.94803	.94723	.94643

TABLE S—BASED ON LIFE TABLE 80CNSMT SINGLE LIFE REMAINDER FACTORS

[Applicable After April 30, 1989, and Before May 1, 1999]

Age	Interest rate									
	12.2%	12.4%	12.6%	12.8%	13.0%	13.2%	13.4%	13.6%	13.8%	14.0%
001683	.01669	.01655	.01642	.01630	.01618	.01607	.01596	.01586	.01576
100559	.00544	.00531	.00518	.00506	.00494	.00484	.00473	.00464	.00454
200528	.00513	.00499	.00485	.00473	.00461	.00449	.00439	.00428	.00419
300524	.00508	.00493	.00479	.00465	.00453	.00441	.00429	.00419	.00408
400536	.00519	.00503	.00488	.00473	.00460	.00447	.00435	.00423	.00412
500558	.00540	.00523	.00507	.00492	.00477	.00464	.00451	.00439	.00427
600588	.00569	.00550	.00533	.00517	.00502	.00487	.00473	.00460	.00448
700624	.00604	.00584	.00566	.00549	.00532	.00517	.00502	.00488	.00475
800668	.00646	.00626	.00606	.00588	.00570	.00554	.00538	.00523	.00509
900722	.00699	.00677	.00656	.00636	.00617	.00600	.00583	.00567	.00552
1000785	.00761	.00737	.00715	.00694	.00674	.00655	.00637	.00620	.00604
1100861	.00835	.00810	.00786	.00764	.00743	.00723	.00704	.00686	.00668
1200946	.00918	.00891	.00866	.00843	.00820	.00799	.00779	.00760	.00741
1301035	.01006	.00978	.00951	.00927	.00903	.00880	.00859	.00839	.00819
1401122	.01091	.01061	.01034	.01007	.00982	.00958	.00936	.00914	.00894
1501203	.01171	.01140	.01110	.01082	.01056	.01031	.01007	.00985	.00963
1601279	.01244	.01211	.01181	.01151	.01123	.01097	.01072	.01048	.01025
1701347	.01311	.01276	.01244	.01213	.01184	.01156	.01130	.01104	.01081
1801411	.01373	.01336	.01302	.01270	.01239	.01209	.01182	.01155	.01130
1901474	.01434	.01396	.01359	.01325	.01293	.01262	.01233	.01205	.01178

Internal Revenue Service, Treasury

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TABLE S—BASED ON LIFE TABLE 80CNSMT SINGLE LIFE REMAINDER FACTORS—Continued

[Applicable After April 30, 1989, and Before May 1, 1999]

Age	Interest rate									
	12.2%	12.4%	12.6%	12.8%	13.0%	13.2%	13.4%	13.6%	13.8%	14.0%
2001537	.01494	.01454	.01415	.01379	.01345	.01313	.01282	.01252	.01224
2101598	.01553	.01510	.01470	.01432	.01396	.01361	.01329	.01298	.01268
2201660	.01613	.01568	.01525	.01485	.01446	.01410	.01375	.01343	.01312
2301725	.01674	.01627	.01581	.01539	.01498	.01460	.01423	.01388	.01355
2401796	.01742	.01692	.01644	.01599	.01556	.01515	.01476	.01439	.01404
2501876	.01819	.01765	.01714	.01666	.01621	.01577	.01536	.01497	.01460
2601967	.01907	.01850	.01796	.01745	.01696	.01650	.01606	.01565	.01525
2702072	.02008	.01948	.01890	.01836	.01784	.01735	.01688	.01644	.01601
2802190	.02122	.02057	.01996	.01938	.01883	.01831	.01781	.01734	.01689
2902322	.02249	.02181	.02116	.02054	.01996	.01940	.01887	.01836	.01788
3002469	.02392	.02319	.02250	.02184	.02122	.02062	.02006	.01952	.01900
3102634	.02552	.02475	.02401	.02331	.02264	.02201	.02140	.02083	.02028
3202816	.02729	.02647	.02568	.02494	.02423	.02355	.02291	.02229	.02170
3303018	.02926	.02838	.02755	.02675	.02600	.02528	.02459	.02393	.02331
3403239	.03142	.03048	.02960	.02875	.02795	.02718	.02645	.02575	.02508
3503482	.03378	.03279	.03185	.03095	.03009	.02928	.02850	.02775	.02704
3603743	.03633	.03528	.03428	.03333	.03242	.03155	.03072	.02992	.02916
3704026	.03909	.03798	.03692	.03591	.03494	.03401	.03313	.03228	.03147
3804330	.04207	.04089	.03977	.03869	.03767	.03668	.03574	.03484	.03398
3904658	.04528	.04403	.04284	.04170	.04061	.03957	.03857	.03762	.03670
4005011	.04873	.04741	.04615	.04495	.04379	.04269	.04163	.04061	.03964
4105389	.05244	.05104	.04971	.04844	.04721	.04604	.04492	.04384	.04281
4205791	.05638	.05491	.05350	.05216	.05086	.04962	.04844	.04729	.04620
4306219	.06057	.05902	.05754	.05612	.05475	.05344	.05218	.05098	.04981
4406673	.06503	.06340	.06184	.06034	.05890	.05752	.05619	.05491	.05368
4507157	.06978	.06806	.06642	.06484	.06332	.06186	.06046	.05911	.05781
4607669	.07481	.07301	.07128	.06962	.06802	.06649	.06501	.06358	.06221
4708212	.08015	.07826	.07645	.07470	.07302	.07140	.06984	.06834	.06690
4808784	.08578	.08380	.08190	.08006	.07830	.07660	.07496	.07338	.07186
4909384	.09169	.08961	.08762	.08570	.08384	.08206	.08034	.07868	.07708
5010013	.09787	.09570	.09361	.09160	.08966	.08779	.08598	.08424	.08256
5110671	.10436	.10209	.09991	.09780	.09577	.09381	.09192	.09009	.08832
5211365	.11120	.10883	.10655	.10435	.10222	.10017	.09819	.09628	.09442
5312095	.11840	.11593	.11355	.11126	.10904	.10689	.10482	.10282	.10088
5412860	.12595	.12338	.12090	.11851	.11619	.11396	.11179	.10970	.10767
5513663	.13386	.13120	.12862	.12613	.12372	.12138	.11912	.11694	.11482
5614503	.14217	.13940	.13672	.13413	.13162	.12919	.12683	.12456	.12235
5715385	.15089	.14801	.14523	.14254	.13994	.13741	.13496	.13259	.13029
5816311	.16004	.15706	.15418	.15139	.14868	.14606	.14352	.14105	.13866
5917279	.16961	.16654	.16355	.16066	.15786	.15514	.15250	.14994	.14745
6018286	.17958	.17640	.17332	.17033	.16743	.16462	.16188	.15922	.15664
6119330	.18992	.18665	.18347	.18038	.17738	.17447	.17164	.16889	.16622
6220409	.20061	.19724	.19396	.19078	.18768	.18467	.18175	.17891	.17614
6321522	.21165	.20818	.20480	.20152	.19833	.19523	.19221	.18928	.18642
6422672	.22306	.21949	.21602	.21265	.20937	.20617	.20306	.20003	.19708
6523867	.23491	.23125	.22769	.22423	.22085	.21757	.21437	.21125	.20821
6625112	.24727	.24353	.23988	.23632	.23286	.22948	.22619	.22299	.21986
6726409	.26016	.25633	.25260	.24896	.24541	.24195	.23857	.23528	.23206
6827760	.27359	.26968	.26586	.26214	.25851	.25497	.25151	.24814	.24484
6929157	.28748	.28350	.27961	.27581	.27211	.26849	.26495	.26150	.25812
7030596	.30181	.29775	.29379	.28992	.28614	.28245	.27884	.27532	.27187
7132069	.31648	.31236	.30833	.30440	.30055	.29679	.29312	.28952	.28600
7233578	.33151	.32733	.32325	.31925	.31535	.31152	.30778	.30412	.30054
7335123	.34691	.34269	.33855	.33450	.33054	.32666	.32286	.31914	.31550
7436715	.36279	.35852	.35434	.35024	.34623	.34230	.33845	.33468	.33098
7538360	.37921	.37491	.37069	.36656	.36250	.35853	.35464	.35082	.34708
7640064	.39623	.39190	.38765	.38349	.37941	.37540	.37148	.36762	.36384
7741823	.41381	.40947	.40521	.40103	.39692	.39290	.38895	.38507	.38126
7843632	.43189	.42755	.42329	.41910	.41499	.41095	.40698	.40309	.39926
7945473	.45032	.44599	.44173	.43755	.43344	.42940	.42543	.42153	.41770
8047333	.46894	.46463	.46040	.45623	.45213	.44811	.44414	.44025	.43642
8149191	.48755	.48328	.47907	.47493	.47085	.46684	.46290	.45902	.45520
8251034	.50603	.50179	.49762	.49351	.48947	.48549	.48157	.47772	.47392
8352852	.52427	.52008	.51595	.51189	.50788	.50394	.50006	.49623	.49246
8454648	.54228	.53815	.53407	.53006	.52610	.52221	.51836	.51458	.51084
8556426	.56013	.55606	.55205	.54810	.54420	.54035	.53656	.53282	.52913
8658169	.57764	.57364	.56970	.56581	.56197	.55818	.55445	.55076	.54713
8759850	.59452	.59060	.58673	.58291	.57913	.57541	.57174	.56811	.56453
8861476	.61086	.60702	.60322	.59947	.59577	.59212	.58851	.58494	.58142

TABLE S—BASED ON LIFE TABLE 80CNSMT SINGLE LIFE REMAINDER FACTORS—Continued

[Applicable After April 30, 1989, and Before May 1, 1999]

Age	Interest rate									
	12.2%	12.4%	12.6%	12.8%	13.0%	13.2%	13.4%	13.6%	13.8%	14.0%
8963078	.62697	.62321	.61950	.61583	.61220	.60862	.60508	.60159	.59813
9064674	.64302	.63935	.63573	.63215	.62861	.62511	.62165	.61823	.61485
9166238	.65877	.65520	.65167	.64819	.64474	.64133	.63795	.63462	.63132
9267730	.67379	.67032	.66689	.66350	.66014	.65682	.65354	.65029	.64708
9369130	.68789	.68452	.68119	.67789	.67463	.67140	.66820	.66504	.66191
9470421	.70090	.69762	.69438	.69118	.68800	.68486	.68175	.67867	.67563
9571594	.71272	.70954	.70639	.70326	.70017	.69712	.69409	.69109	.68812
9672638	.72325	.72014	.71707	.71403	.71101	.70803	.70507	.70215	.69925
9773590	.73285	.72982	.72682	.72385	.72090	.71799	.71510	.71224	.70941
9874448	.74149	.73853	.73560	.73269	.72981	.72696	.72414	.72134	.71856
9975240	.74948	.74658	.74371	.74086	.73805	.73525	.73248	.72974	.72702
10075974	.75687	.75403	.75121	.74842	.74566	.74292	.74020	.73751	.73484
10176669	.76388	.76109	.75833	.75559	.75287	.75018	.74751	.74486	.74223
10277393	.77117	.76844	.76573	.76304	.76037	.75773	.75511	.75251	.74993
10378158	.77888	.77620	.77355	.77091	.76830	.76571	.76313	.76058	.75805
10479007	.78743	.78482	.78222	.77964	.77709	.77455	.77203	.76953	.76705
10580065	.79809	.79556	.79304	.79054	.78805	.78559	.78314	.78071	.77829
10681631	.81389	.81149	.80911	.80674	.80438	.80204	.79972	.79741	.79511
10783963	.83745	.83529	.83313	.83099	.82886	.82674	.82463	.82254	.82045
10887910	.87739	.87569	.87400	.87232	.87064	.86897	.86731	.86566	.86401
10994563	.94484	.94405	.94326	.94248	.94170	.94092	.94014	.93937	.93860

TABLE 80CNSMT—APPLICABLE AFTER APRIL 30, 1989, AND BEFORE MAY 1, 1999

Age × (1)	1(×) (2)	Age × (1)	1(×) (2)	Age × (1)	1(×) (2)
0	100000	37	95492	74	59279
1	98740	38	95317	75	56799
2	98648	39	95129	76	54239
3	98584	40	94926	77	51599
4	98535	41	94706	78	48878
5	98495	42	94465	79	46071
6	98459	43	94201	80	43180
7	98426	44	93913	81	40208
8	98396	45	93599	82	37172
9	98370	46	93256	83	34095
10	98347	47	92882	84	31012
11	98328	48	92472	85	27960
12	98309	49	92021	86	24961
13	98285	50	91526	87	22038
14	98248	51	90986	88	19235
15	98196	52	90402	89	16598
16	98129	53	89771	90	14154
17	98047	54	89087	91	11908
18	97953	55	88348	92	9863
19	97851	56	87551	93	8032
20	97741	57	86695	94	6424
21	97623	58	85776	95	5043
22	97499	59	84789	96	3884
23	97370	60	83726	97	2939
24	97240	61	82581	98	2185
25	97110	62	81348	99	1598
26	96982	63	80024	100	1150
27	96856	64	78609	101	815
28	96730	65	77107	102	570
29	96604	66	75520	103	393
30	96477	67	73846	104	267
31	96350	68	72082	105	179
32	96220	69	70218	106	119
33	96088	70	68248	107	78
34	95951	71	66165	108	51
35	95808	72	63972	109	33
36	95655	73	61673	110	0

[T.D. 8540, 59 FR 30151, June 10, 1994, as amended at 59 FR 30152, June 10, 1994; T.D. 8819, 64 FR 23211, 23212, Apr. 30, 1999; 64 FR 33195, June 22, 1999; T.D. 8886, 65 FR 36943, June 12, 2000]

TAXABLE ESTATE

§ 20.2051-1 Definition of taxable estate.

The taxable estate of a decedent who was a citizen or resident (see paragraph (b)(1) of § 20.0-1) of the United States at the time of his death is determined by subtracting the total amount of the deductions authorized by sections 2052 through 2056 from the total amount which must be included in the gross estate under sections 2031 through 2044. These deductions are in general as follows:

- (a) An exemption of \$60,000 (section 2052);
- (b) Funeral and administration expenses and claims against the estate (including certain taxes and charitable pledges) (section 2053);
- (c) Losses from casualty or theft during the administration of the estate (section 2054);
- (d) Charitable transfers (section 2055); and
- (e) The marital deduction (section 2056).

See section 2106 and the regulations thereunder for the computation of the taxable estate of a decedent who was not a citizen or resident of the United States. See also § 1.642(g)-1 of this chapter concerning the disallowance for income tax purposes of certain deductions allowed for estate tax purposes.

§ 20.2052-1 Exemption.

An exemption of \$60,000 is allowed as a deduction under section 2052 from the gross estate of a decedent who was a citizen or resident of the United States at the time of his death. For the amount of the exemption allowed as a deduction from the gross estate of a decedent who was a nonresident not a citizen of the United States, see paragraph (a)(3) of § 20.2106-1.

§ 20.2053-1 Deductions for expenses, indebtedness, and taxes; in general.

(a) *General rule.* In determining the taxable estate of a decedent who was a citizen or resident of the United States at the time of his death, there are allowed as deductions under section 2053 (a) and (b) amounts falling within the following two categories (subject to the limitations contained in this section and in §§ 20.2053-2 through 20.2053-9):

(1) *First category.* Amounts which are payable out of property subject to claims and which are allowable by the law of the jurisdiction, whether within or without the United States, under which the estate is being administered for—

- (i) Funeral expenses;
- (ii) Administration expenses;
- (iii) Claims against the estate (including taxes to the extent set forth in § 20.2053-6 and charitable pledges to the extent set forth in § 20.2053-5); and
- (iv) Unpaid mortgages on, or any indebtedness in respect of, property, the value of the decedent's interest in which is included in the value of the gross estate undiminished by the mortgage or indebtedness.

As used in this subparagraph, the phrase “allowable by the law of the jurisdiction” means allowable by the law governing the administration of decedents' estates. The phrase has no reference to amounts allowable as deductions under a law which imposes a State death tax. See further §§ 20.2053-2 through 20.2053-7.

(2) *Second category.* Amounts representing expenses incurred in administering property which is included in the gross estate but which is not subject to claims and which—

- (i) Would be allowed as deductions in the first category if the property being administered were subject to claims; and
- (ii) Were paid before the expiration of the period of limitation for assessment provided in section 6501.

See further § 20.2053-8.

(b) *Provisions applicable to both categories—*(1) *In general.* If the item is not one of those described in paragraph (a) of this section, it is not deductible merely because payment is allowed by the local law. If the amount which may be expended for the particular purpose is limited by the local law no deduction in excess of that limitation is permissible.

(2) *Effect of court decree.* The decision of a local court as to the amount and allowability under local law of a claim or administration expense will ordinarily be accepted if the court passes upon the facts upon which deductibility depends. If the court does not pass upon those facts, its decree will, of