

Rev. Rul. 97-34, 1997-2 CB 4 IRC Section 42

In Rev. Rul. 90-60, 1990-2 C.B. 3, the Internal Revenue Service provided guidance to taxpayers concerning the general methodology used by the Treasury Department in computing the bond factor amounts used in calculating the amount of bond considered satisfactory by the Secretary under section 42(j)(6) of the Internal Revenue Code. It further announced that the Secretary would publish in the Internal Revenue Bulletin a table of "bond factor" amounts for dispositions occurring during each calendar month.

This revenue ruling provides in Table 1 the bond factor amounts for calculating the amount of bond considered satisfactory under section 42(j)(6) for dispositions of qualified low-income buildings or interests therein during the period July through September 1997.

TABLE 1

REV. RUL. 97-34

MONTHLY BOND FACTOR AMOUNTS FOR DISPOSITIONS EXPRESSED

AS A PERCENTAGE OF TOTAL CREDITS

CALENDAR YEAR BUILDING PLACED IN SERVICE

OR, IF SECTION 42(f)(1) ELECTION WAS MADE,

THE SUCCEEDING CALENDAR YEAR

Month of

Disposition 1987 1988 1989 1990 1991 1992

Jul '97 78.33 80.65 83.19 86.15 89.61 93.54

Aug '97 78.11 80.43 82.96 85.92 89.36 93.27

Sep '97 77.90 80.21 82.74 85.68 89.12 93.01

Month of

Disposition 1993 1994 1995 1996 1997

Jul '97 97.58 101.48 105.30 109.33 112.52

Aug '97 97.30 101.18 105.01 109.06 112.52

Sep '97 97.03 100.90 104.73 108.81 112.52

For a list of bond factor amounts applicable to dispositions occurring during other calendar years, see the following revenue rulings: Rev. Rul. 90-60, 1990-2 C.B. 3, for dispositions occurring during calendar years 1987, 1988, and 1989; Rev. Rul. 90-88, 1990-2 C.B. 7, for dispositions occurring during calendar year 1990; Rev. Rul. 91-67, 1991-2 C.B. 13, for dispositions occurring during calendar year 1991; Rev. Rul. 92-101, 1992-2 C.B. 9, for dispositions occurring during calendar year 1992; Rev. Rul. 93-83, 1993-2 C.B. 6, for dispositions occurring during calendar year 1993; Rev. Rul. 94-71, 1994-2 C.B. 4, for dispositions occurring during calendar year 1994; Rev. Rul. 95-83, 1995-2 C.B. 8, for dispositions occurring during calendar year 1995; Rev. Rul. 96-16, 1996-1 C.B. 3, for dispositions occurring during the period January through March 1996; Rev. Rul. 96-33, 1996-27 I.R.B. 4, for dispositions occurring during the period April through June 1996; Rev. Rul. 96-45, 1996-39 I.R.B. 5, for dispositions occurring during the period July through September 1996; Rev. Rul. 96-59, 1996-50 I.R.B. 4, for dispositions occurring during the period October through December 1996; Rev. Rul. 97-16, 1997-13 I.R.B. 4, for dispositions occurring during the period January through March 1997; and Rev. Rul. 97-25, 1997-23 I.R.B. 4, for dispositions occurring during the period April through June 1997.

Drafting Information

The principal author of this revenue ruling is Jack Malgeri of the Office of Assistant Chief Counsel (Passthroughs and Special Industries). For further information regarding this revenue ruling, contact Mr. Malgeri at (202) 622-3040 (not a toll-free call).