

Part 1

Section 6621.--Determination of Rate of Interest

26 CFR 301.6621-1: Interest rate.

Rev. Rul. 2010-31

Section 6621 of the Internal Revenue Code establishes the rates for interest on tax overpayments and tax underpayments. Under section 6621(a)(1), the overpayment rate is the sum of the federal short-term rate plus 3 percentage points (2 percentage points in the case of a corporation), except the rate for the portion of a corporate overpayment of tax exceeding \$10,000 for a taxable period is the sum of the federal short-term rate plus 0.5 of a percentage point. Under section 6621(a)(2), the underpayment rate is the sum of the federal short-term rate plus 3 percentage points.

Section 6621(c) provides that for purposes of interest payable under section 6601 on any large corporate underpayment, the underpayment rate under section 6621(a)(2) is determined by substituting "5 percentage points" for "3 percentage points." See section 6621(c) and section 301.6621-3 of the Regulations on Procedure and Administration for the definition of a large corporate underpayment and for the rules for determining the applicable date. Section 6621(c) and section 301.6621-3 are generally effective for periods after December 31, 1990.

Section 6621(b)(1) provides that the Secretary will determine the federal short-term rate for the first month in each calendar quarter. Section 6621(b)(2)(A) provides that the federal short-term rate determined under section 6621(b)(1) for any month

applies during the first calendar quarter beginning after that month. Section 6621(b)(2)(B) provides that in determining the addition to tax under section 6654 for failure to pay estimated tax for any taxable year, the federal short-term rate that applies during the third month following the taxable year also applies during the first 15 days of the fourth month following the taxable year. Section 6621(b)(3) provides that the federal short-term rate for any month is the federal short-term rate determined during that month by the Secretary in accordance with section 1274(d), rounded to the nearest full percent (or, if a multiple of 1/2 of 1 percent, the rate is increased to the next highest full percent).

Notice 88-59, 1988-1 C.B. 546, announced that, in determining the quarterly interest rates to be used for overpayments and underpayments of tax under section 6621, the Internal Revenue Service will use the federal short-term rate based on daily compounding because that rate is most consistent with section 6621 which, pursuant to section 6622, is subject to daily compounding.

The federal short-term rate determined in accordance with section 1274(d) during October 2010 is the rate published in Revenue Ruling 2010-26, 2010-44 IRB 573 to take effect beginning November 1, 2010. The federal short-term rate, rounded to the nearest full percent, based on daily compounding determined during the month of October 2010 is 0 percent. Accordingly, an overpayment rate of 3 percent (2 percent in the case of a corporation) and an underpayment rate of 3 percent are established for the calendar quarter beginning January 1, 2011. The overpayment rate for the portion of a corporate overpayment exceeding \$10,000 for the calendar quarter beginning January 1, 2011, is 0.5 percent. The underpayment rate for large corporate underpayments for the calendar quarter beginning January 1, 2011, is 5 percent. These rates apply to amounts bearing interest during that calendar quarter.

Under section 6621(b)(2)(B), the 3 percent rate also applies to estimated tax underpayments for the first calendar quarter in 2011 and for the first 15 days in April 2011.

Interest factors for daily compound interest for an annual rate of 0.5 percent are published in Appendix A of this Revenue Ruling. Interest factors for daily compound interest for annual rates of 2 percent, 3 percent, and 5 percent are published in Tables 7, 9, 11, and 15 of Rev. Proc. 95-17, 1995-1 C.B. 561, 563, 565, and 569.

Annual interest rates to be compounded daily pursuant to section 6622 that apply for prior periods are set forth in the tables accompanying this revenue ruling.

DRAFTING INFORMATION

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APPENDIX A

| 365 Day Year | | | | | |
|-----------------------------|-------------|------|-------------|------|-------------|
| 0.5% Compound Rate 184 Days | | | | | |
| Days | Factor | Days | Factor | Days | Factor |
| 1 | 0.000013699 | 63 | 0.000863380 | 125 | 0.001713784 |
| 2 | 0.000027397 | 64 | 0.000877091 | 126 | 0.001727506 |
| 3 | 0.000041096 | 65 | 0.000890801 | 127 | 0.001741228 |
| 4 | 0.000054796 | 66 | 0.000904512 | 128 | 0.001754951 |
| 5 | 0.000068495 | 67 | 0.000918223 | 129 | 0.001768673 |
| 6 | 0.000082195 | 68 | 0.000931934 | 130 | 0.001782396 |
| 7 | 0.000095894 | 69 | 0.000945646 | 131 | 0.001796119 |
| 8 | 0.000109594 | 70 | 0.000959357 | 132 | 0.001809843 |
| 9 | 0.000123294 | 71 | 0.000973069 | 133 | 0.001823566 |
| 10 | 0.000136995 | 72 | 0.000986781 | 134 | 0.001837290 |
| 11 | 0.000150695 | 73 | 0.001000493 | 135 | 0.001851013 |
| 12 | 0.000164396 | 74 | 0.001014206 | 136 | 0.001864737 |
| 13 | 0.000178097 | 75 | 0.001027918 | 137 | 0.001878462 |
| 14 | 0.000191798 | 76 | 0.001041631 | 138 | 0.001892186 |
| 15 | 0.000205499 | 77 | 0.001055344 | 139 | 0.001905910 |
| 16 | 0.000219201 | 78 | 0.001069057 | 140 | 0.001919635 |
| 17 | 0.000232902 | 79 | 0.001082770 | 141 | 0.001933360 |
| 18 | 0.000246604 | 80 | 0.001096484 | 142 | 0.001947085 |
| 19 | 0.000260306 | 81 | 0.001110197 | 143 | 0.001960811 |
| 20 | 0.000274008 | 82 | 0.001123911 | 144 | 0.001974536 |
| 21 | 0.000287711 | 83 | 0.001137625 | 145 | 0.001988262 |
| 22 | 0.000301413 | 84 | 0.001151339 | 146 | 0.002001988 |
| 23 | 0.000315116 | 85 | 0.001165054 | 147 | 0.002015714 |
| 24 | 0.000328819 | 86 | 0.001178768 | 148 | 0.002029440 |
| 25 | 0.000342522 | 87 | 0.001192483 | 149 | 0.002043166 |
| 26 | 0.000356225 | 88 | 0.001206198 | 150 | 0.002056893 |
| 27 | 0.000369929 | 89 | 0.001219913 | 151 | 0.002070620 |
| 28 | 0.000383633 | 90 | 0.001233629 | 152 | 0.002084347 |
| 29 | 0.000397336 | 91 | 0.001247344 | 153 | 0.002098074 |
| 30 | 0.000411041 | 92 | 0.001261060 | 154 | 0.002111801 |
| 31 | 0.000424745 | 93 | 0.001274776 | 155 | 0.002125529 |
| 32 | 0.000438449 | 94 | 0.001288492 | 156 | 0.002139257 |
| 33 | 0.000452154 | 95 | 0.001302208 | 157 | 0.002152985 |
| 34 | 0.000465859 | 96 | 0.001315925 | 158 | 0.002166713 |
| 35 | 0.000479564 | 97 | 0.001329641 | 159 | 0.002180441 |
| 36 | 0.000493269 | 98 | 0.001343358 | 160 | 0.002194169 |
| 37 | 0.000506974 | 99 | 0.001357075 | 161 | 0.002207898 |
| 38 | 0.000520680 | 100 | 0.001370792 | 162 | 0.002221627 |
| 39 | 0.000534386 | 101 | 0.001384510 | 163 | 0.002235356 |
| 40 | 0.000548092 | 102 | 0.001398227 | 164 | 0.002249085 |
| 41 | 0.000561798 | 103 | 0.001411945 | 165 | 0.002262815 |

| | | | | | |
|----|-------------|-----|-------------|-----|-------------|
| 42 | 0.000575504 | 104 | 0.001425663 | 166 | 0.002276544 |
| 43 | 0.000589211 | 105 | 0.001439381 | 167 | 0.002290274 |
| 44 | 0.000602917 | 106 | 0.001453100 | 168 | 0.002304004 |
| 45 | 0.000616624 | 107 | 0.001466818 | 169 | 0.002317734 |
| 46 | 0.000630331 | 108 | 0.001480537 | 170 | 0.002331465 |
| 47 | 0.000644039 | 109 | 0.001494256 | 171 | 0.002345195 |
| 48 | 0.000657746 | 110 | 0.001507975 | 172 | 0.002358926 |
| 49 | 0.000671454 | 111 | 0.001521694 | 173 | 0.002372657 |
| 50 | 0.000685161 | 112 | 0.001535414 | 174 | 0.002386388 |
| 51 | 0.000698869 | 113 | 0.001549133 | 175 | 0.002400120 |
| 52 | 0.000712578 | 114 | 0.001562853 | 176 | 0.002413851 |
| 53 | 0.000726286 | 115 | 0.001576573 | 177 | 0.002427583 |
| 54 | 0.000739995 | 116 | 0.001590293 | 178 | 0.002441315 |
| 55 | 0.000753703 | 117 | 0.001604014 | 179 | 0.002455047 |
| 56 | 0.000767412 | 118 | 0.001617734 | 180 | 0.002468779 |
| 57 | 0.000781121 | 119 | 0.001631455 | 181 | 0.002482511 |
| 58 | 0.000794831 | 120 | 0.001645176 | 182 | 0.002496244 |
| 59 | 0.000808540 | 121 | 0.001658897 | 183 | 0.002509977 |
| 60 | 0.000822250 | 122 | 0.001672619 | 184 | 0.002523710 |
| 61 | 0.000835960 | 123 | 0.001686340 | | |
| 62 | 0.000849670 | 124 | 0.001700062 | | |

| 366 Day Year | | | | | |
|-----------------------------|-------------|------|-------------|------|-------------|
| 0.5% Compound Rate 184 Days | | | | | |
| Days | Factor | Days | Factor | Days | Factor |
| 1 | 0.000013661 | 63 | 0.000861020 | 125 | 0.001709097 |
| 2 | 0.000027323 | 64 | 0.000874693 | 126 | 0.001722782 |
| 3 | 0.000040984 | 65 | 0.000888366 | 127 | 0.001736467 |
| 4 | 0.000054646 | 66 | 0.000902040 | 128 | 0.001750152 |
| 5 | 0.000068308 | 67 | 0.000915713 | 129 | 0.001763837 |
| 6 | 0.000081970 | 68 | 0.000929387 | 130 | 0.001777522 |
| 7 | 0.000095632 | 69 | 0.000943061 | 131 | 0.001791208 |
| 8 | 0.000109295 | 70 | 0.000956735 | 132 | 0.001804893 |
| 9 | 0.000122958 | 71 | 0.000970409 | 133 | 0.001818579 |
| 10 | 0.000136620 | 72 | 0.000984084 | 134 | 0.001832265 |
| 11 | 0.000150283 | 73 | 0.000997758 | 135 | 0.001845951 |
| 12 | 0.000163947 | 74 | 0.001011433 | 136 | 0.001859638 |
| 13 | 0.000177610 | 75 | 0.001025108 | 137 | 0.001873324 |
| 14 | 0.000191274 | 76 | 0.001038783 | 138 | 0.001887011 |
| 15 | 0.000204938 | 77 | 0.001052459 | 139 | 0.001900698 |
| 16 | 0.000218602 | 78 | 0.001066134 | 140 | 0.001914385 |
| 17 | 0.000232266 | 79 | 0.001079810 | 141 | 0.001928073 |
| 18 | 0.000245930 | 80 | 0.001093486 | 142 | 0.001941760 |
| 19 | 0.000259595 | 81 | 0.001107162 | 143 | 0.001955448 |
| 20 | 0.000273260 | 82 | 0.001120839 | 144 | 0.001969136 |
| 21 | 0.000286924 | 83 | 0.001134515 | 145 | 0.001982824 |
| 22 | 0.000300590 | 84 | 0.001148192 | 146 | 0.001996512 |
| 23 | 0.000314255 | 85 | 0.001161869 | 147 | 0.002010201 |
| 24 | 0.000327920 | 86 | 0.001175546 | 148 | 0.002023889 |
| 25 | 0.000341586 | 87 | 0.001189223 | 149 | 0.002037578 |
| 26 | 0.000355252 | 88 | 0.001202900 | 150 | 0.002051267 |
| 27 | 0.000368918 | 89 | 0.001216578 | 151 | 0.002064957 |
| 28 | 0.000382584 | 90 | 0.001230256 | 152 | 0.002078646 |
| 29 | 0.000396251 | 91 | 0.001243934 | 153 | 0.002092336 |
| 30 | 0.000409917 | 92 | 0.001257612 | 154 | 0.002106025 |
| 31 | 0.000423584 | 93 | 0.001271291 | 155 | 0.002119715 |
| 32 | 0.000437251 | 94 | 0.001284969 | 156 | 0.002133405 |
| 33 | 0.000450918 | 95 | 0.001298648 | 157 | 0.002147096 |
| 34 | 0.000464586 | 96 | 0.001312327 | 158 | 0.002160786 |
| 35 | 0.000478253 | 97 | 0.001326006 | 159 | 0.002174477 |
| 36 | 0.000491921 | 98 | 0.001339685 | 160 | 0.002188168 |
| 37 | 0.000505589 | 99 | 0.001353365 | 161 | 0.002201859 |
| 38 | 0.000519257 | 100 | 0.001367044 | 162 | 0.002215550 |
| 39 | 0.000532925 | 101 | 0.001380724 | 163 | 0.002229242 |
| 40 | 0.000546594 | 102 | 0.001394404 | 164 | 0.002242933 |
| 41 | 0.000560262 | 103 | 0.001408085 | 165 | 0.002256625 |
| 42 | 0.000573931 | 104 | 0.001421765 | 166 | 0.002270317 |
| 43 | 0.000587600 | 105 | 0.001435446 | 167 | 0.002284010 |

| | | | | | |
|----|-------------|-----|-------------|-----|-------------|
| 44 | 0.000601269 | 106 | 0.001449127 | 168 | 0.002297702 |
| 45 | 0.000614939 | 107 | 0.001462808 | 169 | 0.002311395 |
| 46 | 0.000628608 | 108 | 0.001476489 | 170 | 0.002325087 |
| 47 | 0.000642278 | 109 | 0.001490170 | 171 | 0.002338780 |
| 48 | 0.000655948 | 110 | 0.001503852 | 172 | 0.002352473 |
| 49 | 0.000669618 | 111 | 0.001517533 | 173 | 0.002366167 |
| 50 | 0.000683289 | 112 | 0.001531215 | 174 | 0.002379860 |
| 51 | 0.000696959 | 113 | 0.001544897 | 175 | 0.002393554 |
| 52 | 0.000710630 | 114 | 0.001558580 | 176 | 0.002407248 |
| 53 | 0.000724301 | 115 | 0.001572262 | 177 | 0.002420942 |
| 54 | 0.000737972 | 116 | 0.001585945 | 178 | 0.002434636 |
| 55 | 0.000751643 | 117 | 0.001599628 | 179 | 0.002448331 |
| 56 | 0.000765315 | 118 | 0.001613311 | 180 | 0.002462025 |
| 57 | 0.000778986 | 119 | 0.001626994 | 181 | 0.002475720 |
| 58 | 0.000792658 | 120 | 0.001640678 | 182 | 0.002489415 |
| 59 | 0.000806330 | 121 | 0.001654361 | 183 | 0.002503110 |
| 60 | 0.000820003 | 122 | 0.001668045 | 184 | 0.002516806 |
| 61 | 0.000833675 | 123 | 0.001681729 | | |
| 62 | 0.000847348 | 124 | 0.001695413 | | |

TABLE OF INTEREST RATES

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

OVERPAYMENTS AND UNDERPAYMENTS

| PERIOD | RATE | In 1995-1 C.B. | |
|-----------------------------|------|------------------|---------|
| | | 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 |
| Oct. 1, 2001--Dec. 31, 2001 | 7% | 19 | 573 |
| Jan. 1, 2002--Mar. 31, 2002 | 6% | 17 | 571 |
| Apr. 1, 2002--Jun. 30, 2002 | 6% | 17 | 571 |
| Jul. 1, 2002--Sep. 30, 2002 | 6% | 17 | 571 |
| Oct. 1, 2002--Dec. 31, 2002 | 6% | 17 | 571 |
| Jan. 1, 2003--Mar. 31, 2003 | 5% | 15 | 569 |
| Apr. 1, 2003--Jun. 30, 2003 | 5% | 15 | 569 |
| Jul. 1, 2003--Sep. 30, 2003 | 5% | 15 | 569 |
| Oct. 1, 2003--Dec. 31, 2003 | 4% | 13 | 567 |
| Jan. 1, 2004--Mar. 31, 2004 | 4% | 61 | 615 |
| Apr. 1, 2004--Jun. 30, 2004 | 5% | 63 | 617 |
| Jul. 1, 2004--Sep. 30, 2004 | 4% | 61 | 615 |
| Oct. 1, 2004--Dec. 31, 2004 | 5% | 63 | 617 |
| Jan. 1, 2005--Mar. 31, 2005 | 5% | 15 | 569 |
| Apr. 1, 2005--Jun. 30, 2005 | 6% | 17 | 571 |
| Jul. 1, 2005--Sep. 30, 2005 | 6% | 17 | 571 |
| Oct. 1, 2005--Dec. 31, 2005 | 7% | 19 | 573 |
| Jan. 1, 2006--Mar. 31, 2006 | 7% | 19 | 573 |
| Apr. 1, 2006--Jun. 30, 2006 | 7% | 19 | 573 |
| Jul. 1, 2006--Sep. 30, 2006 | 8% | 21 | 575 |
| Oct. 1, 2006--Dec. 31, 2006 | 8% | 21 | 575 |
| Jan. 1, 2007--Mar. 31, 2007 | 8% | 21 | 575 |
| Apr. 1, 2007--Jun. 30, 2007 | 8% | 21 | 575 |
| Jul. 1, 2007--Sep. 30, 2007 | 8% | 21 | 575 |
| Oct. 1, 2007--Dec. 31, 2007 | 8% | 21 | 575 |
| Jan. 1, 2008--Mar. 31, 2008 | 7% | 67 | 621 |
| Apr. 1, 2008--Jun. 30, 2008 | 6% | 65 | 619 |
| Jul. 1, 2008--Sep. 30, 2008 | 5% | 63 | 617 |

| | | | |
|-----------------------------|----|----|-----|
| Oct. 1, 2008--Dec. 31, 2008 | 6% | 65 | 619 |
| Jan. 1, 2009--Mar. 31, 2009 | 5% | 15 | 569 |
| Apr. 1, 2009--Jun. 30, 2009 | 4% | 13 | 567 |
| Jul. 1, 2009--Sep. 30, 2009 | 4% | 13 | 567 |
| Oct. 1, 2009--Dec. 31, 2009 | 4% | 13 | 567 |
| Jan. 1, 2010--Mar. 31, 2010 | 4% | 13 | 567 |
| Apr. 1, 2010--Jun. 30, 2010 | 4% | 13 | 567 |
| Jul. 1, 2010--Sep. 30, 2010 | 4% | 13 | 567 |
| Oct. 1, 2010--Dec. 31, 2010 | 4% | 13 | 567 |
| Jan. 1, 2010--Mar. 31, 2011 | 3% | 11 | 565 |

TABLE OF INTEREST RATES

FROM JANUARY 1, 1999 - PRESENT

CORPORATE OVERPAYMENTS AND UNDERPAYMENTS

| | OVERPAYMENTS | | | UNDERPAYMENTS | | |
|-----------------------------|---------------------|-------|-----|---------------------|-------|-----|
| | 1995-1 C.B. RATE | TABLE | PG | 1995-1 C.B. 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 |
| Oct. 1, 2001--Dec. 31, 2001 | 6% | 17 | 571 | 7% | 19 | 573 |
| Jan. 1, 2002--Mar. 31, 2002 | 5% | 15 | 569 | 6% | 17 | 571 |
| Apr. 1, 2002--Jun. 30, 2002 | 5% | 15 | 569 | 6% | 17 | 571 |
| Jul. 1, 2002--Sep. 30, 2002 | 5% | 15 | 569 | 6% | 17 | 571 |
| Oct. 1, 2002--Dec. 31, 2002 | 5% | 15 | 569 | 6% | 17 | 571 |
| Jan. 1, 2003--Mar. 31, 2003 | 4% | 13 | 567 | 5% | 15 | 569 |
| Apr. 1, 2003--Jun. 30, 2003 | 4% | 13 | 567 | 5% | 15 | 569 |
| Jul. 1, 2003--Sep. 30, 2003 | 4% | 13 | 567 | 5% | 15 | 569 |
| Oct. 1, 2003--Dec. 31, 2003 | 3% | 11 | 565 | 4% | 13 | 567 |
| Jan. 1, 2004--Mar. 31, 2004 | 3% | 59 | 613 | 4% | 61 | 615 |

| | | | | | | |
|-----------------------------|----|----|-----|----|----|-----|
| Apr. 1, 2004--Jun. 30, 2004 | 4% | 61 | 615 | 5% | 63 | 617 |
| Jul. 1, 2004--Sep. 30, 2004 | 3% | 59 | 613 | 4% | 61 | 615 |
| Oct. 1, 2004--Dec. 31, 2004 | 4% | 61 | 615 | 5% | 63 | 617 |
| Jan. 1, 2005--Mar. 31, 2005 | 4% | 13 | 567 | 5% | 15 | 569 |
| Apr. 1, 2005--Jun. 30, 2005 | 5% | 15 | 569 | 6% | 17 | 571 |
| Jul. 1, 2005--Sep. 30, 2005 | 5% | 15 | 569 | 6% | 17 | 571 |
| Oct. 1, 2005--Dec. 31, 2005 | 6% | 17 | 571 | 7% | 19 | 573 |
| Jan. 1, 2006--Mar. 31, 2006 | 6% | 17 | 571 | 7% | 19 | 573 |
| Apr. 1, 2006--Jun. 30, 2006 | 6% | 17 | 571 | 7% | 19 | 573 |
| Jul. 1, 2006--Sep. 30, 2006 | 7% | 19 | 573 | 8% | 21 | 575 |
| Oct. 1, 2006--Dec. 31, 2006 | 7% | 19 | 573 | 8% | 21 | 575 |
| Jan. 1, 2007--Mar. 31, 2007 | 7% | 19 | 573 | 8% | 21 | 575 |
| Apr. 1, 2007--Jun. 30, 2007 | 7% | 19 | 573 | 8% | 21 | 575 |
| Jul. 1, 2007--Sep. 30, 2007 | 7% | 19 | 573 | 8% | 21 | 575 |
| Oct. 1, 2007--Dec. 31, 2007 | 7% | 19 | 573 | 8% | 21 | 575 |
| Jan. 1, 2008--Mar. 31, 2008 | 6% | 65 | 619 | 7% | 67 | 621 |
| Apr. 1, 2008--Jun. 30, 2008 | 5% | 63 | 617 | 6% | 65 | 619 |
| Jul. 1, 2008--Sep. 30, 2008 | 4% | 61 | 615 | 5% | 63 | 617 |
| Oct. 1, 2008--Dec. 31, 2008 | 5% | 63 | 617 | 6% | 65 | 619 |
| Jan. 1, 2009--Mar. 31, 2009 | 4% | 13 | 567 | 5% | 15 | 569 |
| Apr. 1, 2009--Jun. 30, 2009 | 3% | 11 | 565 | 4% | 13 | 567 |
| Jul. 1, 2009--Sep. 30, 2009 | 3% | 11 | 565 | 4% | 13 | 567 |
| Oct. 1, 2009--Dec. 31, 2009 | 3% | 11 | 565 | 4% | 13 | 567 |
| Jan. 1, 2010--Mar. 31, 2010 | 3% | 11 | 565 | 4% | 13 | 567 |
| Apr. 1, 2010--Jun. 30, 2010 | 3% | 11 | 565 | 4% | 13 | 567 |
| Jul. 1, 2010--Sep. 30, 2010 | 3% | 11 | 565 | 4% | 13 | 567 |
| Oct. 1, 2010--Dec. 31, 2010 | 3% | 11 | 565 | 4% | 13 | 567 |
| Jan. 1, 2011--Mar. 31, 2011 | 2% | 9 | 563 | 3% | 11 | 565 |

TABLE OF INTEREST RATES FOR
LARGE CORPORATE UNDERPAYMENTS

FROM JANUARY 1, 1991 - PRESENT

| | | 1995-1 C.B. | |
|-----------------------------|-----|-------------|-----|
| | | RATE | PG |
| | | TABLE | |
| 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 |
| Oct. 1, 2001--Dec. 31, 2001 | 9% | 23 | 577 |
| Jan. 1, 2002--Mar. 31, 2002 | 8% | 21 | 575 |
| Apr. 1, 2002--Jun. 30, 2002 | 8% | 21 | 575 |
| Jul. 1, 2002--Sep. 30, 2002 | 8% | 21 | 575 |
| Oct. 1, 2002--Dec. 31, 2002 | 8% | 21 | 575 |
| Jan. 1, 2003--Mar. 31, 2003 | 7% | 19 | 573 |
| Apr. 1, 2003--Jun. 30, 2003 | 7% | 19 | 573 |
| Jul. 1, 2003--Sep. 30, 2003 | 7% | 19 | 573 |
| Oct. 1, 2003--Dec. 31, 2003 | 6% | 17 | 571 |
| Jan. 1, 2004--Mar. 31, 2004 | 6% | 65 | 619 |
| Apr. 1, 2004--Jun. 30, 2004 | 7% | 67 | 621 |
| Jul. 1, 2004--Sep. 30, 2004 | 6% | 65 | 619 |

| | | | |
|-----------------------------|-----|----|-----|
| Oct. 1, 2004--Dec. 31, 2004 | 7% | 67 | 621 |
| Jan. 1, 2005--Mar. 31, 2005 | 7% | 19 | 573 |
| Apr. 1, 2005--Jun. 30, 2005 | 8% | 21 | 575 |
| Jul. 1, 2005--Sep. 30, 2005 | 8% | 21 | 575 |
| Oct. 1, 2005--Dec. 31, 2005 | 9% | 23 | 577 |
| Jan. 1, 2006--Mar. 31, 2006 | 9% | 23 | 577 |
| Apr. 1, 2006--Jun. 30, 2006 | 9% | 23 | 577 |
| Jul. 1, 2006--Sep. 30, 2006 | 10% | 25 | 579 |
| Oct. 1, 2006--Dec. 31, 2006 | 10% | 25 | 579 |
| Jan. 1, 2007--Mar. 31, 2007 | 10% | 25 | 579 |
| Apr. 1, 2007--Jun. 30, 2007 | 10% | 25 | 579 |
| Jul. 1, 2007--Sep. 30, 2007 | 10% | 25 | 579 |
| Oct. 1, 2007--Dec. 31, 2007 | 10% | 25 | 579 |
| Jan. 1, 2008--Mar. 31, 2008 | 9% | 71 | 625 |
| Apr. 1, 2008--Jun. 30, 2008 | 8% | 69 | 623 |
| Jul. 1, 2008--Sep. 30, 2008 | 7% | 67 | 621 |
| Oct. 1, 2008--Dec. 31, 2008 | 8% | 69 | 623 |
| Jan. 1, 2009--Mar. 31, 2009 | 7% | 19 | 573 |
| Apr. 1, 2009--Jun. 30, 2009 | 6% | 17 | 571 |
| Jul. 1, 2009--Sep. 30, 2009 | 6% | 17 | 571 |
| Oct. 1, 2009--Dec. 31, 2009 | 6% | 17 | 571 |
| Jan. 1, 2010--Mar. 31, 2010 | 6% | 17 | 571 |
| Apr. 1, 2010--Jun. 30, 2010 | 6% | 17 | 571 |
| Jul. 1, 2010--Sep. 30, 2010 | 6% | 17 | 571 |
| Oct. 1, 2010--Dec. 31, 2010 | 6% | 17 | 571 |
| Jan. 1, 2011--Mar. 31, 2011 | 5% | 15 | 569 |

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 |
| Oct. 1, 2001--Dec. 31, 2001 | 4.5% | 14 | 568 |
| Jan. 1, 2002--Mar. 31, 2002 | 3.5% | 12 | 566 |
| Apr. 1, 2002--Jun. 30, 2002 | 3.5% | 12 | 566 |
| Jul. 1, 2002--Sep. 30, 2002 | 3.5% | 12 | 566 |
| Oct. 1, 2002--Dec. 31, 2002 | 3.5% | 12 | 566 |
| Jan. 1, 2003--Mar. 31, 2003 | 2.5% | 10 | 564 |
| Apr. 1, 2003--Jun. 30, 2003 | 2.5% | 10 | 564 |
| Jul. 1, 2003--Sep. 30, 2003 | 2.5% | 10 | 564 |
| Oct. 1, 2003--Dec. 31, 2003 | 1.5% | 8 | 562 |
| Jan. 1, 2004--Mar. 31, 2004 | 1.5% | 56 | 610 |
| Apr. 1, 2004--Jun. 30, 2004 | 2.5% | 58 | 612 |
| Jul. 1, 2004--Sep. 30, 2004 | 1.5% | 56 | 610 |
| Oct. 1, 2004--Dec. 31, 2004 | 2.5% | 58 | 612 |
| Jan. 1, 2005--Mar. 31, 2005 | 2.5% | 10 | 564 |
| Apr. 1, 2005--Jun. 30, 2005 | 3.5% | 12 | 566 |
| Jul. 1, 2005--Sep. 30, 2005 | 3.5% | 12 | 566 |
| Oct. 1, 2005--Dec. 31, 2005 | 4.5% | 14 | 568 |
| Jan. 1, 2006--Mar. 31, 2006 | 4.5% | 14 | 568 |
| Apr. 1, 2006--Jun. 30, 2006 | 4.5% | 14 | 568 |
| Jul. 1, 2006--Sep. 30, 2006 | 5.5% | 16 | 570 |
| Oct. 1, 2006--Dec. 31, 2006 | 5.5% | 16 | 570 |
| Jan. 1, 2007--Mar. 31, 2007 | 5.5% | 16 | 570 |
| Apr. 1, 2007--Jun. 30, 2007 | 5.5% | 16 | 570 |
| Jul. 1, 2007--Sep. 30, 2007 | 5.5% | 16 | 570 |
| Oct. 1, 2007--Dec. 31, 2007 | 5.5% | 16 | 570 |
| Jan. 1, 2008--Mar. 31, 2008 | 4.5% | 62 | 616 |
| Apr. 1, 2008--Jun. 30, 2008 | 3.5% | 60 | 614 |
| Jul. 1, 2008--Sep. 30, 2008 | 2.5% | 58 | 612 |
| Oct. 1, 2008--Dec. 31, 2008 | 3.5% | 60 | 614 |

| | | | |
|-----------------------------|-------|----|-----|
| Jan. 1, 2009--Mar. 31, 2009 | 2.5% | 10 | 564 |
| Apr. 1, 2009--Jun. 30, 2009 | 1.5% | 8 | 562 |
| Jul. 1, 2009--Sep. 30, 2009 | 1.5% | 8 | 562 |
| Oct. 1, 2009--Dec. 31, 2009 | 1.5% | 8 | 562 |
| Jan. 1, 2010--Mar. 31, 2010 | 1.5% | 8 | 562 |
| Apr. 1, 2010--Jun. 30, 2010 | 1.5% | 8 | 562 |
| Jul. 1, 2010--Sep. 30, 2010 | 1.5% | 8 | 562 |
| Oct. 1, 2010--Dec. 31, 2010 | 1.5% | 8 | 562 |
| Jan. 1, 2011--Mar. 31, 2011 | 0.5%* | | |