Part I. Rulings and Decisions Under the Internal Revenue Code of 1986

Section 61.—Gross Income Defined

26 CFR 1.61–21: Taxation of fringe benefits.

Fringe benefits aircraft valuation formula. For purposes of section 1.61–21(g) of the regulations, relating to the rule for valuing non-commercial flights on employer-provided aircraft, the Standard Industry Fare Level (SIFL), cents-per-mile rates and terminal charges in effect for 1996 are set forth. Rev. Rul. 95–66 modified.

Rev. Rul. 96–25

For purposes of the taxation of fringe benefits under section 61 of the Internal Revenue Code, section 1.61–21(g) of the Income Tax Regulations provides a rule for valuing noncommercial flights on employer-provided aircraft. Section 1.61–21(g)(5) of the Income Tax Regulations provides an aircraft valuation formula to determine the value of such flights. The value of a flight is determined under the base aircraft valuation formula (also known as the Standard Industry Fare Level formula or SIFL) by multiplying the SIFL cents-per-mile rates applicable for the period during which the flight was taken by the appropriate aircraft multiple provided in section 1.61–21(g)(7) and then adding the applicable terminal charge. The SIFL cents-per-mile rates in the formula and the terminal charge are calculated by the Department of Transportation and are revised semi-annually.

The following chart sets forth the terminal charges and SIFL mileage rates:

Period During Which the Flight Was Taken	*Terminal Charge*	*SIFL Mileage Rates*
1/1/96-6/30/96	$32.20	Up to 500 miles = $.1761 per mile
		501–1500 miles = $.1343
		Over 1500 miles = $.1291

EFFECT ON OTHER REVENUE RULING

Rev. Rul. 95–66, 1995–40 I.R.B. 4, is modified.

DRAFTING INFORMATION

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