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The FMV of the property on the alternate valuation date, but only if the executor of the estate files an estate tax return (Form 706) and elects to use the alternate valuation on that return. See the instructions for Form 706.

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Fair market value (FMV) is an important concept in the valuation and exchange of real property and other property. The Internal Revenue Service (IRS) uses fair market value to determine the dollar value of charitable donations, of assets that are converted to business use, and in various other tax-related matters. What Is Fair Market Value?

Fair Market Value in Real Estate for Tax Purposes
About Federal Tax Valuation Business valuations prepared for federal tax transactions are at the core of the valuation practice of Business Valuation Analysts, LLC (or "BVA"), for good reason, we are recognized experts in this challenging area of valuation practice. We understand what the IRS considers important.

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(b) Special rules No deduction under this chapter of any item shall be allowed if allowance for such items is in effect given by the alternate valuation provided by this section. Wherever in any other subsection or section of this chapter reference is made to the value of property at the time of the decedent's death, such reference shall be deemed to refer to the value of such property used ...

26 U.S. Code § 2032 - Alternate valuation | U.S. Code | US ...
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Chapter 24 IRS Positions Summary This chapter explores the Service's positions on valuation as expressed in Tax Advice Memorandums (TAMs), Revenue Rulings (Rev. Rul.), and Revenue Procedures (Rev. Proc.). The ... - Selection from Business Valuation and Federal Taxes: Procedure, Law and Perspective, 2nd Edition [Book]

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