

SEC. 8. Estates of nonresidents not citizens—Continued

(f) Special methods of computing tax:

“SEC. 2107. Expatriation to avoid tax.

“(a) Rate of tax.

“(b) Gross estate.

“(c) Credits.

“(d) Exception for loss of citizenship for certain causes.

“(e) Burden of proof.

“SEC. 2108. Application of pre-1967 estate tax provisions.

“(a) Imposition of more burdensome tax by foreign country.

“(b) Alleviation of more burdensome tax.

“(c) Notification of Congress required.

“(d) Implementation by regulations.”

(g) Estate tax returns.

(h) Clerical amendment.

(i) Effective date.

SEC. 9. Tax on gifts of nonresidents not citizens.

(a) Imposition of tax.

(b) Transfers in general.

(c) Effective date.

SEC. 10. Treaty obligations.

1 (c) AMENDMENT OF 1954 CODE.—Except as other-
 2 wise expressly provided, whenever in this Act an amend-
 3 ment or repeal is expressed in terms of an amendment to,
 4 or repeal of, a section or other provision, the reference is to a
 5 section or other provision of the Internal Revenue Code of
 6 1954.

7 SEC. 2. SOURCE OF INCOME.

8 (a) INTEREST.—

9 (1) (A) Subparagraph (A) of section 861 (a) (1)
 10 (relating to interest from sources within the United
 11 States) is amended to read as follows:

12 “(A) interest on amounts described in sub-
 13 section (c) received by a nonresident alien indi-
 14 vidual or a foreign corporation, if such interest is