

1 regard shall be given to whether or not such asset or
 2 such income, gain, or loss was accounted for through
 3 such trade or business. In applying this paragraph and
 4 paragraph (4), interest referred to in section 861 (a)
 5 (1) (A) shall be considered income from sources within
 6 the United States.

7 “(3) OTHER INCOME FROM SOURCES WITHIN
 8 UNITED STATES.—All income, gain, or loss from sources
 9 within the United States (other than income, gain, or
 10 loss to which paragraph (2) applies) shall be treated
 11 as effectively connected with the conduct of a trade or
 12 business within the United States.

13 “(4) INCOME FROM SOURCES WITHOUT UNITED
 14 STATES.—

15 “(A) Except as provided in subparagraph
 16 ~~(B)~~, (B) and (C), no income, gain, or loss from
 17 sources without the United States shall be treated
 18 as effectively connected with the conduct of a trade
 19 or business within the United States.

20 “(B) Income, gain, or loss from sources with-
 21 out the United States shall be treated as effectively
 22 connected with the conduct of a trade or business
 23 within the United States by a nonresident alien
 24 individual or a foreign corporation if such person