

1 has an office or other fixed place of business within
2 the United States to which such income, gain, or
3 loss is attributable and such income, gain, or loss—

4 “(i) consists of rents or royalties for the
5 use of or for the privilege of using intangible
6 property described in section 862 (a) (4) (in-
7 cluding any gain or loss realized on the sale of
8 such property) derived in the active conduct
9 of such trade or business;

10 “(ii) consists of dividends or interest, or
11 gain or loss from the sale or exchange of stock
12 or notes, bonds, or other evidences of indebted-
13 ness, and either is derived in the active conduct
14 of a banking, financing, or similar business
15 within the United States or is received by a
16 corporation the principal business of which is
17 trading in stock or securities for its own account;
18 or

19 “(iii) is derived from the sale (without
20 the United States) through such office or fixed
21 place of business of personal property described
22 in section 1221 (1), except that this clause
23 shall not apply if the property is sold for use,