

1 nonresident alien individuals) is amended to read as
2 follows:

3 **"SEC. 873. DEDUCTIONS.**

4 "(a) **GENERAL RULE.**—In the case of a nonresident
5 alien individual, the deductions shall be allowed only for
6 purposes of section 871 (b) and (except as provided by sub-
7 section (b)) only if and to the extent that they are con-
8 nected with income which is effectively connected with the
9 conduct of a trade or business within the United States; and
10 the proper apportionment and allocation of the deductions
11 for this purpose shall be determined as provided in regula-
12 tions prescribed by the Secretary or his delegate.

13 "(b) **EXCEPTIONS.**—The following deductions shall be
14 allowed whether or not they are connected with income
15 which is effectively connected with the conduct of a trade
16 or business within the United States:

17 "(1) **LOSSES.**—The deduction, for losses of prop-
18 erty not connected with the trade or business if arising
19 from certain casualties or theft, allowed by section
20 165 (c) (3), but only if the loss is of property located
21 within the United States.

22 "(2) **CHARITABLE CONTRIBUTIONS.**—The deduc-
23 tion for charitable contributions and gifts allowed by
24 section 170.