

1 connected with the conduct of a trade or business with-
2 in the United States, and

3 “(2) gross income which is effectively connected
4 with the conduct of a trade or business within the
5 United States.

6 “(c) ALLOWANCE OF DEDUCTIONS AND CREDITS.—

7 “(1) ALLOCATION OF DEDUCTIONS.—

8 “(A) GENERAL RULE.—In the case of a for-
9 eign corporation, the deductions shall be allowed
10 only for purposes of subsection (a) and (except as
11 provided by subparagraph (B)) only if and to the
12 extent that they are connected with income which
13 is effectively connected with the conduct of a trade
14 or business within the United States; and the proper
15 apportionment and allocation of the deductions for
16 this purpose shall be determined as provided in
17 regulations prescribed by the Secretary or his
18 delegate.

19 “(B) CHARITABLE CONTRIBUTIONS.—The de-
20 duction for charitable contributions and gifts pro-
21 vided by section 170 shall be allowed whether or
22 not connected with income which is effectively con-
23 nected with the conduct of a trade or business
24 within the United States.