

“(2) DEDUCTIONS AND CREDITS ALLOWED ONLY
IF RETURN FILED.—A foreign corporation shall receive
the benefit of the deductions and credits allowed to it
in this subtitle only by filing or causing to be filed with
the Secretary or his delegate a true and accurate return,
in the manner prescribed in subtitle F, including therein
all the information which the Secretary or his delegate
may deem necessary for the calculation of such deduc-
tions and credits. This paragraph shall not be construed
to deny the credit provided by section 32 for tax with-
held at source or the credit provided by section 39 for
certain uses of gasoline and lubricating oil.

“(3) FOREIGN TAX CREDIT.—Except as provided
by section 906, foreign corporations shall not be allowed
the credit against the tax for taxes of foreign countries
and possessions of the United States allowed by section
901.

“(4) CROSS REFERENCE.—

“For rule that certain foreign taxes are not to be taken
into account in determining deduction or credit, see sec-
tion 906(b)(1).

“(d) ELECTION TO TREAT REAL PROPERTY INCOME
AS INCOME CONNECTED WITH UNITED STATES BUSI-
NESS.—