

1 (d) **EFFECTIVE DATE.**—The amendments made by this
 2 section (other than subsection (e)) shall apply with respect
 3 to taxable years beginning after December 31, 1966.

4 (e) **ELECTIONS BY NONRESIDENT UNITED STATES**
 5 **CITIZENS WHO ARE SUBJECT TO FOREIGN COMMUNITY**
 6 **PROPERTY LAWS.**—

7 (1) *Part III of subchapter N of chapter 1 (relat-*
 8 *ing to income from sources without the United States)*
 9 *is amended by adding at the end thereof the following new*
 10 *subpart:*

11 “*Subpart H—Income of Certain Nonresident United States*
 12 *Citizens Subject to Foreign Community Property Laws*

“*Sec. 981. Elections as to treatment of income subject to*
foreign community property laws.

13 “**SEC. 981. ELECTION AS TO TREATMENT OF INCOME SUB-**
 14 **JECT TO FOREIGN COMMUNITY PROPERTY**
 15 **LAWS.**

16 “(a) **GENERAL RULE.**—*In the case of any taxable year*
 17 *beginning after December 31, 1966, if—*

18 “(1) *an individual is (A) a citizen of the United*
 19 *States, (B) a bona fide resident of a foreign country*
 20 *or countries during the entire taxable year, and (C)*
 21 *married at the close of the taxable year to a spouse who is*
 22 *a nonresident alien during the entire taxable year, and*