

States; then the President is to proclaim that the tax on estates of such residents of such foreign country who die after the date of such proclamation is to be determined under subchapter B of chapter 11 without regard to amendments made to sections 2101, 2102, 2106, and 6018 on or after the date of enactment of the bill.

(b) *Alleviation of more burdensome tax.*—Subsection (b) of section 2108 provides that, whenever the President finds that the laws of any foreign country with respect to which the President has made a proclamation under subsection (a) have been modified so that the tax on the transfer of estates of decedents who were citizens of the United States and not residents of such foreign country is no longer more burdensome than the tax imposed by subchapter B of chapter 11, he is to proclaim that the tax on the transfer of the estates of residents of such foreign country (not citizens of the United States) dying after the date of such proclamation of revocation is to be determined under subchapter B without regard to subsection (a) of section 2108.

(c) *Notification of Congress required.*—Subsection (c) of section 2108 provides that neither the proclamation authorized by subsection (a) nor that authorized by subsection (b) is to be issued unless, at least 30 days prior to such proclamation, the President has notified Congress of his intention to make such proclamation.

(d) *Implementation by regulations.*—Subsection (d) of section 2108 provides that the Secretary of the Treasury or his delegate is to prescribe such regulations as may be necessary or appropriate to implement section 2108.

SECTION 8 OF BILL—CONTINUED

(g) *Estate tax returns.*—Subsection (g) of section 8 of the bill conforms paragraph (2) of section 6018(a) of the code (relating to estate tax returns of estates of nonresidents not citizens) to the amendment made by subsection (e) of section 8 of the bill by striking out “\$2,000” and inserting in lieu thereof “\$30,000”. The effect of amended paragraph (2) is to require an estate tax return in the case of a nonresident not a citizen of the United States only if that part of his gross estate which is situated in the United States exceeds \$30,000.

(h) *Clerical amendment.*—Subsection (h) of section 8 of the bill amends the table of sections for subchapter B of chapter 11 of the code to include new sections 2107 and 2108 of the code, as added by section 8(f) of the bill.

(i) *Effective date.*—Subsection (i) of section 8 of the bill provides that the amendments made by such section is to apply with respect to estates of decedents dying after the date of the enactment of the bill.

SECTION 9 OF BILL. GIFT TAX OF NONRESIDENTS NOT CITIZENS

(a) *Imposition of tax.*—Subsection (a) of section 9 of the bill strikes out subsection (a) of section 2501 of the code and inserts in its place a new subsection (a). Existing subsection (a) of section 2501 of the code provides that a tax, computed as provided in section 2502, is imposed on the transfer of property by gift by any individual, whether resident or nonresident, except transfers of intangible property by a