

(3) *it is in the public interest to apply pre-1967 tax provisions in accordance with this section to the transfer of estates of decedents who were residents of such foreign country,* the President shall proclaim that the tax on the transfer of the estate of every decedent who was a resident of such foreign country at the time of his death shall, in the case of decedents dying after the date of such proclamation, be determined under this subchapter without regard to amendments made to section 2101 (relating to tax imposed), 2102 (relating to credits against tax), 2106 (relating to taxable estate), and 6018 (relating to estate tax returns) on or after the date of enactment of this section.

(b) **ALLEVIATION OF MORE BURDENSOME TAX.**—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 this subchapter on the transfer of estates of decedents who were residents of such foreign country, he shall proclaim that the tax on the transfer of the estate of every decedent who was a resident of such foreign country at the time of his death shall, in the case of decedents dying after the date of such proclamation, be determined under this subchapter without regard to subsection (a).

(c) **NOTIFICATION OF CONGRESS REQUIRED.**—No proclamation shall be issued by the President pursuant to this section unless, at least 30 days prior to such proclamation, he has notified the Senate and the House of Representatives of his intention to issue such proclamation.

(d) **IMPLEMENTATION BY REGULATIONS.**—The Secretary or his delegate shall prescribe such regulations as may be necessary or appropriate to implement this section.

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CHAPTER 12—GIFT TAX

Subchapter A. Determination of tax liability.
Subchapter B. Transfers.
Subchapter C. Deductions.

Subchapter A—Determination of Tax Liability

Sec. 2501. Imposition of tax.
Sec. 2502. Rate of tax.
Sec. 2503. Taxable gifts.
Sec. 2504. Taxable gifts for preceding years.

SEC. 2501. IMPOSITION OF TAX.

(a) **TAXABLE TRANSFERS.**—

(1) **GENERAL RULE.**—For the calendar year 1955 and each calendar year thereafter a tax, computed as provided in section 2502, is hereby imposed on the transfer of property by gift during such calendar year by any individual, resident or nonresident [except transfers].