1	in section 1221(1), except that this clause
2	shall not apply if the property is sold for use,
3	consumption, or disposition outside the United
4	States and an office or other fixed place of busi-
5	ness of the taxpayer outside the United States
6	participated materially in such sale.
7	In the case of a sale described in clause (iii), the
8	income which shall be treated as attributable to the
9	office or other fixed place of business within the
10	United States shall not exceed the income which
11	would be derived from sources within the United
12	States if the sale were made in the United States.
13	"(C) In the case of a foreign corporation tax-
14	able under part I of subchapter L, any income from
15	sources without the United States which is attrib-
16	utable to its United States business shall be treated
17	as effectively connected with the conduct of a trade
18	or business within the United States.
19	"(D) No income, gain, or loss from sources
20	without the United States shall be treated as effec-
21	tively connected with the conduct of a trade or
22	business within the United States if it either—

3

"(i) consists of dividends, interest, or