

1 ~~(relating to miscellaneous provisions applicable to nonresi-~~
 2 ~~dent aliens and foreign corporations)~~ is amended by adding
 3 at the end thereof the following new section:

4 **"SEC. 896. APPLICATION OF PRE-1967 INCOME TAX PRO-**
 5 **VISIONS.**

6 ~~"(a) IMPOSITION OF MORE BURDENSOME TAXES BY~~
 7 ~~FOREIGN COUNTRY.—Whenever the President finds that—~~
 8 ~~"(1) under the laws of any foreign country, con-~~
 9 ~~sidering the tax system of such foreign country, citizens~~
 10 ~~of the United States not residents of such foreign coun-~~
 11 ~~try or domestic corporations are being subjected to more~~
 12 ~~burdensome taxes; on any item of income received by~~
 13 ~~such citizens or corporations from sources within such~~
 14 ~~foreign country, than taxes imposed by the provisions of~~
 15 ~~this subtitle on similar income derived from sources~~
 16 ~~within the United States by residents or corporations of~~
 17 ~~such foreign country,~~

18 ~~"(2) such foreign country, when requested by the~~
 19 ~~United States to do so, has not acted to revise or reduce~~
 20 ~~such taxes so that they are no more burdensome than~~
 21 ~~taxes imposed by the provisions of this subtitle on similar~~
 22 ~~income derived from sources within the United States by~~
 23 ~~residents or corporations of such foreign country, and~~

24 ~~"(3) it is in the public interest to apply pre-1967~~
 25 ~~tax provisions in accordance with the provisions of this~~