

1 **SEC. 6. FOREIGN TAX CREDIT.**

2 ~~(a) ALLOWANCE OF CREDIT TO CERTAIN NONRESI-~~
3 ~~DENT ALIENS AND FOREIGN CORPORATIONS.—~~

4 ~~(1) Subpart A of part III of subchapter N of chap-~~
5 ~~ter 1 (relating to foreign tax credit) is amended by~~
6 ~~adding at the end thereof the following new section:~~

7 **“SEC. 906. NONRESIDENT ALIEN INDIVIDUALS AND FOR-**
8 **EIGN CORPORATIONS.**

9 ~~“(a) ALLOWANCE OF CREDIT.—A nonresident alien~~
10 ~~individual or a foreign corporation engaged in trade or~~
11 ~~business within the United States during the taxable year~~
12 ~~shall be allowed a credit under section 901 for the amount~~
13 ~~of any income, war profits, and excess profits taxes paid or~~
14 ~~accrued during the taxable year (or deemed, under section~~
15 ~~902, paid or accrued during the taxable year) to any foreign~~
16 ~~country or possession of the United States with respect to~~
17 ~~income effectively connected with the conduct of a trade or~~
18 ~~business within the United States.~~

19 ~~“(b) SPECIAL RULES.—~~

20 ~~“(1) For purposes of subsection (a) and for pur-~~
21 ~~poses of determining the deductions allowable under~~
22 ~~sections 873(a) and 882(c), in determining the amount~~
23 ~~of any tax paid or accrued to any foreign country or~~