~~(other than paragraph (3)) shall apply with respect to taxable years beginning after December 31, 1966. The amendment made by paragraph (3) shall apply with respect to estates of decedents dying after the date of the enactment of this Act.~~

~~(c) FOREIGN TAX CREDIT AN CASE OF CERTAIN OVERSEAS OPERATIONS FUNDING SUBSIDIARIES.—~~

~~(1) Section 904(f)(2) (relating to application of limitations on foreign tax credit in case of certain interest income) is amended—~~

~~(A) by striking out "or" at the end of subparagraph (C),~~

~~(B) by striking out the period at the end of subparagraph (D) and inserting in lieu thereof ", or", and~~

~~(C) by adding at the end thereof the following new subparagraph:~~

~~"(E) received by an overseas operations funding subsidiary on obligations of a related foreign corporation."~~

~~(2) Section 904(f) is amended by adding at the end thereof the following new paragraph:~~

~~"(5) DEFINITIONS FOR PURPOSES OF PARAGRAPH (1)(E).—For purposes of paragraph (1)(E).—~~