

1 ~~“(A)~~ the term ‘overseas operations funding
2 subsidiary’ means a domestic corporation which ~~(i)~~
3 is a member of an affiliated group ~~(within the~~
4 meaning of section 1504) and is not the common
5 parent corporation; and ~~(ii)~~ was formed and is
6 availed of for the principal purpose of raising funds
7 outside the United States through public offerings to
8 foreign persons and of using such funds to finance
9 the operations in foreign countries of one or more
10 related foreign corporations; and

11 ~~“(B)~~ a foreign corporation is, with respect to
12 an overseas operations funding subsidiary, a related
13 foreign corporation if the affiliated group of which
14 such subsidiary is a member owns 50 percent or
15 more of the voting stock of such foreign corporation
16 either directly or through ownership of the voting
17 stock of another foreign corporation.”

18 ~~(3)~~ The amendments made by paragraphs ~~(1)~~ and
19 ~~(2)~~ shall apply to interest received after December 31,
20 1965, in taxable years ending after such date.