

1 *(relating to interest from sources within the United*
 2 *States) is amended to read as follows:*

3 *“(A) interest on amounts described in sub-*
 4 *section (c) received by a nonresident alien indi-*
 5 *vidual or a foreign corporation, if such interest is*
 6 *not effectively connected with the conduct of a trade*
 7 *or business within the United States,”.*

8 *(B) Section 861 is amended by adding at the end*
 9 *thereof the following new subsection:*

10 *“(c) INTEREST ON DEPOSITS, ETC.—For purposes of*
 11 *subsection (a)(1)(A), the amounts described in this sub-*
 12 *section are—*

13 *“(1) deposits with persons carrying on the bank-*
 14 *ing business,*

15 *“(2) deposits or withdrawable accounts with sav-*
 16 *ings institutions chartered and supervised as savings*
 17 *and loan or similar associations under Federal or State*
 18 *law, but only to the extent that amounts paid or credited*
 19 *on such deposits or accounts are deductible under section*
 20 *591 (determined without regard to section 265) in com-*
 21 *puting the taxable income of such institutions, and*

22 *“(3) amounts held by an insurance company under*
 23 *an agreement to pay interest thereon.*

24 *Effective with respect to amounts paid or credited after*