

1 *period ending with the close of its taxable year pre-*
2 *ceding the payment of such interest (or for such part*
3 *of such period as the corporation has been in exist-*
4 *ence) was effectively connected with the conduct of*
5 *a trade or business within the United States,*

6 *“(D) in the case of interest received from a*
7 *foreign corporation (other than interest paid or*
8 *credited after December 31, 1971, by a domestic*
9 *branch of a foreign corporation, if such branch*
10 *is engaged in the commercial banking business) 50*
11 *percent or more of the gross income of which from*
12 *all sources for the 3-year period ending with the*
13 *close of its taxable year preceding the payment of*
14 *such interest (or for such part of such period as*
15 *the corporation has been in existence) was effectively*
16 *connected with the conduct of a trade or business*
17 *within the United States, an amount of such interest*
18 *which bears the same ratio to such interest as the*
19 *gross income of such foreign corporation for such*
20 *period which was not effectively connected with the*
21 *conduct of a trade or business within the United*
22 *States bears to its gross income from all sources,*

23 *“(E) income derived by a foreign central bank*
24 *of issue from bankers’ acceptances, and*