

1 section shall not be construed to deny the credits provided  
 2 by sections 31 and 32 for tax withheld at source or the credit  
 3 provided by section 39 for certain uses of gasoline and  
 4 lubricating oil."

5 (e) *BENEFICIARIES OF ESTATES AND TRUSTS.*—

6 (1) Section 875 (relating to partnerships) is  
 7 amended to read as follows:

8 "SEC. 875. *PARTNERSHIPS; BENEFICIARIES OF ESTATES*  
 9 *AND TRUSTS.*

10 "For purposes of this subtitle—

11 "(1) a nonresident alien individual or foreign cor-  
 12 poration shall be considered as being engaged in a trade  
 13 or business within the United States if the partnership  
 14 of which such individual or corporation is a member is  
 15 so engaged, and

16 "(2) a nonresident alien individual or foreign cor-  
 17 poration which is a beneficiary of an estate or trust which  
 18 is engaged in any trade or business within the United  
 19 States shall be treated as being engaged in such trade or  
 20 business within the United States."

21 (2) The table of sections for subpart A of part II  
 22 of subchapter N of chapter 1 is amended by striking out  
 23 the item relating to section 875 and inserting in lieu  
 24 thereof the following:

"Sec. 875. *Partnerships; beneficiaries of estates and trusts.*"