- subsection (a) shall be required in the case of any amount received as an annuity if such amount is, under section 871(f), exempt from the tax imposed by section 871 (a)."; and
- 5 (9) by redesignating subsection (d) as (e), and 6 by inserting after subsection (c) the following new 7 subsection:
- "(d) EXEMPTION OF CERTAIN FOREIGN PARTNER-8 9 SHIPS.—Subject to such terms and conditions as may be 10 provided by regulations prescribed by the Secretary or his delegate, subsection (a) shall not apply in the case of a 11 12 foreign partnership engaged in trade or business within the United States if the Secretary or his delegate determines **13** that the requirements of subsection (a) impose an undue 14 **1**5 administrative burden and that the collection of the tax 16 imposed by section 871(a) on the members of such partner-17 ship who are nonresident alien individuals will not be jeop-18 ardized by the exemption."
- (i) Liability for Withheld Tax.—Section 1461
  (relating to return and payment of withheld tax) is amended
  to read as follows:
- 22 "SEC. 1461. LIABILITY FOR WITHHELD TAX.
- "Every person required to deduct and withhold any tax under this chapter is hereby made liable for such tax and is hereby indemnified against the claims and demands of any