

1 *within the United States if the Secretary or his delegate de-*
 2 *termines that the requirements of subsection (a) impose an*
 3 *undue administrative burden and that the collection of the*
 4 *tax imposed by section 881 on such corporation will not be*
 5 *jeopardized by the exemption."*

6 *(d) DIVIDENDS RECEIVED FROM CERTAIN FOREIGN*
 7 *CORPORATIONS.—Subsection (a) of section 245 (relating to*
 8 *the allowance of a deduction in respect of dividends received*
 9 *from a foreign corporation) is amended—*

10 *(1) by striking out "and has derived 50 percent*
 11 *or more of its gross income from sources within the*
 12 *United States," in that portion of subsection (a) which*
 13 *precedes paragraph (1) and by inserting in lieu thereof*
 14 *"and if 50 percent or more of the gross income of such*
 15 *corporation from all sources for such period is effectively*
 16 *connected with the conduct of a trade or business within*
 17 *the United States,";*

18 *(2) by striking out "from sources within the United*
 19 *States" in paragraph (1) and inserting in lieu thereof*
 20 *"which is effectively connected with the conduct of a*
 21 *trade or business within the United States";*

22 *(3) by striking out "from sources within the United*
 23 *States" in paragraph (2) and inserting in lieu thereof*
 24 *", which is effectively connected with the conduct of a*
 25 *trade or business within the United States,"; and*