- "(5) For allowance of credit against the tax in case of a foreign corporation having income effectively connected with the conduct of a trade or business within the United States, see section 906.
- "(6) For withholding at source of tax on income of foreign corporations, see section 1442."
- 1 (2) Section 953(b)(3)(F) is amended by strik-
- 2 ing out "832(b)(5)" and inserting in lieu thereof
- 3 "832(c)(5)".
- 4 (3) Section 1249(a) is amended by striking out
- 5 "Except as provided in subsection (c), gain" and in-
- 6 serting in lieu thereof "Gain".
- 7 (n) EFFECTIVE DATES.—The amendments made by
- 8 this section (other than subsection (k)) shall apply with
- 9 respect to taxable years beginning after December 31, 1966.
- 10 The amendment made by subsection (k) shall apply with
- 11 respect to sales or exchanges occurring after December 31,
- 12 *1966*.
- 13 SEC. 105. SPECIAL TAX PROVISIONS.
- 14 (a) INCOME AFFECTED BY TREATY.—Section 894 (re-
- 15 lating to income exempt under treaties) is amended to read
- 16 as follows:
- 17 "SEC. 894. INCOME AFFECTED BY TREATY.
- 18 "(a) INCOME EXEMPT UNDER TREATY.—Income of
- 19 any kind, to the extent required by any treaty obligation of
- 20 the United States, shall not be included in gross income and
- 21 shall be exempt from taxation under this subtitle.