

1 (2) *The table of sections for such subpart A is*
 2 *amended by adding at the end thereof the following:*

"Sec. 906. Nonresident alien individuals and foreign corporations."

3 (3) *Section 874(c) is amended by striking out*
 4 *"(c) FOREIGN TAX CREDIT NOT ALLOWED.—A non-*
 5 *resident"* *and inserting in lieu thereof the following:*

6 *"(c) FOREIGN TAX CREDIT.—Except as provided in*
 7 *section 906, a nonresident"*.

8 (4) *Subsection (b) of section 901 (relating to*
 9 *amount allowed) is amended by redesignating para-*
 10 *graph (4) as paragraph (5), and by inserting after*
 11 *paragraph (3) the following new paragraph:*

12 *"(4) NONRESIDENT ALIEN INDIVIDUALS AND FOR-*
 13 *EIGN CORPORATIONS.—In the case of any nonresident*
 14 *alien individual not described in section 876 and in the*
 15 *case of any foreign corporation, the amount determined*
 16 *pursuant to section 906; and"*.

17 (5) *Paragraph (5) (as redesignated) of section*
 18 *901(b) is amended by striking out "or (3)," and in-*
 19 *serting in lieu thereof "(3), or (4),"*.

20 (6) *The amendments made by this subsection shall*
 21 *apply with respect to taxable years beginning after*
 22 *December 31, 1966. In applying section 904 of the*
 23 *Internal Revenue Code of 1954 with respect to section*