

factor in realizing an item of income, gain, or loss, due regard shall be given to whether or not such asset or such income, gain, or loss was accounted for through such trade or business. In applying this paragraph and paragraph (4), interest referred to in section 861(a)-(1)-(A) shall be considered income from sources within the United States.

~~“(3) OTHER INCOME FROM SOURCES WITHIN UNITED STATES.—~~All income, gain, or loss from sources within the United States (other than income, gain, or loss to which paragraph (2) applies) shall be treated as effectively connected with the conduct of a trade or business within the United States.

~~“(4) INCOME FROM SOURCES WITHOUT UNITED STATES.—~~

~~“(A) Except as provided in subparagraph (B) and (C), no income, gain, or loss from sources without the United States shall be treated as effectively connected with the conduct of a trade or business within the United States.~~

~~“(B) Income, gain, or loss from sources without the United States shall be treated as effectively connected with the conduct of a trade or business~~