

ing to tax-free covenant bonds), the deduction and with-
 holding shall be at the rate specified therein. For purposes
 of the preceding sentence, the reference in section 1441(e)
 (1) to section 871(b)(1) shall be treated as referring to
 section 842 or section 882(a), as the case may be.

“(b) EXEMPTION.—Subject to such terms and condi-
 tions as may be provided by regulations prescribed by the
 Secretary or his delegate, subsection (a) shall not apply in
 the case of a foreign corporation engaged in trade or business
 within the United States if the Secretary or his delegate de-
 termines that the requirements of subsection (a) imposes an
 undue administrative burden and that the collection of the
 tax imposed by section 881 on such corporation will not be
 jeopardized by the exemption.”

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

(1) by striking out “and has derived 50 percent
 or more of its gross income from sources within the
 United States,” in that portion of subsection (a) which
 precedes paragraph (1) and by inserting in lieu thereof
 “and if 50 percent or more of the gross income of such