

1 related business taxable income which is effectively connected
2 with the conduct of a trade or business within the United
3 States.”

4 ~~(f) CORPORATION SUBJECT TO PERSONAL HOLDING~~
5 ~~COMPANY TAX.~~—Paragraph ~~(7)~~ of section 542(c) ~~(re-~~
6 ~~lating to corporations not subject to the personal holding~~
7 ~~company tax)~~ is amended to read as follows:

8 “~~(7)~~ a foreign corporation, if all of its stock out-
9 standing during the last half of the taxable year is owned
10 by nonresident alien individuals, whether directly or in-
11 directly through foreign estates, foreign trusts, foreign
12 partnerships, or other foreign corporations;”

13 ~~(g) AMENDMENTS WITH RESPECT TO FOREIGN COR-~~
14 ~~PORATIONS CARRYING ON INSURANCE BUSINESS IN~~
15 ~~UNITED STATES.~~

16 ~~(1)~~ Section 842 ~~(relating to computation of gross~~
17 ~~income)~~ is amended to read as follows:

18 “~~SEC. 842. FOREIGN CORPORATIONS CARRYING ON INSUR-~~
19 ~~ANCE BUSINESS.~~

20 “If a foreign corporation carrying on an insurance busi-
21 ness within the United States would qualify under part I,
22 II, or III of this subchapter for the taxable year if ~~(without~~
23 ~~regard to income not effectively connected with the conduct~~
24 ~~of any trade or business within the United States)~~ it were
25 a domestic corporation, such corporation shall be taxable