

1 (~~relating to miscellaneous provisions applicable to nonresi-~~
 2 ~~dent aliens and foreign corporations~~) is amended by adding
 3 at the end thereof the following new section:

4 **"SEC. 896. APPLICATION OF PRE-1967 INCOME TAX PRO-**
 5 **VISIONS.**

6 ~~"(a)~~ IMPOSITION OF MORE BURDENSOME TAXES BY
 7 FOREIGN COUNTRY.—Whenever the President finds that—

8 ~~"(1)~~ under the laws of any foreign country, con-
 9 sidering the tax system of such foreign country, citizens
 10 of the United States not residents of such foreign coun-
 11 try or domestic corporations are being subjected to more
 12 burdensome taxes, on any item of income received by
 13 such citizens or corporations from sources within such
 14 foreign country, than taxes imposed by the provisions of
 15 this subtitle on similar income derived from sources
 16 within the United States by residents or corporations of
 17 such foreign country,

18 ~~"(2)~~ such foreign country, when requested by the
 19 United States to do so, has not acted to revise or reduce
 20 such taxes so that they are no more burdensome than
 21 taxes imposed by the provisions of this subtitle on similar
 22 income derived from sources within the United States by
 23 residents or corporations of such foreign country, and

24 ~~"(3)~~ it is in the public interest to apply pre-1967
 25 tax provisions in accordance with the provisions of this