

1 foreign corporation choosing the benefits of this sub-
 2 part which receives dividends shall, with respect to
 3 such dividends, be treated as a domestic corporation."

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

"Sec. 906. Nonresident alien individuals and foreign cor-
 porations."

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

9 "(e) FOREIGN TAX CREDIT.—Except as provided in
 10 section 906, a nonresident".

11 (4) Subsection (b) of section 901 (relating to
 12 amount allowed) is amended by redesignating para-
 13 graph (4) as paragraph (5); and by inserting after
 14 paragraph (3) the following new paragraph:

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

20 (5) Paragraph (5) (as redesignated) of section
 21 901(b) is amended by striking out "or (3)," and in-
 22 serting in lieu thereof "(3), or (4),".