

1 ~~(6)~~ The amendments made by this subsection shall
 2 apply with respect to taxable years beginning after
 3 December 31, 1966. In applying section 904 of the
 4 Internal Revenue Code of 1954 with respect to section
 5 906 of such Code, no amount may be carried from or to
 6 any taxable year beginning before January 1, 1967, and
 7 no such year shall be taken into account.

8 ~~(b)~~ ALIEN RESIDENTS OF THE UNITED STATES OR
 9 PUERTO RICO.—

10 ~~(1)~~ Paragraph ~~(3)~~ of section 901~~(b)~~ ~~(relating~~
 11 to amount of foreign tax credit allowed in case of alien
 12 resident of the United States or Puerto Rico) is amended
 13 by striking out “, if the foreign country of which such
 14 alien resident is a citizen or subject, in imposing such
 15 taxes, allows a similar credit to citizens of the United
 16 States residing in such country”.

17 ~~(2)~~ Section 901 is amended by redesignating sub-
 18 sections ~~(e)~~ and ~~(d)~~ as subsections ~~(d)~~ and ~~(e)~~, and
 19 by inserting after subsection ~~(b)~~ the following new
 20 subsection:

21 “~~(e)~~ SIMILAR CREDIT REQUIRED FOR CERTAIN ALIEN
 22 RESIDENTS.—Whenever the President finds that—

23 “~~(1)~~ a foreign country, in imposing income, war
 24 profits, and excess profits taxes, does not allow to