

1 *(g) PARTIAL EXCLUSION OF DIVIDENDS.—Subsection*
 2 *(d) of section 116 (relating to certain nonresident aliens*
 3 *ineligible for exclusion) is amended to read as follows:*

4 *“(d) CERTAIN NONRESIDENT ALIENS INELIGIBLE*
 5 *FOR EXCLUSION.—In the case of a nonresident alien indi-*
 6 *vidual, subsection (a) shall apply only—*

7 *“(1) in determining the tax imposed for the tax-*
 8 *able year pursuant to section 871(b)(1) and only in*
 9 *respect of dividends which are effectively connected with*
 10 *the conduct of a trade or business within the United*
 11 *States, or*

12 *“(2) in determining the tax imposed for the tax-*
 13 *able year pursuant to section 877(b).”*

14 *(h) WITHHOLDING OF TAX ON NONRESIDENT*
 15 *ALIENS.—Section 1441 (relating to withholding of tax on*
 16 *nonresident aliens) is amended—*

17 *(1) by striking out “, or of any partnership not*
 18 *engaged in trade or business within the United States and*
 19 *composed in whole or in part of nonresident aliens,” in*
 20 *subsection (a) and inserting in lieu thereof “or of any*
 21 *foreign partnership”;*

22 *(2) by striking out “(except interest on deposits*
 23 *with persons carrying on the banking business paid to*
 24 *persons not engaged in business in the United States)”*
 25 *in subsection (b);*