

1 *foreign estates, foreign trusts, foreign partnerships, or other*
 2 *foreign corporations), the taxable income for purposes of*
 3 *subsection (a) shall be the income which constitutes personal*
 4 *holding company income under section 543(a)(7), reduced*
 5 *by the deductions attributable to such income, and adjusted,*
 6 *with respect to such income, in the manner provided in sub-*
 7 *section (b)."*

8 (4)(A) *Subchapter B of chapter 68 (relating to*
 9 *assessable penalties) is amended by adding at the end*
 10 *thereof the following new section:*

11 **"SEC. 6683. FAILURE OF FOREIGN CORPORATION TO FILE**
 12 **RETURN OF PERSONAL HOLDING COMPANY**
 13 **TAX.**

14 *"Any foreign corporation which—*

15 *"(1) is a personal holding company for any tax-*
 16 *able year, and*

17 *"(2) fails to file or to cause to be filed with the*
 18 *Secretary or his delegate a true and accurate return of*
 19 *the tax imposed by section 541,*

20 *shall, in addition to other penalties provided by law, pay a*
 21 *penalty equal to 10 percent of the taxes imposed by chapter 1*
 22 *(including the tax imposed by section 541) on such foreign*
 23 *corporation for such taxable year."*