

1 “(4) *All other such community income shall be*
 2 *treated as provided in the applicable foreign community*
 3 *property law.*

4 “(c) *ELECTION FOR PRE-1967 YEARS.—*

5 “(1) *ELECTION.—If an individual meets the re-*
 6 *quirements of subsections (a)(1) (A) and (C) for any*
 7 *taxable year beginning before January 1, 1967, and if*
 8 *such individual and the spouse referred to in subsection*
 9 *(a)(1)(C) elect under this subsection, then paragraph*
 10 *(2) of this subsection shall apply to their community in-*
 11 *come under foreign community property laws for all*
 12 *open taxable years beginning before January 1, 1967*
 13 *(whether under this chapter, the corresponding provi-*
 14 *sions of the Internal Revenue Code of 1939, or the cor-*
 15 *responding provisions of prior revenue laws), for which*
 16 *the requirements of subsection (a)(1) (A) and (C)*
 17 *are met.*

18 “(2) *EFFECT OF ELECTION.—For any taxable*
 19 *year to which an election made under this subsection*
 20 *applies, the community income under foreign community*
 21 *property laws of the husband and wife making the*
 22 *election shall be treated as provided by subsection (b),*
 23 *except that the other community income described in*
 24 *paragraph (4) of subsection (b) shall be treated as the*
 25 *income of the spouse who, for such taxable year, had*