

1 *906 of such Code, no amount may be carried from or to*
 2 *any taxable year beginning before January 1, 1967, and*
 3 *no such year shall be taken into account.*

4 ***(b) ALIEN RESIDENTS OF THE UNITED STATES OR***
 5 ***PUERTO RICO.—***

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

13 *(2) Section 901 is amended by redesignating sub-*
 14 *sections (c) and (d) as subsections (d) and (e), and*
 15 *by inserting after subsection (b) the following new*
 16 *subsection:*

17 ***“(c) SIMILAR CREDIT REQUIRED FOR CERTAIN ALIEN***
 18 ***RESIDENTS.—Whenever the President finds that—***

19 *“(1) a foreign country, in imposing income, war*
 20 *profits, and excess profits taxes, does not allow to*
 21 *citizens of the United States residing in such foreign*
 22 *country a credit for any such taxes paid or accrued to*
 23 *the United States or any foreign country, as the case*