

1 *by subsection (a), the value of the gross estate of every*
 2 *decedent to whom subsection (a) applies shall be determined*
 3 *as provided in section 2103, except that—*

4 “(1) *if such decedent owned (within the meaning*
 5 *of section 958(a)) at the time of his death 10 percent*
 6 *or more of the total combined voting power of all classes*
 7 *of stock entitled to vote of a foreign corporation, and*

8 “(2) *if such decedent owned (within the meaning*
 9 *of section 958(a)), or is considered to have owned*
 10 *(by applying the ownership rules of section 958(b)),*
 11 *at the time of his death, more than 50 percent of the*
 12 *total combined voting power of all classes of stock en-*
 13 *titled to vote of such foreign corporation,*

14 *then that proportion of the fair market value of the stock of*
 15 *such foreign corporation owned (within the meaning of sec-*
 16 *tion 958(a)) by such decedent at the time of his death,*
 17 *which the fair market value of any assets owned by such for-*
 18 *ign corporation and situated in the United States, at the time*
 19 *of his death, bears to the total fair market value of all assets*
 20 *owned by such foreign corporation at the time of his death,*
 21 *shall be included in the gross estate of such decedent. For*
 22 *purposes of the preceding sentence, a decedent shall be*
 23 *treated as owning stock of a foreign corporation at the time*