-	(o) 120milon impliements.
2	(1) Section 543(a)(2) (relating to adjusted in-
3	come from rents included in personal holding company
4	income) is amended by striking out the last sentence
5	thereof.
6	(2) Section 543(b)(2) (relating to definition of
7	adjusted ordinary gross income) is amended by adding
8	at the end thereof the following new subparagraph:
9	"(D) CERTAIN EXCLUDED RENTS.—From the
10	gross income consisting of compensation described
11	in subparagraph (D) of paragraph (3) subtract
12	the amount allowable as deductions for the items
13	described in clauses (i), (ii), (iii), and (iv) of
14	subparagraph (A) to the extent allocable, under
15	regulations prescribed by the Secretary or his dele-
16	gate, to such gross income. The amount subtracted
17	under this subparagraph shall not exceed such gross
18	income."
19	(c) Effective Date.—The amendments made by
20	subsections (a) and (b) shall apply to taxable years begin-
21	ning after the date of the enactment of this Act. Such
22	amendments shall also apply, at the election of the taxpayer
23	(made at such time and in such manner as the Secretary or