

Summary—Continued

I. Explanation of provisions—Continued

A. Foreign Investors Tax Act—Continued

6. Estate tax provisions-----	Page 35
a. Estate tax rates-----	35
b. Limitation on credit for State death taxes-----	37
c. Bond situs rule-----	37
d. Deposits in U.S. banks or foreign branch banks of U.S. corporations-----	38
e. Definition of taxable estate-----	38
f. Expatriation to avoid tax-----	38
g. Application of pre-1967 estate tax provisions-----	40
h. Estate tax returns-----	41
7. Gift tax provisions-----	41
a. Tax on gifts of nonresidents not citizens-----	41
b. Situs of bonds given by expatriates-----	42
8. Treaty obligations-----	42

B. Other amendments to the Internal Revenue Code-----

1. Application of investment credit to property used in U.S. possessions-----	42
2. Basis of property received in the liquidation of sub- sidiary-----	42
3. "Swap funds"-----	44
4. Removal of certain limitations on deductibility of contributions to self-employed individuals pension plans-----	44
5. Treatment of certain income of authors, inventors, etc., as earned income for retirement plan purposes-----	45
6. Exclusion of certain rents from personal holding com- pany income-----	46
7. Percentage depletion rate for certain clay bearing alumina-----	47
8. Percentage depletion rate for clam and oyster shells-----	47
9. Percentage depletion rate for certain clay, shale, and slate-----	47
10. Income from the lapse of straddle options-----	47
11. Tax treatment of per-unit retain allocations-----	50
12. Excise tax rate on hearses-----	52
13. Interest equalization tax; loans to insure raw material sources-----	52
14. Interest equalization tax; insurance company reserve funds-----	53
15. Interest equalization tax; dollar loans of foreign branches of U.S. banks-----	53
C. Presidential Election Campaign Fund Act-----	54
1. Designation of income tax payments to Presidential Election Campaign Fund-----	54
2. The Presidential Election Campaign Fund and pay- ments therefrom-----	54
3. The Advisory Board-----	55
D. Miscellaneous provisions-----	56
1. Treasury notes payable in foreign currency-----	56
2. Reports on Government contingent liabilities and assets-----	56
II. Revenue effect-----	57