

# FEDERAL REGISTER



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Washington, Tuesday, November 25, 1952.

## TITLE 26—INTERNAL REVENUE

### Chapter I—Bureau of Internal Revenue, Department of the Treasury

#### Subchapter A—Income and Excess-Profits Taxes (Regs. 111; T. D. 5947)

#### PART 29—INCOME TAX; TAXABLE YEARS BEGINNING AFTER DECEMBER 31, 1941

#### CREDIT FOR TAXES OF FOREIGN CORPORATIONS

On September 27, 1952, there was published in the FEDERAL REGISTER (17 F. R. 8634) a notice of proposed rule making to conform Regulations 111 (26 CFR Part 29) to section 332 of the Revenue Act of 1951, relating to credit for taxes of foreign corporations, approved October 20, 1951. No objection to the rules proposed having been received, the amendments set forth below are hereby adopted.

PARAGRAPH 1. There is inserted immediately preceding § 29.131 the following:

SEC. 332. CREDIT FOR TAXES OF FOREIGN CORPORATIONS (REVENUE ACT OF 1951, APPROVED OCTOBER 20, 1951).

(a) *Foreign subsidiary of a domestic corporation.* Effective with respect to dividends received by a domestic corporation from a foreign corporation during taxable years beginning after December 31, 1950, the first sentence of section 131 (f) (1) is hereby amended by striking out "a majority" and inserting in lieu thereof "at least 10 per centum".

(b) *Foreign subsidiary of a foreign corporation.* Effective with respect to dividends received by a foreign corporation from another foreign corporation in taxable years beginning after December 31, 1950, section 131 (f) (2) is hereby amended by striking out "all the voting stock (except qualifying shares)" and inserting in lieu thereof "50 per centum or more of the voting stock".

(c) *Clerical amendment.* So much of section 131 (f) (1) as precedes the first sentence thereof is hereby amended to read as follows:

(f) *Taxes of foreign corporations—(1) Treatment of taxes paid by foreign corporation.*

PAR. 2. Section 29.131-3, as amended by Treasury Decision 5893, approved April 4, 1952, is further amended by revising the first sentence, which commences with the words "For credit where taxes", of paragraph (d) thereof to read as follows: "For credit available to a do-

mestic corporation with respect to taxes paid by a foreign corporation, see § 29.131-7."

PAR. 3. Section 29.131-7, as amended by Treasury Decision 5452, approved April 19, 1945, is further amended as follows:

(A) By revising so much thereof as precedes the words "of the voting stock of a foreign corporation", which appear in the first sentence of paragraph (a) thereof, to read as follows:

§ 29.131-7 *Taxes of foreign corporation—(a) Domestic corporation owning stock of a foreign corporation.* In the case of a domestic corporation which owns a majority or, effective with respect to dividends received during a taxable year beginning after December 31, 1950, at least 10 percent \* \* \*

(B) By striking out of the expression "paid or accrued by such controlled foreign corporation to any foreign country", which appears in the first sentence of paragraph (a) thereof, the word "controlled" so that such expression will read as follows: "paid or accrued by such foreign corporation to any foreign country".

(C) By revising the second and third sentences of paragraph (a) thereof, which commence, respectively, with the words "See, however, the limitations" and "If dividends are received", to read as follows: "If dividends are received from more than one such foreign corporation, the limitation is to be computed separately for the dividends received from each. For other limitations upon the amount of credit available under section 131, see § 29.131-8."

(D) By striking out of the last sentence of paragraph (a) thereof "a controlled" and inserting in lieu thereof "such a", so that such sentence will read as follows: "Taxes paid or accrued by such a foreign corporation are deemed to have been paid by the domestic corporation for purposes of credit only."

(E) By revising the headnote of paragraph (b) and paragraph (b) (1) thereof to read as follows:

(b) *Foreign corporation owning stock of another foreign corporation.* (1) If

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## PROPOSED RULE MAKING

ministrator showing that he has met the physical requirements appropriate to his rating within the following time limits:

3. By deleting from § 43.42 the phrase "A person shall not pilot any" and inserting in lieu thereof the phrase "A person shall not serve as pilot in command or copilot of an".

This amendment is proposed under the authority of Title VI of the Civil Aeronautics Act of 1938, as amended. The proposals may be changed in the light of

comments received in response to this notice of proposed rule making.

(Sec. 205, 52 Stat. 984; 49 U. S. C. 425. Interpret or apply secs. 601-610, 52 Stat. 1007-1012; 49 U. S. C. 551-560)

Dated November 18, 1952, at Washington, D. C.

By the Bureau of Safety Regulation.

[SEAL] JOHN M. CHAMBERLAIN,  
Director.

[F. R. Doc. 52-12531; Filed, Nov. 24, 1952;  
8:49 a. m.]

the intermediate point, Prescott, Ariz., on its route No. 105.

Notice is hereby given, pursuant to the provisions of the Civil Aeronautics Act of 1938, as amended, that oral argument in the above-entitled proceeding is assigned to be held on December 9, 1952, at 10:00 a. m., e. s. t. in Room 5042, Commerce Building, Constitution Avenue, between Fourteenth and Fifteenth Streets NW., Washington, D. C., before the Board.

Dated at Washington, D. C., November 20, 1952.

[SEAL] FRANCIS W. BROWN,  
Chief Examiner.

[F. R. Doc. 52-12530; Filed, Nov. 24, 1952;  
8:48 a. m.]

## NOTICES

## DEPARTMENT OF THE TREASURY

## Office of the Secretary

[Treasury Department Order 150-19]

BUREAU OF INTERNAL REVENUE  
REORGANIZATIONABOLITION AND ESTABLISHMENT OF CERTAIN  
OFFICES

Bureau of Internal Revenue reorganization. Abolition of offices of Collectors and Deputy Collectors of Arizona, Colorado, New Mexico, Utah, and Wyoming Collection Districts; establishment of offices of District Commissioner and Directors of Internal Revenue.

By virtue of the authority vested in me as Secretary of the Treasury by Reorganization Plan No. 26 of 1950 and Reorganization Plan No. 1 of 1952:

1. *Abolition of existing offices.* The abolition of the offices of Collector of Internal Revenue and Deputy Collector for the Arizona, Colorado, New Mexico, Utah, and Wyoming Collection Districts shall become effective as of 12 o'clock midnight, November 24, 1952.

2. *Establishment of District Commissioner.* Effective as of 12:01 a. m., November 25, 1952, there is hereby established an office of District Commissioner of Internal Revenue, which shall be known as the Denver District, and which shall be comprised of the States of Arizona, Colorado, New Mexico, Utah, and Wyoming.

3. *Location of headquarters.* The headquarters office shall be located in the City of Denver, Colorado.

4. *Establishment of offices of Director of Internal Revenue.* Effective as of 12:01 a. m., November 25, 1952, there are hereby created the following offices within the Denver District:

(a) Director of Internal Revenue for the Collection District of Arizona (as presently constituted). The headquarters of such office shall be located in Phoenix, Arizona, and the office shall have the operating title of Director of Internal Revenue, Phoenix.

(b) Director of Internal Revenue for the Collection District of Colorado (as presently constituted). The headquarters of such office shall be located in Denver, Colorado, and the office shall have the operating title of Director of Internal Revenue, Denver.

(c) Director of Internal Revenue for the Collection District of New Mexico (as

presently constituted). The headquarters of such office shall be located in Albuquerque, New Mexico, and the office shall have the operating title of Director of Internal Revenue, Albuquerque.

(d) Director of Internal Revenue for the Collection District of Utah (as presently constituted). The headquarters of such office shall be located in Salt Lake City, Utah, and the office shall have the operating title of Director of Internal Revenue, Salt Lake City.

(e) Director of Internal Revenue for the Collection District of Wyoming (as presently constituted). The headquarters of such office shall be located in Cheyenne, Wyoming, and the office shall have the operating title of Director of Internal Revenue, Cheyenne.

Dated: November 21, 1952.

[SEAL] E. H. FOLEY,  
Acting Secretary of the Treasury.

[F. R. Doc. 52-12588; Filed, Nov. 24, 1952;  
9:29 a. m.]

## CIVIL AERONAUTICS BOARD

[Docket No. 4522 et al.]

FRONTIER AIRLINES, INC., ET AL.; ROUTE 93  
RENEWAL CASE

## NOTICE OF ORAL ARGUMENT

In the matter of the applications of Frontier Airlines, Inc., under Docket No. 4522, for renewal of its authority to serve Route 93 for a period of five years, the extension of its route to Fort Huachuca, Ariz.; and under Docket No. 4311 for a certificate amendment authorizing nonstop service between Douglas, Ariz., and El Paso, Tex.; the application of Bonanza Air Lines, Inc., under Docket No. 4471 to extend its route No. 105 to all points presently certificated on Route 93; the application of Trans World Airlines, Inc., under Docket No. 5210, for a certificate amendment to eliminate the intermediate point Winslow, Ariz., therefrom; the investigation instituted by the Board on petition of American Airlines, Inc., under Docket No. 5394, to determine whether said airline should be authorized to suspend service temporarily at Douglas, Ariz.; and the petition of Frontier Airlines, Inc., under Docket No. 5207, to suspend the authority of Trans World Airlines, Inc., to serve Winslow, Ariz., on its route No. 2, and the authority of Bonanza Air Lines, Inc., to serve

## FEDERAL POWER COMMISSION

[Docket No. G-1447]

UNITED GAS PIPE LINE CO.

ORDER REOPENING PROCEEDINGS AND FIXING  
DATE OF HEARING

NOVEMBER 18, 1952.

On August 21, 1952, United Gas Pipe Line Company (Applicant), a Delaware Corporation having its principal place of business at Shreveport, Louisiana, filed an application for a certificate of public convenience and necessity pursuant to section 7 of the Natural Gas Act, authorizing the transportation and sale of natural gas on a temporary basis during an interim period to Texas Gas Transmission Corporation pending completion of certain facilities by the latter, as more fully described in said application on file with the Commission and open to public inspection.

Applicant has requested that its application be heard under the shortened procedure provided by § 1.32 (b) (18 CFR 1.32 (b)) of the Commission's rules of practice and procedure.

Due notice of the filing of the application, including publication in the FEDERAL REGISTER on September 12, 1952 (17 F. R. 8221), has been given.

An "Answer" to the application was filed on September 29, 1952, by the National Coal Association, the United Mine Workers of America, the Fuels Research Council, Inc., the Anthracite Institute, the Railway Labor Executives Association and the Chesapeake and Ohio Railway Company. This "Answer" is addressed to the acceptance for filing of said application.

The Commission finds:

(1) The proceedings at Docket No. G-1447 should be reopened for the sole purpose of effecting such amendment of the Commission's order, issued February 27, 1951, granting a certificate of public convenience and necessity to Applicant, as may be required in disposing of the foregoing application of August 21, 1952.

(2) For good cause, the date fixed for hearing is less than 15 days required by § 1.20 of the Commission's rules of practice and procedure.

The Commission orders:

(A) The proceedings at Docket No. G-1447 be and the same are hereby reopened for the sole purpose of effecting such amendment to the Commission's order, issued February 27, 1951, grant-