

Portion of dividend to N Corporation  
which is from earnings not included  
in N Corporation's gross income  
under section 951 with respect to A  
Corporation or lower tiers

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Earnings and profits of A Corporation  
not included in N Corporation's gross  
income under section 951 with respect  
to B Corporation or lower tiers

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Tax paid by A Corporation on earnings  
not included in N Corporation's gross  
income with respect to B Corporation  
or lower tiers