No. 6235

UNITED STATES OF AMERICA
and
COLOMBIA

Exchange of notes constituting an agreement relating to relief from double taxation on earnings derived from the operation of ships and aircraft. Washington, 1 August 1961

Official text: English.

Registered by the United States of America on 13 July 1962.

ÉTATS-UNIS D'AMÉRIQUE
et
COLOMBIE

Échange de notes constituant un accord tendant à éviter la double imposition des bénéfices provenant de l'exploitation de navires ou d'aéronefs. Washington, 1er août 1961

Texte officiel anglais.

Enregistré par les États-Unis d'Amérique le 13 juillet 1962.

No. 6235. EXCHANGE OF NOTES CONSTITUTING AN AGREEMENT[1] BETWEEN THE UNITED STATES OF AMERICA AND COLOMBIA RELATING TO RELIEF FROM DOUBLE TAXATION ON EARNINGS DERIVED FROM THE OPERATION OF SHIPS AND AIRCRAFT. WASHINGTON, 1 AUGUST 1961

I

The Secretary of State to the Colombian Ambassador

DEPARTMENT OF STATE
WASHINGTON

Aug 1, 1961

Excellency :

I have the honor to refer to conversations between representatives of the Government of the United States of America and representatives of the Government of Colombia relating to the possibility of concluding an agreement between the two Governments with a view to granting, on a reciprocal basis, relief from double taxation on earnings derived from the operation of ships and aircraft. The Government of the United States of America agrees as follows :

1. The Government of the United States of America, in accordance with Sections 872 (*b*) and 883 of the Internal Revenue Code of 1954 shall, on the basis of an equivalent exemption granted by the Government of Colombia, exclude from gross income and exempt from income tax all earnings derived,

(*a*) by a corporation organized in Colombia, or

(*b*) by a citizen of Colombia nonresident in the United States of America,

from the operation of a ship or ships documented, and from the operation of aircraft registered, under the laws of Colombia.

2. For the purposes of this agreement,

(*a*) the expressions "operation of a ship or ships" and "operation of aircraft" mean the business or enterprise, carried on by owners or charterers of a ship or ships, or of aircraft, as the case may be, of

[1] Came into force on 11 December 1961, the date on which the Government of Colombia notified the Government of the United States of America that the said Agreement had been approved by the Congress of Colombia, in accordance with the provisions of the said notes.