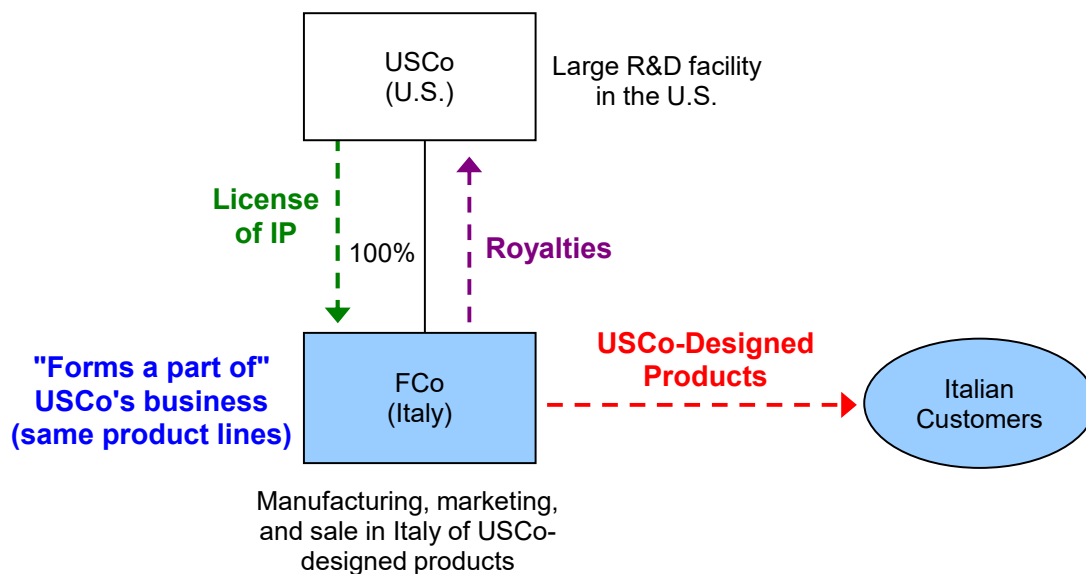


**Italy Protocol (1999)
Treasury Tech. Explan.,
Article 2, Paragraph 3,
Example 2**

**Italian Manufacturer
Activity "Forms a Part of"
U.S. R&D Activity**

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Limitation on benefits:

**Active trade or
business test
("derived in
connection with")**

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