

allowable deductions, respectively, that proportion of the investment income, ordinary income and allowable deductions, respectively, of the partnership for the annual accounting period of the partnership ending with or in the taxable year of the partner, that such partner's distributive share (whether distributed or not) of the net income of the partnership for such annual accounting period, bears to the total net income of the partnership for such annual accounting period.

246. *Allocation of Corporate Income.* The net income of a corporation (domestic or foreign) shall be allocated in the following manner:

(a) Income from ground rents, rents and royalties and other income from real estate or tangible personal property permanently located in this State (less related expenses) shall be allocated to this State; and such income from real estate or tangible personal property permanently located outside this State (less related expenses), shall be allocated outside this State.

(b) The remaining net income (including net income from dividends and interest on intangible personal property having a business or commercial situs either in this State or outside this State but excluding net income from dividends and interest on other intangible personal property), hereinafter referred to as business income, shall be allocated to this State if the trade or business of the corporation is carried on wholly within this State, but if the trade or business of the corporation is carried on partly within and partly without this State, so much of the business income of the corporation as is derived from or reasonably attributable to the trade or business of the corporation carried on within this State, shall be allocated to this State and any balance of the business income shall be allocated outside this State. The portion of the business income derived from or reasonably attributable to the trade or business carried on within this State shall be determined by separate accounting where practicable, but where separate accounting is not practicable, the portion of the business income of the corporation allocable to this State shall be determined in such manner as may be prescribed by rules and regulations of the Comptroller. The Comptroller is hereby authorized to prescribe by rules and regulations such method or methods of allocating the business income of corporations as may justly and fairly determine the portion thereof derived from or reasonably attributable to the trade or business carried on within this State.

247. *Tax a Personal Debt.* Every tax imposed by this subtitle, and all increases, interest and penalties thereon, shall