

# Corporate Foreign Tax Credit, 2003

by Robert Singmaster

**F**or Tax Year 2003, corporations filing a U.S. tax return claimed \$50 billion in foreign tax credits, an all-time high for this credit and increase of over \$7.5 billion from Tax Year 2002. The foreign tax credit reported by these corporations reduced their U.S. tax on worldwide income by 33.5 percent, from \$149.2 billion to \$99.3 billion. Additional credits, including the general business credit and the U.S. possessions tax credit, further reduced their total U.S. tax liability to \$88.9 billion.

The 5,409 corporations claiming a foreign tax credit for 2003 earned \$424.5 billion in worldwide taxable income and paid \$140.5 billion in worldwide income taxes. \$205.1 billion of the worldwide taxable income (48.3 percent) were derived from foreign sources, while foreign taxes accounted for \$51.6 billion (36.7 percent) of the worldwide income taxes. The United Kingdom, Canada, Japan, the Netherlands, and Switzerland combined for the largest share of foreign-source taxable income, accounting for 38.0 percent (\$77.9 billion) of the total, as well as 39.4 percent (\$20.4 billion) of all foreign taxes. The United Kingdom alone was responsible for 11.9 percent (\$24.5 billion) of foreign-source taxable income, the most from any one country. Europe was the source of 42.9 percent of foreign-source taxable income and 45.8 percent of foreign taxes, outpacing any other continent or region.

Corporations whose primary business was manufacturing accounted for the largest share of foreign income, tax, and foreign tax credit. These corporations claimed \$33.1 billion (66.2 percent) in foreign tax credits, earned \$133 billion (64.8 percent) in foreign-source taxable income, and paid \$34.9 billion (67.5 percent) of total foreign taxes. By individual region, Europe accounted for the largest share of manufacturing foreign-source taxable income, with \$62.8 billion (47.2 percent), and total manufacturing foreign taxes, with \$18.3 billion (52.4 percent). In terms of one country, \$11 billion (8.3 percent) in manufacturing foreign-source taxable income and \$4.5 billion (12.8 percent) in total manufacturing foreign taxes were accounted for by the United

Kingdom and Spain, respectively, the most from any single country. Looking beyond manufacturing, the services industry had the second-largest share of foreign tax credits (11.2 percent) and foreign taxes (11.3 percent) and was third in foreign-source taxable income (9.4 percent). Finance, insurance, real estate, and rental and leasing corporations claimed the second-largest share of foreign-source taxable income (13.1 percent) with \$26.9 billion.

For 2003, U.S. corporations computed a separate foreign tax credit for a defined group of statutory categories of foreign-source income or “baskets” (each of these is described separately in the Explanation of Selected Terms section). The total foreign tax credit claimed is the sum of credits allowed in each separate limitation category.

As has been the case for several years, corporations allocated the majority of their foreign-source taxable incomes (75.9 percent) and foreign taxes (80.5 percent) to the general limitation income basket. The financial services income basket was responsible for the second-largest share of these amounts, with 18.3 percent of the foreign-source taxable income and 14.7 percent of foreign taxes. Two new income baskets, dividends from each 10/50 PFIC and dividends from 10/50 corporations, were introduced for Tax Year 2003, effectively replacing the noncontrolled section 902 corporation basket from prior years. These income categories accounted for a combined 1.3 percent of foreign-source taxable income and 2.2 percent of foreign taxes.

## Data Sources and Limitations

The statistics in this data release were compiled based on corporation income tax returns with a foreign tax credit that were included in the 2003 Statistics of Income sample of returns with accounting periods ending between July 2003 and June 2004. These returns were selected after administrative processing but prior to any amendments or audit examination. The 2003 corporation income tax return sample included Forms 1120, 1120-F, 1120-L, 1120-PC, and 1120-REIT.

The foreign tax credit is provided under section 901 of the Internal Revenue Code. Corporations report the foreign income and taxes related to the credit on Form 1118, *Computation of Foreign Tax Credit—Corporations*, filed with their income tax

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returns. The statistics in this data release are based on information reported on Forms 1118 and related corporate returns. In addition to current-year foreign taxes, foreign taxes available for credit shown in this data release include only those carried forward to 2003 from previous years. Corporations with an “alternative minimum tax” (AMT) liability are required to compute a separate “alternative minimum tax foreign tax credit.” The AMT foreign tax credit data are not reflected in the statistics in this data release, even if the corporation reported both the “regular” foreign tax credit and the AMT foreign tax credit. Corporations reporting only the AMT computation had no regular tax and therefore were not included in the foreign tax credit statistics.

There are small discrepancies between the more complete foreign tax credit data presented in this data release and those published in *Statistics of Income—2003, Corporation Income Tax Returns*. These differences can be attributed to several factors, including, but not limited to, the following reasons: Some of the returns designated for the Statistics of Income sample were received too late to be included in the regular corporation statistics, but were included in the foreign tax credit statistics presented in this data release. Certain corporations submitted preliminary data on their original returns because they lacked complete information on their foreign operations at the time of filing. On a case-by-case basis, additional information was requested directly from the taxpayer. However, amended returns filed at a later date, including those with carrybacks of foreign taxes to be credited for 2003, were not included in the statistics.

The 2003 foreign tax credit statistics in this data release do not represent the final amounts credited that year. A complete foreign tax credit amount for 2003 would reflect the results of any audits, as well as the carryback of any foreign tax credits from 2004 and 2005. Also, some corporations did not file Form 1118 because they did not have a U.S. income tax liability, and were thus unable to credit any foreign taxes paid, accrued, or deemed paid for 2003. Finally, other corporations could have deducted their foreign taxes from their gross incomes instead of claiming a foreign tax credit. Accordingly, foreign income and taxes are understated in this data release to the extent that they were not reported on Form 1118.

Because the estimates are based on a sample, they are subject to sampling error. Coefficients of Variation (CVs) are used to measure the magnitude of this sampling error. The CV concept is defined in the section on sampling variability in the “SOI Sampling Methodology and Data Limitations” appendix of this publication. Figure A presents CVs for foreign tax credits by selected North American Industry Classification System (NAICS) divisions, industrial sectors, and sectors. The smaller the CV, the more reliable the estimate is judged to be.

The industry classification used in this data release is based on NAICS, created under the auspices of the governments of the United States, Mexico, and Canada in response to the North American Free Trade Agreement (NAFTA). NAICS is unique among industry classifications in that the economic units that have similar production processes are classified in the same industry. In 1997, NAICS replaced the Standard Industrial Classification (SIC) of the United States. Prior to 1996, the SIC system was the basis for industrial groupings in data releases by Statistics of Income on the foreign tax credit.

### Description of Tables 1-3

Table 1, columns 2 through 15, presents statistics on assets, receipts, income, and taxes reported on the basic corporation income tax returns for those corporations claiming a foreign tax credit. Columns 16 through 51 present statistics from Form 1118, *Foreign Tax Credit—Corporations*. Columns 16 through 35 present statistics on foreign income (i.e., income from sources outside the United States, including U.S. Possessions) and deductions, reported primarily on Form 1118, Schedule A, *Income or Loss Before Adjustments*.

Although the amounts of oil and gas income and deductions (columns 23 and 35, respectively) are included in the summary columns (i.e., columns 16 through 22 and 26 through 34), these amounts are also reported separately (on Form 1118, Schedule I, *Reduction of Oil and Gas Extraction Taxes*) because oil and gas extraction income is subject to special rules under Internal Revenue Code section 907, which effectively requires a separate limitation calculation for taxes related to oil and gas extraction income. This may result in a reduction of foreign taxes

**Figure A**

**Coefficients of Variation for Foreign Tax Credit, by Selected Sector or Group, Tax Year 2003**

Selected sector or group	Coefficients of variation for foreign tax credit (percentages)
<b>All industries</b> .....	0.03
<b>Agriculture, forestry, fishing, and hunting</b> .....	0.08
<b>Mining</b> .....	0.21
<b>Utilities</b> .....	0.03
<b>Construction</b> .....	1.76
<b>Manufacturing</b> .....	0.01
Food manufacturing.....	0.01
Beverage and tobacco Products.....	[1]
Petroleum and coal products manufacturing.....	[1]
Chemical Manufacturing.....	0.02
Pharmaceutical and medicine manufacturing.....	0.01
Fabricated metal products.....	0.06
Machinery manufacturing.....	0.09
Computer and electronic product manufacturing.....	0.02
Transportation equipment manufacturing.....	0.07
<b>Wholesale and retail trade</b> .....	[1]
<b>Transportation and warehousing</b> .....	0.21
<b>Information</b> .....	0.29
Publishing (except internet), motion picture and sound recording.....	0.19
<b>Finance, insurance, real estate, rental, and leasing</b> .....	0.03
Finance and Insurance.....	0.03
Securities, commodity contracts, etc.....	0.09
Insurance and related activities.....	[1]
<b>Services</b> .....	0.17
Management of holding companies.....	0.18

[1] Less than 0.005 percent

available for credit. Reductions in creditable oil and gas extraction income taxes are included with several other types of reductions in column 40 of Table 1.

Similarly, foreign branch income is also included in the summary amounts reported in columns 16 through 22 of Table 1, and is also reported separately (on Form 1118, Schedule F, *Gross Income and Definitely Allocable Deductions for Foreign Branches*) in column 24 of Table 1. For Tax Year 2003, Code section 863(b) income (income partly from within and partly from outside the United States) is included in the summary amounts reported in columns 16 through 22 of Table 1, and is aggregated on Form 1118, Schedule A, *Income or (Loss) Before Adjustments*, using a special country code.

Total deductions not definitely allocable to specific types of income (column 31 of Table 1) are

equal to the sum of columns 32 through 34, relating to research and development, interest, and any other “not definitely allocable expenses” (any differences are due to taxpayer reporting). Total foreign-source gross income (Table 1, column 16) less total foreign deductions (Table 1, column 25) is equal to foreign-source taxable income before adjustments (Table 1, column 36).

Adjustments to foreign-source taxable income (reported in column 37 of Table 1) include the allocation of: (1) current-year foreign-source losses, (2) overall foreign losses, and (3) current-year U.S.-source losses, as well as the recapture of prior-year overall foreign losses and recharacterization of prior-year foreign-source losses. These adjustments (reported on Schedule J, *Separate Limitation Loss Allocations and Other Adjustments Necessary To Determine Numerators of Limitation Fractions, Yearend Recharacterization Balances, and Overall Foreign Loss Account Balances*) affect the numerator of the limitation fraction used to compute the foreign tax credit. The income after adjustments (the numerator of the limitation fraction) is reported in column 38 of Table 1. The limitation fraction, foreign-source taxable income divided by total taxable income from all sources, is applied to the total U.S. tax against which the credit is allowed to determine any limitation on the foreign tax credit. Taxpayers are required to calculate this limitation for each income basket.

Statistics on foreign taxes are reported in columns 39 through 51 of Table 1. Data on foreign income taxes paid, accrued, and “deemed paid” (through Controlled Foreign Corporations) from Form 1118, Schedule B, *Foreign Tax Credit—Corporations*, are reported in columns 42 through 51 of Table 1. Total foreign taxes paid or accrued (Table 1, column 43) are the sum of columns 44 through 50 (any differences are due to taxpayer reporting). Table 1, column 41 shows carryovers of excess or unused taxes from prior years, which can be added to the 2003 pool of creditable foreign taxes. Total foreign taxes paid, accrued, and “deemed paid,” plus carryover, are then adjusted for certain items (e.g., reductions of foreign taxes related to oil and gas extraction income under Internal Revenue Code section 907 and reductions of foreign taxes related to income earned in sanctioned countries under Internal Revenue Code section 901(j), as well as other reductions of creditable taxes) in column 40. Thus, total foreign taxes

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available for credit (Table 1, column 39) are equal to total foreign taxes paid, accrued, and “deemed paid” (column 42), plus any carryover of prior-year excess or unused foreign taxes (column 41), less any reduction in foreign taxes (column 40).

Tables 2 and 3 are similar in column format to Table 1 except that they provide data only from Form 1118 without the data from the basic corporation income tax return (for example, total assets and total receipts). Table 2 presents data reported by industrial grouping and separate income basket, while Table 3 presents data by selected geographic region and country.

## Explanation of Selected Terms

*Adjustments to taxable income*—This includes several types of adjustments reported on Schedule J of Form 1118, *Computation of Foreign Tax Credit—Corporations*. These include the allocation of current-year foreign losses, overall foreign losses, and current-year U.S.-source losses. Adjustments due to prior-year loss allocations are also made, including the recapture of foreign-source losses and the recharacterization of foreign-source income. The overall result of these adjustments is shown in column 37 of Table 1 and column 23 of Table 2.

*Carryover of foreign taxes*—Under Internal Revenue Code section 904, “U.S. persons” are allowed a 2-year carryback and 5-year carryforward of excess or unused foreign taxes for purposes of computing the final foreign tax credit for those years. Such taxes were included in the computation of the current-year foreign tax credit to the extent that they did not exceed the credit limitation for the current year. The 2003 statistics used for this article include only those foreign taxes that were carried forward from previous years (1998-2002). See column 41 of Table 1 and column 27 of Table 2.

*Controlled foreign corporation (CFC)*—Under Internal Revenue Code section 957, a foreign corporation is a “controlled foreign corporation” if more than 50 percent of its outstanding voting stock, or more than 50 percent of the value of all its outstanding stock, is owned (directly, indirectly, or constructively) by “U.S. shareholders” on any day during the foreign corporation’s tax year. Internal Revenue Code section 951(b) defines a “U.S. shareholder” as a U.S. person with 10 percent or more of the total

combined voting stock of the foreign corporation. Ownership attribution rules are provided in Internal Revenue Code section 958. See also *Deemed dividends* and *Subpart F*.

*Current-year foreign taxes*—Current-year foreign taxes include foreign income taxes paid, accrued, or “deemed paid” and are shown in column 42 of Table 1, column 28 of Table 2, and column 14 of Table 3. Current-year foreign taxes do not include any carryback or carryforward of foreign taxes from other tax years.

*Deemed dividends*—Certain types of income earned by controlled foreign corporations (CFCs) are recognized under Subpart F of the Internal Revenue Service Code as current-year income of the U.S. corporation, even if no income is actually received from the CFC in the current tax year. In such cases, the U.S. corporation is deemed to have received a pro-rata share of this income and required to report it as a “deemed dividend” on Form 1118, Schedule A. See Internal Revenue Code section 951(a) for a more detailed description of income reported as deemed dividends. See also *controlled foreign corporation* and *Subpart F income*.

*Dividend gross-up*—Since a dividend represents a distribution from after-tax earnings, the amount of income that a domestic corporation recognizes on receiving a dividend from a foreign corporation is net of all the foreign income taxes paid by that foreign corporation. U.S. corporations that satisfy ownership and other requirements are permitted to take an indirect foreign tax credit for taxes paid on the profits from which the dividends were distributed. Under Internal Revenue Code section 78, these taxes are “deemed paid” by the U.S. corporations under Internal Revenue Code sections 902 and 960(a). Consequently, the dividend income is “grossed-up” by the amount of the taxes deemed paid on the income from which the dividend was paid. This prevents U.S. corporations from crediting the foreign taxes deemed paid and deducting the same taxes in computing foreign-source taxable income.

*Financial services income*—This separate limitation category or basket applies to certain income from financial services activities. Financial services income includes all income, including “passive income” (see below), that is generated from banking, insurance, financing, or similar activities, and from

certain types of insurance investments. Financial services income excludes “high withholding tax interest,” dividends from noncontrolled foreign corporations as defined in Internal Revenue Code section 902, and certain types of export financing interest.

*Foreign oil and gas extraction income (FOGEI)*—FOGEI is the gross income from the extraction of oil and gas, as well as from the sale of assets used in the extraction of oil and gas, or from related services, working capital, dividend and partnership distributions, and any other oil and gas extraction income. In general, a foreign tax credit is not permitted for foreign taxes paid, accrued, or deemed paid in connection with the purchase or sale of oil or gas extracted in a foreign country if the taxpayer has no economic interest in the oil or gas and if the purchase or sales price differs from the fair market value.

*Foreign sales corporation (FSC)*—A foreign sales corporation was a company incorporated abroad and controlled by a “U.S. person.” A portion of the FSC’s “foreign trade income” was exempt from U.S. taxation. Although these statistics do not include FSC returns (Forms 1120-FSC), FSC dividends received by corporations claiming a foreign tax credit are included. Dividends and interest generated by a FSC or former FSC comprise a separate limitation category. In July 1999, the World Trade Organization (WTO) declared FSC provisions to be an illegal export subsidy. Congress repealed the FSC provisions and created the Extraterritorial Income Exclusion Act in November 2000, which allowed U.S. corporations to continue operating FSCs until December 2001.

*Foreign-source taxable income*—Foreign-source taxable income is equal to gross income (less loss) less deductions from sources outside the United States, including U.S. possessions, and is included in the taxable income of U.S. corporations.

*Foreign trade income*—This includes gross receipts from foreign trade earned by a foreign sales corporation (FSC) from: 1) the sale of “export property,” 2) the leasing of export property for use outside the United States, or 3) services in connection with the sale or leasing of export property. The related separate limitation category, taxable income attributable to foreign trade income, is unusual in the 2003 statistics. Code section 923(b), which permits the foreign trade income basket, has since been repealed, effective September 30, 2000.

*General limitation income*—This separate limitation category or basket comprises foreign income not included in any other separate limitation category.

*High withholding tax interest*—This separate limitation category or basket includes interest income subject to a withholding tax greater than or equal to 5 percent. This basket does not include interest received from the financing of certain export activities.

*Income resourced by bilateral tax treaty*—Selected U.S. income tax treaties contain provisions reclassifying certain income items from being U.S.-source income to foreign-source income (for instance, when the tax treaty allows the other country to tax what would otherwise be U.S.-source income). Certain dividends and income from a U.S.-owned foreign corporation can be included in this category. A separate foreign tax credit limitation has to be computed for each amount resourced by a tax treaty.

*Domestic international sales corporation (DISC)*—DISCs (now referred to as IC-DISCs) were small domestic corporations formed to export U.S. products. A DISC could defer the tax liability on a portion of its income but had to ultimately pay the deferred tax plus interest. Under the DISC provisions, a U.S. manufacturer could set up a DISC (located in the United States) whose income was not taxed at the DISC level. Instead, the corporate shareholder was taxed directly on a portion of the DISC’s income that was deemed distributed. The portion of the income not deemed distributed was not subject to U.S. taxation until it was actually distributed. The foreign trading partners of the United States that are party to the General Agreement on Tariffs and Trade (GATT) maintained that the DISC provisions constituted an illegal export trade subsidy because they allowed indefinite deferral of direct taxes on income from exports earned in the United States. Essentially, this pre-1985 system of tax deferral for export income was replaced by the exemption system of Foreign sales corporations (FSCs), now also repealed. To elect DISC status, at least 95 percent of the corporation’s gross receipts had to be “qualified export receipts,” and at least 95 percent of its assets “qualified export assets.” Distributions from a DISC or former DISC are a separate limitation category.

*Noncontrolled section 902 corporation*—A non-controlled foreign corporation is defined by Internal Revenue Code section 902 as a foreign corporation

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in which a U.S. corporation possesses at least 10 percent of the voting stock and the U.S. shareholders own no more than 50 percent of the stock measured by voting power or value. These foreign corporations are also referred to as “10/50 companies.” Each non-controlled section 902 foreign corporation is treated individually, with dividends from each corporation placed in separate categories or baskets to avoid the averaging of high-taxed and low-taxed dividends. Under Internal Revenue Code section 904(d)(1)(E), dividends paid by 10/50 corporations that are not passive foreign investment companies (PFICs) are treated in the aggregate as a separate category of income and are placed in this basket. Tax year 2003 was the first to include this income basket.

*Passive foreign investment company (PFIC)*—A PFIC is a passive investment company, one whose income is mainly passive or that uses at least half of its assets to create passive income.

*Passive income*—This separate limitation category or basket includes dividends, interest (with the exception noted below), rents, royalties, annuities, and net capital gains, as well as commodity transactions not connected with the active conduct of a trade or business. High-taxed passive income is excluded from this basket and is included, instead, under financial services income. Interest subject to a high withholding tax is categorized in a separate basket (see *High withholding tax interest*, above). Furthermore, income that by definition is passive, yet is subject to a foreign tax rate exceeding the highest applicable U.S. rate, is placed in the general limitation basket instead of the passive income basket.

*Section 901(j) income*—Internal Revenue Code section 901(j) denies credit for taxes paid or accrued to select foreign governments that the United States deems ineligible. These countries include the following: (1) countries not recognized by the United States, (2) countries with which the United States has severed or does not conduct diplomatic relations, or (3) countries identified by the United States as providing support for terrorism. For 2003, countries subject to these restrictions were Cuba, Iran, Iraq, Libya, North Korea, Sudan, and Syria. Income and deductions from section 901(j) countries are reported on Form 1118, even though these taxes are not cred-

itable. A separate limitation credit is computed for informational purposes and is not included in the foreign tax credit of the corporation.

*Shipping income*—This separate limitation category or basket applies to certain income from shipping-related activities. Shipping income includes the following: (1) all income from the use (or leasing for use) of a vessel or aircraft in foreign commerce, (2) income from services directly related to the use of a vessel or aircraft, (3) gains on the sale or exchange of a vessel or aircraft used in the performance of such services, and (4) income generated from other space and oceanic activities not included elsewhere. Income that would be foreign-base company shipping income for purposes of determining the income received from controlled foreign corporations, under Internal Revenue Code section 954(f), is also classified as shipping income.

*Specifically allocable income*—Internal Revenue Code section 863(b) provides special rules for determining taxable income from sources outside the United States with respect to gross income derived partly from within and partly from outside the United States. The income apportioned to sources outside the United States under these special rules is commonly referred to as “section 863(b) income.”

*Subpart F income*—Provisions of the Internal Revenue Code limit the ability of U.S. taxpayers to defer U.S. taxes by shifting certain types of income to lower-tax foreign countries. Subpart F (i.e., Internal Revenue Code sections 951-965) identifies certain types of income, primarily passive investment income, earned by certain controlled foreign corporations (CFCs), and requires the U.S. corporation to report a pro-rata share of this current-year income for U.S. tax purposes, regardless of whether or not the income was actually repatriated to the U.S. corporation in the current tax year. See also *Controlled foreign corporation* and *Deemed dividends*.

*Tax deemed paid*—See Dividend gross-up.

*U.S. person*—A U.S. person is any citizen or resident of the United States, domestic partnership, corporation, association, company, or any estate or trust that is not considered foreign. See Internal Revenue Code section 7701 for more information on the definition of a U.S. person.

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**Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2003: Total Assets, Income, Taxes, and Credits, and Foreign Income, Taxes, and Credit, by Major and Selected Minor Industry**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Major and selected minor industry of U.S. corporation filing return	Number of returns	Total assets	Total receipts	Dividends received from foreign corporations	Dividends received from IC-DISCs or former DISCs [1]	Includable income of controlled foreign corporations	Foreign dividend income from foreign taxes deemed paid (gross-up)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
<b>All industries.....</b>	<b>5,409</b>	<b>20,487,827,959</b>	<b>5,864,923,885</b>	<b>39,903,149</b>	<b>11,129</b>	<b>39,543,251</b>	<b>31,078,066</b>
<b>Agriculture, forestry, fishing, and hunting.....</b>	<b>272</b>	<b>3,641,824</b>	<b>2,224,220</b>	<b>71,637</b>	<b>0</b>	<b>* 53</b>	<b>* 41,441</b>
<b>Mining.....</b>	<b>57</b>	<b>106,091,302</b>	<b>44,838,375</b>	<b>708,867</b>	<b>0</b>	<b>367,299</b>	<b>329,325</b>
Oil and gas extraction.....	36	38,036,379	16,423,800	446,518	0	* 31,691	* 153,674
Coal mining and metal ore mining.....	5	* 31,703,418	* 5,770,857	* 62,262	0	* 162,811	* 40,001
Nonmetallic minerals.....	6	* 7,735,403	* 4,806,533	* 24,757	0	* 9,793	* 12,818
Support activities for mining.....	10	28,616,102	17,837,385	* 175,330	0	* 163,004	* 122,832
<b>Utilities.....</b>	<b>8</b>	<b>* 90,003,800</b>	<b>* 32,224,502</b>	<b>* 225,588</b>	<b>0</b>	<b>* 28,831</b>	<b>* 49,288</b>
<b>Construction.....</b>	<b>242</b>	<b>15,510,595</b>	<b>27,221,366</b>	<b>27,552</b>	<b>0</b>	<b>* 3,661</b>	<b>* 12,970</b>
Building, developing, and general contracting.....	88	9,334,236	20,820,955	11,114	0	* 241	* 3,588
Heavy construction.....	49	4,936,597	4,351,427	736	0	* 3,421	* 144
Special trade contractors.....	105	1,239,761	2,048,984	* 15,702	0	0	* 9,238
<b>Manufacturing.....</b>	<b>1,095</b>	<b>5,078,506,497</b>	<b>2,600,632,007</b>	<b>28,859,213</b>	<b>6,474</b>	<b>27,530,865</b>	<b>23,273,320</b>
Food manufacturing.....	84	245,722,673	203,163,056	1,072,702	* 247	4,012,880	1,713,948
Beverage and tobacco products.....	16	89,542,821	68,097,616	* 990,283	* 437	* 831,345	* 869,223
Tobacco manufacturing.....	4	* 18,671,180	* 15,720,491	* 1,231	0	* 11,567	* 5,581
Textile mills and textile product mills.....	7	* 279,672,079	* 61,647,899	* 277,065	0	* 114,539	* 63,886
Apparel manufacturing.....	13	12,955,181	14,958,643	* 13,258	0	* 71,222	* 35,040
Leather and allied product manufacturing.....	6	* 1,621,021	* 2,501,514	* 7,556	0	* 187	* 2,961
Wood product manufacturing.....	14	57,059,446	23,088,028	* 155,191	0	* 2,302	* 51,353
Paper manufacturing.....	16	97,189,009	48,173,101	* 685,377	* 388	156,795	334,894
Printing and related support activities.....	27	5,696,308	6,136,691	* 11,189	0	* 2,673	* 6,727
Petroleum and coal products manufacturing.....	16	982,134,546	631,297,347	* 8,147,612	0	* 5,925,936	8,023,712
Chemical manufacturing.....	161	969,899,337	454,448,417	8,776,179	* 764	6,687,603	6,052,707
Pharmaceutical and medicine manufacturing.....	38	549,108,779	243,491,181	5,716,765	0	4,898,525	4,068,071
Other chemical manufacturing.....	123	420,790,558	210,957,235	3,059,415	* 764	1,789,077	1,984,636
Plastics and rubber products manufacturing.....	50	21,495,233	15,576,093	111,535	0	123,498	101,929
Nonmetallic mineral product manufacturing.....	32	17,918,385	15,566,793	* 27,732	* 438	* 25,215	* 12,461
Primary metal manufacturing.....	14	74,116,875	21,905,046	* 441,487	0	* 536,755	* 328,924
Fabricated metal products.....	150	165,876,568	55,079,493	611,489	* 874	313,169	429,099
Machinery manufacturing.....	122	174,451,522	119,983,222	850,224	* 1,110	588,368	710,951
Computer and electronic product manufacturing.....	140	292,300,385	262,793,330	2,479,629	0	2,290,816	1,755,631
Electrical equipment, appliance, and component manufacturing.....	76	914,613,374	168,974,964	247,181	* 781	3,315,942	512,444
Transportation equipment manufacturing.....	55	597,708,387	365,453,357	3,484,863	* 4	1,852,663	1,897,378
Motor vehicles and related manufacturing.....	33	495,764,204	273,704,224	2,863,509	* 4	* 1,216,851	1,455,145
Other transportation equipment manufacturing.....	22	101,944,182	91,749,133	621,354	0	* 635,811	442,233
Furniture and related products.....	12	9,575,324	12,811,056	* 35,719	0	* 11,079	* 17,095
Miscellaneous manufacturing and manufacturing not allocable.....	83	68,958,022	48,976,339	432,940	* 1,431	667,878	352,957
<b>Wholesale and retail trade.....</b>	<b>657</b>	<b>618,128,351</b>	<b>975,635,282</b>	<b>2,031,302</b>	<b>* 889</b>	<b>1,667,993</b>	<b>1,451,932</b>
Wholesale trade.....	356	307,903,265	421,084,958	1,896,949	* 61	1,224,099	1,182,916
Durable goods.....	213	87,941,760	147,237,131	123,471	* 44	118,563	97,673
Machinery, equipment, and supplies.....	56	9,955,031	13,615,129	* 7,048	0	* 2,087	* 1,092
Other miscellaneous durable goods.....	157	77,986,729	133,622,002	116,423	* 44	116,476	96,581
Nondurable goods.....	143	219,961,505	273,847,826	1,773,477	* 17	1,105,537	1,085,244
Drugs, chemicals, and allied products.....	29	86,199,558	156,162,264	125,047	0	* 189,658	121,518
Groceries and related products.....	14	8,794,888	23,356,533	* 3	0	* 2,842	* 551
Petroleum and petroleum products.....	10	* 43,818,759	20,508,069	* 458,513	0	* 69,213	* 244,119
Other miscellaneous nondurable goods.....	90	81,148,300	73,820,959	1,189,914	* 17	843,824	719,055

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2003: Total Assets, Income, Taxes, and Credits, and Foreign Income, Taxes, and Credit, by Major and Selected Minor Industry—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Major and selected minor industry of U.S. corporation filing return	Number of returns	Total assets	Total receipts	Dividends received from foreign corporations	Dividends received from IC-DISCs or former DISCs [1]	Includable income of controlled foreign corporations	Foreign dividend income from foreign taxes deemed paid (gross-up)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
<b>Wholesale and retail trade—continued</b>							
Retail trade.....	301	310,225,087	554,550,325	134,354	* 828	443,893	269,016
Motor vehicle, parts dealers, and gas stations.....	23	2,112,257	5,679,035	* 9,051	0	* 1	* 6,531
Building materials, garden equipment, and supplies.....	27	* 81,079,489	* 66,280,470	* 5	0	* 20	0
Food and beverages stores.....	7	* 8,283,984	* 22,664,195	* 377	0	* 740	* 421
Apparel and accessory stores.....	20	32,219,426	47,576,619	* 8	0	* 318,508	* 27,885
General merchandise stores.....	6	* 130,999,539	* 307,364,933	* 6,354	0	* 109,521	* 185,514
Miscellaneous retail trade.....	218	55,530,392	104,985,072	118,560	* 828	* 15,103	* 48,666
<b>Transportation and warehousing.....</b>	<b>46</b>	<b>119,744,350</b>	<b>103,206,000</b>	<b>179,843</b>	<b>0</b>	<b>257,052</b>	<b>103,298</b>
Air, rail, and water transportation.....	14	61,885,612	19,197,090	* 94,975	0	* 176,013	* 35,375
Water transportation.....	8	* 4,845,442	* 4,112,371	* 21,983	0	* 168,674	* 1,968
Air and rail transportation.....	6	* 57,040,170	* 15,084,719	* 72,992	0	* 7,339	* 33,407
Other transportation and warehousing.....	32	57,858,738	84,008,910	84,868	0	* 81,039	* 67,923
<b>Information.....</b>	<b>517</b>	<b>692,825,550</b>	<b>310,806,565</b>	<b>1,457,785</b>	<b>* 850</b>	<b>1,349,480</b>	<b>890,763</b>
Publishing, motion picture, and sound recording.....	413	311,738,131	132,918,628	652,795	* 850	1,223,573	497,982
Broadcasting, Internet publishing.....	71	75,669,109	39,992,134	* 297,888	0	* 18,589	* 133,546
Telecommunications.....	18	287,188,507	126,897,226	* 462,564	0	* 13,130	* 186,220
Internet service providers, Web search portals, and data processing services.....	3	* 11,107,578	* 4,311,932	* 9,236	0	* 955	* 4,755
Other information services.....	12	7,122,224	6,686,645	* 35,301	0	* 93,234	* 68,260
<b>Finance, insurance, real estate, and rental and leasing...</b>	<b>795</b>	<b>7,130,693,100</b>	<b>1,130,963,108</b>	<b>2,186,472</b>	<b>* 1,071</b>	<b>6,149,958</b>	<b>2,099,229</b>
Finance and insurance.....	448	7,119,819,577	1,126,190,722	2,156,786	* 1,071	6,140,599	2,095,145
Commercial banking and other depository credit agencies.....	35	85,861,386	5,930,796	276	0	* 110	* 7
Commercial banking.....	7	* 6,652,568	* 645,329	* 16	0	0	0
Depository credit agencies other than banks.....	28	79,208,818	5,285,467	259	0	* 110	* 7
Nondepository credit intermediation.....	44	406,404,697	66,184,987	* 73,392	0	* 545,837	* 103,778
Securities, commodity contracts, and other.....	77	2,365,110,764	132,516,886	917,239	0	1,342,952	995,792
Insurance and related activities.....	273	4,222,122,740	920,147,780	1,162,144	* 1,071	4,118,463	910,260
Insurance agencies and brokerages.....	24	51,723,308	16,043,481	* 271,198	0	* 234,356	* 213,374
Funds, trusts, and other financial vehicles.....	19	40,319,989	1,410,274	* 3,736	0	* 133,237	* 85,308
Real estate and rental and leasing.....	347	10,873,523	4,772,385	29,686	0	* 9,359	* 4,084
Real estate.....	334	2,989,678	796,568	29,350	0	* 562	* 3,987
Rentals and leasing.....	13	7,883,845	3,975,818	* 336	0	* 8,797	* 97
<b>Services.....</b>	<b>1,720</b>	<b>6,632,682,592</b>	<b>637,172,460</b>	<b>4,154,889</b>	<b>* 1,845</b>	<b>2,188,060</b>	<b>2,826,500</b>
Professional, scientific, and technical services.....	366	127,846,023	81,687,960	364,625	* 1,845	276,486	227,929
Management of holding companies.....	897	6,296,999,232	396,745,206	3,298,557	0	1,693,145	2,277,001
Administrative and support and waste management and remediation.....	85	34,348,695	22,286,363	55,184	0	121,789	42,224
Education services, health care, and social assistance.....	35	39,861,187	24,641,084	* 31,158	0	* 10,344	* 10,201
Arts, entertainment, and recreation.....	267	4,259,333	2,638,502	* 6,229	0	0	* 6,705
Accommodation and food services.....	41	120,057,628	101,035,828	155,918	0	* 75,965	96,675
Accommodation.....	11	54,511,325	46,978,211	* 12,558	0	* 44,807	* 12,998
Food services and drinking places.....	30	65,546,303	54,057,617	143,361	0	* 31,158	* 83,677
Other services.....	28	9,310,495	8,137,518	* 243,218	0	* 10,331	* 165,765
Repair and maintenance services.....	16	* 980,563	* 982,315	* 5	0	* 545	0
Personal services, religious, grantmaking, civic, professional, etc.....	12	8,329,932	7,155,202	* 243,212	0	* 9,785	* 165,765

Footnotes at end of table.



# Corporate Foreign Tax Credit, 2003

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**Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2003: Total Assets, Income, Taxes, and Credits, and Foreign Income, Taxes, and Credit, by Major and Selected Minor Industry—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Major and selected minor industry of U.S. corporation filing return	Net income (less deficit)	Income subject to U.S. tax	U.S. Income tax before credits		Foreign tax credit claimed	U.S. possessions tax credit
			Total	Regular and alternative minimum tax		
	(8)	(9)	(10)	(11)	(12)	(13)
<b>All industries.....</b>	<b>443,832,142</b>	<b>424,500,012</b>	<b>149,244,042</b>	<b>149,235,556</b>	<b>49,963,270</b>	<b>226,257</b>
<b>Agriculture, forestry, fishing, and hunting.....</b>	<b>307,670</b>	<b>299,498</b>	<b>103,749</b>	<b>103,874</b>	<b>29,788</b>	<b>0</b>
<b>Mining.....</b>	<b>5,876,495</b>	<b>5,675,638</b>	<b>2,015,430</b>	<b>2,015,430</b>	<b>1,256,572</b>	<b>0</b>
Oil and gas extraction.....	3,453,638	3,296,729	1,158,757	1,158,756	579,647	0
Coal mining and metal ore mining.....	* 1,265,057	* 1,238,482	* 455,465	* 455,465	* 406,231	0
Nonmetallic minerals.....	* 245,796	* 242,584	* 86,846	* 86,846	* 26,479	0
Support activities for mining.....	912,004	897,843	314,362	314,362	244,215	0
<b>Utilities.....</b>	<b>* 1,356,997</b>	<b>* 1,346,043</b>	<b>* 471,098</b>	<b>* 471,098</b>	<b>* 54,315</b>	<b>0</b>
<b>Construction.....</b>	<b>955,784</b>	<b>929,862</b>	<b>324,917</b>	<b>324,121</b>	<b>24,283</b>	<b>0</b>
Building, developing, and general contracting.....	601,286	596,896	209,945	209,332	5,926	0
Heavy construction.....	268,272	250,025	87,103	86,965	7,386	0
Special trade contractors.....	86,226	82,940	27,869	27,824	10,971	0
<b>Manufacturing.....</b>	<b>205,712,954</b>	<b>196,324,427</b>	<b>68,932,563</b>	<b>68,924,670</b>	<b>33,083,208</b>	<b>221,233</b>
Food manufacturing.....	15,318,477	15,154,740	5,304,007	5,303,610	2,034,769	* 1,692
Beverage and tobacco products.....	9,397,701	9,321,412	3,262,553	3,262,483	1,165,984	* 61,257
Tobacco manufacturing.....	* 1,758,565	* 1,736,495	* 607,840	* 607,773	* 46,419	* 4,660
Textile mills and textile product mills.....	* 10,833,219	* 10,272,815	* 3,596,088	* 3,595,347	* 91,520	0
Apparel manufacturing.....	1,222,554	1,210,692	423,492	423,492	49,997	0
Leather and allied product manufacturing.....	* 137,658	* 137,653	* 48,060	* 48,060	* 7,838	0
Wood product manufacturing.....	539,418	505,082	175,884	176,486	80,688	0
Paper manufacturing.....	3,560,479	3,516,785	1,231,608	1,231,608	583,705	0
Printing and related support activities.....	782,098	704,771	247,176	246,512	13,435	* 1,532
Petroleum and coal products manufacturing.....	56,013,644	55,697,660	19,523,424	19,522,337	13,455,265	0
Chemical manufacturing.....	52,954,711	48,427,904	16,987,906	16,987,763	7,722,720	* 118,552
Pharmaceutical and medicine manufacturing.....	35,207,349	31,900,147	11,184,799	11,184,723	4,851,744	* 115,400
Other chemical manufacturing.....	17,747,361	16,527,758	5,803,107	5,803,040	2,870,976	* 3,152
Plastics and rubber products manufacturing.....	906,937	881,887	309,947	309,908	112,732	* 1,969
Nonmetallic mineral product manufacturing.....	790,495	773,538	270,171	270,170	20,354	* 568
Primary metal manufacturing.....	1,247,123	1,194,315	428,490	428,723	379,983	0
Fabricated metal products.....	4,516,877	4,494,273	1,572,178	1,570,928	611,849	0
Machinery manufacturing.....	4,185,416	4,038,990	1,427,623	1,427,334	827,352	0
Computer and electronic product manufacturing.....	21,712,554	19,931,640	7,058,154	7,058,028	2,872,924	0
Electrical equipment, appliance, and component manufacturing.....	6,750,329	6,103,985	2,143,280	2,141,126	946,175	* 35,007
Transportation equipment manufacturing.....	8,785,830	8,178,157	2,889,474	2,886,397	1,553,458	* 361
Motor vehicles and related manufacturing.....	4,740,651	4,329,699	1,538,564	1,538,508	1,099,959	* 361
Other transportation equipment manufacturing.....	4,045,179	3,848,458	1,350,910	1,347,889	453,499	0
Furniture and related products.....	478,420	472,986	165,342	165,342	20,459	0
Miscellaneous manufacturing and manufacturing not allocable.....	5,579,014	5,305,143	1,867,705	1,869,016	532,000	* 296
<b>Wholesale and retail trade.....</b>	<b>44,356,401</b>	<b>43,089,603</b>	<b>15,085,996</b>	<b>15,085,951</b>	<b>1,843,929</b>	<b>0</b>
Wholesale trade.....	16,822,906	15,818,429	5,543,321	5,543,321	1,392,508	0
Durable goods.....	4,018,757	3,685,928	1,290,867	1,290,867	122,352	0
Machinery, equipment, and supplies.....	662,722	642,706	224,263	224,263	10,135	0
Other miscellaneous durable goods.....	3,356,035	3,043,222	1,066,604	1,066,604	112,217	0
Nondurable goods.....	12,804,149	12,132,501	4,252,454	4,252,454	1,270,156	0
Drugs, chemicals, and allied products.....	6,291,616	6,242,432	2,186,143	2,186,143	210,179	0
Groceries and related products.....	394,980	378,735	132,098	132,098	3,335	0
Petroleum and petroleum products.....	1,557,836	1,046,945	366,221	366,221	189,114	0
Other miscellaneous nondurable goods.....	4,559,717	4,464,389	1,567,992	1,567,992	867,528	0

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2003: Total Assets, Income, Taxes, and Credits, and Foreign Income, Taxes, and Credit, by Major and Selected Minor Industry—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Major and selected minor industry of U.S. corporation filing return	Net income (less deficit)	Income subject to U.S. tax	U.S. Income tax before credits		Foreign tax credit claimed	U.S. possessions tax credit
			Total	Regular and alternative minimum tax		
	(8)	(9)	(10)	(11)	(12)	(13)
<b>Wholesale and retail trade—continued</b>						
Retail trade.....	27,533,495	27,271,174	9,542,675	9,542,630	451,421	0
Motor vehicle, parts dealers, and gas stations.....	116,866	115,966	40,410	40,410	10,516	0
Building materials, garden equipment, and supplies.....	* 4,887,412	* 4,879,400	* 1,707,578	* 1,707,578	* 10,720	0
Food and beverages stores.....	* 306,676	* 304,157	* 106,214	* 106,214	* 15,249	0
Apparel and accessory stores.....	3,937,966	3,931,869	1,375,937	1,375,937	98,711	0
General merchandise stores.....	* 13,727,662	* 13,537,154	* 4,738,028	* 4,737,983	* 202,450	0
Miscellaneous retail trade.....	4,556,913	4,502,628	1,574,508	1,574,508	113,774	0
<b>Transportation and warehousing.....</b>	<b>5,909,830</b>	<b>5,799,091</b>	<b>2,028,920</b>	<b>2,028,920</b>	<b>194,242</b>	<b>0</b>
Air, rail, and water transportation.....	1,068,690	1,032,220	361,054	361,054	47,881	0
Water transportation.....	* 261,889	* 235,983	* 82,566	* 82,566	* 9,004	0
Air and rail transportation.....	* 806,800	* 796,236	* 278,487	* 278,487	* 38,877	0
Other transportation and warehousing.....	4,841,140	4,766,871	1,667,866	1,667,866	146,362	0
<b>Information.....</b>	<b>32,233,109</b>	<b>29,405,463</b>	<b>10,329,322</b>	<b>10,306,737</b>	<b>2,351,763</b>	<b>0</b>
Publishing, motion picture, and sound recording.....	23,507,486	22,865,011	8,017,212	8,016,883	1,794,916	0
Broadcasting, Internet publishing.....	1,348,394	1,184,700	414,035	414,035	229,056	0
Telecommunications.....	5,698,730	3,691,912	1,315,165	1,292,952	251,725	0
Internet service providers, Web search portals, and data processing services.....	* 525,969	* 520,157	* 181,979	* 181,979	* 7,048	0
Other information services.....	1,152,529	1,143,682	400,931	400,890	69,018	0
<b>Finance, insurance, real estate, and rental and leasing...</b>	<b>79,063,588</b>	<b>75,309,492</b>	<b>26,719,724</b>	<b>26,747,008</b>	<b>5,527,846</b>	<b>0</b>
Finance and insurance.....	78,645,185	75,007,321	26,612,896	26,640,686	5,511,045	0
Commercial banking and other depository credit agencies.....	985,300	929,397	323,849	323,751	13,800	0
Commercial banking.....	* 136,453	* 134,286	* 46,846	* 46,846	* 4,527	0
Depository credit agencies other than banks.....	848,847	795,111	277,003	276,906	9,273	0
Nondepository credit intermediation.....	5,940,307	5,670,520	1,992,651	1,984,294	272,433	0
Securities, commodity contracts, and other.....	14,975,353	14,401,666	5,060,950	5,060,607	1,603,907	0
Insurance and related activities.....	55,296,017	52,565,879	18,727,050	18,763,637	3,253,206	0
Insurance agencies and brokerages.....	2,391,117	2,369,201	828,803	828,784	298,102	0
Funds, trusts, and other financial vehicles.....	1,448,208	1,439,859	508,397	508,397	367,700	0
Real estate and rental and leasing.....	418,402	302,171	106,828	106,322	16,801	0
Real estate.....	224,590	203,201	68,563	68,561	11,603	0
Rentals and leasing.....	193,813	98,970	38,265	37,762	5,198	0
<b>Services.....</b>	<b>68,059,313</b>	<b>66,320,896</b>	<b>23,232,323</b>	<b>23,227,748</b>	<b>5,597,324</b>	<b>* 5,024</b>
Professional, scientific, and technical services.....	5,265,185	4,888,966	1,719,815	1,718,739	453,670	0
Management of holding companies.....	54,358,837	53,215,802	18,628,495	18,626,008	4,389,197	0
Administrative and support and waste management and remediation.....	1,393,396	1,307,531	467,233	467,231	141,469	0
Education services, health care, and social assistance.....	1,648,817	1,588,463	555,302	555,302	14,482	0
Arts, entertainment, and recreation.....	265,266	256,697	88,235	88,235	40,850	0
Accommodation and food services.....	4,352,530	4,321,071	1,513,463	1,512,451	405,902	* 5,024
Accommodation.....	1,171,961	1,165,239	408,657	407,682	39,684	* 420
Food services and drinking places.....	3,180,569	3,155,832	1,104,806	1,104,769	366,219	* 4,603
Other services.....	775,282	742,365	259,780	259,783	151,754	0
Repair and maintenance services.....	* 73,896	* 55,974	* 19,364	* 19,364	* 368	0
Personal services, religious, grantmaking, civic, professional, etc.....	71,385	686,391	240,316	240,419	151,385	0

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2003: Total Assets, Income, Taxes, and Credits, and Foreign Income, Taxes, and Credit, by Major and Selected Minor Industry—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Major and selected minor industry of U.S. corporation filing return	General business credit	U.S. income tax after credits [2]	Foreign income and taxes			
			Gross income (less loss)			
			Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest
	(14)	(15)	(16)	(17)	(18)	(19)
<b>All industries.....</b>	<b>6,570,750</b>	<b>88,894,393</b>	<b>406,485,266</b>	<b>78,185,158</b>	<b>31,064,340</b>	<b>48,742,000</b>
<b>Agriculture, forestry, fishing, and hunting.....</b>	<b>* 1,534</b>	<b>72,271</b>	<b>214,241</b>	<b>72,342</b>	<b>* 41,441</b>	<b>* 1,402</b>
<b>Mining.....</b>	<b>13,839</b>	<b>686,114</b>	<b>8,382,306</b>	<b>1,073,197</b>	<b>329,325</b>	<b>288,158</b>
Oil and gas extraction.....	7,630	543,224	2,682,327	478,205	* 153,674	19,628
Coal mining and metal ore mining.....	0	* 40,612	* 3,285,768	* 222,473	* 40,001	* 109,916
Nonmetallic minerals.....	* 1,039	* 44,343	* 186,413	* 34,550	* 12,818	* 25,900
Support activities for mining.....	* 5,170	* 57,935	2,227,799	* 337,969	* 122,832	* 132,714
<b>Utilities.....</b>	<b>* 5,649</b>	<b>* 364,184</b>	<b>* 327,189</b>	<b>* 253,947</b>	<b>* 49,275</b>	<b>* 3,830</b>
<b>Construction.....</b>	<b>* 6,933</b>	<b>231,938</b>	<b>553,402</b>	<b>30,863</b>	<b>* 12,969</b>	<b>* 3,267</b>
Building, developing, and general contracting.....	* 333	142,482	34,225	11,357	* 3,588	* 42
Heavy construction.....	* 6,519	72,901	453,834	3,805	* 144	* 3,225
Special trade contractors.....	* 81	16,555	65,343	* 15,701	* 9,238	0
<b>Manufacturing.....</b>	<b>3,430,705</b>	<b>30,804,184</b>	<b>213,057,886</b>	<b>55,675,229</b>	<b>23,278,744</b>	<b>7,650,357</b>
Food manufacturing.....	67,324	3,159,747	11,554,143	5,070,810	1,713,869	142,530
Beverage and tobacco products.....	* 4,597	2,029,120	7,407,847	1,816,645	* 869,223	305,166
Tobacco manufacturing.....	* 629	* 556,133	* 410,252	* 12,798	* 5,581	* 4,287
Textile mills and textile product mills.....	* 33,163	* 3,471,342	* 2,356,555	* 391,604	* 63,886	* 198,595
Apparel manufacturing.....	* 1,554	371,940	278,565	* 84,263	* 35,040	* 3,150
Leather and allied product manufacturing.....	* 1,191	* 39,031	* 165,104	* 7,742	* 2,961	* 586
Wood product manufacturing.....	* 3,529	89,530	326,686	* 157,492	* 51,353	* 21,877
Paper manufacturing.....	* 86,184	415,584	3,193,674	842,129	334,892	* 130,859
Printing and related support activities.....	* 4,913	223,553	78,473	13,227	* 6,396	* 1,134
Petroleum and coal products manufacturing.....	* 487,508	4,916,949	54,906,783	14,090,877	8,023,711	2,406,940
Chemical manufacturing.....	1,615,151	7,520,932	50,474,541	15,400,714	6,064,433	664,687
Pharmaceutical and medicine manufacturing.....	1,316,060	4,898,805	32,367,493	10,545,529	4,066,848	126,942
Other chemical manufacturing.....	299,091	2,622,127	18,107,048	4,855,185	1,997,585	537,745
Plastics and rubber products manufacturing.....	4,321	190,740	577,729	235,027	103,105	21,025
Nonmetallic mineral product manufacturing.....	2,047	238,702	172,565	52,936	* 12,461	* 39,449
Primary metal manufacturing.....	* 2,061	46,430	2,505,923	* 971,520	* 328,048	* 355,875
Fabricated metal products.....	40,950	917,974	4,016,699	923,844	428,938	94,826
Machinery manufacturing.....	73,923	516,228	7,272,733	1,435,087	709,822	427,301
Computer and electronic product manufacturing.....	621,146	3,530,666	35,979,551	4,623,327	1,752,589	395,771
Electrical equipment, appliance, and component manufacturing.....	189,785	517,048	13,940,727	3,571,590	512,444	1,825,222
Transportation equipment manufacturing.....	109,366	1,216,545	12,687,506	4,844,898	1,896,007	559,042
Motor vehicles and related manufacturing.....	44,381	389,950	10,674,251	4,080,947	1,453,944	516,182
Other transportation equipment manufacturing.....	64,985	826,595	2,013,255	763,951	442,063	42,860
Furniture and related products.....	* 3,479	140,944	123,999	* 46,798	* 16,650	* 6,712
Miscellaneous manufacturing and manufacturing not allocable.....	78,513	1,251,178	5,038,081	1,094,698	352,916	49,612
<b>Wholesale and retail trade.....</b>	<b>258,796</b>	<b>12,916,267</b>	<b>14,055,521</b>	<b>3,679,500</b>	<b>1,452,046</b>	<b>347,307</b>
Wholesale trade.....	163,961	3,933,080	11,011,033	3,103,254	1,183,029	178,262
Durable goods.....	39,512	1,127,473	3,327,056	241,214	97,786	41,183
Machinery, equipment, and supplies.....	* 842	213,233	112,200	9,131	* 1,091	9,923
Other miscellaneous durable goods.....	38,669	914,240	3,214,856	232,083	96,695	31,260
Nondurable goods.....	124,450	2,805,608	7,683,977	2,862,041	1,085,243	137,079
Drugs, chemicals, and allied products.....	49,808	1,920,170	2,508,897	311,250	121,518	14,737
Groceries and related products.....	* 1,524	127,239	120,337	* 2,845	* 551	* 59
Petroleum and petroleum products.....	* 50,864	126,110	1,023,914	* 527,624	* 244,119	* 16,907
Other miscellaneous nondurable goods.....	22,254	632,088	4,030,829	2,020,321	719,055	105,377

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2003: Total Assets, Income, Taxes, and Credits, and Foreign Income, Taxes, and Credit, by Major and Selected Minor Industry—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Major and selected minor industry of U.S. corporation filing return	General business credit	U.S. income tax after credits [2]	Foreign income and taxes			
			Gross income (less loss)			
			Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest
	(14)	(15)	(16)	(17)	(18)	(19)
<b>Wholesale and retail trade—continued</b>						
Retail trade.....	94,834	8,983,187	3,044,488	576,245	269,016	169,045
Motor vehicle, parts dealers, and gas stations.....	* 3,420	21,011	48,468	* 9,057	* 6,531	* 1,434
Building materials, garden equipment, and supplies.....	* 2,933	* 1,693,925	* 55,766	* 27	0	* 29,170
Food and beverages stores.....	* 4,786	* 85,636	* 56,811	* 1,116	* 421	* 3,446
Apparel and accessory stores.....	* 6,497	1,270,349	798,952	* 316,508	* 27,885	* 17,894
General merchandise stores.....	* 63,644	* 4,471,934	* 1,039,386	* 115,875	* 185,514	* 16,488
Miscellaneous retail trade.....	13,554	1,440,331	1,045,105	133,663	* 48,666	100,613
<b>Transportation and warehousing.....</b>	<b>* 22,100</b>	<b>1,677,224</b>	<b>11,154,793</b>	<b>436,789</b>	<b>103,297</b>	<b>93,687</b>
Air, rail, and water transportation.....	* 212	181,085	2,179,980	* 270,914	* 35,375	* 8,020
Water transportation.....	[3]	* 52,401	* 1,897,180	* 190,653	* 1,968	* 106
Air and rail transportation.....	* 212	* 128,685	* 282,800	* 80,261	* 33,407	* 7,914
Other transportation and warehousing.....	* 21,888	1,496,139	8,974,814	165,875	* 67,922	85,667
<b>Information.....</b>	<b>771,135</b>	<b>6,745,197</b>	<b>31,430,320</b>	<b>2,777,323</b>	<b>877,451</b>	<b>323,987</b>
Publishing, motion picture, and sound recording.....	700,156	5,253,885	21,233,454	1,833,526	497,982	100,599
Broadcasting, Internet publishing.....	* 13,667	171,309	3,704,509	* 329,377	* 132,739	* 88,638
Telecommunications.....	* 46,308	824,164	5,789,372	475,694	* 186,230	* 132,596
Internet service providers, Web search portals, and data processing services.....	* 5,733	* 169,197	* 121,495	* 10,191	* 4,755	* 1,229
Other information services.....	* 5,270	326,642	581,489	* 128,535	* 55,745	* 924
<b>Finance, insurance, real estate, and rental and leasing...</b>	<b>783,011</b>	<b>19,424,613</b>	<b>64,342,868</b>	<b>7,981,884</b>	<b>2,099,189</b>	<b>20,210,940</b>
Finance and insurance.....	780,311	19,338,750	64,022,404	7,942,766	2,095,104	20,204,638
Commercial banking and other depository credit agencies.....	* 14,496	295,275	63,538	392	* 8	* 63,015
Commercial banking.....	* 177	* 42,125	* 20,831	* 16	0	* 20,769
Depository credit agencies other than banks.....	* 14,319	253,151	42,707	376	* 8	* 42,246
Nondepository credit intermediation.....	* 174,618	1,545,207	8,301,484	331,491	* 103,784	1,548,084
Securities, commodity contracts, and other.....	57,973	3,046,633	17,399,469	2,251,875	995,840	7,589,094
Insurance and related activities.....	511,108	14,334,598	36,714,536	5,222,035	910,164	9,745,456
Insurance agencies and brokerages.....	* 2,915	496,737	1,560,125	505,554	* 213,374	* 92,887
Funds, trusts, and other financial vehicles.....	* 22,116	117,037	1,543,377	* 136,973	* 85,308	1,258,989
Real estate and rental and leasing.....	2,701	85,863	320,464	39,118	* 4,085	6,302
Real estate.....	* 160	56,201	122,228	29,986	* 3,988	6,192
Rentals and leasing.....	* 2,541	29,662	198,236	* 9,132	* 97	* 110
<b>Services.....</b>	<b>1,277,048</b>	<b>15,972,400</b>	<b>62,966,739</b>	<b>6,204,085</b>	<b>2,820,602</b>	<b>19,819,065</b>
Professional, scientific, and technical services.....	52,136	1,209,821	9,455,004	649,901	227,918	188,232
Management of holding companies.....	1,081,500	12,861,246	45,728,543	4,846,103	2,271,121	19,056,975
Administrative and support and waste management and remediation.....	14,949	310,223	1,500,057	176,558	42,224	38,546
Education services, health care, and social assistance.....	* 12,383	527,572	212,290	40,996	* 10,201	* 3,009
Arts, entertainment, and recreation.....	* 703	46,682	523,549	* 6,232	* 6,700	* 4,678
Accommodation and food services.....	113,682	910,526	4,927,753	230,749	96,672	517,774
Accommodation.....	* 14,221	279,379	1,246,283	* 56,230	* 12,995	* 252,121
Food services and drinking places.....	99,461	631,147	3,681,470	174,519	* 83,677	265,653
Other services.....	* 1,696	106,330	619,544	253,548	* 165,765	* 9,849
Repair and maintenance services.....	* 19	* 18,977	* 9,518	* 551	0	* 600
Personal services, religious, grantmaking, civic, professional, etc.....	* 1,677	87,353	610,026	* 252,996	* 165,765	* 9,250

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2003: Total Assets, Income, Taxes, and Credits, and Foreign Income, Taxes, and Credit, by Major and Selected Minor Industry—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Major and selected minor industry of U.S. corporation filing return	Foreign income and taxes—continued						
	Gross income (less loss)—continued					Deductions	
	Rents, royalties, and license fees	Service income	Other income	Oil and gas extraction income [4]	Foreign branch income [4]	Total	Definitely allocable deductions
	(20)	(21)	(22)	(23)	(24)	(25)	(26)
<b>All industries.....</b>	<b>65,684,288</b>	<b>20,195,460</b>	<b>162,614,019</b>	<b>34,936,165</b>	<b>83,280,537</b>	<b>201,355,604</b>	<b>108,129,366</b>
<b>Agriculture, forestry, fishing, and hunting.....</b>	<b>* 12,604</b>	<b>* -10</b>	<b>86,463</b>	<b>0</b>	<b>* 22,469</b>	<b>* 95,064</b>	<b>* 65,545</b>
<b>Mining.....</b>	<b>130,206</b>	<b>* 266,209</b>	<b>6,295,211</b>	<b>2,270,068</b>	<b>2,685,639</b>	<b>4,219,824</b>	<b>3,336,414</b>
Oil and gas extraction.....	* 418	* 30,482	1,999,920	2,259,902	* 274,082	837,891	682,101
Coal mining and metal ore mining.....	* 13,055	* 93,632	* 2,806,690	* 10,166	* 453,753	* 2,032,479	* 1,574,165
Nonmetallic minerals.....	* 11,798	0	* 101,347	0	* 36,170	* 93,043	* 82,262
Support activities for mining.....	* 104,936	* 142,095	* 1,387,253	0	* 1,921,633	1,256,412	* 997,885
<b>Utilities.....</b>	<b>* 7,445</b>	<b>* 1,841</b>	<b>* 10,850</b>	<b>0</b>	<b>* 11,929</b>	<b>* 77,887</b>	<b>* 10,597</b>
<b>Construction.....</b>	<b>* 20,785</b>	<b>463,048</b>	<b>22,470</b>	<b>0</b>	<b>* 109,757</b>	<b>463,691</b>	<b>455,551</b>
Building, developing, and general contracting.....	* 10,449	* 4,310	* 4,478	0	* 4,727	* 2,011	* 672
Heavy construction.....	* 10,303	* 429,936	* 6,420	0	* 94,124	* 429,341	* 423,956
Special trade contractors.....	* 32	* 28,801	* 11,571	0	* 10,906	* 32,339	* 30,924
<b>Manufacturing.....</b>	<b>39,140,378</b>	<b>3,378,944</b>	<b>83,934,234</b>	<b>* 31,589,595</b>	<b>17,701,449</b>	<b>80,035,390</b>	<b>41,702,323</b>
Food manufacturing.....	841,460	* 28,206	3,757,269	0	1,335,933	4,023,155	2,615,708
Beverage and tobacco products.....	1,478,132	* 910,106	2,028,576	0	* 1,148,639	3,132,480	806,760
Tobacco manufacturing.....	* 109,013	0	* 278,573	0	* 97,144	* 187,370	* 66,938
Textile mills and textile product mills.....	* 79,699	* 16,142	* 1,606,629	0	* 1,639,444	* 1,160,384	* 1,045,209
Apparel manufacturing.....	* 102,035	* 6,655	* 47,422	0	* 21,635	* 70,897	* 48,526
Leather and allied product manufacturing.....	* 39,349	* 83,752	* 30,714	0	* 94,099	* 99,335	* 90,947
Wood product manufacturing.....	* 35,549	0	* 60,415	0	0	* 81,049	* 39,648
Paper manufacturing.....	* 866,203	* 169	* 1,019,421	0	* 201,910	1,305,532	* 631,313
Printing and related support activities.....	* 26,439	* 12,345	* 18,931	0	* 6,226	32,328	* 24,306
Petroleum and coal products manufacturing.....	407,768	* 23,525	29,953,961	* 31,589,595	* 3,849,116	15,933,521	13,417,343
Chemical manufacturing.....	13,469,612	182,651	14,692,445	0	4,003,947	17,140,211	7,676,297
Pharmaceutical and medicine manufacturing.....	8,736,727	* 48,139	8,843,308	0	1,781,003	10,075,338	4,566,715
Other chemical manufacturing.....	4,732,885	134,512	5,849,137	0	2,222,943	7,064,873	3,109,582
Plastics and rubber products manufacturing.....	147,276	* 834	70,463	0	* 13,906	199,608	53,821
Nonmetallic mineral product manufacturing.....	* 22,410	* 8,072	* 37,236	0	* 4,815	88,479	* 31,670
Primary metal manufacturing.....	* 387,664	* 69,484	* 393,332	0	* 418,080	* 1,104,924	* 436,111
Fabricated metal products.....	454,226	31,492	2,083,373	0	1,668,182	1,982,616	1,512,408
Machinery manufacturing.....	1,328,203	333,173	3,039,146	0	1,350,453	4,055,758	1,439,072
Computer and electronic product manufacturing.....	13,230,545	1,332,721	14,644,598	0	930,271	15,489,074	5,081,924
Electrical equipment, appliance, and component manufacturing.....	2,334,824	49,025	5,647,623	0	260,378	8,372,448	4,197,675
Transportation equipment manufacturing.....	2,351,821	* 246,119	2,789,619	0	385,455	3,518,897	1,274,055
Motor vehicles and related manufacturing.....	2,200,121	* 114	2,422,944	0	* 263,087	2,895,466	976,951
Other transportation equipment manufacturing.....	151,701	* 246,005	366,675	0	* 122,369	623,432	297,104
Furniture and related products.....	* 6,438	* 1,317	* 46,084	0	* 23,764	* 55,988	* 30,180
Miscellaneous manufacturing and manufacturing not allocable.....	1,530,724	* 43,155	1,966,975	0	345,195	2,188,705	1,249,350
<b>Wholesale and retail trade.....</b>	<b>3,693,644</b>	<b>330,549</b>	<b>4,552,475</b>	<b>* 722,830</b>	<b>2,337,779</b>	<b>6,730,598</b>	<b>4,455,555</b>
Wholesale trade.....	2,587,154	223,878	3,735,455	* 722,830	1,630,780	5,524,256	3,624,314
Durable goods.....	1,794,895	62,771	1,089,208	0	259,938	2,281,379	1,731,471
Machinery, equipment, and supplies.....	* 19,528	* 22,081	* 50,446	0	* 24,717	70,533	47,562
Other miscellaneous durable goods.....	1,775,367	40,690	1,038,761	0	235,221	2,210,846	1,683,908
Nondurable goods.....	792,260	161,107	2,646,247	* 722,830	1,370,842	3,242,877	1,892,843
Drugs, chemicals, and allied products.....	416,367	* 30,419	1,614,608	0	* 879,410	1,642,857	1,098,162
Groceries and related products.....	* 30,780	* 22,355	* 63,747	0	* 25,159	100,153	93,827
Petroleum and petroleum products.....	0	0	* 235,264	* 722,830	* 233,921	* 459,809	* 204,561
Other miscellaneous nondurable goods.....	345,113	* 108,334	732,628	0	232,352	1,040,058	496,293

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2003: Total Assets, Income, Taxes, and Credits, and Foreign Income, Taxes, and Credit, by Major and Selected Minor Industry—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Major and selected minor industry of U.S. corporation filing return	Foreign income and taxes—continued						
	Gross income (less loss)—continued					Deductions	
	Rents, royalties, and license fees	Service income	Other income	Oil and gas extraction income [4]	Foreign branch income [4]	Total	Definitely allocable deductions
							Total
	(20)	(21)	(22)	(23)	(24)	(25)	(26)
<b>Wholesale and retail trade—continued</b>							
Retail trade.....	1,106,490	* 106,671	817,021	0	706,999	1,206,342	831,241
Motor vehicle, parts dealers, and gas stations.....	* 197	* 1,468	* 29,781	0	* 5,739	* 14,006	* 12,658
Building materials, garden equipment, and supplies.....	* 25,405	0	* 1,164	0	0	* 6,200	* 639
Food and beverages stores.....	* 51,119	0	* 709	0	0	* 7,452	* 3,642
Apparel and accessory stores.....	176,822	* 902	258,942	0	* 168,154	230,898	166,957
General merchandise stores.....	* 606,734	* 390	* 114,384	0	* 21,169	* 345,010	* 212,716
Miscellaneous retail trade.....	246,213	* 103,910	412,040	0	511,936	602,775	434,629
<b>Transportation and warehousing.....</b>	<b>219,815</b>	<b>5,520,670</b>	<b>4,780,535</b>	<b>0</b>	<b>* 3,982,658</b>	<b>9,225,007</b>	<b>8,123,651</b>
Air, rail, and water transportation.....	* 97,815	* 29,325	* 1,738,531	0	* 238,036	1,750,689	* 849,510
Water transportation.....	0	* 18,249	* 1,686,204	0	* 215,833	* 1,623,914	* 776,040
Air and rail transportation.....	* 97,815	* 11,076	* 52,327	0	* 22,203	* 126,775	* 73,470
Other transportation and warehousing.....	* 122,000	* 5,491,344	3,042,004	0	* 3,744,622	7,474,319	7,274,140
<b>Information.....</b>	<b>16,023,789</b>	<b>1,110,861</b>	<b>10,316,909</b>	<b>0</b>	<b>5,797,453</b>	<b>19,432,627</b>	<b>12,837,770</b>
Publishing, motion picture, and sound recording.....	12,935,148	189,503	5,676,696	0	4,342,884	11,573,768	5,813,156
Broadcasting, Internet publishing.....	* 2,920,694	* 172,300	* 60,760	0	* 21,763	3,009,305	2,704,942
Telecommunications.....	* 57,878	* 724,834	* 4,212,140	0	* 1,085,994	* 4,431,276	* 3,960,327
Internet service providers, Web search portals, and data processing services.....	* 35,450	* 12,566	* 57,305	0	* 2,809	* 85,912	* 63,188
Other information services.....	* 74,619	* 11,658	* 310,009	0	* 344,004	332,365	296,157
<b>Finance, insurance, real estate, and rental and leasing.....</b>	<b>1,013,059</b>	<b>3,113,047</b>	<b>29,924,749</b>	<b>* 89,840</b>	<b>17,593,547</b>	<b>37,426,024</b>	<b>18,324,939</b>
Finance and insurance.....	800,515	3,111,336	29,868,045	* 89,840	17,589,203	37,213,099	18,140,487
Commercial banking and other depository credit agencies.....	0	0	* 123	0	* 902	* 20,559	* 13,534
Commercial banking.....	0	0	* 45	0	* 902	* 7,179	* 179
Depository credit agencies other than banks.....	0	0	* 78	0	0	* 13,380	* 13,356
Nondepository credit intermediation.....	* 44,388	* 823,753	* 5,449,985	* 89,840	* 2,897,507	7,022,028	3,637,446
Securities, commodity contracts, and other.....	* 39,813	709,945	5,812,901	0	* 713,729	9,743,310	4,426,812
Insurance and related activities.....	* 715,396	1,577,406	18,544,080	0	13,977,065	20,148,509	10,039,601
Insurance agencies and brokerages.....	0	* 54,193	* 694,117	0	* 750,406	* 682,337	* 530,421
Funds, trusts, and other financial vehicles.....	* 919	* 231	* 60,956	0	0	278,693	23,094
Real estate and rental and leasing.....	212,543	* 1,711	* 56,704	0	* 4,345	212,925	184,452
Real estate.....	* 29,495	* 208	* 52,359	0	0	51,524	27,267
Rentals and leasing.....	183,048	* 1,503	* 4,345	0	* 4,345	* 161,402	* 157,185
<b>Services.....</b>	<b>5,422,563</b>	<b>6,010,301</b>	<b>22,690,123</b>	<b>* 263,833</b>	<b>33,037,856</b>	<b>43,649,491</b>	<b>18,817,021</b>
Professional, scientific, and technical services.....	1,243,445	3,879,157	3,266,351	0	5,127,547	7,216,168	5,949,167
Management of holding companies.....	2,303,798	1,215,925	16,034,621	* 263,833	24,764,012	31,326,232	9,172,153
Administrative and support and waste management and remediation.....	231,394	533,887	477,448	0	707,185	823,787	442,191
Education services, health care, and social assistance.....	* 36,787	* 99,452	* 21,845	0	* 23,565	130,536	104,156
Arts, entertainment, and recreation.....	* 100,172	* 189,286	* 216,480	0	* 24,399	* 344,052	* 284,960
Accommodation and food services.....	1,455,363	79,781	2,547,413	0	2,264,835	3,650,020	2,726,711
Accommodation.....	* 108,592	* 45,265	* 771,080	0	* 718,278	* 1,084,103	* 985,388
Food services and drinking places.....	1,346,771	* 34,517	1,776,333	0	* 1,546,558	2,565,916	1,741,324
Other services.....	* 51,604	* 12,813	* 125,965	0	* 126,313	158,696	* 137,683
Repair and maintenance services.....	* 607	* 7,140	* 620	0	* 7,021	* 6,785	* 6,752
Personal services, religious, grantmaking, civic, professional, etc.....	* 50,997	* 5,673	* 125,345	0	* 119,292	* 151,910	* 130,931

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2003: Total Assets, Income, Taxes, and Credits, and Foreign Income, Taxes, and Credit, by Major and Selected Minor Industry—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Major and selected minor industry of U.S. corporation filing return	Foreign income and taxes—continued					
	Deductions—continued					
	Definitely allocable deductions—continued				Deductions not allocable to specific types of income	
	Depreciation, depletion, and amortization	Other expenses	Service expenses	Other definitely allocable deductions	Total	Research and development
(27)	(28)	(29)	(30)	(31)	(32)	
<b>All industries.....</b>	<b>1,325,193</b>	<b>3,538,638</b>	<b>12,719,342</b>	<b>90,546,193</b>	<b>93,226,238</b>	<b>11,961,592</b>
<b>Agriculture, forestry, fishing, and hunting.....</b>	<b>0</b>	<b>* 63</b>	<b>0</b>	<b>* 65,482</b>	<b>* 29,520</b>	<b>* 4,778</b>
<b>Mining.....</b>	<b>* 27,335</b>	<b>* 54,135</b>	<b>* 113,441</b>	<b>3,141,503</b>	<b>883,410</b>	<b>* 11,208</b>
Oil and gas extraction.....	* 16,201	0	* 5,165	660,735	155,789	* 270
Coal mining and metal ore mining.....	* 1,777	* 52,579	* 20,300	* 1,499,510	* 458,313	0
Nonmetallic minerals.....	0	* 53	0	* 82,210	* 10,780	0
Support activities for mining.....	* 9,357	* 1,504	* 87,976	* 899,049	258,527	* 10,938
<b>Utilities.....</b>	<b>0</b>	<b>0</b>	<b>* 1,954</b>	<b>* 8,643</b>	<b>* 67,290</b>	<b>0</b>
<b>Construction.....</b>	<b>* 1,096</b>	<b>* 5,903</b>	<b>* 407,307</b>	<b>* 41,245</b>	<b>8,140</b>	<b>* 256</b>
Building, developing, and general contracting.....	0	0	0	* 672	* 1,339	0
Heavy construction.....	* 1,096	* 5,903	* 382,864	* 34,093	* 5,386	* 97
Special trade contractors.....	0	0	* 24,444	* 6,480	* 1,415	* 159
<b>Manufacturing.....</b>	<b>250,030</b>	<b>358,474</b>	<b>1,172,539</b>	<b>39,921,281</b>	<b>38,333,067</b>	<b>9,609,193</b>
Food manufacturing.....	* 259	* 18,774	* 135	2,596,540	1,407,447	* 85,548
Beverage and tobacco products.....	* 814	* 27,744	* 2,381	* 775,821	2,325,719	* 2,091
Tobacco manufacturing.....	0	* 1,109	0	* 65,828	* 120,432	* 620
Textile mills and textile product mills.....	* 16,178	* 2,310	* 6,835	* 1,019,885	* 115,175	* 12,470
Apparel manufacturing.....	* 1,989	* 16,132	* 3,649	* 26,756	* 22,370	0
Leather and allied product manufacturing.....	0	0	* 85,059	* 5,888	* 8,388	* 2,878
Wood product manufacturing.....	0	* 17	0	* 39,632	* 41,401	* 530
Paper manufacturing.....	0	* 187	* 31	* 631,094	674,219	* 239,545
Printing and related support activities.....	* 68	* 2,221	* 10,868	* 11,149	* 8,022	* 1,840
Petroleum and coal products manufacturing.....	0	* 100,465	* 4,686	13,312,192	2,516,179	* 138,087
Chemical manufacturing.....	0	3,048	17,580	7,655,669	9,463,915	4,260,657
Pharmaceutical and medicine manufacturing.....	0	* 960	0	4,565,755	5,508,623	3,274,523
Other chemical manufacturing.....	0	* 2,088	17,580	3,089,914	3,955,291	986,134
Plastics and rubber products manufacturing.....	* 34	* 6,715	* 18	47,055	145,786	* 14,730
Nonmetallic mineral product manufacturing.....	0	* 2,622	* 5,289	* 23,758	56,809	* 3,238
Primary metal manufacturing.....	* 220,176	* 2,074	* 22,531	* 191,330	* 668,814	* 44,808
Fabricated metal products.....	* 4,182	* 13,642	* 3,493	1,491,090	470,209	89,677
Machinery manufacturing.....	* 482	* 5,857	257,127	1,175,605	2,616,686	286,117
Computer and electronic product manufacturing.....	* 497	52,957	732,314	4,296,156	10,407,150	3,650,717
Electrical equipment, appliance, and component manufacturing.....	* 2,498	* 44,287	* 13,201	4,137,689	4,174,774	259,613
Transportation equipment manufacturing.....	* 2,851	* 18,534	* 131	1,252,539	2,244,842	332,807
Motor vehicles and related manufacturing.....	* 2,851	* 13,312	* 129	960,659	1,918,514	272,235
Other transportation equipment manufacturing.....	0	* 5,222	* 2	* 291,880	326,328	60,572
Furniture and related products.....	* 1	0	* 635	* 29,544	* 25,808	* 3,221
Miscellaneous manufacturing and manufacturing not allocable.....	0	* 40,886	* 6,575	1,201,888	939,356	180,615
<b>Wholesale and retail trade.....</b>	<b>37,101</b>	<b>132,511</b>	<b>64,534</b>	<b>4,221,409</b>	<b>2,275,043</b>	<b>85,579</b>
Wholesale trade.....	29,519	60,089	59,492	3,475,213	1,899,942	82,225
Durable goods.....	* 2,652	20,747	30,977	1,677,095	549,908	4,836
Machinery, equipment, and supplies.....	* 2,370	* 2,427	* 10,165	* 32,600	* 22,971	0
Other miscellaneous durable goods.....	* 282	18,320	* 20,812	1,644,494	526,938	4,836
Nondurable goods.....	26,868	39,342	28,515	1,798,118	1,350,033	77,389
Drugs, chemicals, and allied products.....	* 9,895	* 1,858	* 5,200	1,081,208	544,695	* 56,010
Groceries and related products.....	* 12,562	* 17,164	* 13,609	* 50,493	* 6,326	0
Petroleum and petroleum products.....	0	0	0	* 204,561	* 255,248	0
Other miscellaneous nondurable goods.....	* 4,411	* 20,320	* 9,706	461,856	543,764	* 21,379

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2003: Total Assets, Income, Taxes, and Credits, and Foreign Income, Taxes, and Credit, by Major and Selected Minor Industry—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Major and selected minor industry of U.S. corporation filing return	Foreign income and taxes—continued					
	Deductions—continued					
	Definitely allocable deductions—continued				Deductions not allocable to specific types of income	
	Depreciation, depletion, and amortization	Other expenses	Service expenses	Other definitely allocable deductions	Total	Research and development
(27)	(28)	(29)	(30)	(31)	(32)	
<b>Wholesale and retail trade—continued</b>						
Retail trade.....	* 7,581	72,422	* 5,042	746,196	375,101	* 3,354
Motor vehicle, parts dealers, and gas stations.....	0	* 345	* 961	* 11,352	* 1,347	0
Building materials, garden equipment, and supplies.....	0	* 36	0	* 603	* 5,561	0
Food and beverages stores.....	0	* 3,163	0	* 478	* 3,811	0
Apparel and accessory stores.....	* 874	* 39,989	* 647	* 125,446	63,942	* 2,463
General merchandise stores.....	0	0	0	* 212,716	* 132,294	0
Miscellaneous retail trade.....	* 6,707	* 28,888	* 3,434	395,600	168,146	* 891
<b>Transportation and warehousing.....</b>	<b>* 2,048</b>	<b>* 74,105</b>	<b>4,774,268</b>	<b>3,273,229</b>	<b>1,101,357</b>	<b>* 24,580</b>
Air, rail, and water transportation.....	0	* 38,510	* 23,620	* 787,380	* 901,179	* 1,516
Water transportation.....	0	0	* 14,262	* 761,778	* 847,874	0
Air and rail transportation.....	0	* 38,510	* 9,357	* 25,602	* 53,305	* 1,516
Other transportation and warehousing.....	* 2,048	* 35,595	* 4,750,648	2,485,849	200,178	* 23,064
<b>Information.....</b>	<b>* 205,634</b>	<b>2,204,246</b>	<b>684,431</b>	<b>9,743,460</b>	<b>6,594,856</b>	<b>1,823,992</b>
Publishing, motion picture, and sound recording.....	* 15,189	111,540	72,471	5,613,957	5,760,612	1,791,115
Broadcasting, Internet publishing.....	* 190,445	* 2,086,464	* 99,373	* 328,658	* 304,363	* 6,702
Telecommunications.....	0	0	* 505,578	* 3,454,750	* 470,949	* 20,148
Internet service providers, Web search portals, and data processing services.....	0	* 6,242	* 2,137	* 54,810	* 22,723	* 1,982
Other information services.....	0	0	* 4,872	* 291,285	* 36,209	* 4,046
<b>Finance, insurance, real estate, and rental and leasing...</b>	<b>55,502</b>	<b>311,731</b>	<b>1,880,003</b>	<b>16,077,704</b>	<b>19,101,086</b>	<b>* 11,734</b>
Finance and insurance.....	* 5,209	189,096	1,879,554	16,066,628	19,072,612	* 11,734
Commercial banking and other depository credit agencies.....	0	* 295	0	* 13,239	* 7,025	0
Commercial banking.....	0	0	0	* 179	* 7,000	0
Depository credit agencies other than banks.....	0	* 295	0	* 13,061	* 25	0
Nondepository credit intermediation.....	* 3,282	* 13,212	* 686,946	* 2,934,006	* 3,384,582	* 5,380
Securities, commodity contracts, and other.....	* 1,908	* 141,393	* 428,848	3,854,663	5,316,498	* 1,967
Insurance and related activities.....	* 18	* 34,122	763,760	9,241,701	10,108,908	* 4,387
Insurance agencies and brokerages.....	0	* 8	0	* 530,413	* 151,915	0
Funds, trusts, and other financial vehicles.....	0	* 75	0	* 23,019	* 255,599	0
Real estate and rental and leasing.....	* 50,293	* 122,635	* 449	11,075	* 28,473	0
Real estate.....	* 3,388	* 22,417	* 426	* 1,036	* 24,257	0
Rentals and leasing.....	* 46,905	* 100,217	* 23	* 10,040	* 4,216	0
<b>Services.....</b>	<b>746,448</b>	<b>397,471</b>	<b>3,620,865</b>	<b>14,052,238</b>	<b>24,832,470</b>	<b>390,273</b>
Professional, scientific, and technical services.....	* 61,444	255,254	2,970,401	2,662,068	1,267,002	239,491
Management of holding companies.....	* 679,631	28,046	* 200,780	8,263,697	22,154,079	* 129,236
Administrative and support and waste management and remediation.....	* 207	* 32,884	* 306,467	102,634	381,596	* 13,569
Education services, health care, and social assistance.....	0	* 15	* 40,304	* 63,837	26,381	* 650
Arts, entertainment, and recreation.....	* 3,558	* 45,480	* 85,968	* 149,954	* 59,092	* 7,073
Accommodation and food services.....	* 1,608	* 26,738	* 8,027	2,690,338	923,308	* 253
Accommodation.....	0	0	0	* 985,388	* 98,716	0
Food services and drinking places.....	* 1,608	* 26,738	* 8,027	1,704,951	824,593	* 253
Other services.....	0	* 9,054	* 8,919	* 119,710	* 21,013	0
Repair and maintenance services.....	0	* 3,505	* 3,246	0	* 34	0
Personal services, religious, grantmaking, civic, professional, etc.....	0	* 5,549	* 5,673	* 119,710	* 20,979	0

Footnotes at end of table.



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**Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2003: Total Assets, Income, Taxes, and Credits, and Foreign Income, Taxes, and Credit, by Major and Selected Minor Industry—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Major and selected minor industry of U.S. corporation filing return	Foreign income and taxes—continued					
	Deductions—continued			Taxable income (less loss) before adjustments	Adjustments to taxable income	Taxable income (less loss) after adjustments
	Deductions not allocable to specific types of income—continued		Deductions from oil and gas extraction income [5]			
	Interest	Other				
(33)	(34)	(35)	(36)	(37)	(38)	
<b>All industries.....</b>	<b>32,120,658</b>	<b>47,669,031</b>	<b>9,990,089</b>	<b>205,129,663</b>	<b>21,714,709</b>	<b>183,335,583</b>
<b>Agriculture, forestry, fishing, and hunting.....</b>	<b>* 14,577</b>	<b>* 10,108</b>	<b>0</b>	<b>119,177</b>	<b>* 30,535</b>	<b>88,642</b>
<b>Mining.....</b>	<b>363,336</b>	<b>493,999</b>	<b>731,591</b>	<b>4,162,483</b>	<b>275,273</b>	<b>3,885,887</b>
Oil and gas extraction.....	* 116,028	* 34,508	730,571	1,844,436	* 36,274	1,808,162
Coal mining and metal ore mining.....	* 181,477	* 276,836	* 1,020	* 1,253,289	* 46,130	* 1,207,177
Nonmetallic minerals.....	* 897	0	0	* 93,371	0	* 93,371
Support activities for mining.....	64,934	* 182,655	0	971,387	* 192,869	777,178
<b>Utilities.....</b>	<b>* 42,977</b>	<b>* 24,314</b>	<b>0</b>	<b>* 249,302</b>	<b>* 827</b>	<b>* 248,475</b>
<b>Construction.....</b>	<b>* 3,458</b>	<b>* 3,573</b>	<b>0</b>	<b>89,711</b>	<b>* 3,882</b>	<b>85,828</b>
Building, developing, and general contracting.....	* 237	* 1,102	0	32,214	* 2,604	29,610
Heavy construction.....	* 2,395	* 2,147	0	24,492	* 1,278	23,214
Special trade contractors.....	* 827	* 324	0	33,004	0	33,004
<b>Manufacturing.....</b>	<b>13,385,468</b>	<b>15,138,407</b>	<b>* 8,993,993</b>	<b>133,022,496</b>	<b>16,467,081</b>	<b>116,492,468</b>
Food manufacturing.....	1,008,301	307,465	0	7,530,988	370,990	7,165,863
Beverage and tobacco products.....	439,442	* 1,880,496	0	4,275,367	* 109,286	4,164,806
Tobacco manufacturing.....	* 4,485	* 115,327	0	* 222,882	0	* 222,882
Textile mills and textile product mills.....	* 84,124	* 18,580	0	* 1,196,171	* 17,304	* 1,178,925
Apparel manufacturing.....	* 18,141	* 1,043	0	207,668	* 35,250	172,419
Leather and allied product manufacturing.....	* 2,580	* 2,930	0	* 65,769	* 306	* 65,463
Wood product manufacturing.....	* 38,942	* 1,929	0	245,637	* 684	244,953
Paper manufacturing.....	208,970	* 224,920	0	1,888,142	* 6,050	1,882,047
Printing and related support activities.....	* 777	* 2,163	0	46,145	* 2,695	43,450
Petroleum and coal products manufacturing.....	1,732,641	* 645,209	* 8,993,993	38,973,262	* 12,092	38,940,873
Chemical manufacturing.....	2,737,046	2,446,402	0	33,334,330	4,574,901	28,756,611
Pharmaceutical and medicine manufacturing.....	1,047,307	1,171,421	0	22,292,155	3,730,963	18,537,651
Other chemical manufacturing.....	1,689,739	1,274,981	0	11,042,175	843,938	10,218,960
Plastics and rubber products manufacturing.....	103,581	26,893	0	378,121	37,405	341,732
Nonmetallic mineral product manufacturing.....	* 35,174	* 10,079	0	84,086	* 2,704	82,013
Primary metal manufacturing.....	* 470,583	* 152,842	0	1,400,999	* 278,951	1,115,663
Fabricated metal products.....	216,935	158,064	0	2,034,082	17,534	2,014,423
Machinery manufacturing.....	746,683	1,539,642	0	3,216,975	437,845	2,756,166
Computer and electronic product manufacturing.....	679,693	6,001,685	0	20,490,478	4,786,452	15,700,898
Electrical equipment, appliance, and component manufacturing.....	2,975,970	937,152	0	5,568,279	864,005	4,702,230
Transportation equipment manufacturing.....	1,657,688	246,292	0	9,168,609	4,560,042	4,599,092
Motor vehicles and related manufacturing.....	1,475,254	170,692	0	7,778,785	* 4,553,205	3,216,106
Other transportation equipment manufacturing.....	182,434	75,600	0	1,389,823	* 6,837	1,382,986
Furniture and related products.....	* 14,469	* 7,702	0	68,011	* 3,223	64,893
Miscellaneous manufacturing and manufacturing not allocable.....	213,731	526,920	0	2,849,376	349,363	2,499,946
<b>Wholesale and retail trade.....</b>	<b>766,507</b>	<b>1,293,823</b>	<b>* 237,654</b>	<b>7,324,924</b>	<b>750,809</b>	<b>6,595,876</b>
Wholesale trade.....	578,643	1,147,129	* 237,654	5,486,778	694,161	4,814,378
Durable goods.....	60,566	442,642	0	1,045,677	528,234	517,444
Machinery, equipment, and supplies.....	* 1,855	* 600	0	41,668	* 821	40,847
Other miscellaneous durable goods.....	58,710	442,042	0	1,004,010	527,413	476,597
Nondurable goods.....	518,077	704,487	* 237,654	4,441,100	165,927	4,296,934
Drugs, chemicals, and allied products.....	90,473	380,892	0	866,040	* 32,924	833,119
Groceries and related products.....	* 825	* 22	0	20,184	* 2,127	18,057
Petroleum and petroleum products.....	* 204,139	* 48,273	* 237,654	564,105	* 23,057	563,024
Other miscellaneous nondurable goods.....	222,640	275,300	0	2,990,771	107,819	2,882,734

Footnotes at end of table.

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**Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2003: Total Assets, Income, Taxes, and Credits, and Foreign Income, Taxes, and Credit, by Major and Selected Minor Industry—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Major and selected minor industry of U.S. corporation filing return	Foreign income and taxes—continued					
	Deductions—continued			Taxable income (less loss) before adjustments	Adjustments to taxable income	Taxable income (less loss) after adjustments
	Deductions not allocable to specific types of income—continued		Deductions from oil and gas extraction income [5]			
	Interest	Other				
(33)	(34)	(35)	(36)	(37)	(38)	
<b>Wholesale and retail trade—continued</b>						
Retail trade.....	187,863	146,694	0	1,838,146	56,648	1,781,498
Motor vehicle, parts dealers, and gas stations.....	* 484	* 471	0	34,462	* 318	34,145
Building materials, garden equipment, and supplies.....	* 5,020	* 542	0	* 49,566	0	* 49,566
Food and beverages stores.....	* 2,887	0	0	* 49,358	0	* 49,358
Apparel and accessory stores.....	* 29,026	* 10,457	0	568,054	* 5,244	562,810
General merchandise stores.....	* 128,272	* 4,022	0	* 694,376	0	* 694,376
Miscellaneous retail trade.....	22,176	131,203	0	442,330	* 51,087	391,243
<b>Transportation and warehousing.....</b>	<b>107,190</b>	<b>965,829</b>	<b>0</b>	<b>1,929,786</b>	<b>85,085</b>	<b>1,833,480</b>
Air, rail, and water transportation.....	* 29,303	* 870,244	0	429,291	* 80,477	337,594
Water transportation.....	* 5,934	* 841,875	0	* 273,266	* 64,715	* 208,551
Air and rail transportation.....	* 23,369	* 28,369	0	* 156,025	* 15,762	* 129,043
Other transportation and warehousing.....	77,888	* 95,585	0	1,500,494	* 4,608	1,495,886
<b>Information.....</b>	<b>607,621</b>	<b>3,960,336</b>	<b>0</b>	<b>11,997,693</b>	<b>961,550</b>	<b>11,016,154</b>
Publishing, motion picture, and sound recording.....	199,160	3,732,249	0	9,659,686	726,001	8,933,740
Broadcasting, Internet publishing.....	* 181,952	* 111,458	0	695,205	[3]	695,205
Telecommunications.....	* 215,905	* 74,603	0	1,358,096	* 208,397	1,129,654
Internet service providers, Web search portals, and data processing services.....	* 4,548	* 16,194	0	* 35,583	0	* 35,583
Other information services.....	* 6,057	* 25,832	0	249,124	* 27,152	221,972
<b>Finance, insurance, real estate, and rental and leasing...</b>	<b>6,717,266</b>	<b>11,838,757</b>	<b>0</b>	<b>26,916,844</b>	<b>2,230,152</b>	<b>24,679,802</b>
Finance and insurance.....	6,717,205	11,814,607	0	26,809,305	2,208,550	24,601,073
Commercial banking and other depository credit agencies.....	* 3,342	* 2,465	0	42,979	0	42,979
Commercial banking.....	* 3,317	* 2,465	0	* 13,652	0	* 13,652
Depository credit agencies other than banks.....	* 25	[3]	0	29,327	0	29,327
Nondepository credit intermediation.....	* 547,857	* 2,358,201	0	1,279,456	* 347	1,279,193
Securities, commodity contracts, and other.....	4,149,738	1,159,284	0	7,656,159	* 1,649,185	6,006,973
Insurance and related activities.....	1,817,461	8,237,864	0	16,566,027	543,500	16,022,760
Insurance agencies and brokerages.....	* 140,431	* 11,484	0	877,789	0	877,789
Funds, trusts, and other financial vehicles.....	* 198,808	* 56,792	0	1,264,684	* 15,517	1,249,167
Real estate and rental and leasing.....	* 61	* 24,150	0	107,539	* 21,602	78,730
Real estate.....	* 61	* 24,150	0	70,704	* 21,168	49,536
Rentals and leasing.....	0	0	0	36,835	* 434	29,194
<b>Services.....</b>	<b>10,112,257</b>	<b>13,939,885</b>	<b>* 26,850</b>	<b>19,317,248</b>	<b>909,515</b>	<b>18,408,971</b>
Professional, scientific, and technical services.....	256,768	718,356	0	2,238,836	584,068	1,653,874
Management of holding companies.....	9,315,875	12,400,722	* 26,850	14,402,311	175,287	14,225,387
Administrative and support and waste management and remediation.....	63,839	* 301,390	0	676,269	* 48,652	627,573
Education services, health care, and social assistance.....	* 17,048	* 4,614	0	81,754	* 26,932	54,823
Arts, entertainment, and recreation.....	* 13,413	* 29,993	0	179,497	* 37,816	141,681
Accommodation and food services.....	430,318	* 480,242	0	1,277,733	36,679	1,244,865
Accommodation.....	* 66,414	* 31,259	0	162,180	* 1,419	161,453
Food services and drinking places.....	363,904	* 448,983	0	1,115,554	* 35,260	1,083,413
Other services.....	* 14,995	* 4,568	0	460,848	* 81	460,767
Repair and maintenance services.....	* 8	* 26	0	* 2,733	* 81	* 2,651
Personal services, religious, grantmaking, civic, professional, etc.....	* 14,987	* 4,542	0	458,116	[3]	458,116

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2003: Total Assets, Income, Taxes, and Credits, and Foreign Income, Taxes, and Credit, by Major and Selected Minor Industry—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Major and selected minor industry of U.S. corporation filing return	Foreign income and taxes—continued					
	Foreign taxes available for credit					
	Total	Reduction for certain foreign taxes	Carryover	Total paid, accrued, and deemed paid	Foreign taxes paid or accrued	
					Total	Taxes withheld at source on:
					Dividends	
	(39)	(40)	(41)	(42)	(43)	(44)
<b>All industries.....</b>	<b>64,504,758</b>	<b>2,607,690</b>	<b>15,475,018</b>	<b>51,637,430</b>	<b>20,572,435</b>	<b>1,772,683</b>
<b>Agriculture, forestry, fishing, and hunting.....</b>	<b>54,679</b>	<b>0</b>	<b>* 8,482</b>	<b>46,197</b>	<b>4,756</b>	<b>452</b>
<b>Mining.....</b>	<b>1,987,968</b>	<b>140,618</b>	<b>610,477</b>	<b>1,518,109</b>	<b>1,188,784</b>	<b>88,674</b>
Oil and gas extraction.....	637,048	72,507	112,443	597,112	443,438	5,470
Coal mining and metal ore mining.....	* 939,048	* 62,661	* 417,749	* 583,961	* 543,960	* 81,898
Nonmetallic minerals.....	* 71,957	* 5,450	* 52,571	* 24,836	* 12,018	* 494
Support activities for mining.....	339,915	0	* 27,714	312,201	189,369	* 813
<b>Utilities.....</b>	<b>* 55,640</b>	<b>0</b>	<b>* 3,249</b>	<b>* 52,391</b>	<b>* 3,115</b>	<b>* 1,320</b>
<b>Construction.....</b>	<b>45,178</b>	<b>0</b>	<b>19,938</b>	<b>25,240</b>	<b>12,271</b>	<b>1,051</b>
Building, developing, and general contracting.....	15,788	0	* 10,828	4,961	1,373	379
Heavy construction.....	15,366	0	* 7,981	7,385	7,241	40
Special trade contractors.....	14,024	0	* 1,130	12,895	3,657	* 633
<b>Manufacturing.....</b>	<b>44,399,581</b>	<b>2,275,008</b>	<b>11,819,748</b>	<b>34,854,841</b>	<b>11,575,430</b>	<b>951,574</b>
Food manufacturing.....	2,302,925	0	263,481	2,039,444	325,498	187,522
Beverage and tobacco products.....	1,181,759	* 430	* 8,415	1,173,773	304,550	* 43,281
Tobacco manufacturing.....	* 52,912	0	0	* 52,912	* 47,331	* 1,495
Textile mills and textile product mills.....	* 96,999	0	* 3,682	* 93,317	* 29,431	* 5,759
Apparel manufacturing.....	50,693	0	* 2,523	48,170	* 13,129	* 528
Leather and allied product manufacturing.....	* 10,059	0	* 2,067	* 7,992	* 5,030	* 778
Wood product manufacturing.....	94,376	0	* 31,721	62,655	11,302	* 7,875
Paper manufacturing.....	599,431	* 54	* 144,131	455,354	120,461	* 9,954
Printing and related support activities.....	15,852	0	* 6,855	8,997	2,600	* 352
Petroleum and coal products manufacturing.....	19,446,474	* 2,251,582	6,756,306	14,941,750	6,918,038	* 94,686
Chemical manufacturing.....	9,171,546	0	1,733,906	7,437,640	1,372,983	324,398
Pharmaceutical and medicine manufacturing.....	5,466,514	0	632,270	4,834,245	772,524	242,941
Other chemical manufacturing.....	3,705,031	0	1,101,636	2,603,395	600,459	81,456
Plastics and rubber products manufacturing.....	145,470	* 23	23,192	122,301	19,196	6,532
Nonmetallic mineral product manufacturing.....	25,659	0	* 5,868	19,791	7,330	* 577
Primary metal manufacturing.....	527,495	* 22,278	* 93,577	456,196	128,148	* 7,017
Fabricated metal products.....	733,907	0	106,982	626,925	197,988	26,279
Machinery manufacturing.....	1,407,185	* 57	477,341	929,901	220,079	29,561
Computer and electronic product manufacturing.....	4,486,263	* 583	1,697,092	2,789,755	1,037,165	105,226
Electrical equipment, appliance, and component manufacturing.....	999,333	0	58,710	940,623	428,180	8,077
Transportation equipment manufacturing.....	2,400,064	0	219,641	2,180,423	284,087	65,505
Motor vehicles and related manufacturing.....	1,724,802	0	62,981	1,661,821	207,548	* 58,239
Other transportation equipment manufacturing.....	675,262	0	* 156,661	518,602	76,538	* 7,267
Furniture and related products.....	40,978	0	* 20,928	20,050	3,400	* 2,552
Miscellaneous manufacturing and manufacturing not allocable.....	663,114	0	163,329	499,785	146,833	25,117
<b>Wholesale and retail trade.....</b>	<b>2,273,871</b>	<b>* 166,207</b>	<b>490,112</b>	<b>1,949,966</b>	<b>497,920</b>	<b>53,612</b>
Wholesale trade.....	1,738,645	* 166,207	397,863	1,506,989	323,960	37,126
Durable goods.....	252,820	[3]	51,148	201,671	103,885	5,347
Machinery, equipment, and supplies.....	12,236	0	* 4,732	7,504	6,413	* 165
Other miscellaneous durable goods.....	240,583	[3]	46,416	194,167	97,473	5,182
Nondurable goods.....	1,485,826	* 166,207	346,715	1,305,318	220,074	31,779
Drugs, chemicals, and allied products.....	274,055	* 2,663	79,383	197,335	75,817	10,809
Groceries and related products.....	6,055	0	* 1,312	4,744	4,192	[3]
Petroleum and petroleum products.....	255,910	* 163,430	* 166,073	253,267	* 9,148	* 1,189
Other miscellaneous nondurable goods.....	949,806	* 114	99,948	849,972	130,916	19,780

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2003: Total Assets, Income, Taxes, and Credits, and Foreign Income, Taxes, and Credit, by Major and Selected Minor Industry—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Major and selected minor industry of U.S. corporation filing return	Foreign income and taxes—continued					
	Foreign taxes available for credit					
	Total	Reduction for certain foreign taxes	Carryover	Total paid, accrued, and deemed paid	Foreign taxes paid or accrued	
					Total	Taxes withheld at source on:
					Dividends	
	(39)	(40)	(41)	(42)	(43)	(44)
<b>Wholesale and retail trade—continued</b>						
Retail trade.....	535,226	0	92,249	442,977	173,961	16,486
Motor vehicle, parts dealers, and gas stations.....	14,202	0	* 2,839	11,362	4,832	* 21
Building materials, garden equipment, and supplies.....	* 10,745	0	* 1,198	* 9,547	* 9,547	* 1
Food and beverages stores.....	* 15,480	0	* 8,889	* 6,591	* 6,170	* 1
Apparel and accessory stores.....	112,809	0	* 11,907	100,903	73,018	* 1,129
General merchandise stores.....	* 202,472	0	* 92	* 202,380	* 16,865	* 600
Miscellaneous retail trade.....	179,517	0	67,323	112,194	63,529	14,733
<b>Transportation and warehousing.....</b>	<b>262,101</b>	<b>0</b>	<b>61,884</b>	<b>200,217</b>	<b>96,931</b>	<b>11,023</b>
Air, rail, and water transportation.....	96,329	0	* 42,375	53,954	18,579	* 5,572
Water transportation.....	* 15,268	0	* 3,057	* 12,211	* 10,243	* 5,572
Air and rail transportation.....	* 81,062	0	* 39,318	* 41,743	* 8,336	0
Other transportation and warehousing.....	165,772	0	19,508	146,263	78,351	5,451
<b>Information.....</b>	<b>2,680,687</b>	<b>* 743</b>	<b>251,673</b>	<b>2,429,758</b>	<b>1,552,307</b>	<b>54,805</b>
Publishing, motion picture, and sound recording.....	1,956,685	* 743	124,599	1,832,829	1,334,848	32,747
Broadcasting, Internet publishing.....	361,551	0	* 62,209	299,341	166,603	* 16,755
Telecommunications.....	263,826	0	* 36,951	226,874	40,644	* 1,471
Internet service providers, Web search portals, and data processing services.....	* 7,048	0	0	* 7,048	* 2,293	* 473
Other information services.....	91,579	0	* 27,914	63,665	7,920	* 3,359
<b>Finance, insurance, real estate, and rental and leasing...</b>	<b>5,897,939</b>	<b>0</b>	<b>1,158,881</b>	<b>4,739,057</b>	<b>2,639,868</b>	<b>216,118</b>
Finance and insurance.....	5,866,368	0	1,144,178	4,722,189	2,627,085	213,741
Commercial banking and other depository credit agencies.....	15,234	0	0	15,234	15,226	28
Commercial banking.....	* 5,961	0	0	* 5,961	* 5,961	[3]
Depository credit agencies other than banks.....	9,273	0	0	9,273	9,264	27
Nondepository credit intermediation.....	303,261	0	23,142	280,119	176,335	* 6,883
Securities, commodity contracts, and other.....	1,752,863	0	214,289	1,538,574	542,734	107,819
Insurance and related activities.....	3,407,338	0	893,862	2,513,476	1,603,312	98,581
Insurance agencies and brokerages.....	336,660	0	* 59,140	277,520	64,146	* 18,841
Funds, trusts, and other financial vehicles.....	387,672	0	* 12,885	374,786	289,478	* 430
Real estate and rental and leasing.....	31,571	0	14,703	16,868	12,783	2,376
Real estate.....	18,073	0	6,973	11,100	7,112	161
Rentals and leasing.....	13,498	0	* 7,730	5,768	5,671	* 2,215
<b>Services.....</b>	<b>6,847,114</b>	<b>* 25,114</b>	<b>1,050,575</b>	<b>5,821,653</b>	<b>3,001,052</b>	<b>394,054</b>
Professional, scientific, and technical services.....	847,541	* 97	338,170	509,468	281,550	16,100
Management of holding companies.....	4,943,476	* 25,004	480,377	4,488,103	2,216,982	363,563
Administrative and support and waste management and remediation.....	180,015	0	40,574	139,441	97,217	5,243
Education services, health care, and social assistance.....	31,920	0	* 13,715	18,205	8,005	* 732
Arts, entertainment, and recreation.....	49,898	0	* 2,925	46,973	40,273	* 319
Accommodation and food services.....	606,826	0	162,149	444,678	348,006	5,649
Accommodation.....	77,687	0	* 37,239	40,448	27,452	* 308
Food services and drinking places.....	529,140	0	124,910	404,230	320,553	* 5,342
Other services.....	187,438	* 14	* 12,666	174,785	9,020	* 2,449
Repair and maintenance services.....	* 380	* 14	0	* 394	* 394	* 1
Personal services, religious, grantmaking, civic, professional, etc.....	187,057	0	* 12,666	174,391	* 8,626	* 2,449

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2003: Total Assets, Income, Taxes, and Credits, and Foreign Income, Taxes, and Credit, by Major and Selected Minor Industry—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Major and selected minor industry of U.S. corporation filing return	Foreign income and taxes—continued						
	Foreign taxes available for credit—continued						
	Foreign taxes paid or accrued—continued						Taxes deemed paid
	Taxes withheld at source on—continued		Other taxes paid or accrued on:				
	Interest	Rents, royalties, and license fees	Branch income	Specifically allocable income (section 863(b))	Service income	Other income	
(45)	(46)	(47)	(48)	(49)	(50)	(51)	
<b>All industries.....</b>	<b>744,888</b>	<b>2,797,998</b>	<b>5,035,070</b>	<b>77,612</b>	<b>333,466</b>	<b>9,810,717</b>	<b>31,064,995</b>
<b>Agriculture, forestry, fishing, and hunting.....</b>	<b>* 10</b>	<b>* 971</b>	<b>* 2,426</b>	<b>0</b>	<b>* 10</b>	<b>* 888</b>	<b>* 41,441</b>
<b>Mining.....</b>	<b>13,626</b>	<b>* 5,913</b>	<b>292,696</b>	<b>0</b>	<b>* 8,957</b>	<b>778,917</b>	<b>329,325</b>
Oil and gas extraction.....	* 469	* 107	* 6,515	0	* 2,290	428,586	* 153,674
Coal mining and metal ore mining.....	* 11,016	* 3,266	* 106,440	0	* 1,713	* 339,628	* 40,001
Nonmetallic minerals.....	* 1,421	* 39	0	0	0	* 10,065	* 12,818
Support activities for mining.....	* 720	* 2,501	* 179,741	0	* 4,955	* 639	* 122,832
<b>Utilities.....</b>	<b>* 127</b>	<b>* 657</b>	<b>* 998</b>	<b>0</b>	<b>* 0</b>	<b>* 13</b>	<b>* 49,275</b>
<b>Construction.....</b>	<b>* 328</b>	<b>* 2,438</b>	<b>* 2,831</b>	<b>0</b>	<b>5,601</b>	<b>* 21</b>	<b>* 12,969</b>
Building, developing, and general contracting.....	* 5	* 648	* 102	0	* 239	0	* 3,588
Heavy construction.....	* 323	* 1,787	* 844	0	* 4,243	* 5	* 144
Special trade contractors.....	0	* 3	* 1,885	0	* 1,120	* 16	* 9,238
<b>Manufacturing.....</b>	<b>128,863</b>	<b>1,734,008</b>	<b>1,221,625</b>	<b>70,654</b>	<b>73,671</b>	<b>7,395,035</b>	<b>23,279,410</b>
Food manufacturing.....	10,284	36,466	75,049	* 121	* 1,381	14,675	1,713,946
Beverage and tobacco products.....	* 2,342	* 56,068	* 142,296	* 43,476	* 718	* 16,370	* 869,223
Tobacco manufacturing.....	0	* 866	* 1,085	* 43,240	0	* 645	* 5,581
Textile mills and textile product mills.....	* 2,211	* 3,224	* 5,937	0	* 46	* 12,254	* 63,886
Apparel manufacturing.....	* 187	* 8,156	* 610	0	0	* 3,648	* 35,040
Leather and allied product manufacturing.....	* 33	* 2,589	* 1,225	0	* 46	* 360	* 2,961
Wood product manufacturing.....	* 216	* 1,142	0	0	0	* 2,069	* 51,353
Paper manufacturing.....	* 3,390	* 57,080	* 7,691	0	* 4,094	* 38,252	334,892
Printing and related support activities.....	* 115	* 1,769	* 68	0	* 208	* 88	* 6,396
Petroleum and coal products manufacturing.....	21,599	40,290	* 89,414	0	* 724	* 6,671,326	8,023,711
Chemical manufacturing.....	25,218	545,298	313,045	* 1,314	21,737	141,973	6,064,657
Pharmaceutical and medicine manufacturing.....	720	342,914	140,943	* 1,313	* 4,724	* 38,968	4,061,720
Other chemical manufacturing.....	24,498	202,383	172,102	* 1	17,013	103,005	2,002,937
Plastics and rubber products manufacturing.....	634	9,706	* 607	0	* 1	1,716	103,105
Nonmetallic mineral product manufacturing.....	* 4,190	* 1,815	* 315	0	* 250	* 184	* 12,461
Primary metal manufacturing.....	* 3,427	* 58,087	* 43,583	0	* 13,698	* 2,336	* 328,048
Fabricated metal products.....	2,399	13,695	144,618	0	* 767	10,230	428,938
Machinery manufacturing.....	14,956	47,456	94,821	* 849	4,359	28,078	709,822
Computer and electronic product manufacturing.....	3,570	683,865	198,890	* 4,256	* 13,178	28,180	1,752,589
Electrical equipment, appliance, and component manufacturing.....	19,813	40,832	27,087	* 1,078	* 1,626	329,666	512,444
Transportation equipment manufacturing.....	10,991	51,175	41,065	* 17,448	* 9,393	88,509	1,896,336
Motor vehicles and related manufacturing.....	9,307	37,721	* 31,814	0	* 8,545	* 61,922	1,454,273
Other transportation equipment manufacturing.....	* 1,684	13,453	* 9,251	* 17,448	* 848	* 26,588	442,063
Furniture and related products.....	* 517	* 321	0	0	0	* 10	* 16,650
Miscellaneous manufacturing and manufacturing not allocable.....	2,773	74,978	35,302	* 2,111	* 1,444	* 5,109	352,952
<b>Wholesale and retail trade.....</b>	<b>15,169</b>	<b>144,188</b>	<b>172,675</b>	<b>* 515</b>	<b>7,702</b>	<b>104,059</b>	<b>1,452,046</b>
Wholesale trade.....	7,743	100,923	89,864	* 515	7,560	80,229	1,183,029
Durable goods.....	3,800	58,892	17,439	* 222	3,290	14,896	97,786
Machinery, equipment, and supplies.....	* 977	* 3,017	* 1,107	0	* 851	* 296	* 1,091
Other miscellaneous durable goods.....	2,823	55,875	16,332	* 222	2,439	14,600	96,695
Nondurable goods.....	3,943	42,031	72,424	* 293	* 4,270	65,333	1,085,243
Drugs, chemicals, and allied products.....	* 1,366	17,616	* 37,126	* 293	* 601	* 8,006	121,518
Groceries and related products.....	* 6	* 710	* 2,982	0	* 95	* 399	* 551
Petroleum and petroleum products.....	* 580	0	* 6,266	0	0	* 1,113	* 244,119
Other miscellaneous nondurable goods.....	1,991	23,705	26,050	0	* 3,575	55,815	719,055

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2003: Total Assets, Income, Taxes, and Credits, and Foreign Income, Taxes, and Credit, by Major and Selected Minor Industry—Continued**

**Footnotes**

\* Data should be used with caution because of the small number of sample returns on which they were based.

[1] Interest-Charge Domestic International Sales Corporation (IC-DISC) and Domestic International Sales Corporation (DISC).

[2] In addition to the credits shown in columns 12-14, this is after reduction by other credits, such as the jobs credit and the investment credit, which are not shown separately in this table

[3] Less than \$500.

[4] Included in gross income (less loss), columns 16-22. See notes below.

[5] Included in deductions, columns 25-34. See notes below.

Notes: Detail may not add to totals because of rounding. Columns 2 through 15 present statistics on assets, receipts, income, and taxes reported on Form 1120 (Corporation Income Tax Return) series for corporations claiming a foreign tax credit. Columns 16 through 51 present statistics from Form 1118, Foreign Tax Credit—Corporations. Schedule references indicate the schedule of Form 1118 from which the data were obtained. Columns 16 through 35 present statistics on foreign income (i.e., income from sources outside the United States) and deductions reported primarily on Schedule A, Form 1118. Although the amounts of oil and gas income and deductions (columns 23 and 35, respectively) are contained in the summary columns (i.e., columns 16 through 22 and 25 through 34), these amounts are also reported separately (on Schedule I) because oil and gas income is subject to special rules under Internal Revenue Code section 907, which may result in a reduction of foreign taxes available for credit. Foreign branch income and code section 863(b) income (income partly within and partly without the United States) also are included in the summary amounts reported in columns 16 through 22. Foreign branch income also is reported separately on Schedule F, shown in column 24. Total deductions not allocable to specific types of income (column 31) are equal to the sum of columns 32 through 34 (any differences are due to taxpayer reporting practices). Total foreign-source gross income (column 16) less total foreign deductions (column 25) is equal to foreign-source taxable income (less loss) before adjustments (column 36).

Adjustments to foreign-source taxable income (reported in column 37) include allocations of current-year U.S.-source losses and recapture of foreign losses, as well as other adjustments. These adjustments (reported on Schedule J) affect the numerator of the limitation fraction used to compute the foreign tax credit. The foreign-source taxable income (less loss) after adjustments (the numerator of the limitation fraction) is reported in column 38. The limitation fraction, which represents the ratio of foreign-source taxable income after adjustments to total (U.S. and foreign) taxable income after adjustments, is applied to the total U.S. tax against which the credit is allowed to determine any limitation on the foreign tax credit.

Statistics on foreign taxes are reported in columns 39 through 51. Data on foreign taxes paid, accrued, and deemed paid (through related foreign corporations or their subsidiaries) from Schedule B, Form 1118, are reported in columns 42 through 51. Total foreign taxes paid or accrued (column 43) are the sum of columns 44 through 50 (any differences are due to taxpayer reporting practices). Total foreign taxes paid, accrued, and deemed paid (column 42) are equal to the sum of total taxes paid or accrued (column 43) and taxes deemed paid (column 51). Total foreign taxes paid, accrued, and deemed paid are then adjusted for certain items (e.g., reductions of foreign taxes under Code section 907 related to oil and gas income), which are reported in column 40, as well as carryovers of foreign taxes not credited in prior years, which are reported in column 41. Thus, total foreign taxes available for credit (column 39) are equal to total foreign taxes paid, accrued, and deemed paid (column 42) less certain foreign taxes (column 40), plus any carryover of prior-year foreign taxes (column 41).

# Corporate Foreign Tax Credit, 2003

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**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and type of foreign income for which separate credit was computed	Number of returns	Foreign income and taxes				
		Gross income (less loss)				
		Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees
(1)	(2)	(3)	(4)	(5)	(6)	
<b>ALL INDUSTRIES</b>						
All income types.....	5,409	406,485,266	78,185,158	31,064,340	48,742,000	65,684,288
Passive income.....	2,104	10,112,459	4,650,363	566,110	3,320,448	618,305
High withholding tax interest.....	189	907,437	12,047	* 4,178	891,212	0
Financial services income.....	259	108,453,489	12,443,484	3,293,057	38,599,142	3,592,161
Shipping income.....	37	7,145,643	463,370	69,865	267,793	* 944,735
Dividends from each noncontrolled section 902 corporation.....	27	128,340	92,215	34,874	* 1,252	0
Dividends from an IC-DISC or former DISC [1].....	9	* 2,233	* 2,206	* 26	0	0
Distributions from a FSC or former FSC [2].....	8	* 138,420	* 138,420	0	0	0
General limitation income.....	3,427	276,476,237	58,574,950	25,996,636	5,620,266	60,503,248
Section 901(j) income.....	16	88,258	* 18,241	* 161	* 842	* 22
Income resourced by treaty.....	20	101,407	51,607	* 10,051	* 802	* 4,728
Dividends from each 10/50 PFIC.....	139	309,153	188,874	94,145	* 3,760	* 451
Dividends from 10/50 corporations.....	157	2,622,191	1,549,380	995,238	36,484	* 20,638
<b>AGRICULTURE, FORESTRY, FISHING, AND HUNTING</b>						
All income types.....	272	214,241	72,342	* 41,441	* 1,402	* 12,604
Passive income.....	178	842	504	* 1	0	* 197
High withholding tax interest.....	d	d	d	d	d	d
Financial services income.....	0	0	0	0	0	0
Shipping income.....	0	0	0	0	0	0
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0
General limitation income.....	d	d	d	d	d	d
Section 901(j) income.....	0	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	0	0	0	0	0	0
Dividends from 10/50 corporations.....	0	0	0	0	0	0
<b>MINING</b>						
All income types.....	57	8,382,306	1,073,197	329,325	288,158	130,206
Passive income.....	28	382,270	99,382	* 22,639	45,064	0
High withholding tax interest.....	4	* 9,895	0	0	* 9,895	0
Financial services income.....	d	d	d	d	d	d
Shipping income.....	d	d	d	d	d	d
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0
General limitation income.....	48	7,884,174	937,630	302,617	233,199	130,206
Section 901(j) income.....	3	* 77,065	* 11,352	0	0	0
Income resourced by treaty.....	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	0	0	0	0	0	0
Dividends from 10/50 corporations.....	3	* 15,554	* 11,485	* 4,069	0	0
<b>UTILITIES</b>						
All income types.....	8	* 327,189	* 253,947	* 49,275	* 3,830	* 7,445
Passive income.....	7	* 8,741	* 8,153	* 581	0	0
High withholding tax interest.....	0	0	0	0	0	0
Financial services income.....	d	d	d	d	d	d
Shipping income.....	0	0	0	0	0	0
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0
General limitation income.....	d	d	d	d	d	d
Section 901(j) income.....	0	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	0	0	0	0	0	0
Dividends from 10/50 corporations.....	0	0	0	0	0	0

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and type of foreign income for which separate credit was computed	Number of returns	Foreign income and taxes				
		Gross income (less loss)				
		Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees
(1)	(2)	(3)	(4)	(5)	(6)	
<b>CONSTRUCTION</b>						
All income types.....	242	553,402	30,863	* 12,969	* 3,267	* 20,785
Passive income.....	67	11,513	3,320	* 1	* 2,806	* 5,386
High withholding tax interest.....	0	0	0	0	0	0
Financial services income.....	d	d	d	d	d	d
Shipping income.....	0	0	0	0	0	0
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0
General limitation income.....	176	541,690	27,386	* 12,968	* 461	* 15,399
Section 901(j) income.....	0	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	d	d	d	d	d	d
Dividends from 10/50 corporations.....	0	0	0	0	0	0
<b>MANUFACTURING</b>						
All income types.....	1,095	213,057,886	55,675,229	23,278,744	7,650,357	39,140,378
Passive income.....	478	5,682,516	2,826,249	391,819	1,545,002	319,256
High withholding tax interest.....	55	223,693	* 9,490	* 3,440	210,763	0
Financial services income.....	38	8,959,148	2,615,775	* 179,976	1,774,895	* 742,421
Shipping income.....	13	1,266,059	* 154,687	* 27,115	* 205,788	* 783,899
Dividends from each noncontrolled section 902 corporation.....	16	69,819	55,135	14,685	[4]	0
Dividends from an IC-DISC or former DISC [1].....	6	* 1,365	* 1,339	* 26	0	0
Distributions from a FSC or former FSC [2].....	3	* 67,154	* 67,154	0	0	0
General limitation income.....	838	194,822,424	48,799,952	21,924,810	3,900,307	37,269,200
Section 901(j) income.....	11	5,773	* 1,702	* 11	* 761	* 22
Income resourced by treaty.....	13	70,093	* 50,154	* 10,051	* 768	* 4,728
Dividends from each 10/50 PFIC.....	24	80,720	50,578	11,640	0	* 451
Dividends from 10/50 corporations.....	86	1,809,121	1,043,013	715,173	* 12,073	* 20,400
<b>WHOLESALE AND RETAIL TRADE</b>						
All income types.....	657	14,055,521	3,679,500	1,452,046	347,307	3,693,644
Passive income.....	245	445,257	178,472	32,542	55,730	117,356
High withholding tax interest.....	34	16,078	* 301	* 169	15,608	0
Financial services income.....	5	* 153,682	* 79,176	* 30,996	* 32,668	0
Shipping income.....	3	* 73,847	* 66,778	* 6,686	* 43	* 122
Dividends from each noncontrolled section 902 corporation.....	d	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1].....	d	d	d	d	d	d
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0
General limitation income.....	451	13,314,928	3,325,930	1,371,033	243,139	3,576,166
Section 901(j) income.....	d	d	d	d	d	d
Income resourced by treaty.....	5	* 12,122	* 77	0	* 34	0
Dividends from each 10/50 PFIC.....	9	* 22,216	* 15,427	* 6,840	0	0
Dividends from 10/50 corporations.....	14	11,957	8,134	3,630	* 3	0

Footnotes at end of table.



# Corporate Foreign Tax Credit, 2003

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**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and type of foreign income for which separate credit was computed	Number of returns	Foreign income and taxes				
		Gross income (less loss)				
		Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees
(1)	(2)	(3)	(4)	(5)	(6)	
<b>TRANSPORTATION AND WAREHOUSING</b>						
All income types.....	46	11,154,793	436,789	103,297	93,687	219,815
Passive income.....	14	35,795	* 21,655	* 1,257	* 4,178	* 7,616
High withholding tax interest.....	5	* 8,985	0	0	* 8,985	0
Financial services income.....	d	d	d	d	d	d
Shipping income.....	11	5,105,416	* 231,046	* 36,049	* 56,072	* 86,012
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0
General limitation income.....	31	5,876,186	115,488	43,518	24,448	* 126,101
Section 901(j) income.....	0	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	d	d	d	d	d	d
Dividends from 10/50 corporations.....	4	* 83,110	* 62,000	* 21,021	* 4	* 86
<b>INFORMATION</b>						
All income types.....	517	31,430,320	2,777,323	877,451	323,987	16,023,789
Passive income.....	141	1,420,823	1,076,020	98,917	104,744	* 102,888
High withholding tax interest.....	8	* 2,481	0	0	* 2,481	0
Financial services income.....	d	d	d	d	d	d
Shipping income.....	3	* 165,710	0	0	* 4,126	* 74,702
Dividends from each noncontrolled section 902 corporation.....	d	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1].....	d	d	d	d	d	d
Distributions from a FSC or former FSC [2].....	d	d	d	d	d	d
General limitation income.....	401	29,468,891	1,475,235	706,574	188,394	15,820,208
Section 901(j) income.....	0	0	0	0	0	0
Income resourced by treaty.....	d	d	d	d	d	d
Dividends from each 10/50 PFIC.....	d	d	d	d	d	d
Dividends from 10/50 corporations.....	5	* 296,743	* 202,847	* 69,653	* 24,243	0
<b>FINANCE, INSURANCE, REAL ESTATE, AND RENTAL AND LEASING</b>						
All income types.....	795	64,342,868	7,981,884	2,099,189	20,210,940	1,013,059
Passive income.....	428	1,787,847	234,901	7,154	1,520,683	* 17,030
High withholding tax interest.....	41	177,288	* 1,506	0	175,783	0
Financial services income.....	152	58,842,094	7,540,894	2,022,751	18,271,258	* 741,283
Shipping income.....	d	d	d	d	d	d
Dividends from each noncontrolled section 902 corporation.....	d	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	d	d	d	d	d	d
General limitation income.....	238	2,992,912	183,868	68,584	241,451	254,745
Section 901(j) income.....	0	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	d	d	d	d	d	d
Dividends from 10/50 corporations.....	7	* 19,663	* 18,894	* 662	0	0
<b>SERVICES</b>						
All income types.....	1,720	62,966,739	6,204,085	2,820,602	19,819,065	5,422,563
Passive income.....	518	336,854	201,706	11,200	42,241	48,575
High withholding tax interest.....	41	468,920	* 751	* 569	467,600	0
Financial services income.....	53	40,421,541	2,202,182	1,059,334	18,517,613	2,082,466
Shipping income.....	3	* 4,007	* 1,458	* 15	0	0
Dividends from each noncontrolled section 902 corporation.....	6	* 41,464	* 25,889	* 14,324	* 1,252	0
Dividends from an IC-DISC or former DISC [1].....	d	d	d	d	d	d
Distributions from a FSC or former FSC [2].....	3	* 58,366	* 58,366	0	0	0
General limitation income.....	1,145	21,055,120	3,397,438	1,479,916	786,439	3,291,370
Section 901(j) income.....	d	d	d	d	d	d
Income resourced by treaty.....	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	98	194,424	113,288	* 74,213	* 3,760	0
Dividends from 10/50 corporations.....	38	386,043	203,007	181,030	* 161	* 152

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes—continued				
	Gross income (less loss)—continued				Deductions
	Service income	Other income	Oil and gas extraction income [3]	Foreign branch income [3]	Total
	(7)	(8)	(9)	(10)	(11)
<b>ALL INDUSTRIES</b>					
All income types.....	20,195,460	162,614,019	34,936,165	83,280,537	201,355,604
Passive income.....	* 2,034	955,198	0	50,912	2,833,011
High withholding tax interest.....	0	[4]	0	* 98	259,487
Financial services income.....	3,176,801	47,348,845	0	43,808,750	70,999,852
Shipping income.....	* 78,567	5,321,313	0	* 1,947,911	6,167,976
Dividends from each noncontrolled section 902 corporation.....	0	* -1	0	0	14,552
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	* 44
Distributions from a FSC or former FSC [2].....	0	0	0	0	* 112,661
General limitation income.....	16,934,876	108,846,263	34,936,165	37,459,615	120,730,526
Section 901(j) income.....	0	* 68,991	0	* 254	30,003
Income resourced by treaty.....	0	34,219	0	* 4,652	15,137
Dividends from each 10/50 PFIC.....	* 3,164	* 18,759	0	* 537	25,182
Dividends from 10/50 corporations.....	* 20	20,431	0	* 7,808	167,172
<b>AGRICULTURE, FORESTRY, FISHING, AND HUNTING</b>					
All income types.....	* -10	86,463	0	* 22,469	* 95,064
Passive income.....	0	* 139	0	0	* 77
High withholding tax interest.....	d	d	d	d	d
Financial services income.....	0	0	0	0	0
Shipping income.....	0	0	0	0	0
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0
General limitation income.....	d	d	d	d	d
Section 901(j) income.....	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0
Dividends from each 10/50 PFIC.....	0	0	0	0	0
Dividends from 10/50 corporations.....	0	0	0	0	0
<b>MINING</b>					
All income types.....	* 266,209	6,295,211	2,270,068	2,685,639	4,219,824
Passive income.....	0	* 215,185	0	0	39,516
High withholding tax interest.....	0	0	0	0	* 1,088
Financial services income.....	d	d	d	d	d
Shipping income.....	d	d	d	d	d
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0
General limitation income.....	* 266,209	6,014,312	2,270,068	2,685,386	4,158,842
Section 901(j) income.....	0	* 65,714	0	* 254	* 10,646
Income resourced by treaty.....	0	0	0	0	0
Dividends from each 10/50 PFIC.....	0	0	0	0	0
Dividends from 10/50 corporations.....	0	0	0	0	* 8,437
<b>UTILITIES</b>					
All income types.....	* 1,841	* 10,850	0	* 11,929	* 77,887
Passive income.....	0	* 7	0	0	* 9,879
High withholding tax interest.....	0	0	0	0	0
Financial services income.....	d	d	d	d	d
Shipping income.....	0	0	0	0	0
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0
General limitation income.....	d	d	d	d	d
Section 901(j) income.....	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0
Dividends from each 10/50 PFIC.....	0	0	0	0	0
Dividends from 10/50 corporations.....	0	0	0	0	0

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes—continued				Deductions  Total
	Gross income (less loss)—continued				
	Service income	Other income	Oil and gas extraction income [3]	Foreign branch income [3]	
	(7)	(8)	(9)	(10)	(11)
<b>CONSTRUCTION</b>					
All income types.....	463,048	22,470	0	* 109,757	463,691
Passive income.....	0	[4]	0	* 137	* 5,259
High withholding tax interest.....	0	0	0	0	0
Financial services income.....	d	d	d	d	d
Shipping income.....	0	0	0	0	0
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0
General limitation income.....	463,048	22,427	0	* 109,620	458,432
Section 901(j) income.....	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0
Dividends from each 10/50 PFIC.....	d	d	d	d	d
Dividends from 10/50 corporations.....	0	0	0	0	0
<b>MANUFACTURING</b>					
All income types.....	3,378,944	83,934,234	* 31,589,595	17,701,449	80,035,390
Passive income.....	* 37	600,154	0	2,842	1,993,462
High withholding tax interest.....	0	[4]	0	0	76,606
Financial services income.....	* 40,397	3,605,685	0	* 1,800,291	5,748,197
Shipping income.....	* -25,991	* 120,561	0	* -26,661	1,255,868
Dividends from each noncontrolled section 902 corporation.....	0	* -1	0	0	7,908
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	* 44
Distributions from a FSC or former FSC [2].....	0	0	0	0	* 67,154
General limitation income.....	3,364,501	79,563,654	* 31,589,595	15,920,326	70,732,082
Section 901(j) income.....	0	* 3,277	0	0	* 19,155
Income resourced by treaty.....	0	* 4,392	0	* 4,652	* 9,522
Dividends from each 10/50 PFIC.....	0	* 18,050	0	0	17,420
Dividends from 10/50 corporations.....	0	18,461	0	0	107,973
<b>WHOLESALE AND RETAIL TRADE</b>					
All income types.....	330,549	4,552,475	* 722,830	2,337,779	6,730,598
Passive income.....	0	61,157	0	* 7,706	131,416
High withholding tax interest.....	0	0	0	* 98	1,852
Financial services income.....	0	* 10,841	0	* 4,467	* 39,486
Shipping income.....	0	* 218	0	0	* 6,931
Dividends from each noncontrolled section 902 corporation.....	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1].....	d	d	d	d	d
Distributions from a FSC or former FSC [2].....	0	0	0	0	0
General limitation income.....	330,549	4,468,110	* 722,830	2,324,223	6,541,406
Section 901(j) income.....	d	d	d	d	d
Income resourced by treaty.....	0	* 12,010	0	0	* 4,764
Dividends from each 10/50 PFIC.....	0	* -51	0	0	* 734
Dividends from 10/50 corporations.....	0	* 189	0	* 1,286	3,176

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes—continued				Deductions
	Gross income (less loss)—continued				
	Service income	Other income	Oil and gas extraction income [3]	Foreign branch income [3]	
	(7)	(8)	(9)	(10)	(11)
<b>TRANSPORTATION AND WAREHOUSING</b>					
All income types.....	5,520,670	4,780,535	0	* 3,982,658	9,225,007
Passive income.....	0	* 1,089	0	0	* 1,463
High withholding tax interest.....	0	0	0	0	* 3,667
Financial services income.....	d	d	d	d	d
Shipping income.....	* 104,557	* 4,591,680	0	* 1,972,038	* 4,211,165
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0
General limitation income.....	5,378,864	187,766	0	* 2,010,534	4,967,256
Section 901(j) income.....	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0
Dividends from each 10/50 PFIC.....	d	d	d	d	d
Dividends from 10/50 corporations.....	0	0	0	* 86	* 6,367
<b>INFORMATION</b>					
All income types.....	1,110,861	10,316,909	0	5,797,453	19,432,627
Passive income.....	* 1,517	36,736	0	* 358	304,883
High withholding tax interest.....	0	0	0	0	* 2,464
Financial services income.....	d	d	d	d	d
Shipping income.....	0	* 86,883	0	0	* 59,051
Dividends from each noncontrolled section 902 corporation.....	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1].....	d	d	d	d	d
Distributions from a FSC or former FSC [2].....	d	d	d	d	d
General limitation income.....	1,109,344	10,169,136	0	5,797,095	18,967,291
Section 901(j) income.....	0	0	0	0	0
Income resourced by treaty.....	d	d	d	d	d
Dividends from each 10/50 PFIC.....	d	d	d	d	d
Dividends from 10/50 corporations.....	0	0	0	0	* 20,061
<b>FINANCE, INSURANCE, REAL ESTATE, AND RENTAL AND LEASING</b>					
All income types.....	3,113,047	29,924,749	* 89,840	17,593,547	37,426,024
Passive income.....	* 479	7,600	0	* 4,088	310,272
High withholding tax interest.....	0	0	0	0	54,813
Financial services income.....	2,094,824	28,171,085	0	17,399,207	34,386,074
Shipping income.....	d	d	d	d	d
Dividends from each noncontrolled section 902 corporation.....	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	d	d	d	d	d
General limitation income.....	1,017,745	1,226,518	* 89,840	* 190,252	2,030,435
Section 901(j) income.....	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0
Dividends from each 10/50 PFIC.....	d	d	d	d	d
Dividends from 10/50 corporations.....	0	* 108	0	0	* 7,928
<b>SERVICES</b>					
All income types.....	6,010,301	22,690,123	* 263,833	33,037,856	43,649,491
Passive income.....	* 1	33,130	0	35,781	36,783
High withholding tax interest.....	0	0	0	0	118,999
Financial services income.....	* 1,004,332	15,555,614	0	24,604,785	30,723,609
Shipping income.....	0	* 2,534	0	* 2,534	* 122
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	* 5,566
Dividends from an IC-DISC or former DISC [1].....	d	d	d	d	d
Distributions from a FSC or former FSC [2].....	0	0	0	0	* 32,607
General limitation income.....	5,002,785	7,097,172	* 263,833	8,387,782	12,713,770
Section 901(j) income.....	d	d	d	d	d
Income resourced by treaty.....	0	0	0	0	0
Dividends from each 10/50 PFIC.....	* 3,164	0	0	* 537	* 4,794
Dividends from 10/50 corporations.....	* 20	* 1,673	0	* 6,437	13,231

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes—continued					
	Deductions—continued					
	Deductions allocable to specific types of income					Deductions not allocable to specific types of income
	Total	Depreciation, depletion, and amortization	Other expenses	Total	Dividends	
	(12)	(13)	(14)	(15)	(16)	Interest (17)
<b>ALL INDUSTRIES</b>						
All income types.....	108,129,366	1,325,193	3,538,638	12,719,342	90,546,193	93,226,238
Passive income.....	667,698	18,965	91,788	* 2,519	554,426	2,165,313
High withholding tax interest.....	42,230	0	* 245	0	41,985	217,257
Financial services income.....	28,753,221	* 666,931	52,482	1,129,102	26,904,706	42,246,631
Shipping income.....	4,947,031	* 33,884	* 129,513	* 93,186	4,690,448	1,220,945
Dividends from each noncontrolled section 902 corporation.....	* 1,370	0	0	0	* 1,370	13,182
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	* 44
Distributions from a FSC or former FSC [2].....	* 112,661	0	0	* 155	* 112,506	0
General limitation income.....	73,573,758	605,413	3,264,610	11,494,379	58,209,356	47,156,768
Section 901(j) income.....	* 2,432	0	0	0	* 2,432	27,571
Income resourced by treaty.....	* 7,877	0	0	0	* 7,877	7,260
Dividends from each 10/50 PFIC.....	* 420	0	0	0	* 420	24,762
Dividends from 10/50 corporations.....	20,666	0	0	0	20,666	146,506
<b>AGRICULTURE, FORESTRY, FISHING, AND HUNTING</b>						
All income types.....	* 65,545	0	* 63	0	* 65,482	* 29,520
Passive income.....	* 3	0	0	0	* 3	* 74
High withholding tax interest.....	d	d	d	d	d	d
Financial services income.....	0	0	0	0	0	0
Shipping income.....	0	0	0	0	0	0
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0
General limitation income.....	d	d	d	d	d	d
Section 901(j) income.....	0	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	0	0	0	0	0	0
Dividends from 10/50 corporations.....	0	0	0	0	0	0
<b>MINING</b>						
All income types.....	3,336,414	* 27,335	* 54,135	* 113,441	3,141,503	883,410
Passive income.....	* 14,329	0	0	0	* 14,329	* 25,187
High withholding tax interest.....	* 1,084	0	0	0	* 1,084	* 4
Financial services income.....	d	d	d	d	d	d
Shipping income.....	d	d	d	d	d	d
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0
General limitation income.....	3,319,957	* 27,335	* 54,135	* 113,441	3,125,047	838,885
Section 901(j) income.....	* 1,026	0	0	0	* 1,026	* 9,620
Income resourced by treaty.....	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	0	0	0	0	0	0
Dividends from 10/50 corporations.....	* 18	0	0	0	* 18	* 8,419
<b>UTILITIES</b>						
All income types.....	* 10,597	0	0	* 1,954	* 8,643	* 67,290
Passive income.....	* -22	0	0	0	* -22	* 9,901
High withholding tax interest.....	0	0	0	0	0	0
Financial services income.....	d	d	d	d	d	d
Shipping income.....	0	0	0	0	0	0
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0
General limitation income.....	d	d	d	d	d	d
Section 901(j) income.....	0	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	0	0	0	0	0	0
Dividends from 10/50 corporations.....	0	0	0	0	0	0

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes—continued					
	Deductions—continued					
	Deductions allocable to specific types of income					Deductions not allocable to specific types of income
	Total	Depreciation, depletion, and amortization	Other expenses	Total	Dividends	
(12)	(13)	(14)	(15)	(16)	(17)	
<b>CONSTRUCTION</b>						
All income types.....	455,551	* 1,096	* 5,903	* 407,307	* 41,245	8,140
Passive income.....	* 5,191	* 985	* 4,112	0	* 94	* 68
High withholding tax interest.....	0	0	0	0	0	0
Financial services income.....	d	d	d	d	d	d
Shipping income.....	0	0	0	0	0	0
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0
General limitation income.....	450,360	* 111	* 1,791	* 407,307	* 41,151	8,072
Section 901(j) income.....	0	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	d	d	d	d	d	d
Dividends from 10/50 corporations.....	0	0	0	0	0	0
<b>MANUFACTURING</b>						
All income types.....	41,702,323	250,030	358,474	1,172,539	39,921,281	38,333,067
Passive income.....	442,215	* 98	2,285	0	439,831	1,551,247
High withholding tax interest.....	* 23,372	0	0	0	* 23,372	53,234
Financial services income.....	3,465,426	0	* 121	* 2	3,465,303	2,282,772
Shipping income.....	1,046,239	0	0	[4]	* 1,046,239	209,629
Dividends from each noncontrolled section 902 corporation.....	* 1,289	0	0	0	* 1,289	6,619
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	* 44
Distributions from a FSC or former FSC [2].....	* 67,154	0	0	* 155	* 66,999	0
General limitation income.....	36,633,244	249,931	356,068	1,172,380	34,854,864	34,098,838
Section 901(j) income.....	* 1,397	0	0	0	* 1,397	* 17,758
Income resourced by treaty.....	* 3,985	0	0	0	* 3,985	* 5,537
Dividends from each 10/50 PFIC.....	* 21	0	0	0	* 21	17,399
Dividends from 10/50 corporations.....	17,981	0	0	0	17,981	89,992
<b>WHOLESALE AND RETAIL TRADE</b>						
All income types.....	4,455,555	37,101	132,511	64,534	4,221,409	2,275,043
Passive income.....	42,839	* 12,832	* 5,170	* 125	24,712	88,578
High withholding tax interest.....	* 305	0	* 242	0	* 63	1,546
Financial services income.....	* 7,275	0	0	0	* 7,275	* 32,211
Shipping income.....	* 2,714	0	0	0	* 2,714	* 4,217
Dividends from each noncontrolled section 902 corporation.....	d	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1].....	d	d	d	d	d	d
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0
General limitation income.....	4,398,442	24,269	127,099	64,409	4,182,665	2,142,964
Section 901(j) income.....	d	d	d	d	d	d
Income resourced by treaty.....	* 3,609	0	0	0	* 3,609	* 1,156
Dividends from each 10/50 PFIC.....	0	0	0	0	0	* 734
Dividends from 10/50 corporations.....	* 367	0	0	0	* 367	2,809

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes—continued					
	Deductions—continued					
	Deductions allocable to specific types of income					Deductions not allocable to specific types of income
	Total	Depreciation, depletion, and amortization	Other expenses	Total	Dividends	
	(12)	(13)	(14)	(15)	(16)	Interest (17)
<b>TRANSPORTATION AND WAREHOUSING</b>						
All income types.....	8,123,651	* 2,048	* 74,105	4,774,268	3,273,229	1,101,357
Passive income.....	* 543	0	0	* 468	* 75	* 920
High withholding tax interest.....	0	0	0	0	0	* 3,667
Financial services income.....	d	d	d	d	d	d
Shipping income.....	* 3,265,530	0	0	* 93,186	* 3,172,345	* 945,635
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0
General limitation income.....	4,822,570	* 2,048	* 74,105	4,645,607	100,809	144,686
Section 901(j) income.....	0	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	d	d	d	d	d	d
Dividends from 10/50 corporations.....	0	0	0	0	0	* 6,367
<b>INFORMATION</b>						
All income types.....	12,837,770	* 205,634	2,204,246	684,431	9,743,460	6,594,856
Passive income.....	72,514	0	* 62,459	* 1,500	8,555	232,369
High withholding tax interest.....	* 4	0	0	0	* 4	* 2,460
Financial services income.....	d	d	d	d	d	d
Shipping income.....	* 39,708	* 33,884	* 225	0	* 5,598	* 19,344
Dividends from each noncontrolled section 902 corporation.....	d	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1].....	d	d	d	d	d	d
Distributions from a FSC or former FSC [2].....	d	d	d	d	d	d
General limitation income.....	12,647,700	* 171,749	2,141,562	682,930	9,651,459	6,319,590
Section 901(j) income.....	0	0	0	0	0	0
Income resourced by treaty.....	d	d	d	d	d	d
Dividends from each 10/50 PFIC.....	d	d	d	d	d	d
Dividends from 10/50 corporations.....	* 23	0	0	0	* 23	* 20,037
<b>FINANCE, INSURANCE, REAL ESTATE, AND RENTAL AND LEASING</b>						
All income types.....	18,324,939	55,502	311,731	1,880,003	16,077,704	19,101,086
Passive income.....	74,188	* 3,240	* 12,883	* 426	57,639	236,084
High withholding tax interest.....	15,842	0	* 3	0	15,839	38,971
Financial services income.....	16,353,586	* 1,951	* 42,816	1,094,085	15,214,735	18,032,488
Shipping income.....	d	d	d	d	d	d
Dividends from each noncontrolled section 902 corporation.....	d	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	d	d	d	d	d	d
General limitation income.....	1,287,276	* 50,311	126,741	* 785,492	324,732	743,159
Section 901(j) income.....	0	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	d	d	d	d	d	d
Dividends from 10/50 corporations.....	* 1,132	0	0	0	* 1,132	* 6,796
<b>SERVICES</b>						
All income types.....	18,817,021	746,448	397,471	3,620,865	14,052,238	24,832,470
Passive income.....	15,899	* 1,809	4,879	0	9,211	20,884
High withholding tax interest.....	1,623	0	[4]	0	1,623	117,376
Financial services income.....	8,827,644	* 664,980	* 9,546	* 7	8,153,111	21,895,966
Shipping income.....	* 1	0	0	0	* 1	* 121
Dividends from each noncontrolled section 902 corporation.....	* 6	0	0	0	* 6	* 5,560
Dividends from an IC-DISC or former DISC [1].....	d	d	d	d	d	d
Distributions from a FSC or former FSC [2].....	* 32,607	0	0	0	* 32,607	0
General limitation income.....	9,938,091	79,658	383,046	3,620,857	5,854,530	2,775,679
Section 901(j) income.....	d	d	d	d	d	d
Income resourced by treaty.....	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	[4]	0	0	0	[4]	* 4,793
Dividends from 10/50 corporations.....	* 1,144	0	0	0	* 1,144	12,087

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes—continued					
	Deductions—continued				Taxable income (less loss) before adjustments	Adjustments to taxable income
	Deductions not allocable to specific types of income—continued			Deductions from oil and gas extraction income [5]		
	Research and development	Interest	Other			
(18)	(19)	(20)	(21)	(22)	(23)	
<b>ALL INDUSTRIES</b>						
All income types.....	11,961,592	32,120,658	47,669,031	9,990,089	205,129,663	21,714,709
Passive income.....	208,610	1,362,771	558,841	0	7,279,448	437,683
High withholding tax interest.....	* 331	141,846	68,591	0	647,950	18,102
Financial services income.....	138,202	18,005,703	23,772,345	0	37,453,637	2,817,709
Shipping income.....	* 6,550	322,300	891,964	0	977,667	-30,818
Dividends from each noncontrolled section 902 corporation.....	16,274	110,615	28,462	0	113,788	8,399
Dividends from an IC-DISC or former DISC [1].....	0	0	* 44	0	* 2,189	* -18
Distributions from a FSC or former FSC [2].....	0	0	0	0	* 25,759	* -1
General limitation income.....	11,589,828	12,134,911	22,333,550	9,990,089	155,745,711	18,460,227
Section 901(j) income.....	* 51	* 18,214	* 9,307	0	58,255	-2,541
Income resourced by treaty.....	* 801	* 5,192	* 1,266	0	86,270	3,633
Dividends from each 10/50 PFIC.....	* 945	19,105	4,662	0	283,971	2,334
Dividends from 10/50 corporations.....	0	0	0	0	2,455,019	0
<b>AGRICULTURE, FORESTRY, FISHING, AND HUNTING</b>						
All income types.....	* 4,778	* 14,577	* 10,108	0	119,177	* 30,535
Passive income.....	0	0	* 74	0	765	0
High withholding tax interest.....	d	d	d	d	d	d
Financial services income.....	0	0	0	0	0	0
Shipping income.....	0	0	0	0	0	0
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0
General limitation income.....	d	d	d	d	d	d
Section 901(j) income.....	0	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	0	0	0	0	0	0
Dividends from 10/50 corporations.....	0	0	0	0	0	0
<b>MINING</b>						
All income types.....	* 11,208	363,336	493,999	731,591	4,162,483	275,273
Passive income.....	0	* 13,291	* 11,815	0	342,755	* 414
High withholding tax interest.....	0	0	* 4	0	* 8,807	* 211
Financial services income.....	d	d	d	d	d	d
Shipping income.....	d	d	d	d	d	d
Dividends from each noncontrolled section 902 corporation.....	0	* 6,846	* 1,573	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0
General limitation income.....	* 11,205	340,699	472,196	731,591	3,725,331	262,092
Section 901(j) income.....	0	* 1,368	* 8,252	0	* 66,420	* 12,620
Income resourced by treaty.....	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	0	0	0	0	0	0
Dividends from 10/50 corporations.....	0	0	0	0	* 7,117	0
<b>UTILITIES</b>						
All income types.....	0	* 42,977	* 24,314	0	* 249,302	* 827
Passive income.....	0	* 5,979	* 3,922	0	* -1,137	* -3,013
High withholding tax interest.....	0	0	0	0	0	0
Financial services income.....	d	d	d	d	d	d
Shipping income.....	0	0	0	0	0	0
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0
General limitation income.....	d	d	d	d	d	d
Section 901(j) income.....	0	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	0	0	0	0	0	0
Dividends from 10/50 corporations.....	0	0	0	0	0	0

Footnotes at end of table.



# Corporate Foreign Tax Credit, 2003

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**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes—continued					
	Deductions—continued				Taxable income (less loss) before adjustments	Adjustments to taxable income
	Deductions not allocable to specific types of income—continued			Deductions from oil and gas extraction income [5]		
	Research and development	Interest	Other			
(18)	(19)	(20)	(21)	(22)	(23)	
<b>CONSTRUCTION</b>						
All income types.....	* 256	* 3,458	* 3,573	0	89,711	* 3,882
Passive income.....	0	* 58	* 10	0	6,254	* 308
High withholding tax interest.....	0	0	0	0	0	0
Financial services income.....	d	d	d	d	d	d
Shipping income.....	0	0	0	0	0	0
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0
General limitation income.....	* 256	* 3,400	* 3,563	0	83,258	* 3,574
Section 901(j) income.....	0	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	d	d	d	d	d	d
Dividends from 10/50 corporations.....	0	0	0	0	0	0
<b>MANUFACTURING</b>						
All income types.....	9,609,193	13,385,468	15,138,407	* 8,993,993	133,022,496	16,467,081
Passive income.....	160,951	1,115,752	266,609	0	3,689,054	266,134
High withholding tax interest.....	* 20	45,315	5,645	0	147,087	23,169
Financial services income.....	7,288	2,245,134	30,349	0	3,210,951	556,323
Shipping income.....	* 582	206,081	* 2,965	0	10,191	-95,165
Dividends from each noncontrolled section 902 corporation.....	16,187	61,020	19,047	0	61,911	* 3,933
Dividends from an IC-DISC or former DISC [1].....	0	0	* 44	0	* 1,322	* -18
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	* -1
General limitation income.....	9,422,473	9,677,800	14,809,122	* 8,993,993	124,090,342	15,725,418
Section 901(j) income.....	* 51	* 16,680	* 1,026	0	-13,381	* -15,159
Income resourced by treaty.....	* 789	* 4,052	* 696	0	60,571	* 521
Dividends from each 10/50 PFIC.....	* 853	* 13,633	* 2,903	0	63,300	1,926
Dividends from 10/50 corporations.....	0	0	0	0	1,701,148	0
<b>WHOLESALE AND RETAIL TRADE</b>						
All income types.....	85,579	766,507	1,293,823	* 237,654	7,324,924	750,809
Passive income.....	* 1,272	52,311	15,034	0	313,840	-1,110
High withholding tax interest.....	0	* 870	* 510	0	14,226	* 1,462
Financial services income.....	0	* 25,113	* 7,098	0	* 114,196	* -4,199
Shipping income.....	0	* 3,463	* 754	0	* 66,915	* -3,022
Dividends from each noncontrolled section 902 corporation.....	d	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1].....	d	d	d	d	d	d
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0
General limitation income.....	84,214	680,612	1,269,486	* 237,654	6,773,521	759,448
Section 901(j) income.....	d	d	d	d	d	d
Income resourced by treaty.....	* 2	* 1,079	* 75	0	* 7,357	* -996
Dividends from each 10/50 PFIC.....	* 89	* 254	* 352	0	* 21,482	* -143
Dividends from 10/50 corporations.....	0	0	0	0	8,781	0

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes—continued					Taxes deemed paid
	Foreign taxes paid, accrued, and deemed paid—continued					
	Foreign taxes paid or accrued—continued					
	Taxes withheld at source on—continued	Other taxes paid or accrued on—				
		Rents, royalties, and license fees	Branch income	Specifically allocable income [section 863(b)]		
(18)	(19)	(20)	(21)	(22)	(23)	
<b>TRANSPORTATION AND WAREHOUSING</b>						
All income types.....	* 24,580	107,190	965,829	0	1,929,786	85,085
Passive income.....	0	* 919	* 1	0	34,332	* 7,308
High withholding tax interest.....	0	* 3,615	0	0	* 5,318	* 9
Financial services income.....	d	d	d	d	d	d
Shipping income.....	* 5,656	* 51,941	* 887,974	0	894,251	* 85,787
Dividends from each noncontrolled section 902 corporation.....	0	* 5,617	* 749	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0
General limitation income.....	* 18,924	45,098	* 77,022	0	908,930	-10,006
Section 901(j) income.....	0	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	d	d	d	d	d	d
Dividends from 10/50 corporations.....	0	0	0	0	* 76,744	0
<b>INFORMATION</b>						
All income types.....	1,823,992	607,621	3,960,336	0	11,997,693	961,550
Passive income.....	* 45,181	48,524	133,919	0	1,115,940	14,846
High withholding tax interest.....	0	* 2,392	* 59	0	* 17	* -2,586
Financial services income.....	d	d	d	d	d	d
Shipping income.....	* 312	* 18,799	* 232	0	* 106,659	* 93,768
Dividends from each noncontrolled section 902 corporation.....	d	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1].....	d	d	d	d	d	d
Distributions from a FSC or former FSC [2].....	d	d	d	d	d	d
General limitation income.....	1,778,465	518,730	3,824,381	0	10,501,600	880,262
Section 901(j) income.....	0	0	0	0	0	0
Income resourced by treaty.....	d	d	d	d	d	d
Dividends from each 10/50 PFIC.....	d	d	d	d	d	d
Dividends from 10/50 corporations.....	0	0	0	0	* 276,682	0
<b>FINANCE, INSURANCE, REAL ESTATE, AND RENTAL AND LEASING</b>						
All income types.....	* 11,734	6,717,266	11,838,757	0	26,916,844	2,230,152
Passive income.....	0	* 117,189	118,850	0	1,477,575	102,570
High withholding tax interest.....	0	20,894	17,140	0	122,475	-4,298
Financial services income.....	* 5,785	6,505,165	11,487,846	0	24,456,020	2,226,280
Shipping income.....	d	d	d	d	d	d
Dividends from each noncontrolled section 902 corporation.....	d	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	d	d	d	d	d	d
General limitation income.....	* 5,949	25,982	213,992	0	962,476	19,288
Section 901(j) income.....	0	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	d	d	d	d	d	d
Dividends from 10/50 corporations.....	0	0	0	0	* 11,735	0
<b>SERVICES</b>						
All income types.....	390,273	10,112,257	13,939,885	* 26,850	19,317,248	909,515
Passive income.....	* 1,206	8,747	8,606	0	300,070	50,226
High withholding tax interest.....	* 311	68,760	* 45,235	0	349,921	* 67
Financial services income.....	* 125,106	9,227,375	12,246,794	0	9,697,932	72,727
Shipping income.....	0	* 15	* 38	0	* 3,884	* 5
Dividends from each noncontrolled section 902 corporation.....	* 85	11,078	4,379	0	* 35,898	* 44
Dividends from an IC-DISC or former DISC [1].....	d	d	d	d	d	d
Distributions from a FSC or former FSC [2].....	0	0	0	0	* 25,759	0
General limitation income.....	263,565	792,890	1,633,427	* 26,850	8,341,350	786,405
Section 901(j) income.....	d	d	d	d	d	d
Income resourced by treaty.....	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	0	* 3,385	* 1,407	0	189,630	* 53
Dividends from 10/50 corporations.....	0	0	0	0	372,812	0

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes—continued							
	Taxable Income (less loss) after adjustments	Foreign taxes available for credit					Foreign taxes paid or accrued	
		Total	Reduction for certain foreign taxes	Carryover	Total paid, accrued, and deemed paid	Total	Dividends	
								(24)
<b>ALL INDUSTRIES</b>								
All income types.....	183,335,583	64,504,758	2,607,690	15,475,018	51,637,430	20,572,435	1,772,683	
Passive income.....	6,841,765	1,216,451	* 77	175,815	1,040,713	479,689	64,591	
High withholding tax interest.....	629,848	171,654	[4]	20,833	150,821	146,644	* 197	
Financial services income.....	34,635,928	9,049,977	0	1,466,736	7,583,241	4,290,184	444,010	
Shipping income.....	1,008,485	166,080	0	* 34,607	131,473	61,608	* 3,340	
Dividends from each noncontrolled section 902 corporation....	2,481,037	512,438	0	475,833	36,605	1,731	1,731	
Dividends from an IC-DISC or former DISC [1].....	* 2,206	* 28	0	[4]	* 28	* 2	* 2	
Distributions from a FSC or former FSC [2].....	* 25,760	* 160	0	0	* 160	* 160	* 160	
General limitation income.....	137,285,484	52,222,877	2,607,613	13,264,031	41,566,459	15,564,082	1,234,861	
Section 901(j) income.....	60,796	* 178	0	* 1	* 177	* 16	* 7	
Income resourced by treaty.....	82,637	17,104	0	* 3,902	13,202	3,151	* 675	
Dividends from each 10/50 PFIC.....	281,637	133,930	0	33,259	100,671	6,526	6,476	
Dividends from 10/50 corporations.....	0	1,013,879	0	0	1,013,879	18,641	16,633	
<b>AGRICULTURE, FORESTRY, FISHING, AND HUNTING</b>								
All income types.....	88,642	54,679	0	* 8,482	46,197	4,756	452	
Passive income.....	765	186	0	* 104	82	81	49	
High withholding tax interest.....	d	d	d	d	d	d	d	
Financial services income.....	0	0	0	0	0	0	0	
Shipping income.....	0	0	0	0	0	0	0	
Dividends from each noncontrolled section 902 corporation....	0	0	0	0	0	0	0	
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0	0	
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0	0	
General limitation income.....	d	d	d	d	d	d	d	
Section 901(j) income.....	0	0	0	0	0	0	0	
Income resourced by treaty.....	0	0	0	0	0	0	0	
Dividends from each 10/50 PFIC.....	0	0	0	0	0	0	0	
Dividends from 10/50 corporations.....	0	0	0	0	0	0	0	
<b>MINING</b>								
All income types.....	3,885,887	1,987,968	140,618	610,477	1,518,109	1,188,784	88,674	
Passive income.....	342,341	82,150	0	* 203	81,947	59,308	* 261	
High withholding tax interest.....	* 8,596	* 5,320	0	0	* 5,320	* 5,320	0	
Financial services income.....	d	d	d	d	d	d	d	
Shipping income.....	d	d	d	d	d	d	d	
Dividends from each noncontrolled section 902 corporation....	* 5,795	0	0	0	0	0	0	
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0	0	
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0	0	
General limitation income.....	3,463,239	1,896,332	140,618	610,274	1,426,676	1,124,059	88,316	
Section 901(j) income.....	* 53,799	0	0	0	0	0	0	
Income resourced by treaty.....	0	0	0	0	0	0	0	
Dividends from each 10/50 PFIC.....	0	0	0	0	0	0	0	
Dividends from 10/50 corporations.....	0	* 4,166	0	0	* 4,166	* 97	* 97	
<b>UTILITIES</b>								
All income types.....	* 248,475	* 55,640	0	* 3,249	* 52,391	* 3,115	* 1,320	
Passive income.....	* 1,876	* 596	0	0	* 596	* 15	* 2	
High withholding tax interest.....	0	0	0	0	0	0	0	
Financial services income.....	d	d	d	d	d	d	d	
Shipping income.....	0	0	0	0	0	0	0	
Dividends from each noncontrolled section 902 corporation....	0	0	0	0	0	0	0	
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0	0	
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0	0	
General limitation income.....	d	d	d	d	d	d	d	
Section 901(j) income.....	0	0	0	0	0	0	0	
Income resourced by treaty.....	0	0	0	0	0	0	0	
Dividends from each 10/50 PFIC.....	0	0	0	0	0	0	0	
Dividends from 10/50 corporations.....	0	0	0	0	0	0	0	

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes—continued						
	Taxable Income (less loss) after adjustments	Foreign taxes available for credit				Foreign taxes paid or accrued	
		Total	Reduction for certain foreign taxes	Carryover	Total paid, accrued, and deemed paid	Total	Dividends
<b>CONSTRUCTION</b>							
All income types.....	85,828	45,178	0	19,938	25,240	12,271	1,051
Passive income.....	5,946	2,243	0	* 377	1,866	1,865	32
High withholding tax interest.....	0	0	0	0	0	0	0
Financial services income.....	d	d	d	d	d	d	d
Shipping income.....	0	0	0	0	0	0	0
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0	0
General limitation income.....	79,684	42,913	0	19,553	23,359	10,391	1,009
Section 901(j) income.....	0	0	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	d	d	d	d	d	d	d
Dividends from 10/50 corporations.....	0	0	0	0	0	0	0
<b>MANUFACTURING</b>							
All income types.....	116,492,468	44,399,581	2,275,008	11,819,748	34,854,841	11,575,430	951,574
Passive income.....	3,422,920	632,163	* 77	152,529	479,711	92,978	18,957
High withholding tax interest.....	123,918	40,019	0	9,523	30,495	27,056	[4]
Financial services income.....	2,654,628	305,024	0	* 4,476	300,548	120,572	* 6,077
Shipping income.....	105,356	* 41,847	0	* 8,561	* 33,285	* 6,171	0
Dividends from each noncontrolled section 902 corporation.....	1,696,179	397,473	0	382,262	15,211	526	526
Dividends from an IC-DISC or former DISC [1].....	* 1,339	* 26	0	0	* 26	0	0
Distributions from a FSC or former FSC [2].....	* 1	0	0	0	0	0	0
General limitation income.....	108,364,924	42,211,077	2,274,931	11,247,218	33,238,790	11,308,229	908,929
Section 901(j) income.....	* 1,778	* 28	0	* 1	* 27	* 16	* 7
Income resourced by treaty.....	60,050	12,768	0	* 1,902	* 10,866	* 815	* 45
Dividends from each 10/50 PFIC.....	61,374	29,514	0	13,276	16,238	* 4,598	* 4,553
Dividends from 10/50 corporations.....	0	729,642	0	0	729,642	14,469	12,480
<b>WHOLESALE AND RETAIL TRADE</b>							
All income types.....	6,595,876	2,273,871	* 166,207	490,112	1,949,966	497,920	53,612
Passive income.....	314,951	53,628	0	1,344	52,284	19,742	1,214
High withholding tax interest.....	12,764	2,330	[4]	* 310	2,020	1,852	0
Financial services income.....	* 118,395	* 39,056	0	0	* 39,056	* 8,060	0
Shipping income.....	* 69,937	* 6,698	0	0	* 6,698	* 12	0
Dividends from each noncontrolled section 902 corporation.....	d	d	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1].....	d	d	d	d	d	d	d
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0	0
General limitation income.....	6,014,073	2,136,518	* 166,207	465,879	1,836,846	465,813	51,667
Section 901(j) income.....	d	d	d	d	d	d	d
Income resourced by treaty.....	* 8,353	* 1,741	0	* 31	* 1,710	* 1,710	* 4
Dividends from each 10/50 PFIC.....	* 21,625	* 8,082	0	* 1,027	* 7,055	* 215	* 215
Dividends from 10/50 corporations.....	0	4,145	0	0	4,145	* 514	* 510

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes—continued							
	Taxable Income (less loss) after adjustments	Foreign taxes available for credit					Foreign taxes paid or accrued	
		Total	Reduction for certain foreign taxes	Carryover	Total paid, accrued, and deemed paid	Total	Dividends	
								(24)
<b>TRANSPORTATION AND WAREHOUSING</b>								
All income types.....	1,833,480	262,101	0	61,884	200,217	96,931	11,023	
Passive income.....	27,024	6,260	0	* 489	5,771	4,514	* 3,648	
High withholding tax interest.....	* 5,309	* 1,152	0	* 55	* 1,096	* 1,096	0	
Financial services income.....	d	d	d	d	d	d	d	
Shipping income.....	808,464	116,683	0	* 26,009	90,674	54,625	* 3,340	
Dividends from each noncontrolled section 902 corporation.....	* 65,523	* 13,174	0	* 13,174	0	0	0	
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0	0	
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0	0	
General limitation income.....	918,936	100,688	0	22,156	78,531	35,023	* 2,364	
Section 901(j) income.....	0	0	0	0	0	0	0	
Income resourced by treaty.....	0	0	0	0	0	0	0	
Dividends from each 10/50 PFIC.....	d	d	d	d	d	d	d	
Dividends from 10/50 corporations.....	0	* 21,058	0	0	* 21,058	* 37	* 37	
<b>INFORMATION</b>								
All income types.....	11,016,154	2,680,687	* 743	251,673	2,429,758	1,552,307	54,805	
Passive income.....	1,101,093	120,115	0	* 7,708	112,407	13,490	3,324	
High withholding tax interest.....	* 2,603	* 350	0	* 69	* 281	* 281	0	
Financial services income.....	d	d	d	d	d	d	d	
Shipping income.....	* 12,891	0	0	0	0	0	0	
Dividends from each noncontrolled section 902 corporation.....	d	d	d	d	d	d	d	
Dividends from an IC-DISC or former DISC [1].....	d	d	d	d	d	d	d	
Distributions from a FSC or former FSC [2].....	d	d	d	d	d	d	d	
General limitation income.....	9,621,338	2,451,982	* 743	208,279	2,244,446	1,537,872	50,816	
Section 901(j) income.....	0	0	0	0	0	0	0	
Income resourced by treaty.....	d	d	d	d	d	d	d	
Dividends from each 10/50 PFIC.....	d	d	d	d	d	d	d	
Dividends from 10/50 corporations.....	0	* 69,693	0	0	* 69,693	* 40	* 40	
<b>FINANCE, INSURANCE, REAL ESTATE, AND RENTAL AND LEASING</b>								
All income types.....	24,679,802	5,897,939	0	1,158,881	4,739,057	2,639,868	216,118	
Passive income.....	1,375,005	280,536	0	2,334	278,202	271,048	31,051	
High withholding tax interest.....	126,773	34,419	0	10,041	24,378	24,378	* 197	
Financial services income.....	22,229,740	5,402,331	0	1,111,886	4,290,444	2,267,694	176,975	
Shipping income.....	d	d	d	d	d	d	d	
Dividends from each noncontrolled section 902 corporation.....	d	d	d	d	d	d	d	
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0	0	
Distributions from a FSC or former FSC [2].....	d	d	d	d	d	d	d	
General limitation income.....	943,189	173,775	0	31,159	142,617	74,033	5,179	
Section 901(j) income.....	0	0	0	0	0	0	0	
Income resourced by treaty.....	0	0	0	0	0	0	0	
Dividends from each 10/50 PFIC.....	d	d	d	d	d	d	d	
Dividends from 10/50 corporations.....	0	* 3,217	0	0	* 3,217	* 2,555	* 2,555	
<b>SERVICES</b>								
All income types.....	18,408,971	6,847,114	* 25,114	1,050,575	5,821,653	3,001,052	394,054	
Passive income.....	249,845	38,575	0	10,727	27,847	16,647	6,053	
High withholding tax interest.....	349,854	88,055	0	* 834	87,221	86,651	0	
Financial services income.....	9,625,205	3,302,523	0	349,361	2,953,162	1,893,828	260,957	
Shipping income.....	* 3,880	* 849	0	* 34	* 816	* 800	0	
Dividends from each noncontrolled section 902 corporation.....	409,904	37,300	0	21,771	15,529	1,205	* 1,205	
Dividends from an IC-DISC or former DISC [1].....	d	d	d	d	d	d	d	
Distributions from a FSC or former FSC [2].....	* 25,759	0	0	0	0	0	0	
General limitation income.....	7,554,946	3,104,627	* 25,114	648,899	2,480,843	1,000,927	124,862	
Section 901(j) income.....	d	d	d	d	d	d	d	
Income resourced by treaty.....	0	0	0	0	0	0	0	
Dividends from each 10/50 PFIC.....	189,578	93,226	0	* 18,949	* 74,276	* 64	* 64	
Dividends from 10/50 corporations.....	0	181,959	0	0	181,959	* 929	* 914	

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes—continued						
	Foreign taxes available for credit—continued						
	Foreign taxes paid or accrued—continued						Taxes deemed paid
	Interest	Rents, royalties, and license fees	Branch income	Specifically allocable income [section 863(b)]	Service income	Other income	
(31)	(32)	(33)	(34)	(35)	(36)	(37)	
<b>ALL INDUSTRIES</b>							
All income types.....	744,888	2,797,998	5,035,070	77,612	333,466	9,810,717	31,064,995
Passive income.....	254,809	34,538	19,612	0	* 52	106,087	561,024
High withholding tax interest.....	146,447	0	0	0	0	0	* 4,178
Financial services income.....	217,669	35,728	2,242,441	0	96,676	1,253,660	3,293,057
Shipping income.....	* 862	* 6,464	* 38,327	0	* 554	* 12,062	69,865
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	0	0	34,874
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0	* 26
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0	0
General limitation income.....	125,042	2,719,121	2,734,266	77,612	236,184	8,436,995	26,002,377
Section 901(j) income.....	0	* 9	0	0	0	0	* 161
Income resourced by treaty.....	0	* 351	* 420	0	0	* 1,706	* 10,051
Dividends from each 10/50 PFIC.....	[4]	* 45	0	0	0	* 5	94,145
Dividends from 10/50 corporations.....	* 59	* 1,742	* 4	0	0	* 203	995,238
<b>AGRICULTURE, FORESTRY, FISHING, AND HUNTING</b>							
All income types.....	* 10	* 971	* 2,426	0	* 10	* 888	* 41,441
Passive income.....	0	* 19	0	0	0	* 14	* 1
High withholding tax interest.....	d	d	d	d	d	d	d
Financial services income.....	0	0	0	0	0	0	0
Shipping income.....	0	0	0	0	0	0	0
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0	0
General limitation income.....	d	d	d	d	d	d	d
Section 901(j) income.....	0	0	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	0	0	0	0	0	0	0
Dividends from 10/50 corporations.....	0	0	0	0	0	0	0
<b>MINING</b>							
All income types.....	13,626	* 5,913	292,696	0	* 8,957	778,917	329,325
Passive income.....	* 1,837	0	* 31	0	0	* 57,179	* 22,639
High withholding tax interest.....	* 5,320	0	0	0	0	0	0
Financial services income.....	d	d	d	d	d	d	d
Shipping income.....	d	d	d	d	d	d	d
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0	0
General limitation income.....	6,469	* 5,913	292,665	0	* 8,957	721,739	302,617
Section 901(j) income.....	0	0	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	0	0	0	0	0	0	0
Dividends from 10/50 corporations.....	0	0	0	0	0	0	* 4,069
<b>UTILITIES</b>							
All income types.....	* 127	* 657	* 998	0	0	* 13	* 49,275
Passive income.....	0	0	0	0	0	* 13	* 581
High withholding tax interest.....	0	0	0	0	0	0	0
Financial services income.....	d	d	d	d	d	d	d
Shipping income.....	0	0	0	0	0	0	0
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0	0
General limitation income.....	d	d	d	d	d	d	d
Section 901(j) income.....	0	0	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	0	0	0	0	0	0	0
Dividends from 10/50 corporations.....	0	0	0	0	0	0	0

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes—continued						Taxes deemed paid
	Foreign taxes available for credit—continued						
	Foreign taxes paid or accrued—continued						
	Interest	Rents, royalties, and license fees	Branch income	Specifically allocable income [section 863(b)]	Service income	Other income	
(31)	(32)	(33)	(34)	(35)	(36)	(37)	
<b>CONSTRUCTION</b>							
All income types.....	1,051	* 328	* 2,438	* 2,831	0	5,601	* 12,969
Passive income.....	32	* 299	* 1,534	0	0	0	* 1
High withholding tax interest.....	0	0	0	0	0	0	0
Financial services income.....	d	d	d	d	d	d	d
Shipping income.....	0	0	0	0	0	0	0
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0	0
General limitation income.....	1,009	* 29	* 905	* 2,831	0	5,601	* 12,968
Section 901(j) income.....	0	0	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	d	d	d	d	d	d	d
Dividends from 10/50 corporations.....	0	0	0	0	0	0	0
<b>MANUFACTURING</b>							
All income types.....	951,574	128,863	1,734,008	1,221,625	70,654	73,671	23,279,410
Passive income.....	18,957	10,656	12,456	14,140	0	0	386,733
High withholding tax interest.....	[4]	27,056	0	0	0	0	* 3,440
Financial services income.....	* 6,077	* 2,420	* 2,386	* 10,658	0	* 9,819	* 179,976
Shipping income.....	0	* 8	0	0	0	* 194	* 27,115
Dividends from each noncontrolled section 902 corporation.....	526	0	0	0	0	0	14,685
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0	* 26
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0	0
General limitation income.....	908,929	88,666	1,717,034	1,196,407	70,654	63,658	21,930,562
Section 901(j) income.....	* 7	0	* 9	0	0	0	* 11
Income resourced by treaty.....	* 45	0	* 351	* 420	0	0	* 10,051
Dividends from each 10/50 PFIC.....	* 4,553	0	* 45	0	0	0	11,640
Dividends from 10/50 corporations.....	12,480	* 59	* 1,727	0	0	0	715,173
<b>WHOLESALE AND RETAIL TRADE</b>							
All income types.....	53,612	15,169	144,188	172,675	* 515	7,702	1,452,046
Passive income.....	1,214	1,263	7,609	* 125	0	0	32,542
High withholding tax interest.....	0	1,852	0	0	0	0	* 169
Financial services income.....	0	0	0	* 2,406	0	* 46	* 30,996
Shipping income.....	0	0	* 12	0	0	0	* 6,686
Dividends from each noncontrolled section 902 corporation.....	d	d	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1].....	d	d	d	d	d	d	d
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0	0
General limitation income.....	51,667	12,054	136,566	170,140	* 515	7,657	1,371,033
Section 901(j) income.....	d	d	d	d	d	d	d
Income resourced by treaty.....	* 4	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	* 215	0	0	0	0	0	* 6,840
Dividends from 10/50 corporations.....	* 510	0	0	* 4	0	0	3,630

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes—continued						
	Foreign taxes available for credit—continued						
	Foreign taxes paid or accrued—continued						Taxes deemed paid
	Interest	Rents, royalties, and license fees	Branch income	Specifically allocable income [section 863(b)]	Service income	Other income	
(31)	(32)	(33)	(34)	(35)	(36)	(37)	
<b>TRANSPORTATION AND WAREHOUSING</b>							
All income types.....	11,023	2,167	10,483	* 47,519	* 30	7,136	103,287
Passive income.....	* 3,648	* 132	* 448	0	0	0	* 1,257
High withholding tax interest.....	0	* 1,096	0	0	0	0	0
Financial services income.....	d	d	d	d	d	d	d
Shipping income.....	* 3,340	* 855	* 6,451	* 37,527	0	* 359	* 36,049
Dividends from each noncontrolled section 902 corporation.....	0	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0	0
General limitation income.....	* 2,364	* 83	* 3,583	* 9,992	* 30	* 6,776	43,508
Section 901(j) income.....	0	0	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	d	d	d	d	d	d	d
Dividends from 10/50 corporations.....	* 37	0	0	0	0	0	* 21,021
<b>INFORMATION</b>							
All income types.....	54,805	3,579	668,669	676,201	* 2,443	18,266	877,451
Passive income.....	3,324	* 2,299	* 7,847	0	0	0	98,917
High withholding tax interest.....	0	* 281	0	0	0	0	0
Financial services income.....	d	d	d	d	d	d	d
Shipping income.....	0	0	0	0	0	0	0
Dividends from each noncontrolled section 902 corporation.....	d	d	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1].....	d	d	d	d	d	d	d
Distributions from a FSC or former FSC [2].....	d	d	d	d	d	d	d
General limitation income.....	50,816	* 999	660,822	676,201	* 2,443	18,266	706,574
Section 901(j) income.....	0	0	0	0	0	0	0
Income resourced by treaty.....	d	d	d	d	d	d	d
Dividends from each 10/50 PFIC.....	d	d	d	d	d	d	d
Dividends from 10/50 corporations.....	* 40	0	0	0	0	0	* 69,653
<b>FINANCE, INSURANCE, REAL ESTATE, AND RENTAL AND LEASING</b>							
All income types.....	216,118	444,628	24,742	1,050,363	0	60,756	2,099,189
Passive income.....	31,051	238,035	* 1,229	[4]	0	* 48	7,154
High withholding tax interest.....	* 197	24,181	0	0	0	0	0
Financial services income.....	176,975	181,164	* 16,323	1,047,815	0	49,208	2,022,751
Shipping income.....	d	d	d	d	d	d	d
Dividends from each noncontrolled section 902 corporation.....	d	d	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1].....	0	0	0	0	0	0	0
Distributions from a FSC or former FSC [2].....	d	d	d	d	d	d	d
General limitation income.....	5,179	* 1,247	7,191	* 2,548	0	11,500	68,584
Section 901(j) income.....	0	0	0	0	0	0	0
Income resourced by treaty.....	0	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	d	d	d	d	d	d	d
Dividends from 10/50 corporations.....	* 2,555	0	0	0	0	0	* 662
<b>SERVICES</b>							
All income types.....	394,054	136,392	205,928	1,567,735	* 3,970	151,367	2,820,602
Passive income.....	6,053	287	3,396	* 5,315	0	* 4	11,200
High withholding tax interest.....	0	86,651	0	0	0	0	* 569
Financial services income.....	260,957	34,057	* 17,019	1,181,561	0	* 37,604	1,059,334
Shipping income.....	0	0	0	* 800	0	0	* 15
Dividends from each noncontrolled section 902 corporation.....	* 1,205	0	0	0	0	0	14,324
Dividends from an IC-DISC or former DISC [1].....	d	d	d	d	d	d	d
Distributions from a FSC or former FSC [2].....	0	0	0	0	0	0	0
General limitation income.....	124,862	15,396	185,498	380,058	* 3,970	113,759	1,479,916
Section 901(j) income.....	d	d	d	d	d	d	d
Income resourced by treaty.....	0	0	0	0	0	0	0
Dividends from each 10/50 PFIC.....	* 64	[4]	0	0	0	0	* 74,213
Dividends from 10/50 corporations.....	* 914	[4]	* 15	0	0	0	181,030

Footnotes at end of table.



## **Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

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### **Footnotes**

\* Data should be used with caution because of the small number of sample returns on which they were based

d—Not shown to avoid disclosure of information about specific taxpayers. However, the data are included in the appropriate totals.

[1] Interest-Charge Domestic International Sales Corporation (IC-DISC) and Domestic International Sales Corporation (DISC).

[2] Foreign Sales Corporation (FSC).

[3] Included in gross income (less loss) shown in columns 2-8.

[4] Less than \$500.

# Corporate Foreign Tax Credit, 2003

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**Table 3. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country to Which Foreign Taxes Were Paid**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Industrial sector and type of foreign income for which separate credit was computed	Number of returns	Foreign income and taxes				
		Gross income (less loss)				
		Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees
(1)	(2)	(3)	(4)	(5)	(6)	
<b>All geographic areas.....</b>	<b>5,409</b>	<b>406,485,266</b>	<b>78,185,158</b>	<b>31,064,340</b>	<b>48,742,000</b>	<b>65,684,288</b>
<b>Canada.....</b>	<b>1,975</b>	<b>34,860,199</b>	<b>10,535,327</b>	<b>5,066,354</b>	<b>4,216,048</b>	<b>4,810,254</b>
<b>Latin America, total.....</b>	<b>986</b>	<b>33,405,433</b>	<b>8,162,062</b>	<b>2,803,666</b>	<b>5,345,098</b>	<b>4,300,161</b>
Mexico.....	655	9,908,917	1,829,489	836,162	1,234,685	2,213,332
Central America, total.....	251	1,160,323	155,790	59,889	169,488	125,328
Belize.....	26	3,822	* 1,002	* 66	* 1,251	* 669
Costa Rica.....	126	167,026	22,375	6,492	18,186	51,566
El Salvador.....	89	202,306	18,854	6,459	30,218	13,753
Guatemala.....	106	151,749	11,722	4,120	24,955	17,572
Honduras.....	99	158,052	7,295	* 3,669	9,958	11,950
Nicaragua.....	50	59,047	* 473	* 238	2,102	3,857
Panama (including Canal Zone).....	148	388,460	84,070	35,197	82,817	25,959
Central America not allocable.....	5	* 29,863	* 10,000	* 3,649	0	0
Caribbean countries, total.....	298	7,391,432	2,860,826	744,821	1,588,951	271,088
Cayman Islands (British).....	148	4,634,614	2,073,171	600,212	1,435,262	106,092
Dominican Republic.....	131	720,382	* 447,181	* 103,409	65,515	8,273
Haiti.....	25	29,099	* 36	* 53	* 9,158	* 1,029
Jamaica.....	77	168,378	14,978	* 11,433	38,306	30,438
Trinidad.....	101	1,404,214	* 146,248	* 27,940	37,030	34,580
Other Caribbean countries.....	89	434,744	179,212	1,773	3,679	90,676
South America, total.....	642	14,731,365	3,315,957	1,162,795	2,340,150	1,687,169
Argentina.....	291	1,695,718	289,030	183,328	280,560	141,539
Bolivia.....	62	63,360	* 26,052	* 4,740	11,545	4,275
Brazil.....	413	5,932,212	1,959,977	765,926	1,106,587	742,710
Chile.....	241	2,079,124	217,221	30,338	412,716	106,796
Colombia.....	213	1,183,707	108,574	84,772	94,424	95,178
Ecuador.....	153	443,840	50,215	15,278	51,845	43,942
Paraguay.....	47	89,225	* 40,783	* 16,091	25,331	1,932
Peru.....	173	1,199,387	35,689	9,838	76,056	438,222
Uruguay.....	97	218,735	129,061	7,903	29,169	10,488
Venezuela.....	227	1,739,016	451,339	40,126	248,321	100,596
Other South American countries.....	30	87,042	* 8,016	* 4,452	* 3,596	1,492
Latin America not allocable.....	10	* 213,397	0	0	* 11,824	* 3,244
<b>Other Western Hemisphere, total.....</b>	<b>250</b>	<b>8,706,127</b>	<b>5,288,689</b>	<b>584,576</b>	<b>849,181</b>	<b>2,225,016</b>
Bahamas.....	84	-476,526	99,573	* 5,434	377,003	11,246
Bermuda.....	173	7,810,341	4,996,927	549,176	285,786	1,697,838
Netherlands Antilles.....	66	487,134	102,833	* 11,930	30,921	11,637
Other British West Indies.....	87	812,919	87,989	18,010	142,513	497,499
All other Western Hemisphere.....	62	72,259	* 1,366	* 26	12,958	6,795
<b>Europe, total.....</b>	<b>2,347</b>	<b>165,648,015</b>	<b>39,233,998</b>	<b>16,723,732</b>	<b>20,495,051</b>	<b>27,235,969</b>
European Union, total.....	2,276	136,660,840	32,917,216	14,938,985	18,835,957	21,977,591
Austria.....	187	999,453	199,407	66,862	93,363	424,731
Belgium.....	267	4,483,725	777,195	312,197	225,931	560,811
Denmark.....	206	2,259,254	710,140	331,569	61,582	204,625
Finland.....	220	524,987	106,016	32,723	103,532	169,333
France (including Andorra).....	537	8,094,489	1,702,216	749,719	497,946	2,234,994
Germany.....	561	14,558,284	1,530,105	757,052	1,298,114	3,426,987
Greece.....	140	516,741	226,003	94,967	8,229	99,863

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 3. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country to Which Foreign Taxes Were Paid—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country	Number of returns	Foreign income and taxes				
		Gross income (less loss)				
		Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees
(1)	(2)	(3)	(4)	(5)	(6)	
<b>Europe—continued</b>						
European Union—continued						
Ireland.....	249	11,263,438	3,195,395	354,835	245,232	6,294,771
Italy (including San Marino).....	382	5,247,064	806,836	497,706	462,672	1,102,844
Luxembourg.....	115	4,274,588	2,652,687	809,722	505,853	91,826
Netherlands.....	755	14,144,848	5,815,561	2,110,440	1,152,433	2,726,151
Portugal.....	163	1,326,293	600,850	276,045	34,134	232,004
Spain.....	344	10,104,865	3,783,870	4,453,276	156,580	644,033
Sweden.....	251	2,912,950	1,283,296	470,114	201,380	360,437
United Kingdom.....	1,610	55,949,862	9,527,638	3,621,758	13,788,976	3,404,180
Other West European countries, total.....	368	20,610,080	5,046,848	1,385,526	1,021,393	3,400,981
Liechtenstein.....	10	* 10,567	* 10,310	* 141	* 112	* 1
Monaco.....	13	3,737	* 15	* 6	* 1,052	* 2,256
Norway.....	171	6,789,131	255,698	291,090	442,583	117,857
Switzerland.....	308	12,782,445	4,666,306	1,061,388	330,376	3,192,715
Turkey.....	163	980,402	107,981	32,661	240,793	79,722
Other West European countries not allocable.....	62	43,799	* 6,539	* 240	6,476	8,430
East European countries, total.....	371	7,831,161	1,268,002	398,625	515,828	1,740,945
Romania.....	72	236,790	33,067	12,640	39,738	38,045
Former Soviet Union.....	210	3,701,233	213,167	67,183	293,878	237,515
Other East European countries.....	283	3,893,138	1,021,767	318,802	182,212	1,465,385
Europe not allocable.....	32	545,934	* 1,933	* 597	* 121,873	116,451
<b>Africa, total.....</b>	<b>348</b>	<b>9,871,449</b>	<b>1,627,571</b>	<b>895,822</b>	<b>529,387</b>	<b>483,319</b>
North Africa, total.....	149	1,564,306	43,436	18,776	116,864	70,386
Algeria.....	29	85,224	0	0	* 16,698	* 913
Egypt.....	125	1,343,883	33,951	17,306	77,776	58,433
Libya.....	11	* 6,687	* 6,522	* 3	* 736	* 77
Morocco.....	50	52,932	* 2,551	* 1,417	* 1,772	10,607
Other North African countries.....	42	75,580	* 411	* 49	19,881	* 357
East Africa, total.....	86	435,285	81,449	13,071	57,966	21,712
Ethiopia.....	17	54,117	0	0	* 73	* 855
Kenya.....	46	90,942	* 8,293	* 4,323	* 34,085	5,057
Tanzania.....	15	15,517	* 5,476	* 2,613	* 78	* 561
Uganda.....	9	* 1,017	* 426	* 284	0	* 29
Other East African countries.....	64	273,692	67,254	5,851	23,729	15,211
West and Central Africa, total.....	125	5,519,675	1,043,345	* 575,927	62,655	16,430
Gabon.....	17	120,764	* 63,133	* 36,805	* 6,111	* 184
Ghana.....	18	2,930	* 1,058	* 365	* 354	* 42
Liberia.....	20	21,768	* 5,015	0	12,532	0
Nigeria.....	75	2,780,499	* 540,769	* 185,738	9,997	13,673
Zaire.....	10	67,531	* 5,534	* 1,982	* 63	0
Other West and Central African countries.....	93	2,526,183	* 427,836	* 351,038	33,598	2,532
Southern Africa, total.....	246	2,328,378	459,341	288,048	268,143	374,754
Malawi.....	9	* 2,806	* 1,116	* 1,733	0	* 26
South Africa (including Namibia).....	243	2,003,932	443,691	284,494	268,025	302,452
Zambia.....	19	917	* 6	0	0	* 13
Zimbabwe.....	22	15,645	* 10,555	* 324	* 118	* 253
Other Southern African countries.....	17	305,078	* 3,973	* 1,497	0	* 72,011
Africa not allocable.....	4	* 23,805	0	0	* 23,759	* 36

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 3. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country to Which Foreign Taxes Were Paid—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country	Number of returns	Foreign income and taxes				
		Gross income (less loss)				
		Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees
(1)	(2)	(3)	(4)	(5)	(6)	
<b>Asia, total.....</b>	<b>1,263</b>	<b>74,753,574</b>	<b>9,520,384</b>	<b>4,151,046</b>	<b>5,327,585</b>	<b>15,637,998</b>
Middle East, total.....	315	7,355,396	627,087	93,322	320,454	469,979
Bahrain.....	57	133,225	* 5,703	* 7	* 77,180	2,663
Iran.....	20	18,597	* 6,365	* 5	* 27	* 7,158
Iraq.....	13	297,348	0	0	0	* 13
Israel.....	218	950,552	466,570	67,789	137,242	124,963
Kuwait.....	71	186,625	* 3,540	0	* 187	14,492
Lebanon.....	72	22,967	* 16	0	5,428	6,845
Qatar.....	60	702,910	0	0	19,596	11,905
Saudi Arabia.....	114	2,505,154	34,520	* 6,931	4,038	124,001
United Arab Emirates.....	104	1,548,514	58,496	* 11,964	69,096	97,055
Other areas of Arabian Peninsula.....	54	790,290	* 13,127	* 2,973	* 1,251	37,387
Other Middle East countries.....	107	199,214	38,751	* 3,652	6,410	43,497
Southern and Southeast Asia, total.....	670	18,537,353	2,497,037	815,443	2,302,494	3,618,097
Bangladesh.....	25	91,186	* 678	* 454	* 12,820	* 459
India.....	301	1,361,455	76,411	30,367	523,973	187,896
Indonesia.....	199	4,178,953	442,190	188,343	295,479	107,983
Malaysia.....	251	2,918,469	258,137	49,583	128,003	787,078
Pakistan.....	76	399,412	10,472	5,503	64,945	4,241
Philippines.....	244	1,913,035	363,610	114,316	331,330	256,021
Singapore.....	383	5,168,046	544,694	149,057	616,550	2,030,612
Sri Lanka.....	44	42,784	* 1,284	* 538	* 12,335	3,000
Thailand.....	285	1,863,744	466,721	210,816	296,944	183,182
Vietnam.....	56	73,501	* 94	0	14,676	5,983
Other Southern and Southeast Asian countries.....	53	526,769	* 332,746	* 66,464	5,440	51,642
Eastern Asia, total.....	1,068	48,829,720	6,395,951	3,241,691	2,704,576	11,549,073
China.....	386	5,417,893	680,815	83,595	226,525	2,759,965
Hong Kong.....	357	5,725,847	1,087,528	153,521	823,992	418,151
Japan (including Okinawa and Ryukyu Islands).....	823	29,764,571	3,848,820	2,708,178	620,821	6,237,071
South Korea, Republic of.....	378	4,321,375	589,906	248,072	602,462	1,365,404
Taiwan.....	327	3,333,909	188,882	48,326	424,389	763,009
Other Eastern Asian countries.....	26	266,125	0	0	* 6,386	* 5,472
Asia not allocable.....	15	31,106	* 308	* 590	* 60	* 850
<b>Oceania, total.....</b>	<b>579</b>	<b>12,265,153</b>	<b>2,108,079</b>	<b>580,060</b>	<b>2,477,653</b>	<b>1,184,835</b>
Australia.....	548	10,574,243	1,775,669	521,432	1,822,443	1,090,977
New Zealand.....	256	1,408,177	134,699	57,837	649,841	91,211
Other countries of Oceania.....	57	282,734	197,711	* 792	* 5,369	2,647
<b>Puerto Rico and U.S. Possessions, total.....</b>	<b>421</b>	<b>9,504,900</b>	<b>208,763</b>	<b>67,071</b>	<b>808,046</b>	<b>4,013,127</b>
Puerto Rico.....	373	9,018,390	192,460	63,598	674,115	4,003,780
U.S. Possessions, total.....	142	486,510	16,303	* 3,473	133,931	9,346
American Samoa.....	19	8,383	* 170	* 81	* 6,345	* 303
Guam.....	96	260,740	* 11,200	* 2,905	108,348	4,026
Virgin Islands, U.S.....	81	175,678	* 4,302	* 433	5,252	3,355
Other U.S. Possessions.....	16	41,708	* 631	* 53	* 13,986	* 1,662
<b>Country not stated.....</b>	<b>1896</b>	<b>38,922,628</b>	<b>1,359,658</b>	<b>191,986</b>	<b>8,693,637</b>	<b>5,655,142</b>
<b>Section 863(b) income.....</b>	<b>233</b>	<b>18,424,837</b>	<b>0</b>	<b>0</b>	<b>* 315</b>	<b>* 138,467</b>
<b>Foreign Sales Corporation dividends [1].....</b>	<b>8</b>	<b>* 138,420</b>	<b>* 138,420</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Interest-Charge Domestic International Sales Corporation dividends [1].....</b>	<b>9</b>	<b>* 2,233</b>	<b>* 2,206</b>	<b>* 26</b>	<b>0</b>	<b>0</b>

Footnotes at end of table.

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**Table 3. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country to Which Foreign Taxes Were Paid—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country	Foreign income and taxes—continued				
	Gross income (less loss)—continued				Total deductions
	Service income	Other income	Oil and gas extraction income [2]	Foreign branch income [2]	
(7)	(8)	(9)	(10)	(11)	
<b>All geographic areas</b> .....	<b>20,195,460</b>	<b>162,614,019</b>	<b>34,936,165</b>	<b>83,280,537</b>	<b>201,355,604</b>
<b>Canada</b> .....	<b>1,524,783</b>	<b>8,707,433</b>	<b>3,054,917</b>	<b>5,376,219</b>	<b>12,735,856</b>
<b>Latin America, total</b> .....	<b>932,402</b>	<b>11,862,043</b>	<b>2,682,382</b>	<b>5,665,449</b>	<b>15,671,940</b>
Mexico.....	323,228	3,472,020	* 24	1,988,627	4,907,339
Central America, total.....	29,614	620,214	* 7	269,194	785,188
Belize.....	* 112	721	0	* 335	1,691
Costa Rica.....	3,119	65,286	0	35,443	122,896
El Salvador.....	8,581	124,442	0	16,746	139,647
Guatemala.....	2,351	91,028	0	21,562	105,395
Honduras.....	* 7,896	117,284	0	8,059	132,328
Nicaragua.....	* 393	51,984	0	* 1,094	41,269
Panama (including Canal Zone).....	7,162	153,255	* 7	171,423	236,561
Central America not allocable.....	0	* 16,214	0	* 14,533	* 5,402
Caribbean countries, total.....	209,201	1,716,545	* 896,334	567,297	2,376,963
Cayman Islands (British).....	128,320	291,557	* 45,071	315,598	1,366,178
Dominican Republic.....	5,592	90,413	0	97,385	124,964
Haiti.....	* 480	18,343	0	* 11,639	17,500
Jamaica.....	30,206	43,016	0	31,867	110,267
Trinidad.....	25,199	1,133,218	* 834,242	79,301	424,171
Other Caribbean countries.....	19,405	139,998	* 17,021	31,507	333,882
South America, total.....	370,359	5,854,935	1,786,017	2,827,302	7,407,884
Argentina.....	45,498	755,763	* 410,424	342,137	1,123,033
Bolivia.....	2,710	14,037	* 24	29,016	89,281
Brazil.....	88,550	1,268,461	* 94,402	788,173	2,603,952
Chile.....	20,689	1,291,364	* 23	201,090	1,128,278
Colombia.....	23,402	777,357	* 458,659	151,259	525,916
Ecuador.....	23,974	258,587	* 155,345	58,661	239,671
Paraguay.....	* 1,464	3,623	0	* 26,413	27,227
Peru.....	100,707	538,875	0	497,397	825,927
Uruguay.....	15,428	26,685	0	27,802	70,793
Venezuela.....	42,598	856,037	* 667,140	652,054	707,173
Other South American countries.....	* 5,340	64,146	0	* 53,301	66,633
Latin America not allocable.....	0	* 198,329	0	* 13,029	* 194,566
<b>Other Western Hemisphere, total</b> .....	<b>150,280</b>	<b>-391,616</b>	<b>* 117,186</b>	<b>-239,191</b>	<b>2,443,594</b>
Bahamas.....	* 57,869	-1,027,652	* 14,958	-281,442	469,019
Bermuda.....	64,875	215,739	* 101,829	43,960	1,155,370
Netherlands Antilles.....	* 3,883	325,929	0	28,431	204,557
Other British West Indies.....	* 4,345	62,562	* 399	-51,537	548,272
All other Western Hemisphere.....	* 19,308	31,806	0	* 21,396	66,376
<b>Europe, total</b> .....	<b>8,004,392</b>	<b>53,954,874</b>	<b>15,592,918</b>	<b>38,498,118</b>	<b>77,699,697</b>
European Union, total.....	7,441,978	40,549,113	9,585,963	33,568,213	66,988,511
Austria.....	25,995	189,094	* 4,122	181,086	796,145
Belgium.....	56,403	2,551,188	* 11	1,012,971	3,306,006
Denmark.....	18,997	932,341	* 1,063,368	291,363	680,515
Finland.....	21,367	92,015	0	43,463	276,639
France (including Andorra).....	815,830	2,093,783	* 513	1,248,481	4,899,457
Germany.....	1,787,176	5,758,850	* 7	4,897,449	10,168,943
Greece.....	32,623	55,057	0	27,263	153,681

Footnotes at end of table.

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**Table 3. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country to Which Foreign Taxes Were Paid—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country	Foreign income and taxes—continued				Total deductions
	Gross income (less loss)—continued				
	Service income	Other income	Oil and gas extraction income [2]	Foreign branch income [2]	
	(7)	(8)	(9)	(10)	(11)
<b>Europe—continued</b>					
European Union--continued					
Ireland.....	525,242	647,964	* 11,048	291,321	4,207,646
Italy (including San Marino).....	600,552	1,776,454	* 1,224	1,311,583	3,176,228
Luxembourg.....	* 3,054	211,445	* 481,652	48,268	619,656
Netherlands.....	179,779	2,160,483	* 612,876	929,613	4,328,063
Portugal.....	10,154	173,106	* 271,460	118,358	331,115
Spain.....	241,332	825,774	* 2,091,874	561,918	1,620,403
Sweden.....	48,171	549,552	0	334,168	968,067
United Kingdom.....	3,075,302	22,532,007	* 5,047,808	22,270,906	31,455,944
Other West European countries, total.....	104,837	9,650,496	* 4,245,779	2,761,874	6,687,513
Liechtenstein.....	0	* 2	0	0	* 107
Monaco.....	* 61	* 347	0	0	1,496
Norway.....	46,080	5,635,823	* 4,245,695	986,773	2,223,573
Switzerland.....	45,435	3,486,226	0	1,135,874	3,783,262
Turkey.....	11,814	507,432	0	638,332	666,231
Other West European countries not allocable.....	* 1,448	20,666	* 85	* 896	12,844
East European countries, total.....	454,080	3,453,681	* 1,761,175	2,045,640	3,699,774
Romania.....	9,438	103,861	0	104,290	127,437
Former Soviet Union.....	351,237	2,538,253	* 1,761,175	1,215,006	2,104,025
Other East European countries.....	93,405	811,567	0	726,343	1,468,313
Europe not allocable.....	* 3,497	301,583	0	* 122,391	323,899
<b>Africa, total.....</b>	<b>648,276</b>	<b>5,687,073</b>	<b>* 5,222,151</b>	<b>1,778,888</b>	<b>4,094,391</b>
North Africa, total.....	118,699	1,196,145	* 748,447	397,408	952,487
Algeria.....	* 411	67,202	* 161	* 78,992	60,201
Egypt.....	105,796	1,050,620	* 718,678	227,250	801,076
Libya.....	0	* -651	0	* 16	4,476
Morocco.....	* 2,941	33,644	0	* 32,190	39,933
Other North African countries.....	* 9,550	45,331	* 29,608	* 58,959	46,799
East Africa, total.....	* 35,426	225,662	* 4	136,565	280,407
Ethiopia.....	* 32,036	21,153	0	* 44,188	48,748
Kenya.....	* 1,986	37,198	0	* 44,504	57,686
Tanzania.....	* 5	6,785	0	* 129	7,353
Uganda.....	0	* 278	0	* 21	* 80
Other East African countries.....	* 1,399	160,248	* 4	* 47,723	166,540
West and Central Africa, total.....	126,174	3,695,143	* 4,473,699	406,994	1,574,713
Gabon.....	* 37	* 14,494	* 99,937	* 19,349	16,990
Ghana.....	* 141	* 971	0	* 387	689
Liberia.....	0	* 4,221	0	* 19	6,783
Nigeria.....	11,996	2,018,327	* 2,056,465	* 124,705	549,604
Zaire.....	* 19,278	* 40,674	* 40,086	* 56,061	* 45,908
Other West and Central African countries.....	94,721	1,616,458	* 2,277,211	206,473	954,738
Southern Africa, total.....	367,975	570,116	0	814,162	1,277,764
Malawi.....	0	* -69	0	0	* 6
South Africa (including Namibia).....	140,516	564,755	0	812,107	1,096,690
Zambia.....	* 1	897	0	* 673	444
Zimbabwe.....	* 39	4,355	0	* 1,180	2,375
Other Southern African countries.....	* 227,418	* 178	0	* 202	178,249
Africa not allocable.....	* 3	* 7	0	* 23,759	* 9,020

Footnotes at end of table.

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**Table 3. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country to Which Foreign Taxes Were Paid—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country	Foreign income and taxes—continued				
	Gross income (less loss)—continued				Total deductions
	Service income	Other income	Oil and gas extraction income [2]	Foreign branch income [2]	
(7)	(8)	(9)	(10)	(11)	
<b>Asia, total.....</b>	<b>2,009,803</b>	<b>38,106,759</b>	<b>* 6,351,150</b>	<b>23,937,007</b>	<b>40,754,480</b>
Middle East, total.....	367,750	5,476,804	* 2,437,455	1,328,733	3,644,410
Bahrain.....	* 7,191	40,479	* -4,973	96,126	103,402
Iran.....	0	* 5,042	0	* 5,248	2,819
Iraq.....	* 161,802	* 135,532	0	* 225,232	164,938
Israel.....	58,742	95,246	0	175,020	399,034
Kuwait.....	45,281	123,125	* 21,270	81,834	116,840
Lebanon.....	* 129	10,549	0	10,734	15,879
Qatar.....	* 9,419	661,991	* 343,167	* -2,660	188,864
Saudi Arabia.....	18,458	2,317,206	* 1,152,388	140,426	1,611,144
United Arab Emirates.....	58,861	1,253,042	* 382,349	385,688	608,129
Other areas of Arabian Peninsula.....	* 2,312	733,241	* 543,255	101,755	310,475
Other Middle East countries.....	5,556	101,349	0	109,329	122,886
Southern and Southeast Asia, total.....	341,888	8,962,394	* 3,767,168	4,840,833	8,703,267
Bangladesh.....	* 13	76,761	0	* 70,793	71,768
India.....	62,561	480,246	0	877,612	846,300
Indonesia.....	55,612	3,089,346	* 1,691,906	545,262	2,195,628
Malaysia.....	15,537	1,680,132	* 1,074,325	207,769	801,520
Pakistan.....	* 3,345	310,906	* 197,802	119,835	229,385
Philippines.....	38,520	809,238	* 203,359	482,298	894,141
Singapore.....	70,435	1,756,698	0	1,931,652	2,637,488
Sri Lanka.....	* 2,021	23,606	0	* 32,151	20,936
Thailand.....	68,054	638,027	* 599,775	501,059	884,031
Vietnam.....	* 11,023	41,725	0	28,796	41,731
Other Southern and Southeast Asian countries.....	14,767	55,711	0	43,607	80,338
Eastern Asia, total.....	1,277,890	23,660,539	* 146,527	17,765,806	28,398,983
China.....	232,983	1,434,011	* 140,695	903,526	2,529,734
Hong Kong.....	247,570	2,995,085	0	-63,068	3,512,571
Japan (including Okinawa and Ryukyu Islands).....	406,106	15,943,574	* 5,833	14,185,229	17,335,971
South Korea, Republic of.....	125,967	1,389,564	0	1,216,232	2,619,442
Taiwan.....	253,503	1,655,800	0	1,521,743	2,180,817
Other Eastern Asian countries.....	* 11,760	242,506	0	* 2,144	220,447
Asia not allocable.....	* 22,275	* 7,022	0	* 1,635	7,820
<b>Oceania, total.....</b>	<b>421,745</b>	<b>5,492,781</b>	<b>* 1,196,193</b>	<b>2,782,235</b>	<b>7,147,860</b>
Australia.....	407,468	4,956,253	* 1,129,863	2,532,597	5,904,505
New Zealand.....	8,484	466,105	* 14,455	215,599	1,192,762
Other countries of Oceania.....	* 5,793	70,422	* 51,875	* 34,038	50,593
<b>Puerto Rico and U.S. Possessions, total.....</b>	<b>1,188,276</b>	<b>3,219,617</b>	<b>0</b>	<b>2,487,299</b>	<b>5,593,394</b>
Puerto Rico.....	1,102,320	2,982,117	0	2,274,783	5,227,009
U.S. Possessions, total.....	85,956	237,500	0	212,517	366,385
American Samoa.....	* 726	* 758	0	* 6,248	4,700
Guam.....	66,593	67,668	0	127,694	194,496
Virgin Islands, U.S.....	16,315	146,022	0	40,070	145,884
Other U.S. Possessions.....	* 2,323	* 23,052	0	* 38,504	21,306
<b>Country not stated.....</b>	<b>4,758,122</b>	<b>18,324,083</b>	<b>719,268</b>	<b>2,994,513</b>	<b>25,079,439</b>
<b>Section 863(b) income.....</b>	<b>* 557,380</b>	<b>17,728,675</b>	<b>0</b>	<b>0</b>	<b>10,022,249</b>
<b>Foreign Sales Corporation dividends [1].....</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>* 112,661</b>
<b>Interest-Charge Domestic International Sales Corporation dividends [1].....</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>* 44</b>

Footnotes at end of table.

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**Table 3. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country to Which Foreign Taxes Were Paid—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country	Foreign income and taxes—continued					
	Deductions from oil and gas extraction income [3]	Taxable income (less loss) before adjustments	Foreign taxes paid, accrued, and deemed paid			
			Total	Foreign taxes paid or accrued		
				Total	Taxes withheld at source on:	
				Dividends	Interest	
	(12)	(13)	(14)	(15)	(16)	(17)
<b>All geographic areas</b> .....	<b>9,990,089</b>	<b>205,129,663</b>	<b>51,637,430</b>	<b>20,572,435</b>	<b>1,772,683</b>	<b>744,888</b>
<b>Canada</b> .....	<b>391,539</b>	<b>22,124,343</b>	<b>6,321,283</b>	<b>1,254,929</b>	<b>219,694</b>	<b>64,880</b>
<b>Latin America, total</b> .....	<b>949,399</b>	<b>17,733,493</b>	<b>5,269,267</b>	<b>2,464,559</b>	<b>311,540</b>	<b>148,861</b>
Mexico.....	* 18	5,001,578	1,343,429	507,037	7,984	39,777
Central America, total.....	* 1,432	375,135	109,674	49,785	2,607	395
Belize.....	0	2,131	* 158	* 93	0	* 9
Costa Rica.....	0	44,130	14,845	8,353	* 864	* 39
El Salvador.....	0	62,659	11,131	4,672	* 25	* 38
Guatemala.....	* 1,432	46,353	13,903	9,783	* 92	* 5
Honduras.....	0	25,724	10,731	7,062	* 1,318	* 284
Nicaragua.....	0	17,778	4,409	4,171	0	* 16
Panama (including Canal Zone).....	0	151,898	46,784	11,587	* 308	* 3
Central America not allocable.....	0	* 24,462	* 7,715	* 4,066	0	0
Caribbean countries, total.....	* 303,640	5,014,468	1,231,684	486,589	90,568	1,977
Cayman Islands (British).....	* 21,421	3,268,436	601,812	* 1,325	* 519	0
Dominican Republic.....	0	595,418	197,437	94,028	* 82,988	* 805
Haiti.....	0	11,599	* 4,761	* 4,709	0	0
Jamaica.....	0	58,110	26,193	14,759	* 1,259	* 633
Trinidad.....	* 254,374	980,043	397,156	369,216	* 5,796	* 537
Other Caribbean countries.....	* 27,845	100,863	4,325	2,552	* 5	* 3
South America, total.....	644,309	7,323,481	2,584,312	1,420,980	210,382	106,711
Argentina.....	* 240,341	572,685	310,551	127,222	* 844	11,837
Bolivia.....	* 1	-25,921	7,815	3,075	* 349	* 125
Brazil.....	* 30,764	3,328,259	1,154,640	388,711	50,190	77,525
Chile.....	0	950,847	348,703	318,364	152,748	4,707
Colombia.....	* 79,689	657,791	328,163	243,391	4,927	* 1,040
Ecuador.....	* 77,996	204,169	53,146	37,867	* 414	* 501
Paraguay.....	0	61,998	22,077	5,986	* 8	* 629
Peru.....	* 112	373,460	178,181	168,343	543	5,237
Uruguay.....	0	147,942	11,798	3,893	0	0
Venezuela.....	* 215,407	1,031,843	147,333	106,674	* 359	5,110
Other South American countries.....	0	20,409	* 21,905	* 17,453	0	0
Latin America not allocable.....	0	* 18,832	* 168	* 168	0	0
<b>Other Western Hemisphere, total</b> .....	<b>* 2,636</b>	<b>6,262,533</b>	<b>600,142</b>	<b>15,739</b>	<b>* 4,211</b>	<b>* 236</b>
Bahamas.....	0	-945,546	* 5,673	* 238	0	* 2
Bermuda.....	* 2,612	6,654,972	549,201	* 202	* 16	* 181
Netherlands Antilles.....	0	282,577	25,248	* 13,314	* 4,038	0
Other British West Indies.....	* 1	264,647	19,156	1,146	* 144	* 52
All other Western Hemisphere.....	* 23	5,883	863	838	* 15	0
<b>Europe, total</b> .....	<b>3,681,182</b>	<b>87,948,319</b>	<b>23,624,868</b>	<b>6,901,674</b>	<b>821,196</b>	<b>330,837</b>
European Union, total.....	* 1,746,843	69,672,329	18,844,469	3,906,071	564,145	326,089
Austria.....	0	203,308	95,995	29,133	6,955	* 1,013
Belgium.....	0	1,177,718	372,370	60,173	10,590	567
Denmark.....	* 152,547	1,578,739	540,894	209,325	447	* 44
Finland.....	0	248,348	49,087	16,364	2,549	* 42
France (including Andorra).....	* 563	3,195,032	1,024,331	274,256	19,440	* 1,452
Germany.....	* 7	4,389,340	1,250,574	493,522	44,126	3,365
Greece.....	* 12	363,060	103,733	8,766	* 42	* 18

Footnotes at end of table.



# Corporate Foreign Tax Credit, 2003

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**Table 3. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country to Which Foreign Taxes Were Paid—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country	Foreign income and taxes—continued					
	Deductions from oil and gas extraction income [3]	Taxable income (less loss) before adjustments	Foreign taxes paid, accrued, and deemed paid			
			Total	Foreign taxes paid or accrued		
				Total	Taxes withheld at source on:	
				Dividends	Interest	
	(12)	(13)	(14)	(15)	(16)	(17)
<b>Europe—continued</b>						
European Union--continued						
Ireland.....	* 1,298	7,055,792	367,604	12,857	1,663	* 339
Italy (including San Marino).....	* 82	2,070,836	798,663	298,206	18,730	9,858
Luxembourg.....	0	3,654,931	825,500	15,778	2,327	0
Netherlands.....	* 120,046	9,816,785	2,349,542	240,899	34,180	11,950
Portugal.....	* 15,571	995,178	324,556	48,511	4,218	* 420
Spain.....	0	8,484,461	4,639,691	185,393	71,231	981
Sweden.....	* 3	1,944,883	486,036	15,922	2,361	* 613
United Kingdom.....	* 1,456,712	24,493,919	5,615,893	1,996,966	345,285	295,426
Other West European countries, total.....	* 1,404,880	13,922,568	3,912,036	2,526,545	221,768	110
Liechtenstein.....	0	10,460	* 141	0	0	0
Monaco.....	0	2,241	* 6	0	0	0
Norway.....	* 1,403,023	4,565,558	2,509,632	2,218,542	2,027	* 9
Switzerland.....	* 1,957	8,999,184	1,319,011	257,658	213,759	* 85
Turkey.....	* -112	314,171	82,320	49,659	5,982	* 16
Other West European countries not allocable.....	* 13	30,954	* 925	* 686	0	0
East European countries, total.....	* 529,459	4,131,386	863,091	464,382	35,280	4,634
Romania.....	0	109,353	27,032	14,392	4,267	* 676
Former Soviet Union.....	* 529,459	1,597,208	421,616	354,433	4,997	2,371
Other East European countries.....	0	2,424,825	414,443	95,556	26,015	1,587
Europe not allocable.....	0	222,036	5,272	4,675	* 4	* 4
<b>Africa, total.....</b>	<b>* 1,490,045</b>	<b>5,777,058</b>	<b>2,617,530</b>	<b>1,721,707</b>	<b>6,142</b>	<b>773</b>
North Africa, total.....	* 385,347	611,819	325,642	306,866	* 50	* 435
Algeria.....	* 72	25,023	* 39,966	* 39,966	0	0
Egypt.....	* 377,569	542,807	271,668	254,362	0	* 434
Libya.....	0	2,210	* 3	0	0	0
Morocco.....	0	12,999	6,162	4,745	* 50	* 1
Other North African countries.....	* 7,706	28,780	7,843	* 7,794	0	0
East Africa, total.....	* 13	154,879	38,166	25,095	* 1,422	* 255
Ethiopia.....	0	5,370	* 1,147	* 1,147	0	0
Kenya.....	0	33,256	12,367	8,044	* 622	* 255
Tanzania.....	0	8,165	* 3,198	* 585	* 484	0
Uganda.....	0	* 937	* 286	* 2	0	0
Other East African countries.....	* 13	107,152	21,169	15,317	* 316	0
West and Central Africa, total.....	* 1,104,684	3,944,962	1,912,191	1,336,263	* 4,227	0
Gabon.....	* 3,476	103,774	* 40,205	* 3,400	0	0
Ghana.....	0	2,242	* 645	* 280	* 74	0
Liberia.....	0	14,985	* 8	* 8	0	0
Nigeria.....	* 382,742	2,230,894	1,307,530	1,121,793	* 3,571	0
Zaire.....	* 24,543	21,623	* 1,982	0	0	0
Other West and Central African countries.....	* 693,924	1,571,445	561,821	210,783	* 583	0
Southern Africa, total.....	0	1,050,614	341,532	53,483	* 442	* 84
Malawi.....	0	* 2,800	* 1,782	* 49	* 14	0
South Africa (including Namibia).....	0	907,242	332,279	47,785	* 325	* 52
Zambia.....	0	473	* 38	* 38	0	0
Zimbabwe.....	0	13,270	* 1,814	* 1,491	* 14	* 32
Other Southern African countries.....	0	126,829	* 5,618	* 4,121	* 90	0
Africa not allocable.....	0	* 14,784	0	0	0	0

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 3. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country to Which Foreign Taxes Were Paid—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country	Foreign income and taxes—continued					
	Deductions from oil and gas extraction income [3]	Taxable income (less loss) before adjustments	Foreign taxes paid, accrued, and deemed paid			
			Total	Foreign taxes paid or accrued		
				Total	Taxes withheld at source on:	
				Dividends	Interest	
	(12)	(13)	(14)	(15)	(16)	(17)
<b>Asia, total.....</b>	<b>2,450,270</b>	<b>33,999,095</b>	<b>9,922,547</b>	<b>5,771,178</b>	<b>301,546</b>	<b>136,233</b>
Middle East, total.....	* 1,332,392	3,710,986	685,211	591,890	32,608	1,422
Bahrain.....	* 1,626	29,822	* 87	* 80	0	* 59
Iran.....	0	15,778	* 5	0	0	0
Iraq.....	0	132,409	0	0	0	0
Israel.....	0	551,519	124,217	56,428	32,479	1,266
Kuwait.....	* 16,014	69,785	16,521	16,521	0	* 64
Lebanon.....	0	7,088	1,917	1,916	* -139	0
Qatar.....	* 66,561	514,047	98,181	98,181	0	0
Saudi Arabia.....	* 955,549	894,010	190,231	183,300	* 267	0
United Arab Emirates.....	* 102,854	940,385	54,249	* 42,285	0	0
Other areas of Arabian Peninsula.....	* 189,788	479,815	187,006	184,033	0	0
Other Middle East countries.....	0	76,328	12,798	9,147	0	* 32
Southern and Southeast Asia, total.....	* 1,056,860	9,834,086	2,879,711	2,063,944	48,385	29,752
Bangladesh.....	0	19,418	* 18,519	* 18,065	* 102	0
India.....	0	515,155	205,286	174,918	4,366	363
Indonesia.....	* 611,450	1,983,324	951,389	763,046	5,027	6,284
Malaysia.....	* 210,313	2,116,949	498,329	448,747	374	* 2,462
Pakistan.....	* 72,791	170,027	58,479	52,976	879	* 59
Philippines.....	* 33,762	1,018,893	226,250	111,934	26,886	10,759
Singapore.....	* -1	2,530,558	492,005	342,625	1,110	2,404
Sri Lanka.....	0	21,848	5,956	* 5,418	* 24	0
Thailand.....	* 129,104	979,713	344,977	134,160	9,616	7,421
Vietnam.....	* -559	31,770	9,488	9,488	0	* 1
Other Southern and Southeast Asian countries.....	0	446,432	69,033	2,569	* 1	0
Eastern Asia, total.....	* 61,018	20,430,737	6,356,952	3,115,261	220,554	105,060
China.....	* 60,768	2,888,159	237,161	153,566	5,615	391
Hong Kong.....	0	2,213,276	433,883	280,361	366	* 93,878
Japan (including Okinawa and Ryukyu Islands).....	* 249	12,428,600	4,747,546	2,039,369	119,017	5,115
South Korea, Republic of.....	0	1,701,932	610,396	362,324	56,028	1,193
Taiwan.....	0	1,153,092	326,908	278,582	39,529	4,483
Other Eastern Asian countries.....	0	45,678	* 1,059	* 1,059	0	0
Asia not allocable.....	0	23,286	* 673	* 83	0	0
<b>Oceania, total.....</b>	<b>* 376,791</b>	<b>5,117,293</b>	<b>1,220,487</b>	<b>640,426</b>	<b>26,904</b>	<b>40,844</b>
Australia.....	* 353,297	4,669,737	1,097,722	576,290	20,434	21,875
New Zealand.....	* 4,709	215,415	115,378	57,541	6,391	19,026
Other countries of Oceania.....	* 18,785	232,141	7,387	6,595	* 79	* -58
<b>Puerto Rico and U.S. Possessions, total.....</b>	<b>0</b>	<b>3,911,506</b>	<b>619,366</b>	<b>552,294</b>	<b>20,498</b>	<b>1,372</b>
Puerto Rico.....	0	3,791,381	590,424	526,826	20,171	1,203
U.S. Possessions, total.....	0	120,125	28,941	25,469	* 326	* 170
American Samoa.....	0	3,683	* 737	* 656	0	0
Guam.....	0	66,245	20,721	17,815	* 5	0
Virgin Islands, U.S.....	0	29,794	2,724	2,291	* 321	* 170
Other U.S. Possessions.....	0	20,402	* 4,759	* 4,706	0	0
<b>Country not stated.....</b>	<b>648,227</b>	<b>13,903,189</b>	<b>1,369,125</b>	<b>1,177,139</b>	<b>60,789</b>	<b>20,852</b>
<b>Section 863(b) income.....</b>	<b>0</b>	<b>8,402,588</b>	<b>72,628</b>	<b>72,628</b>	<b>0</b>	<b>0</b>
<b>Foreign Sales Corporation dividends [1].....</b>	<b>0</b>	<b>* 25,759</b>	<b>* 160</b>	<b>* 160</b>	<b>* 160</b>	<b>0</b>
<b>Interest-Charge Domestic International Sales Corporation dividends [1].....</b>	<b>0</b>	<b>* 2,189</b>	<b>* 28</b>	<b>* 2</b>	<b>* 2</b>	<b>0</b>

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 3. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country to Which Foreign Taxes Were Paid—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country	Foreign income and taxes—continued					
	Foreign taxes paid, accrued, and deemed paid—continued					
	Foreign taxes paid or accrued—continued					Taxes deemed paid
	Taxes withheld at source on—continued	Other taxes paid or accrued on:				
Rents, royalties, and license fees		Branch income	Specifically allocable income [section 863(b)]	Service income	Other income	
	(18)	(19)	(20)	(21)	(22)	(23)
<b>All geographic areas.....</b>	<b>2,797,998</b>	<b>5,035,070</b>	<b>77,612</b>	<b>333,466</b>	<b>9,810,717</b>	<b>31,064,995</b>
<b>Canada.....</b>	<b>135,234</b>	<b>402,458</b>	<b>* 158</b>	<b>75,173</b>	<b>357,332</b>	<b>5,066,354</b>
<b>Latin America, total.....</b>	<b>399,413</b>	<b>494,649</b>	<b>* 1,662</b>	<b>42,308</b>	<b>1,066,125</b>	<b>2,804,709</b>
Mexico.....	114,981	236,632	0	8,467	99,196	836,392
Central America, total.....	15,637	14,686	0	1,037	15,423	59,889
Belize.....	0	* 84	0	0	0	* 66
Costa Rica.....	1,878	* 1,925	0	* 355	* 3,292	6,492
El Salvador.....	1,901	* 832	0	* 81	* 1,794	6,459
Guatemala.....	5,718	* 1,309	0	* 360	2,298	4,120
Honduras.....	1,319	* 215	0	* 46	* 3,881	* 3,669
Nicaragua.....	* 539	* 1,407	0	* 7	* 2,201	* 238
Panama (including Canal Zone).....	4,282	* 4,849	0	* 188	* 1,957	35,197
Central America not allocable.....	0	* 4,066	0	0	0	* 3,649
Caribbean countries, total.....	3,634	12,816	0	* 3,160	374,433	745,095
Cayman Islands (British).....	0	0	0	0	* 806	600,487
Dominican Republic.....	1,563	1,506	0	* 35	* 7,131	* 103,409
Haiti.....	* 1	* 933	0	* 4	* 3,770	* 53
Jamaica.....	1,228	* 6,307	0	* 174	* 5,159	* 11,433
Trinidad.....	761	* 3,543	0	* 2,710	* 355,870	* 27,940
Other Caribbean countries.....	* 81	* 528	0	* 238	* 1,696	1,773
South America, total.....	265,021	230,514	* 1,662	29,644	577,046	1,163,332
Argentina.....	30,881	13,195	0	8,472	61,993	183,328
Bolivia.....	182	* 1,774	0	* 11	* 634	* 4,740
Brazil.....	96,195	71,025	0	11,105	82,671	765,929
Chile.....	21,061	14,355	0	3,195	122,298	30,338
Colombia.....	27,190	22,014	0	1,264	186,955	84,772
Ecuador.....	8,931	* 3,294	0	* 2,660	22,067	15,278
Paraguay.....	411	* 3,099	0	* 3	* 1,836	* 16,091
Peru.....	73,278	* 75,866	0	2,377	11,043	9,838
Uruguay.....	1,674	* 473	* 1,662	* 81	* 3	7,906
Venezuela.....	5,204	7,990	0	475	87,537	40,659
Other South American countries.....	* 14	* 17,431	0	0	* 9	* 4,452
Latin America not allocable.....	* 141	0	0	0	* 27	0
<b>Other Western Hemisphere, total.....</b>	<b>* 156</b>	<b>* 8,210</b>	<b>0</b>	<b>* 288</b>	<b>2,637</b>	<b>584,403</b>
Bahamas.....	* 9	0	0	* 3	* 224	* 5,434
Bermuda.....	0	0	0	0	* 5	548,999
Netherlands Antilles.....	0	* 7,524	0	* 21	* 1,732	* 11,934
Other British West Indies.....	* 13	* 595	0	* 3	* 338	18,010
All other Western Hemisphere.....	* 134	* 91	0	* 261	* 337	* 26
<b>Europe, total.....</b>	<b>226,752</b>	<b>1,601,993</b>	<b>* 856</b>	<b>112,839</b>	<b>3,807,200</b>	<b>16,723,195</b>
European Union, total.....	195,827	1,338,040	* 856	104,232	1,376,883	14,938,398
Austria.....	903	19,708	0	0	554	66,862
Belgium.....	* 3,677	34,747	0	* 1,454	9,138	312,197
Denmark.....	* 10	83,513	0	* 437	124,874	331,569
Finland.....	6,222	* 7,101	0	* 40	* 410	32,723
France (including Andorra).....	37,029	67,022	0	* 57,412	91,902	750,075
Germany.....	4,249	369,474	0	* 24,920	47,388	757,052
Greece.....	817	* 6,169	0	* 52	* 1,667	94,967

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 3. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country to Which Foreign Taxes Were Paid—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country	Foreign income and taxes—continued					
	Foreign taxes paid, accrued, and deemed paid—continued					
	Foreign taxes paid or accrued—continued					Taxes deemed paid
	Taxes withheld at source on—continued	Other taxes paid or accrued on:				
Rents, royalties, and license fees		Branch income	Specifically allocable income [section 863(b)]	Service income	Other income	
	(18)	(19)	(20)	(21)	(22)	(23)
<b>Europe—continued</b>						
European Union--continued						
Ireland.....	* 2,993	5,812	0	* 1,257	* 793	354,747
Italy (including San Marino).....	76,842	108,485	0	* 474	83,816	500,457
Luxembourg.....	* 231	* 7,685	0	0	* 5,534	809,722
Netherlands.....	2,955	110,199	0	* 60	81,555	2,108,643
Portugal.....	11,955	* 9,663	0	* 473	21,783	276,045
Spain.....	41,171	23,781	0	2,151	46,077	4,454,298
Sweden.....	0	12,161	0	* 14	* 773	470,114
United Kingdom.....	6,772	472,519	* 856	15,488	860,621	3,618,926
Other West European countries, total.....	7,093	69,987	0	679	2,226,907	1,385,491
Liechtenstein.....	0	0	0	0	0	* 141
Monaco.....	0	0	0	0	0	* 6
Norway.....	* 8	* 3,259	0	* 4	2,213,235	291,090
Switzerland.....	* 1,417	33,269	0	* 462	8,666	1,061,353
Turkey.....	5,668	32,779	0	* 213	5,001	32,661
Other West European countries not allocable.....	0	* 680	0	0	* 5	* 240
East European countries, total.....	23,499	193,966	0	7,780	199,223	398,709
Romania.....	1,717	* 7,218	0	* 403	* 111	12,640
Former Soviet Union.....	1,476	167,224	0	* 2,020	176,344	67,183
Other East European countries.....	20,305	19,524	0	5,357	22,768	318,886
Europe not allocable.....	* 332	0	0	* 149	* 4,186	* 597
<b>Africa, total.....</b>	<b>10,583</b>	<b>145,287</b>	<b>0</b>	<b>2,330</b>	<b>1,556,592</b>	<b>895,822</b>
North Africa, total.....	2,225	* 60,205	0	576	243,374	18,776
Algeria.....	* 207	* 33,436	0	0	* 6,323	0
Egypt.....	1,795	* 24,528	0	* 196	* 227,408	17,306
Libya.....	0	0	0	0	0	* 3
Morocco.....	* 187	* 2,211	0	* 367	* 1,929	* 1,417
Other North African countries.....	* 37	* 29	0	* 14	* 7,715	* 49
East Africa, total.....	989	* 4,863	0	* 257	* 17,310	13,071
Ethiopia.....	* 75	* 488	0	0	* 584	0
Kenya.....	* 389	* 4,292	0	* 256	* 2,231	* 4,323
Tanzania.....	* 100	0	0	* 1	0	* 2,613
Uganda.....	* 1	0	0	0	* 2	* 284
Other East African countries.....	* 423	* 84	0	0	* 14,494	5,851
West and Central Africa, total.....	* 2,242	* 50,989	0	* 1,405	1,277,399	* 575,927
Gabon.....	0	* 2,961	0	0	* 439	* 36,805
Ghana.....	* 3	0	0	0	* 203	* 365
Liberia.....	0	0	0	0	* 8	0
Nigeria.....	* 2,215	* 12,384	0	* 1,101	* 1,102,523	* 185,738
Zaire.....	0	0	0	0	0	* 1,982
Other West and Central African countries.....	* 24	* 35,645	0	* 305	* 174,227	* 351,038
Southern Africa, total.....	5,127	29,230	0	* 91	18,509	288,048
Malawi.....	0	0	0	0	* 35	* 1,733
South Africa (including Namibia).....	1,404	28,826	0	* 67	17,112	284,494
Zambia.....	* 1	* 12	0	* 24	0	0
Zimbabwe.....	* 20	* 347	0	0	* 1,078	* 324
Other Southern African countries.....	* 3,702	* 45	0	0	* 284	* 1,497
Africa not allocable.....	0	0	0	0	0	0

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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**Table 3. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country to Which Foreign Taxes Were Paid—Continued**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Selected country	Foreign income and taxes—continued					Taxes deemed paid
	Foreign taxes paid, accrued, and deemed paid—continued					
	Foreign taxes paid or accrued—continued					
	Taxes withheld at source on—continued	Other taxes paid or accrued on:				
Rents, royalties, and license fees		Branch income	Specifically allocable income [section 863(b)]	Service income		Other income
	(18)	(19)	(20)	(21)	(22)	(23)
<b>Asia, total.....</b>	<b>1,281,436</b>	<b>1,895,395</b>	<b>0</b>	<b>37,478</b>	<b>2,119,088</b>	<b>4,151,370</b>
Middle East, total.....	17,943	96,925	0	1,772	441,221	93,322
Bahrain.....	* 1	0	0	0	* 20	* 7
Iran.....	0	0	0	0	0	* 5
Iraq.....	0	0	0	0	0	0
Israel.....	9,475	* 9,447	0	* 553	3,208	67,789
Kuwait.....	* 2,270	10,986	0	* 772	* 2,427	0
Lebanon.....	* 112	* 1,655	0	* 11	* 277	0
Qatar.....	* 575	* 358	0	* 435	* 96,812	0
Saudi Arabia.....	5,101	* 44,347	0	* 437	* 134,022	* 6,931
United Arab Emirates.....	* 1	* 13,535	0	0	* 28,748	* 11,964
Other areas of Arabian Peninsula.....	* 38	* 8,724	0	* 62	* 175,208	* 2,973
Other Middle East countries.....	* 369	* 7,872	0	* 375	* 498	* 3,652
Southern and Southeast Asia, total.....	161,729	517,671	0	12,613	1,293,796	815,766
Bangladesh.....	0	* 17,142	0	0	* 821	* 454
India.....	15,352	104,204	0	3,465	47,169	30,368
Indonesia.....	7,896	* 55,427	0	2,347	686,065	188,343
Malaysia.....	28,672	3,788	0	635	412,815	49,583
Pakistan.....	* 143	* 19,985	0	* 89	* 31,821	5,503
Philippines.....	17,623	31,920	0	1,006	23,740	114,316
Singapore.....	72,338	235,846	0	1,599	29,327	149,380
Sri Lanka.....	* 5	* 4,179	0	* 2	* 1,208	* 538
Thailand.....	19,302	41,375	0	3,382	53,064	210,816
Vietnam.....	* 130	* 1,577	0	* 50	* 7,730	0
Other Southern and Southeast Asian countries.....	* 268	* 2,226	0	* 38	* 35	* 66,464
Eastern Asia, total.....	1,101,765	1,280,734	0	23,094	384,054	3,241,692
China.....	95,534	11,763	0	1,250	39,014	83,595
Hong Kong.....	4,452	148,834	0	967	31,864	153,521
Japan (including Okinawa and Ryukyu Islands).....	682,634	951,429	0	9,362	271,812	2,708,178
South Korea, Republic of.....	197,614	76,384	0	4,757	26,347	248,072
Taiwan.....	121,530	92,301	0	6,758	13,982	48,326
Other Eastern Asian countries.....	0	* 23	0	0	* 1,036	0
Asia not allocable.....	0	* 65	0	0	* 17	* 590
<b>Oceania, total.....</b>	<b>66,595</b>	<b>173,062</b>	<b>* 1,999</b>	<b>6,793</b>	<b>324,229</b>	<b>580,060</b>
Australia.....	54,884	166,169	* 1,999	6,509	304,421	521,432
New Zealand.....	11,533	6,744	0	* 262	13,585	57,837
Other countries of Oceania.....	* 178	* 150	0	* 23	* 6,223	* 792
<b>Puerto Rico and U.S. Possessions, total.....</b>	<b>369,578</b>	<b>114,439</b>	<b>* 309</b>	<b>24,037</b>	<b>22,061</b>	<b>67,071</b>
Puerto Rico.....	368,960	94,387	* 309	21,939	19,858	63,598
U.S. Possessions, total.....	* 619	20,053	0	2,098	2,203	* 3,473
American Samoa.....	0	* 656	0	0	0	* 81
Guam.....	0	14,498	0	* 1,765	1,548	* 2,905
Virgin Islands, U.S.....	* 619	* 347	0	* 333	* 501	* 433
Other U.S. Possessions.....	0	* 4,552	0	0	* 154	* 53
<b>Country not stated.....</b>	<b>308,251</b>	<b>199,575</b>	<b>0</b>	<b>32,220</b>	<b>555,452</b>	<b>191,986</b>
<b>Section 863(b) income.....</b>	<b>0</b>	<b>0</b>	<b>72,628</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Foreign Sales Corporation dividends [1].....</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Interest-Charge Domestic International Sales Corporation dividends [1].....</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>* 26</b>

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2003

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## **Table 3. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2003: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country to Which Foreign Taxes Were Paid—Continued**

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**Footnotes:**

\* Data should be used with caution because of the small number of sample returns on which they are based.

[1] Dividends from an Interest-Charge Domestic International Sales Corporation or a Foreign Sales Corporation were not reported for specific foreign countries.

[2] Included in gross income (less loss), columns 2-8.

[3] Included in total deductions, column 11.

NOTE: Detail may not add to totals because of rounding.