

Corporate Foreign Tax Credit, 2000

by Scott Luttrell

The total foreign tax credit claimed by U.S. corporations (after limitations) rose by more than \$10 billion for 2000, to an all-time high of \$48.4 billion. Corporations claiming foreign tax credits earned \$196.7 billion in foreign-source taxable income, while paying \$52.5 billion in taxes to foreign jurisdictions. Under the foreign tax credit provisions, these corporations reduced their U.S. tax liabilities by 29.7 percent, from \$163.0 billion to \$114.7 billion. Other credits, including the U.S. possessions tax credit and the general business credit, further reduced their U.S. tax liabilities to \$106.0 billion.

U.S. corporations claiming a foreign tax credit reported \$462.3 billion of “worldwide taxable income” (i.e., the sum of U.S. and foreign-source income). Foreign-source income contributed approximately 42.5 percent of that total. U.S. tax liability on worldwide income reported by these corporations reached \$163.0 billion, with 32.2 percent attributable to foreign sources. U.S. corporations were able to credit 92.1 percent of their current-year foreign-source taxes against their U.S. tax liabilities. The remaining 7.9 percent may be carried back or forward to other tax years, as provided under the law.

The largest shares of foreign-source taxable income were earned in the United Kingdom, Japan, Canada, Germany, and the Netherlands. These five countries accounted for over 41.0 percent of foreign-source taxable income and almost 49.0 percent of foreign taxes. The United Kingdom continued to generate the most foreign-source taxable income with \$26.5 billion, or 13.5 percent of the total. The fifteen countries included in the European Union combined to earn \$67.7 billion, or 34.4 percent of all foreign-source taxable income earned by U.S. corporations claiming a foreign tax credit.

Corporations classified as manufacturers continued to earn the most foreign-source income, pay the most foreign taxes, and claim the most foreign tax credits in 2000. U.S. manufacturers were responsible for 61.4 percent of foreign-source taxable income, 69.1 percent of current-year foreign taxes paid, accrued, and “deemed paid,” and 67.4 percent

of total foreign tax credits claimed. The finance, insurance, real estate, rental, and leasing sector and the information sector combined to account for 16.3 percent of the foreign tax credit and nearly 21.5 percent of foreign-source taxable income.

Background

Since the introduction of the modern income tax in 1913, U.S. taxpayers have been taxed on their worldwide incomes. U.S. corporations may be taxed on their foreign-source incomes by both the foreign jurisdiction in which the income was earned and the United States, resulting in the double taxation of the foreign-source income. The foreign tax credit was adopted by the United States to alleviate this problem. Under the foreign tax credit provisions, the United States taxes worldwide income but allows a credit against the U.S. tax liability on foreign-source income for the income taxes paid to foreign countries. Taxpayers also have the option of deducting foreign taxes from their foreign-source taxable incomes; however, most corporations will elect to take the foreign tax credit because it offsets U.S. taxes dollar-for-dollar.

The foreign tax credit, introduced in the Revenue Act of 1918, has been modified numerous times. Initially, the foreign tax credit provisions allowed taxpayers an unlimited credit against U.S. income taxes for any taxes paid to or accrued in a foreign country. Therefore, in cases where foreign tax rates exceeded U.S. tax rates, corporations were able to credit foreign taxes against their U.S. income tax liabilities. The loss of revenues that resulted from this practice led Congress to amend the foreign tax credit provisions in 1921. The new legislation introduced the “overall limitation,” which restricted the foreign tax credit to an amount equivalent to the U.S. tax on foreign-source taxable income. This was accomplished by limiting the foreign tax credit to the lesser of all creditable foreign taxes paid or an amount equal to the U.S. income tax multiplied by the ratio of foreign-source taxable income to worldwide taxable income. Though it has been finetuned over the years, the principal of “overall limitation” remains a vital part of the foreign tax credit to this day.

A “per-country” limitation, which required taxpayers to compute a foreign tax credit limitation on a country-by-country basis, was the next significant modification to the foreign tax credit provisions. The

Scott Luttrell is an economist with the Special Studies Returns Analysis Section. This article was prepared under the direction of Chris Carson, Chief.

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intent was to constrain taxpayers from using taxes derived from higher-tax foreign jurisdictions to offset U.S. taxes on incomes earned in lower-tax foreign countries. In various forms, the “per-country” limitation was a part of the foreign tax credit provisions from 1932 until 1976.

With the Revenue Act of 1962, taxpayers were required for the first time to calculate a separate limitation for a particular type of income. This legislation was designed to discourage corporations from shifting nonbusiness lower-taxed income overseas. Typically, these investments generated additional foreign income with minimal tax, effectively increasing the limitation on the foreign tax credit. Segregation of this low-taxed nonbusiness income from other foreign income limited U.S. corporations from arranging foreign investments at the expense of U.S. tax revenue.

In the following years, Congress passed legislation requiring additional separate foreign tax credit limitation categories for various types of foreign income and for income from different industrial sectors. Each of the separate categories was intended to further discourage U.S. taxpayers from arranging their operations to maximize the foreign tax credit at the expense of paying taxes due on U.S. source income.

For 2000, taxpayers were required to compute a separate foreign tax credit limitation for each of the following statutory categories of foreign-source income or “baskets” (each of these is described separately in the Explanation of Selected Terms section):

- Passive income
- High withholding tax interest
- Financial services income
- Shipping income
- Dividends from each “noncontrolled” foreign corporation per Internal Revenue Code section 902
- Dividends from an Interest-Charge Domestic International Sales Corporation (IC-DISC) or former DISC
- Certain distributions from a Foreign Sales Corporation (FSC) or former FSC [1]
- Taxable income attributable to “foreign trade income”
- Income from U.S.-sanctioned countries per Internal Revenue Code section 901(j) [2]

- Income resourced by a bilateral income tax treaty
- All other income from outside the United States (commonly referred to as general limitation income or overall basket).

The total foreign tax credit claimed is the sum of credits allowed in each separate limitation category. In certain instances, the total foreign tax credit claimed was reduced for participation in or for cooperation with international boycotts unsanctioned by the U.S. Government [3].

Beginning with the Technical Amendments Act of 1958, Congress allowed for a carryover of “unused” foreign tax credits. These provisions instructed that excess foreign taxes that could not be credited because of the current-year limitation could be carried back 2 years (necessitating an amended return) or carried forward 5 years, subject to the current-year foreign tax credit limitation. As a result, the total foreign taxes for each separate limitation category for any given year include current-year foreign taxes plus taxes carried forward from previous years [4].

ForeignTaxCredit, TaxYear 2000— ComparativeAnalysis

The components of the foreign tax credit for 2000 reached all-time highs in absolute terms, although their positions relative to other foreign tax credit variables remained consistent with prior years. Figure A shows the last 5 years. The four measurements in Figure A include: U.S. income tax before credits as a percentage of income subject to U.S. tax, foreign-source taxable income as a percentage of worldwide taxable income, current-year foreign taxes as a percentage of foreign-source taxable income, and foreign tax credit claimed as a percentage of U.S. income tax before credits. U.S. income tax before credits as a percentage of income subject to U.S. tax remained at 35.2 percent or 35.3 percent from 1996 to 2000. Foreign-source taxable income (less loss) as a percentage of taxable income fluctuated around 40 percent, with a high of 42.9 percent in 1999 and a low of 38.5 percent in 1997. Following a similar trend, current-year foreign taxes as a percentage of foreign-source taxable income remained between 27.0 percent and 28.0 percent from 1996 to 1998. The measure dropped to 24.9 percent in 1999

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Figure A

U.S. Corporation Returns with a Foreign Tax Credit: Income Subject to U.S. Tax, Foreign-Source Taxable Income, Current-Year Foreign Taxes, and Foreign Tax Credit, Tax Years 1996-2000

[Money amounts are in millions of dollars]

Tax year	Number of U.S. corporation returns	Income subject to U.S. tax ¹	U.S. income tax before credits		Foreign-source taxable income (less loss) ²		Current-year foreign taxes		Foreign tax credit claimed	
			Amount	As a percentage of income subject to U.S. tax	Amount	As a percentage of income subject to U.S. tax	Amount	As a percentage of foreign-source taxable income ³	Amount	As a percentage of U.S. income tax before credits
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
2000.....	5,917	462,323	163,009	35.3	196,675	42.5	52,514	30.1	48,355	29.7
1999.....	5,789	385,832	135,855	35.2	165,713	42.9	41,309	24.9	38,271	28.2
1998.....	5,927	377,130	132,741	35.2	147,117	39.0	40,684	27.7	37,338	28.1
1997.....	6,569	410,126	144,779	35.3	157,989	38.5	45,080	28.5	42,223	29.2
1996.....	6,100	370,049	130,748	35.3	150,826	40.8	41,177	27.3	40,255	30.8

¹ "Worldwide taxable income" is also used to describe "income subject to U.S. tax."

² Foreign-source taxable income shown is before adjustments, such as for allocations of current-year U.S.-source losses and recapture of foreign losses.

³ The percentages shown in this column are not effective tax rates. An effective tax rate would contain a measure of economic income in the denominator and taxes on that income in the numerator. The percentages shown here are simply a tool used to determine what factors contributed to the relatively constant proportion of foreign tax credits to U.S. tax liability over the 1996-2000 period.

before growing to 30.1 percent in 2000. Foreign tax credits claimed as a percentage of U.S. income tax before credits was at 30.8 percent in 1996 and stayed within a range of 28.0 percent to 30.0 percent during the next 4 years.

Comparing Tax Year 1999 to Tax Year 2000 yields significant changes in a single year. The \$48.4 billion in foreign tax credits claimed for 2000 represents a 26.3-percent increase over the 1999 total. In fact, this is the largest dollar increase in 1 year since 1979 [5]. As expected, all of the major components of the foreign tax credit saw significant increases in 2000. Income subject to U.S. tax and U.S. income tax before credits rose by 19.8 percent and 20.0 percent, respectively. Notably, the rate of increase in current-year foreign taxes (27.1 percent) outpaced growth in foreign-source taxable income (5.3 percent) by a wide margin, which contributed to the large increase in foreign tax credits.

Separate Limitation Categories, Tax Year 2000

As mentioned previously, corporations are required to compute a separate foreign tax credit for each statutory category (or "basket") of income. Figure B shows foreign-source taxable income, current-year foreign taxes, current-year foreign taxes as a percentage of foreign-source taxable income, carryover of prior-year foreign taxes, and foreign tax credits for

2000. As expected, the majority of foreign-source taxable income was reported in the general limitation income basket (71.4 percent). The general limitation basket also had the most current-year foreign taxes with 79.5 percent. Financial services income was the second largest statutory grouping and accounted for 21.3 percent of foreign-source taxable income. Over \$8.0 million, or 15.3 percent, of the current-year foreign taxes were paid on this income.

Column (3) of Figure B shows that current-year foreign taxes as a percentage of foreign-source taxable income vary widely according to the statutory group [6]. At 29.7 percent, the general limitation basket has the highest percentage of current-year taxes with respect to foreign-source taxable income. The passive income and shipping income groupings isolate certain types of income that tend to be taxed at lower rates and, thus, had the lowest percentages with 9.2 percent and 17.0 percent, respectively. The average rate of current-year taxes as a percentage of foreign-source taxable income for 2000 was 26.7 percent.

Current-year foreign taxes are creditable subject to a limitation that is calculated as the ratio of foreign taxable income attributable to each income category to their worldwide incomes. Overall, for 2000, U.S. corporations were able to credit 92.1 percent of their current-year foreign taxes. The largest percentage

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Figure B

U.S. Corporation Returns with a Foreign Tax Credit: Foreign-Source Taxable Income, Current-Year Foreign Taxes, Carryover and Foreign Tax Credit, by Selected Separate Limitation Category, Tax Year 2000

[Money amounts are in thousands of dollars]

Selected category	Foreign-source taxable income ¹	Current-year foreign taxes	Current-year foreign taxes as a percentage of foreign-source taxable income ²	Carryover	Foreign tax credit
	(1)	(2)	(3)	(4)	(5)
All separate limitation categories ³	196,675,289	52,513,722	26.7	12,405,727	48,355,433
High withholding tax interest.....	1,237,372	352,073	28.5	51,072	319,901
Passive income.....	9,115,293	837,854	9.2	62,167	775,516
General limitation income.....	140,335,274	41,748,523	29.7	10,514,255	38,179,513
Financial services income.....	41,798,420	8,038,713	19.2	1,170,084	7,939,691
Shipping income.....	1,033,076	175,327	17.0	*17,831	157,816

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

¹ Foreign-source taxable income shown is before adjustments, such as for allocations of current-year U.S.-source losses and recapture.

² The percentages shown in this column are not effective tax rates. An effective tax rate would contain a measure of economic income in the denominator and taxes on that income in the numerator.

³ Sum of detail does not equal total for these columns because only selected categories are shown.

of taxes credited was in the financial services income grouping with 98.8 percent. Comparatively, just 91.5 percent of taxes in the general limitation income category were credited.

Geographic Focus

Figure C, which displays foreign-source taxable income, current-year foreign taxes paid or accrued, and current-year tax deemed paid for 2000, provides a summary of foreign income and taxes by the most significant geographical regions and Canada. As in recent years, the European Union (EU) accounted for more foreign-source taxable income than any other region reported by U.S. corporations claiming a foreign tax credit. (The European countries that are member states are listed in Explanation of Terms.) As shown in Figure C, the \$67.7 billion of taxable income from EU countries are well ahead of the second-leading region, Asia. The \$41.0 billion of foreign-source taxable income from Asia were a \$15.2-billion increase from 1999 and the largest increase among any of the regions [7]. Much of Asia's growth is attributable to Japan, which jumped from \$11.6 billion in 1999 to \$19.9 billion in 2000. Other leading regions with respect to foreign-source taxable income were Latin America (\$20.4 billion), Canada (\$15.8 billion), and Other European countries (\$12.7 billion).

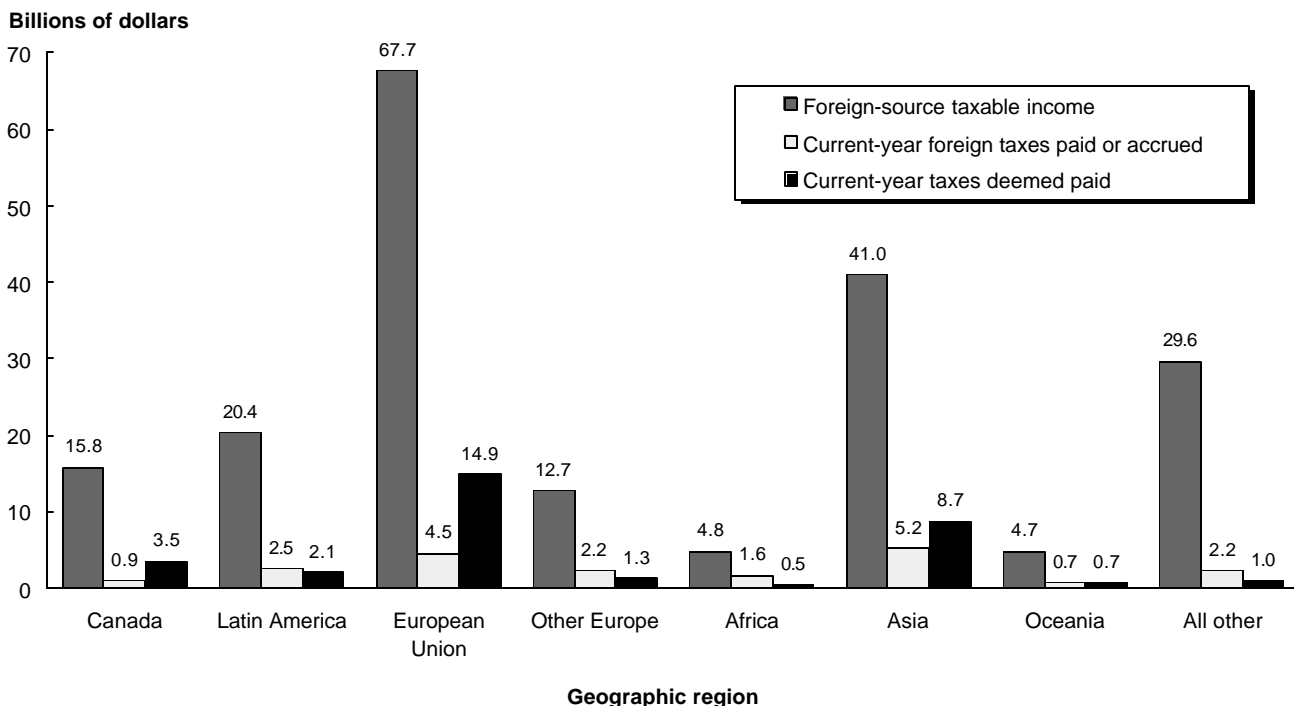
Figure C shows that, while regions with the most foreign-source income tend to have the most current-year foreign taxes, there are regional differences among the two components of current-year foreign taxes, current-year foreign taxes paid or accrued, and current-year tax deemed paid. The EU was responsible for \$19.3 billion in current-year foreign taxes, or 36.7-percent of the worldwide total. The EU accounted for an even greater share of current-year tax deemed paid, with 45.6 percent (\$14.9 billion). While second among regions in current-year foreign taxes, Asia was the leading source of current-year foreign taxes paid or accrued with \$5.2 billion. Together, the EU and Asia accounted for 63.4 percent of current-year foreign taxes paid by companies claiming a foreign tax credit in 2000.

Figure D and Figure E show that a small number of countries accounted for large amounts of the total foreign-source taxable income and total current-year foreign taxes paid in 2000. In fact, the top five countries--the United Kingdom, Japan, Canada, Germany, and the Netherlands--accounted for 41.4 percent of all foreign-source taxable income and nearly 49.0 percent of all current-year foreign taxes. The United Kingdom was the leading source of taxable income with 13.5 percent of the total, and Japan was second with 10.1 percent. Notably, Japan surpassed the UK in 2000 with the most current-year foreign taxes, with

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Figure C

U.S. Corporation Returns with a Foreign Tax Credit: Foreign-Source Taxable Income, Taxes Paid, and Taxes Deemed Paid by Geographic Region, Tax Year 2000



16.2 percent of the total. Japan also had the highest rate of current-year taxes as a percentage of taxable income (42.8 percent) among the selected countries in Figures D and E, followed by Germany (38.6 percent) and the Netherlands (32.9 percent). The United Kingdom (22.0 percent) had the lowest rate. The average rate for all countries in 2000 was 26.7 percent, up from 24.9 percent in 1999.

Industry Composition

Similar to recent years, the manufacturing industry earned the most foreign-source taxable income, paid out the most current-year foreign taxes, and claimed the largest amount of foreign tax credit (Figure F). Corporations in the manufacturing industry received \$120.8 billion in foreign-source taxable income, 61.4 percent of the total. The \$36.3 billion paid in current-year foreign taxes by U.S. manufacturers accounted for 69.1 percent of the total. This allowed them to account for over 67.4 percent of the total foreign tax credit claimed. Corporations classified in petroleum

and coal products manufacturing surpassed manufacturers of computer and electronic products to account for the largest amount of foreign-source taxable income within the manufacturing industry. For the third year in a row, petroleum (including integrated) and coal products manufacturers claimed the largest share of the foreign tax credit, with 22.7 percent of the total.

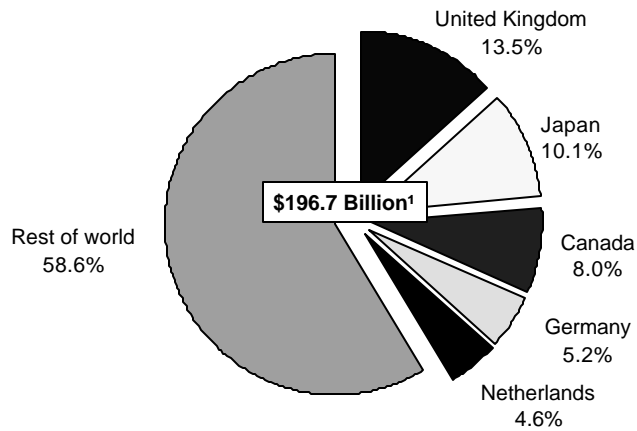
Reversing a downward trend from the 1990's, manufacturing's lead in certain measurements of foreign activity increased in 2000. Manufacturing's share of foreign-source taxable income rose from 60.7 percent in 1999 to 61.4 percent in 2000, while current-year foreign taxes rose from 66.3 percent to 69.1 percent. Its share of the total foreign tax credit fell by 0.3 percent to 67.4 percent.

Finance, insurance, real estate, rental, and leasing, the second leading industrial category, suffered decreases across the board from 1999 to 2000. Foreign-source taxable income dropped from 15.9 percent to 14.4 percent, and current-year taxes

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Figure D

U.S. Corporation Returns with a Foreign Tax Credit: Percentage of Foreign-Source Taxable Income, by Selected Country or Geographic Area, Tax Year 2000

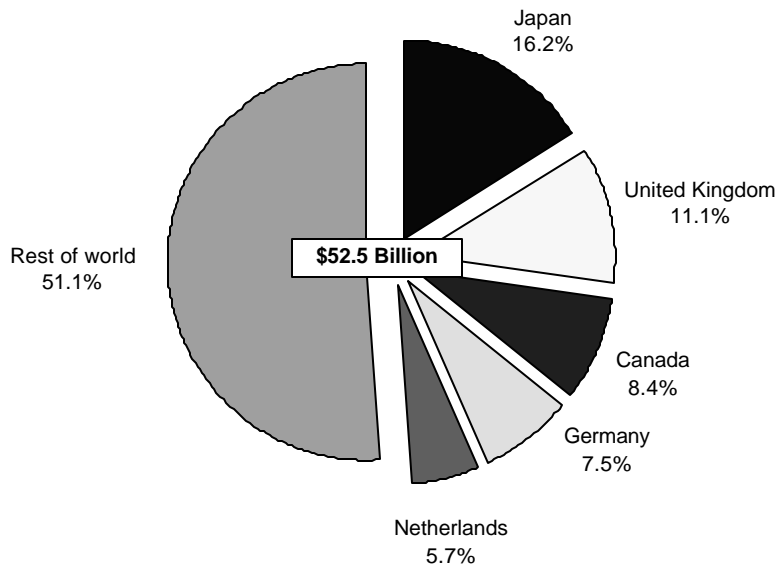


¹ Before adjustments.

NOTE: Detail may not add to 100 percent because of rounding.

Figure E

U.S. Corporation Returns with a Foreign Tax Credit: Percentage of Current-Year Foreign Taxes, by Selected Country or Geographic Area, Tax Year 2000



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Figure F

U.S. Corporation Returns with a Foreign Tax Credit: Foreign-Source Taxable Income, Current-Year Foreign Taxes, and Foreign Tax Credit, by Selected Sector or Group, Tax Year 2000, and Selected Sector or Group Shares of Total Foreign Tax Credit, Tax Years 1999-2000

[Money amounts are in thousands of dollars]

Selected sector or group	2000				Percentage of total foreign tax credit claimed	
	Number of returns	Foreign-source taxable income ¹	Current-year foreign taxes	Foreign tax credit claimed	2000	1999
	(1)	(2)	(3)	(4)	(5)	(6)
All industries.....	5,917	196,675,289	52,513,722	48,355,433	100.0	100.0
Agriculture, forestry, fishing, and hunting.....	151	6,683	1,044	1,394	(²)	0.1
Mining.....	128	2,692,785	1,075,686	780,661	1.6	1.5
Utilities.....	23	980,638	132,002	166,828	0.4	0.9
Construction.....	193	176,755	49,936	51,674	0.1	0.2
Manufacturing.....	1,272	120,771,799	36,292,166	32,613,017	67.4	67.7
Beverage and tobacco products.....	15	6,901,045	2,364,244	2,262,251	4.7	6.2
Petroleum and coal products manufacturing.....	25	32,460,253	13,159,548	10,984,614	22.7	15.7
Chemical manufacturing.....	217	17,964,934	5,408,488	4,809,045	10.0	13.7
Pharmaceutical and medicine manufacturing.....	59	9,623,141	2,589,990	2,414,126	5.0	7.7
Computer and electronic product manufacturing.....	206	35,135,487	7,414,362	6,745,932	14.0	10.2
Transportation equipment manufacturing.....	68	7,766,903	2,007,838	1,950,799	4.0	7.7
Wholesale and retail trade.....	646	5,937,359	1,479,662	1,247,176	2.6	2.9
Transportation and warehousing.....	103	1,607,888	278,747	267,237	0.6	0.4
Information.....	178	13,973,523	2,641,194	3,069,696	6.4	4.1
Finance, insurance, real estate, and rental and leasing.....	917	28,380,475	4,613,960	4,773,821	9.9	13.4
Securities, commodity contracts, etc.....	154	17,672,980	2,964,614	3,202,777	6.6	8.4
Insurance and related activities.....	266	8,827,234	1,111,175	1,103,657	2.3	4.4
Services.....	2,304	22,147,362	5,949,320	5,383,927	11.1	8.7
Professional, scientific, and technical services.....	669	2,216,789	500,077	395,635	0.8	1.5
Management of holding companies.....	1,105	17,422,975	4,652,423	4,271,883	8.8	4.7

¹ Before adjustments.

² Less than 0.05 percent.

NOTE: Detail may not add to the total for "All industries" because of rounding.

dipped from 14.4 percent to 8.8 percent of the total in 2000. The industry saw its share of the total foreign tax credit drop from 13.4 percent to 9.9 percent. Increases were seen in the information and services industries, whose combined share of the total foreign tax credit climbed from 12.8 percent to 17.5 percent in 2000. These increases in share of the foreign tax credit occurred despite a combined decrease of 34.0 percent in foreign-source taxable income.

Apportioned Deductions

The allocation of expenses has a significant impact on a corporation's ability to credit its foreign tax liability. As mentioned previously, corporations are limited to crediting an amount equal to the lesser of all foreign taxes paid or an amount equal to the U.S.

income tax multiplied by the ratio of foreign-source taxable income to worldwide taxable income. To the extent that expenses are allocated to foreign-source income, total foreign-source income is reduced, which in turn reduces the maximum amount of foreign taxes eligible for credit in the current year.

For the purposes of the foreign tax credit, there are two principal categories of deductions; those "definitely allocable" or having a definite relationship to a particular class of gross income, and those that are "not definitely allocable" to a specific class of income and may require apportionment between foreign-source income and domestic-source income. The not definitely allocable deductions are divided into three main categories on Form 1118: research and development, interest, and "other" (i.e., steward-

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ship expenses, legal and accounting expenses, general administrative expenses, advertising and marketing expenses, etc.).

Total not definitely allocable deductions reduced foreign-source gross income by \$125.4 billion for 2000. That figure represents a 1-year increase of 22.3 percent. All three components of not definitely allocable deductions experienced increases, led by interest expense. With \$63.8 billion, interest expense was both the largest and the fastest growing of the not definitely allocable components. "Other" deductions also experienced significant growth, rising 19.0 percent to \$49.1 billion, in 2000. Research and development expenses accounted for just 9.0 percent of all nonallocable deductions.

As shown in Figure G, not definitely allocable deductions grew in significance during the late 1990's, reducing foreign-source income by progressively larger amounts. As a percentage of foreign-source gross income, these deductions rose steadily from 26.7 percent in 1996 to 28.6 percent in 2000. Interest expense contributed significantly to this increase, growing by 79.5 percent during the 5-year period. Research and development expenses and other expenses, combined, increased 19.7 percent.

Manufacturers claiming a foreign tax credit in 2000 compiled the largest share of not definitely allocable deductions, accounting for 37.8 percent of the total (Figure H). Finance, insurance, real estate,

rental, and leasing had 25.7 percent, while services accounted for 25.2 percent. Differences between industrial groups are more pronounced when examining the components of not definitely allocable deductions. Manufacturing accounted for 78.7 percent of all research and development expense but only 30.5 percent of interest expense. Services was the leading industrial category with respect to interest expense, with 37.5 percent of the total. Manufacturers reported the largest share of other expenses, followed by finance, insurance, real estate, rental, and leasing.

Oil and Gas Extraction Income

Businesses claiming a foreign tax credit related to foreign oil and gas extraction income (FOGEI) are required to identify and report foreign-source oil and gas extraction income, deductions, and taxes separately from all other foreign-source income. Separate rules related to oil and gas extraction income, under Section 907 of the Internal Revenue Code, affect the amount of foreign taxes available for corporations to credit. These provisions ban certain foreign levies from being credited and require another limitation calculation specific to foreign oil and gas extraction income. If foreign taxes are paid, accrued, or deemed paid at a rate in excess of the statutory U.S. tax rate, the foreign taxes must be excluded from the foreign tax credit calculation. Foreign levies

Figure G

U.S. Corporation Returns with a Foreign Tax Credit: Not Definitely Allocable Deductions Apportioned to Foreign-Source Gross Income, by Type of Not Definitely Allocable Deduction, and as a Percentage of Foreign-Source Gross Income, Tax Years 1996-2000

[Money amounts are in millions of dollars]

Tax year	Not definitely allocable deductions				Foreign-source gross income	Not definitely allocable deductions as a percentage of foreign-source gross income
	Total ¹	Research and development deductions	Interest deductions	Other deductions		
	(1)	(2)	(3)	(4)	(5)	(6)
2000.....	125,377,761	11,364,335	63,781,017	49,133,088	438,992,946	28.6
1999.....	102,542,312	9,539,700	51,322,499	41,287,061	365,492,272	28.1
1998.....	94,247,133	9,876,318	49,478,293	32,808,117	349,386,789	27.0
1997.....	94,428,510	9,565,637	43,342,264	40,176,836	359,898,600	26.2
1996.....	88,355,742	9,232,584	35,536,186	41,326,284	331,078,563	26.7

¹ Due to instances of incomplete taxpayer reporting, total may not equal sum of components.

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Figure H

U.S. Corporation Returns with a Foreign Tax Credit: Not Definitely Allocable Deductions, Types of Not Definitely Allocable Deductions, by Selected Sector or Group, Tax Year 2000

[Money amounts are in thousands of dollars]

Selected sector or group	Not definitely allocable deductions			
	Total ¹	Research and development	Interest	Other
	(1)	(2)	(3)	(4)
All industries	125,377,761	11,364,335	63,781,017	49,133,088
Manufacturing	47,453,467	8,952,473	19,473,375	18,617,131
Chemical manufacturing.....	8,994,931	2,638,497	3,045,108	3,286,236
Computer and electronic product manufacturing.....	14,529,598	4,408,365	1,333,916	8,558,336
Electrical equipment, appliance & component manufacturing.....	5,034,778	127,710	4,127,448	759,041
Transportation equipment manufacturing.....	5,935,784	720,217	4,777,216	434,059
Motor vehicles and related manufacturing.....	5,095,306	462,504	4,326,370	306,028
Wholesale and retail trade	2,119,956	25,874	791,218	1,168,951
Information	10,366,462	1,854,585	1,242,877	7,199,186
Publishing, motion picture & sound recording.....	8,085,697	1,685,454	216,742	6,121,533
Finance, insurance, real estate, and rental and leasing	32,284,094	*279,882	17,447,669	14,303,866
Finance and insurance.....	32,259,724	*279,882	17,431,770	14,302,654
Services	31,547,327	173,324	23,915,524	7,322,160
Management of holding companies.....	28,966,510	*577	22,885,066	6,038,570

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

¹ Due to instances of incomplete taxpayer reporting, total may not equal sum of components.

can also be excluded if they were not, in effect, income taxes, but rather royalty payments. Only income taxes, as defined by U.S. tax principles, are creditable under the foreign tax credit provisions. Voluntary payments in lieu of taxes, and payments for a specific right (such as the right to extract a natural resource) or services are further examples of payments that are not eligible for a foreign tax credit.

Figure I shows gross income from foreign oil and gas extraction by both selected industrial sectors and selected countries for 2000. As expected, manufacturers of petroleum and coal products continued to account for the majority of FOGEI with 88.1 percent. Corporations classified under wholesale petroleum trade were second with 5.7 percent, while oil and gas extraction corporations accounted for just 2.8 percent.

Figure I also lists the countries generating the largest amounts of gross income associated with foreign oil and gas extraction for 2000. Corporations reported more than twice as much foreign oil and gas extraction income from the United Kingdom (\$5.1 billion), as the next highest country, Indonesia (\$2.3 billion). Those countries together accounted for over

29.0 percent of all FOGEI. Norway (7.4 percent), Nigeria (7.1 percent), Bermuda (5.3 percent) and Japan (5.1 percent), were the next highest in terms of foreign oil and gas extraction income. These countries, along with the UK and Indonesia, accounted for 54.1 percent of all gross income from oil and gas extraction activities related to the foreign tax credit. In many instances, FOGEI is earned by foreign corporations controlled by the U.S. corporation claiming a foreign tax credit. Therefore, the source country reported for FOGEI may be the country of incorporation of the foreign company, not necessarily the same country where the income was generated.

Summary

Each of the leading measures of foreign activity rose for 2000, fueling a \$10-billion dollar increase in the total foreign tax credit. The \$48.4 billion in total foreign tax credits established a new record high. The majority of foreign income and taxes continued to be reported in the general limitation statutory income grouping, as corporations were able to claim over 92.0 percent of their current-year foreign taxes. As in prior years, the European Union and the UK in

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Figure 1

U.S. Corporation Returns with a Foreign Tax Credit: Foreign Oil and Gas Extraction Gross Income, by Selected Industry and Country, Tax Year 2000

[Money amounts are in millions of dollars]

Selected industry, country	Gross income (less loss)	Percentage of total
Selected industrial group:		
All industries.....	25,337	100.0
Petroleum and coal products manufacturing.....	22,327	88.1
Wholesale petroleum trade.....	*1,436	5.7
Oil and gas extraction.....	720	2.8
All other industries.....	854	3.4
Selected country:		
All countries.....	25,337	100.0
United Kingdom.....	*5,088	20.1
Indonesia.....	*2,300	9.1
Norway.....	*1,881	7.4
Nigeria.....	*1,798	7.1
Bermuda.....	*1,337	5.3
Japan.....	*1,304	5.1
Saudi Arabia.....	*1,206	4.8
Former Soviet Union.....	*1,125	4.4
Malaysia.....	*928	3.7
Canada.....	*925	3.7
Algeria.....	*847	3.3
Australia.....	*749	3.0
Denmark.....	*505	2.0
Thailand.....	*397	1.6
Netherlands.....	*354	1.4
All other countries ¹	4,595	18.1

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

¹ Includes U.S. Possessions.

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

particular, were the most significant geographic region and country with respect to foreign-source taxable income. The overall share of the finance, insurance, real estate, rental, and leasing industry declined but remained second in most categories behind the perennial leader, manufacturing.

Data Sources and Limitations

The statistics in this article were derived based on corporation income tax returns with a foreign tax credit that were included in the 2000 Statistics of Income sample of returns with accounting periods ending between July 2000 and June 2001. These returns were selected after administrative processing but prior to any amendments or audit examination.

The 2000 corporation income tax return sample included approximately 138,000 returns sampled from over 5.0 million active corporate returns filed for this period. The corporate tax return forms included in this sample were Forms 1120, 1120S, 1120-L, 1120-F, 1120-PC, 1120-REIT, and 1120-RIC.

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 returns. The statistics in this article are based on information reported on Forms 1118 and related corporate returns. 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 article, 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 article and those published in *Statistics of Income--2000, 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 article. 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 2000, were not included in the statistics.

Foreign income and taxes are understated in this article to the extent that they were not reported on Form 1118. Also, the 2000 foreign tax credit statistics in this article do not represent the final amounts credited that year. A complete foreign tax credit amount for 2000 would reflect the results of any

audits, as well as the carryback of any foreign tax credits from 2001 and 2002. In addition to current-year foreign taxes, foreign taxes available for credit shown in this article include only those carried forward to 2000 from previous years. 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 2000. Finally, other corporations could have deducted their foreign taxes from their gross incomes instead of claiming a foreign tax credit.

Because the estimates are based on a sample, they are subject to sampling error. Coefficients of Variation (CV's) 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 J presents CV's 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 article 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 economic units that have similar production processes are classified in the same industry. NAICS replaced the Standard Industrial Classification (1987) of the United States. Prior to 1986, the SIC system was the basis for industrial groupings in articles 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*. Schedule references indicate the parts 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, including U.S. Possessions) and deductions,

Figure J

Coefficients of Variation for Foreign Tax Credit, by Selected Sector or Group, Tax Year 2000

Selected sector or group	Coefficients of variation for foreign tax credit (percentages)
All industries.....	0.17
Agriculture, forestry, fishing, and hunting ¹.....	8.44
Mining.....	0.71
Utilities.....	0.53
Construction.....	0.76
Manufacturing.....	0.23
Beverage and tobacco products.....	0.68
Petroleum and coal products manufacturing	0.56
Chemical manufacturing	0.23
Pharmaceutical and medicine manufacturing.....	0.38
Computer and electronic product manufacturing.....	0.53
Transportation equipment manufacturing.....	0.49
Wholesale and retail trade.....	0.25
Transportation and warehousing.....	0.74
Information ¹	4.66
Finance, insurance, real estate, and rental and leasing.....	0.25
Securities, commodity contracts, etc.....	0.36
Insurance and related activities.....	0.33
Services.....	0.43
Professional, scientific, and technical services.....	0.66
Management of holding companies.....	0.53

¹ Sample strata for this sector was modified for 2000.

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 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 and column 27 of Table 2.

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

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column 24 of Table 1. For Tax Year 1999, Code section 863(b) income (income partly from within and partly from without 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 variations). 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, Year-End 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 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--Corporation*, 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 varia-

tions). Table 1, column 41 shows carryovers of excess or "unused" taxes from prior years, which can be added to the 2000 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, 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 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 24 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 2000 statistics used for this article include only those foreign taxes that were carried

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forward from previous years (1995-1999). See column 41 of Table 1 and column 28 of Table 2.

Controlled Foreign Corporation.--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 29 of Table 2, and column 15 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 (CFC's) are recognized under Subpart F of the Internal Revenue Code as current-year income of the U.S. corporation, even if no income is actually repatriated 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 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 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.

European Union (EU).--The European Union (EU) is a union of fifteen independent states based on the former European Community and founded to enhance political, economic, and social cooperation. Formerly known as the European Community (EC) or the European Economic Community (EEC), the member states include Austria, Belgium, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Luxembourg, the Netherlands, Portugal, Spain, Sweden, and the United Kingdom.

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 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 Corporations (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, FSC dividends received by corporations claiming a foreign tax credit are in-

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cluded. Dividends and interest generated by a 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 FSC's until December 2001. The European Union subsequently challenged the legality of the Extraterritorial Income Exclusion Act, and, in August 2001, the WTO ruled that it was inconsistent with United States obligations. The Appellate Body of the WTO affirmed this ruling on January 14, 2002.

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 "income subject to U.S. tax" in the statistics.

Foreign trade income.--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 1999 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 re-sourced 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. This usually occurs when a tax treaty allows the other country to tax what would otherwise be U.S.-source income. Certain dividends and capital gains 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 re-sourced by a tax treaty.

Interest-Charge Domestic International Sales Corporation (IC-DISC).--IC-DISC's were small domestic corporations formed to export U.S. products. An IC-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 (FSC's), now also repealed. To elect IC-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 an IC-DISC are a separate limitation category.

Noncontrolled section 902 corporation.--A noncontrolled foreign corporation is defined by Internal Revenue Code section 902 as a foreign corporation 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 noncontrolled 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.

OPEC Countries.--The members of the Organization of Petroleum Exporting Countries (OPEC) for 2000 were Algeria, Indonesia, Iran, Iraq, Kuwait, Libya, Nigeria, Qatar, Saudi Arabia, the United Arab Emirates, and Venezuela.

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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 2000, 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 creditable. 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 current U.S. taxation on certain types of foreign-source income earned by Controlled Foreign Corporations (CFC's). Subpart F identifies certain types of income, primarily passive investment income, earned by certain CFC's, and requires the U.S. corporation to report a pro-rata share of this income currently for U.S. tax purposes, regardless of whether or not the income was actually repatriated to the U.S. corporation. 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.

Notes and References

- [1] Since income tax returns for Foreign Sales Corporations were not a part of the sample used for the statistics, this income category is not included. Distributions from FSC's or former FSC's are reported on the parent corporation's return and are included in these statistics when provided by the taxpayer.
- [2] A foreign tax credit is not allowed for foreign taxes paid to countries sanctioned by the U.S. Government. Nevertheless, a foreign tax credit limitation is computed for each sanctioned country. These countries for Tax Year 2000 were Cuba, Iran, Iraq, Libya, North Korea, Sudan, and Syria.
- [3] According to Internal Revenue Code section 999, U.S. persons who participate or cooperate in international boycotts not sanctioned by U.S. law, regulation, or executive order are penalized under special boycott provisions. Under the boycott provisions, penalties include a reduction

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of foreign tax credits, an increase in taxable income for Controlled Foreign Corporations under subpart F, and a reduction in benefits otherwise allowed regarding Foreign Sales Corporations (FSC's) and Interest-Charge Domestic International Sales Corporation (IC-DISC's), as applicable. For more information on international boycotts, see Green, Kathryn A., "International Boycott Reports, 1999 and 2000," *Statistics of Income Bulletin*, Winter 2002-2003, Volume 22, Number 3.

- [4] Taxes carried back to 2000 returns from 2001 and 2002 are not reflected in the data, as amended returns and refund claims are not included in the statistics.

- [5] Data from Tax Year 1979 are not provided in this article.

- [6] Current-year foreign taxes as a percentage of foreign-source taxable income should not be construed as a measure of the effective tax rate. An effective tax rate would contain a measure of economic income in the denominator and taxes on that in the numerator. These percentages are simply a tool used to compare the proportion of taxes to foreign-source taxable income in each statutory group.

- [7] For geographic region data for Tax Year 1999, see Raub, Brian, "Corporate Foreign Tax Credit, 1999," *Statistics of Income Bulletin*, Fall 2003, Volume 23, Number 2.

SOURCE: IRS, *Statistics of Income Bulletin*, Fall 2004, Publication 1136. (Rev. 12-04.)

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Table 1.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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-DISC's or former DISC's ¹	Includable income of controlled foreign corporations	Foreign dividend income from foreign taxes deemed paid (gross-up)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All industries.....	5,917	18,075,754,387	6,409,830,325	42,346,204	8,296	29,548,804	32,710,622
Agriculture, forestry, fishing, and hunting.....	151	1,381,932	1,270,192	*191	--	*11	*6
Mining.....	128	91,726,673	33,055,540	490,679	*3	338,424	365,269
Oil and gas extraction.....	70	7,699,356	3,304,404	7,357	*3	*1,493	*4,417
Coal mining, metal ore mining.....	10	37,022,255	7,704,634	54,872	--	53,716	36,859
Nonmetallic minerals.....	9	*8,268,905	*5,287,770	*162,795	--	*7,262	*72,227
Support activities for mining.....	40	38,736,156	16,758,733	*265,746	--	*275,954	*251,767
Utilities.....	23	272,978,563	118,527,918	591,857	--	*78,277	*92,377
Construction.....	193	13,665,755	22,029,196	94,546	--	*315	38,642
Building, developing, and general contracting.....	119	6,006,326	11,160,194	85,350	--	*306	*36,515
Heavy construction.....	18	6,607,037	8,643,094	*7,162	--	*9	*1,589
Special trade contractors.....	36	943,982	1,876,166	*2,023	--	--	*538
Manufacturing.....	1,272	4,792,469,066	2,970,905,072	30,968,866	6,770	19,831,043	25,185,056
Food manufacturing.....	55	169,927,320	141,201,605	1,576,356	*1,017	412,691	906,521
Beverage and tobacco products.....	15	109,749,035	88,900,591	*1,952,108	--	*1,695,900	*1,894,940
Tobacco manufacturing.....	4	*84,215,568	*65,197,321	*834,414	--	*1,640,318	*1,276,157
Textile mills and textile product mills.....	22	8,466,148	9,681,997	*34,286	*112	*31,706	*29,169
Apparel manufacturing.....	40	16,945,836	19,382,900	*139,491	--	*40,812	*144,647
Leather and allied product manufacturing.....	11	2,929,295	3,655,998	*1,155	--	--	*886
Wood product manufacturing.....	9	*59,073,238	*23,734,376	*855	--	*11,185	*253
Paper manufacturing.....	30	84,197,921	67,803,802	534,211	--	288,406	503,536
Printing and related support activities.....	13	5,927,612	6,751,285	*10,805	*32	*13,640	*11,473
Petroleum and coal products manufacturing.....	25	1,122,999,954	631,651,950	10,045,324	--	2,205,662	7,025,892
Chemical manufacturing.....	217	621,433,774	375,989,500	4,697,979	*511	4,628,695	4,212,919
Pharmaceutical and medicine manufacturing.....	59	245,509,377	158,003,550	1,831,236	*422	2,404,866	2,015,146
Other chemical manufacturing.....	159	375,924,397	217,985,950	2,866,742	*89	2,223,829	2,197,773
Plastics and rubber products manufacturing.....	66	24,771,569	22,819,154	175,188	--	174,679	176,431
Nonmetallic mineral product manufacturing.....	42	23,946,011	20,340,738	95,968	*800	*220,621	84,612
Primary metal manufacturing.....	24	74,198,130	35,659,982	*259,837	--	*185,436	*230,303
Fabricated metal products.....	92	129,854,579	68,498,166	489,238	*696	357,943	502,558
Machinery manufacturing.....	169	200,118,678	147,313,160	1,417,529	*560	901,745	1,079,192
Computer and electronic product manufacturing.....	206	484,154,200	443,319,920	6,520,081	*722	4,249,999	5,789,091
Electrical equipment, appliance and component manufacturing.....	64	708,379,717	181,768,846	454,584	*420	1,413,508	567,156
Transportation equipment manufacturing.....	68	863,784,596	616,967,364	2,132,641	*10	2,122,123	1,575,108
Motor vehicles and related manufacturing.....	44	682,706,165	433,089,653	1,823,189	*10	1,876,783	1,267,414
Other transportation equipment manufacturing.....	24	181,078,431	183,877,711	309,451	--	245,340	307,694
Furniture and related products.....	15	9,066,676	12,564,261	*11,033	--	*18,747	*18,715
Miscellaneous manufacturing and manufacturing not allocable.....	86	72,544,777	52,899,478	420,198	*1,891	857,545	431,655
Wholesale and retail trade.....	646	502,105,545	816,467,182	1,500,536	*96	1,198,523	1,114,278
Wholesale trade.....	478	257,507,403	395,558,386	1,254,764	*96	799,934	822,946
Durable goods.....	323	100,656,064	177,977,482	106,128	*86	33,083	68,043
Machinery, equipment, and supplies.....	77	3,504,737	5,226,251	*4,178	--	*449	*1,214
Other miscellaneous durable goods.....	246	97,151,327	172,751,231	101,950	*86	32,634	66,829
Nondurable goods.....	155	156,851,340	217,580,904	1,148,636	*10	766,851	754,903
Drugs, chemicals, and allied products.....	29	58,101,328	99,159,946	279,703	--	*181,560	272,054
Groceries and related products.....	12	1,360,653	3,055,268	*48,794	--	*241	*20,236
Petroleum and petroleum products.....	13	30,634,159	23,276,953	*532,859	--	*100,314	*246,908
Other miscellaneous nondurable goods.....	101	66,755,201	92,088,738	287,280	*10	484,736	215,704

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 1.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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-DISC's or former DISC's ¹	Includable income of controlled foreign corporations	Foreign dividend income from foreign taxes deemed paid (gross-up)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Wholesale and retail trade--continued							
Retail trade.....	167	244,598,142	420,908,796	245,772	--	398,589	291,332
Motor vehicle, parts dealers, and gas stations.....	33	1,120,796	2,836,455	*3,209	--	*16,274	*9,475
Furniture and home furnishing stores.....	3	*1,066,986	*1,823,091	--	--	*1,109	*610
Building materials, garden equipment, and supplies.....	4	*52,789,942	*46,185,172	*7	--	*459	--
Food and beverages stores.....	6	*5,440,148	*13,100,800	*2	--	*263	*57
Apparel and accessory stores.....	43	37,542,461	53,449,740	*95,830	--	*258,106	*90,195
General merchandise stores.....	4	*113,555,542	*248,611,086	*123,109	--	*80,479	*115,884
Miscellaneous retail trade.....	74	33,082,267	54,902,451	23,615	--	*41,898	*75,111
Transportation and warehousing.....	103	148,787,981	130,191,817	220,770	--	261,716	201,868
Air, rail, and water transportation.....	27	90,498,494	49,388,163	*114,237	--	*36,883	*32,825
Water transportation.....	7	*3,790,755	*1,915,684	*1,620	--	*23,964	*13,769
Air and rail transportation.....	20	86,707,739	47,472,479	*112,617	--	*12,919	*19,055
Pipeline transportation.....	3	*433,276	*80,684	--	--	--	--
Other transportation and warehousing.....	73	57,856,211	80,722,970	106,533	--	*224,833	169,044
Information.....	178	893,295,042	370,949,155	2,423,711	--	947,553	1,213,862
Publishing, motion picture, and sound recording.....	130	244,232,460	131,813,616	1,193,342	--	650,616	811,607
Broadcasting and telecommunications.....	30	591,384,704	205,510,535	1,170,101	--	*217,449	*355,762
Information services and data processing services.....	18	57,677,877	33,625,005	*60,268	--	*79,489	46,493
Finance, insurance, real estate, and rental and leasing.....	917	6,207,897,160	1,306,896,795	2,208,012	*953	4,026,805	1,556,483
Finance and insurance.....	508	6,184,777,936	1,286,231,245	2,206,744	*953	4,019,989	1,553,916
Commercial banking and other depository credit agencies.....	24	25,698,861	5,525,669	922	--	*3,913	*7
Commercial banking.....	6	*7,300,024	*4,160,810	*641	--	*3,902	--
Depository credit agencies other than banks.....	18	18,398,837	1,364,859	281	--	*11	*7
Nondepository credit intermediation.....	42	620,768,440	100,040,949	*360,508	--	*474,746	*133,337
Securities, commodity contracts, and other.....	154	2,370,258,855	253,188,280	903,877	--	2,846,821	1,001,890
Insurance and related activities.....	266	3,165,296,537	927,356,397	936,861	*953	694,510	418,680
Insurance agencies and brokerages.....	11	51,105,153	13,990,687	*128,418	--	*160,425	*97,363
Funds, trusts, and other financial vehicles.....	22	2,755,242	119,951	*4,578	--	--	*3
Real estate and rental and leasing.....	409	23,119,224	20,665,550	1,268	--	*6,816	*2,567
Real estate.....	340	6,416,963	1,689,169	968	--	*4,233	*1,253
Rentals and leasing.....	70	16,702,262	18,976,381	*300	--	*2,583	*1,314
Services.....	2,304	5,151,446,515	639,537,325	3,847,034	*475	2,866,135	2,942,780
Professional, scientific, and technical services.....	669	119,143,261	96,750,452	337,384	--	214,487	223,111
Management of holding companies.....	1,105	4,834,903,543	387,092,008	3,028,390	*94	2,395,822	2,399,029
Administrative and support and waste management and remediation.....	59	24,089,491	32,419,375	183,436	--	*26,414	109,705
Education services, health care, and social assistance.....	223	61,711,956	30,720,230	13,298	--	*154,825	*81,934
Arts, entertainment, and recreation.....	17	5,125,674	3,019,591	*2,995	--	*184	*2,074
Accommodation and food services.....	134	98,204,434	80,495,499	263,597	--	*55,890	116,068
Accommodation.....	21	56,008,976	43,956,596	*142,993	--	*28,179	*50,433
Food services and drinking places.....	113	42,195,458	36,538,903	*120,604	--	*27,711	*65,635
Other services.....	97	8,268,156	9,040,170	*17,935	*380	*18,512	*10,861
Repair and maintenance services.....	65	*1,023,652	*1,285,173	--	*380	--	--
Personal services, religious, grantmaking, civic, professional, etc.....	32	7,244,504	7,754,996	*17,935	--	*18,512	*10,861

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 1.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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)
All industries.....	493,542,735	462,322,632	163,009,304	163,065,059	48,355,433	248,131
Agriculture, forestry, fishing, and hunting.....	233,052	217,074	74,427	74,416	1,394	--
Mining.....	4,137,852	3,857,116	1,391,268	1,391,286	780,661	--
Oil and gas extraction.....	1,157,688	1,106,417	397,481	397,499	191,092	--
Coal mining, metal ore mining.....	620,943	606,239	229,271	229,271	170,963	--
Nonmetallic minerals.....	*972,035	*960,568	*338,503	*338,503	*78,205	--
Support activities for mining.....	1,387,186	1,183,892	426,012	426,012	340,400	--
Utilities.....	7,893,074	7,690,603	2,703,256	2,703,176	166,828	--
Construction.....	1,182,708	1,066,624	372,762	370,675	51,674	--
Building, developing, and general contracting.....	629,230	518,792	181,163	179,893	45,192	--
Heavy construction.....	439,206	435,008	152,103	152,056	4,423	--
Special trade contractors.....	108,018	106,916	37,584	36,814	2,054	--
Manufacturing.....	249,995,268	232,628,653	82,087,896	82,162,445	32,613,017	242,439
Food manufacturing.....	9,178,153	8,961,233	3,139,483	3,137,522	1,029,571	*779
Beverage and tobacco products.....	16,611,964	16,175,217	5,660,885	5,661,275	2,262,251	*59,937
Tobacco manufacturing.....	*11,453,986	*11,169,743	*3,909,020	*3,909,410	*1,402,135	--
Textile mills and textile product mills.....	620,911	598,484	209,108	209,736	32,929	--
Apparel manufacturing.....	1,453,642	1,414,230	498,553	498,470	101,725	*2,623
Leather and allied product manufacturing.....	288,517	259,688	90,796	90,796	9,096	*1,571
Wood product manufacturing.....	*929,783	*909,630	*318,087	*318,087	*7,845	--
Paper manufacturing.....	6,221,790	5,697,148	1,995,374	1,995,374	608,349	--
Printing and related support activities.....	599,071	587,309	207,051	207,051	13,153	--
Petroleum and coal products manufacturing.....	61,617,617	60,362,676	21,307,715	21,306,639	10,984,614	--
Chemical manufacturing.....	39,812,778	36,934,043	12,990,202	12,990,916	4,809,045	*160,661
Pharmaceutical and medicine manufacturing.....	24,330,437	22,655,140	7,951,606	7,949,509	2,414,126	*152,097
Other chemical manufacturing.....	15,482,341	14,278,903	5,038,596	5,041,407	2,394,919	*8,564
Plastics and rubber products manufacturing.....	1,847,425	1,792,918	626,819	626,813	235,848	*888
Nonmetallic mineral product manufacturing.....	1,574,634	1,465,878	514,402	514,402	114,556	--
Primary metal manufacturing.....	1,681,599	1,523,553	541,693	541,614	274,676	--
Fabricated metal products.....	6,930,066	6,670,202	2,333,298	2,334,442	629,625	--
Machinery manufacturing.....	9,887,683	8,927,941	3,127,178	3,127,112	1,282,692	*10,584
Computer and electronic product manufacturing.....	51,428,571	44,113,756	15,610,527	15,601,968	6,745,932	--
Electrical equipment, appliance and component manufacturing.....	10,911,494	10,439,993	3,565,636	3,651,922	951,258	--
Transportation equipment manufacturing.....	21,701,834	19,584,768	7,175,240	7,172,465	1,950,799	--
Motor vehicles and related manufacturing.....	10,076,118	9,615,433	3,667,419	3,666,548	1,522,086	--
Other transportation equipment manufacturing.....	11,625,717	9,969,335	3,507,820	3,505,917	428,713	--
Furniture and related products.....	784,917	770,196	269,230	269,230	19,011	--
Miscellaneous manufacturing and manufacturing not allocable.....	5,912,819	5,439,791	1,906,620	1,906,613	550,043	*5,396
Wholesale and retail trade.....	36,227,973	33,503,036	11,839,554	11,832,709	1,247,176	*1,161
Wholesale trade.....	15,447,046	13,473,822	4,827,682	4,820,838	877,549	*1,161
Durable goods.....	7,043,876	6,891,420	2,408,230	2,407,489	116,481	--
Machinery, equipment, and supplies.....	361,888	355,076	124,795	123,990	7,294	--
Other miscellaneous durable goods.....	6,681,988	6,536,344	2,283,435	2,283,499	109,186	--
Nondurable goods.....	8,403,170	6,582,401	2,419,452	2,413,349	761,069	*1,161
Drugs, chemicals, and allied products.....	2,535,641	2,317,335	846,337	846,337	285,355	--
Groceries and related products.....	102,970	97,740	34,872	35,433	24,287	--
Petroleum and petroleum products.....	1,729,650	1,212,829	431,587	424,923	222,843	--
Other miscellaneous nondurable goods.....	4,034,909	2,954,498	1,106,655	1,106,655	228,584	*1,161

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 1.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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)
Wholesale and retail trade--continued						
Retail trade.....	20,780,927	20,029,214	7,011,872	7,011,871	369,626	--
Motor vehicle, parts dealers, and gas stations.....	98,221	95,296	33,383	33,383	8,481	--
Furniture and home furnishing stores.....	*161,019	*160,846	*56,276	*56,276	*776	--
Building materials, garden equipment, and supplies.....	*3,428,349	*3,427,098	*1,199,462	*1,199,462	*11,015	--
Food and beverages stores.....	*224,445	*220,433	*77,027	*77,027	*9,234	--
Apparel and accessory stores.....	3,473,848	3,416,514	1,195,962	1,195,962	119,551	--
General merchandise stores.....	*10,627,137	*10,047,113	*3,516,491	*3,516,490	*120,035	--
Miscellaneous retail trade.....	2,767,908	2,661,914	933,272	933,272	100,535	--
Transportation and warehousing.....	7,416,396	7,262,033	2,543,351	2,543,351	267,237	--
Air, rail, and water transportation.....	1,701,664	1,588,959	559,106	559,106	60,264	--
Water transportation.....	*167,102	*140,869	*51,576	*51,576	*24,805	--
Air and rail transportation.....	1,534,561	1,448,089	507,530	507,530	35,459	--
Pipeline transportation.....	*24,175	*24,175	*8,375	*8,375	*3,299	--
Other transportation and warehousing.....	5,690,557	5,648,899	1,975,871	1,975,871	203,674	--
Information.....	49,561,552	42,672,398	15,129,030	15,128,605	3,069,696	--
Publishing, motion picture, and sound recording.....	24,534,212	19,412,766	6,942,442	6,942,442	2,344,580	--
Broadcasting and telecommunications.....	22,149,160	20,756,101	7,305,568	7,305,143	621,721	--
Information services and data processing services.....	2,878,180	2,503,531	881,020	881,020	103,395	--
Finance, insurance, real estate, and rental and leasing..	77,556,568	75,120,680	26,436,799	26,441,057	4,773,821	*1
Finance and insurance.....	76,388,754	74,050,963	26,064,909	26,069,829	4,765,720	*1
Commercial banking and other depository credit agencies.....	626,180	617,132	215,865	215,160	19,800	--
Commercial banking.....	*392,215	*389,221	*136,869	*136,164	*19,687	--
Depository credit agencies other than banks.....	233,965	227,911	78,996	78,996	113	--
Nondepository credit intermediation.....	8,254,410	9,087,581	3,182,366	3,181,538	430,283	--
Securities, commodity contracts, and other.....	23,974,032	22,730,684	8,023,597	8,023,481	3,202,777	--
Insurance and related activities.....	43,427,039	41,516,757	14,607,766	14,614,336	1,103,657	*1
Insurance agencies and brokerages.....	1,356,136	1,342,009	470,201	469,468	155,131	--
Funds, trusts, and other financial vehicles.....	107,092	98,809	35,314	35,314	9,203	--
Real estate and rental and leasing.....	1,167,814	1,069,717	371,890	371,228	8,102	--
Real estate.....	268,925	253,848	86,253	85,591	3,078	--
Rentals and leasing.....	898,889	815,869	285,638	285,638	5,024	--
Services.....	59,338,240	58,304,394	20,430,957	20,417,333	5,383,927	*4,529
Professional, scientific, and technical services.....	6,962,000	6,657,279	2,328,812	2,327,957	395,635	--
Management of holding companies.....	42,597,138	42,095,120	14,747,325	14,735,910	4,271,883	--
Administrative and support and waste management and remediation.....	1,727,521	1,702,228	601,334	600,989	185,321	--
Education services, health care, and social assistance.....	2,099,848	2,065,570	722,254	722,254	69,802	--
Arts, entertainment, and recreation.....	400,094	341,442	125,975	125,975	35,679	--
Accommodation and food services.....	5,046,359	4,967,924	1,740,004	1,738,995	411,624	*4,529
Accommodation.....	1,752,682	1,680,337	589,795	589,063	100,310	*4,529
Food services and drinking places.....	3,293,677	3,287,588	1,150,209	1,149,932	311,314	--
Other services.....	505,280	474,830	165,254	165,254	13,983	--
Repair and maintenance services.....	*36,941	*31,526	*10,464	*10,464	*52	--
Personal services, religious, grantmaking, civic, professional, etc.....	468,338	443,304	154,791	154,791	13,930	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 1.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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 ^a	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)
All industries.....	3,896,988	105,962,413	438,992,946	75,966,294	32,715,823	71,045,520
Agriculture, forestry, fishing, and hunting.....	*1,026	71,697	10,283	268	*6	*454
Mining.....	3,889	561,225	6,760,556	832,671	365,269	314,617
Oil and gas extraction.....	*27	166,098	930,286	*8,822	*4,417	29,089
Coal mining, metal ore mining.....	72	57,271	2,866,090	108,385	36,859	140,081
Nonmetallic minerals.....	*190	*256,230	*304,866	*173,746	*72,227	*2,999
Support activities for mining.....	*3,600	81,626	2,659,314	541,719	*251,767	142,447
Utilities.....	29,105	2,166,080	1,674,074	677,686	*92,377	529,786
Construction.....	*193	294,923	249,223	94,875	38,643	*2,452
Building, developing, and general contracting.....	*77	110,066	173,424	85,656	*36,515	*1,368
Heavy construction.....	*116	147,460	59,369	7,171	*1,589	*933
Special trade contractors.....	--	35,490	15,674	*2,036	*538	*151
Manufacturing.....	2,316,281	43,987,608	210,636,424	54,761,076	25,184,810	9,366,364
Food manufacturing.....	62,771	1,893,189	5,925,154	2,002,074	906,819	111,159
Beverage and tobacco products.....	*7,979	3,316,852	10,910,944	*3,873,354	*1,895,152	*280,671
Tobacco manufacturing.....	*6,569	*2,493,676	*6,294,925	*2,699,542	*1,276,369	*8,189
Textile mills and textile product mills.....	*555	173,636	215,764	*65,991	*29,169	*9,859
Apparel manufacturing.....	*2,350	391,504	699,307	*180,034	*143,583	*14,453
Leather and allied product manufacturing.....	*946	76,537	95,205	*9,368	*886	*198
Wood product manufacturing.....	*382	*308,163	*112,159	*12,492	*253	*32,457
Paper manufacturing.....	52,398	1,240,493	2,840,745	1,146,953	505,829	97,248
Printing and related support activities.....	*1,779	191,699	76,303	*24,735	*11,473	*2,686
Petroleum and coal products manufacturing.....	809,373	7,854,419	47,801,597	12,282,466	7,026,663	2,093,729
Chemical manufacturing.....	372,179	7,519,206	32,137,546	9,473,857	4,210,894	859,316
Pharmaceutical and medicine manufacturing.....	264,177	5,097,660	15,378,538	4,224,449	2,013,398	260,471
Other chemical manufacturing.....	108,002	2,421,546	16,759,008	5,249,407	2,197,496	598,845
Plastics and rubber products manufacturing.....	1,301	384,838	1,139,739	351,952	176,431	52,789
Nonmetallic mineral product manufacturing.....	*1,510	380,555	558,621	309,933	84,609	19,977
Primary metal manufacturing.....	*26	263,907	2,223,331	434,519	*230,303	247,481
Fabricated metal products.....	6,844	1,680,793	3,683,897	848,863	502,548	119,966
Machinery manufacturing.....	41,621	1,733,191	9,538,315	2,830,679	1,078,958	531,751
Computer and electronic product manufacturing.....	317,403	8,496,755	59,159,569	12,869,544	5,788,949	1,154,043
Electrical equipment, appliance and component manufacturing.....	265,325	1,890,420	11,549,344	1,964,603	567,156	2,341,403
Transportation equipment manufacturing.....	326,775	4,643,483	18,122,500	4,755,406	1,574,380	1,295,298
Motor vehicles and related manufacturing.....	276,241	1,843,853	13,362,701	3,639,625	1,266,830	811,224
Other transportation equipment manufacturing.....	50,535	2,799,630	4,759,799	1,115,781	307,551	484,074
Furniture and related products.....	*436	249,728	93,244	*29,674	*18,737	*8,404
Miscellaneous manufacturing and manufacturing not allocable.....	44,328	1,298,241	3,753,140	1,294,578	432,018	93,475
Wholesale and retail trade.....	128,117	10,275,468	13,547,165	2,935,861	1,114,259	506,479
Wholesale trade.....	43,123	3,753,904	9,033,715	2,291,205	822,927	414,578
Durable goods.....	2,603	2,233,974	2,235,729	139,934	68,043	84,369
Machinery, equipment, and supplies.....	*128	117,242	166,596	4,662	*1,214	2,219
Other miscellaneous durable goods.....	2,475	2,116,732	2,069,133	135,272	66,829	82,151
Nondurable goods.....	40,520	1,519,929	6,797,986	2,151,271	754,884	330,209
Drugs, chemicals, and allied products.....	22,973	536,037	1,401,235	463,706	272,054	21,909
Groceries and related products.....	*34	10,552	106,360	*49,035	*20,236	*1,635
Petroleum and petroleum products.....	*7,894	130,873	2,376,495	*630,740	*246,908	*21,783
Other miscellaneous nondurable goods.....	9,619	842,467	2,913,895	1,007,790	215,686	284,882

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 1.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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 ³	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)
Wholesale and retail trade--continued						
Retail trade.....	84,994	6,521,565	4,513,450	644,656	291,332	91,900
Motor vehicle, parts dealers, and gas stations.....	*18	24,637	32,085	*19,493	*9,475	*480
Furniture and home furnishing stores.....	*209	*55,291	*5,188	*1,109	*610	*138
Building materials, garden equipment, and supplies.....	*213	*1,188,222	*32,776	*467	--	*6,336
Food and beverages stores.....	*8,354	*51,744	*738,065	*266	*57	*1,750
Apparel and accessory stores.....	*7,198	1,069,006	1,292,569	354,163	*90,195	*11,610
General merchandise stores.....	*56,474	*3,323,772	*783,078	*203,644	*115,884	*37,574
Miscellaneous retail trade.....	*12,529	808,894	1,629,687	65,515	*75,111	34,013
Transportation and warehousing.....	14,828	2,018,823	13,788,032	482,514	201,868	115,151
Air, rail, and water transportation.....	*3,493	260,701	7,100,623	*151,122	*32,825	*4,331
Water transportation.....	--	*19,722	*103,007	*25,587	*13,769	*199
Air and rail transportation.....	*3,493	240,979	6,997,616	*125,535	*19,055	*4,132
Pipeline transportation.....	--	*5,076	*25,597	--	--	*16,430
Other transportation and warehousing.....	*11,335	1,753,046	6,661,812	331,392	169,044	94,390
Information.....	165,257	11,720,584	36,419,245	3,288,768	1,213,862	570,827
Publishing, motion picture, and sound recording.....	42,165	4,550,247	21,184,260	1,630,566	811,607	95,410
Broadcasting and telecommunications.....	112,705	6,404,807	12,070,732	1,518,444	*355,762	*417,968
Information services and data processing services.....	*10,387	765,530	3,164,253	139,757	46,493	57,449
Finance, insurance, real estate, and rental and leasing...	644,973	20,494,168	82,445,646	6,175,708	1,551,690	26,123,478
Finance and insurance.....	643,731	20,138,621	82,312,078	6,167,502	1,549,123	26,117,198
Commercial banking and other depository credit agencies.....	*753	195,313	324,799	4,837	*7	*319,511
Commercial banking.....	*216	*116,966	*324,052	*4,543	--	*319,509
Depository credit agencies other than banks.....	*536	78,347	747	294	*7	*2
Nondepository credit intermediation.....	*193,959	2,557,774	10,278,538	829,616	*133,337	2,588,813
Securities, commodity contracts, and other.....	*98,957	4,591,422	43,780,488	3,716,532	997,098	16,195,938
Insurance and related activities.....	350,063	12,768,007	27,891,970	1,611,851	418,679	6,981,323
Insurance agencies and brokerages.....	*3,279	299,664	1,188,510	*288,847	*97,363	*214,698
Funds, trusts, and other financial vehicles.....	--	26,105	36,282	*4,666	*3	*31,614
Real estate and rental and leasing.....	*1,241	355,547	133,567	8,206	*2,567	6,280
Real estate.....	*120	81,944	51,708	5,323	*1,253	5,085
Rentals and leasing.....	*1,122	273,603	81,859	*2,882	*1,314	*1,195
Services.....	593,319	14,371,837	73,462,277	6,716,869	2,953,038	33,515,913
Professional, scientific, and technical services.....	71,857	1,846,865	10,015,753	565,493	223,076	269,083
Management of holding companies.....	406,071	10,031,888	56,941,179	5,413,920	2,409,323	32,626,928
Administrative and support and waste management and remediation.....	11,639	395,446	1,237,955	210,244	109,705	53,988
Education services, health care, and social assistance.....	*10,532	641,188	460,022	167,814	*81,934	*5,175
Arts, entertainment, and recreation.....	*1,309	87,259	468,515	*3,179	*2,074	*3,993
Accommodation and food services.....	89,511	1,220,478	4,162,258	319,698	116,067	550,447
Accommodation.....	46,650	427,306	1,460,207	*171,383	*50,432	296,286
Food services and drinking places.....	42,860	793,172	2,702,050	*148,315	*65,635	*254,161
Other services.....	*2,400	148,713	176,596	36,521	*10,861	*6,300
Repair and maintenance services.....	*482	*9,925	*1,559	*9	--	--
Personal services, religious, grantmaking, civic, professional, etc.....	*1,918	138,788	175,037	*36,512	*10,861	*6,300

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 1.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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)	Total
All industries.....	67,325,236	25,370,669	166,569,404	25,337,194	94,478,719	242,317,657	116,939,896
Agriculture, forestry, fishing, and hunting.....	*6,982	*960	*1,614	--	*985	*3,600	*-32
Mining.....	363,907	811,684	4,072,408	942,095	2,006,090	4,067,771	3,251,845
Oil and gas extraction.....	*12,295	*9,732	865,930	720,265	*317,308	309,945	288,261
Coal mining, metal ore mining.....	55,162	*354,032	217,1571	*221,830	684,961	2,224,034	1,675,035
Nonmetallic minerals.....	*1,781	*3,752	*50,361	--	*34,228	*64,244	*47,747
Support activities for mining.....	*294,669	444,168	*984,545	--	*969,593	1,469,548	1,240,802
Utilities.....	*22,309	*81,268	270,649	*16,012	*69,560	693,436	183,535
Construction.....	*22,103	74,499	*16,651	--	*2	72,468	65,234
Building, developing, and general contracting.....	*5,944	*40,626	*3,313	--	*2	*28,268	*26,797
Heavy construction.....	*8,671	*32,253	*8,752	--	--	*39,032	*34,855
Special trade contractors.....	*7,488	*1,619	*3,843	--	--	*5,167	*3,582
Manufacturing.....	40,895,717	2,725,763	77,702,694	22,327,290	20,387,613	89,864,625	42,411,157
Food manufacturing.....	861,799	*23,962	2,019,341	--	1,014,340	2,699,168	1,692,429
Beverage and tobacco products.....	*2,212,457	*260,168	*2,389,141	--	*1,458,791	*4,009,899	*1,297,273
Tobacco manufacturing.....	*1,387,245	*2,495	*921,087	--	*185,747	*2,051,335	*1,097,600
Textile mills and textile product mills.....	*33,094	*1,199	*76,451	--	*2,929	87,129	*40,665
Apparel manufacturing.....	*250,380	*9,485	*101,373	--	*52,692	*302,981	*28,061
Leather and allied product manufacturing.....	*49,893	*9,583	*25,276	--	*26,149	*39,939	*36,891
Wood product manufacturing.....	*7,849	--	*59,108	--	--	*63,942	*34,824
Paper manufacturing.....	641,957	*2,062	446,696	--	*35,998	943,817	562,480
Printing and related support activities.....	*12,703	*3,168	*21,537	--	*14,226	*32,528	*23,159
Petroleum and coal products manufacturing.....	398,906	*514,818	25,485,015	22,327,290	*5,778,704	15,341,344	12,428,415
Chemical manufacturing.....	7,403,942	387,146	9,802,392	--	3,217,830	14,172,612	5,177,681
Pharmaceutical and medicine manufacturing.....	4,122,147	*193,566	4,564,507	--	1,276,509	5,755,398	1,564,861
Other chemical manufacturing.....	3,281,795	193,580	5,237,885	--	1,941,321	8,417,215	3,612,820
Plastics and rubber products manufacturing.....	332,030	*49,631	176,906	--	113,692	418,838	139,847
Nonmetallic mineral product manufacturing.....	51,208	*11,491	81,403	--	*17,141	184,861	52,562
Primary metal manufacturing.....	*405,368	*3,876	901,783	--	*569,322	911,467	269,376
Fabricated metal products.....	316,470	27,838	1,868,212	--	841,182	1,729,619	1,150,361
Machinery manufacturing.....	1,122,345	279,139	3,695,444	--	950,898	5,019,539	2,234,495
Computer and electronic product manufacturing.....	20,307,428	413,538	18,626,068	--	4,091,579	24,024,083	9,494,484
Electrical equipment, appliance and component manufacturing.....	1,674,198	70,086	4,931,898	--	140,563	7,757,755	2,722,976
Transportation equipment manufacturing.....	4,357,978	587,774	5,551,664	--	1,648,568	10,355,597	4,419,813
Motor vehicles and related manufacturing.....	3,548,947	*19,976	4,076,100	--	1,342,381	7,837,009	2,741,703
Other transportation equipment manufacturing.....	809,031	*567,799	1,475,564	--	*306,186	2,518,588	1,678,109
Furniture and related products.....	6,038	*87	*30,303	--	*19,392	*36,238	*14,558
Miscellaneous manufacturing and manufacturing not allocable.....	449,674	70,712	1,412,683	--	393,616	1,733,268	590,806
Wholesale and retail trade.....	2,167,874	652,486	6,170,206	*1,435,782	3,071,857	7,609,806	5,489,850
Wholesale trade.....	1,403,000	291,829	3,810,177	*1,435,782	1,870,439	5,080,349	3,552,260
Durable goods.....	906,896	145,355	891,132	--	324,287	1,506,989	1,186,749
Machinery, equipment, and supplies.....	*9,536	*4,092	144,875	--	*142,738	120,255	68,268
Other miscellaneous durable goods.....	897,360	141,263	746,257	--	181,549	1,386,735	1,118,481
Nondurable goods.....	496,104	146,475	2,919,044	*1,435,782	1,546,152	3,573,360	2,365,511
Drugs, chemicals, and allied products.....	202,918	*20,588	420,061	--	*110,626	499,465	368,890
Groceries and related products.....	*5,791	*23,862	*5,800	--	*359	*35,983	*29,218
Petroleum and petroleum products.....	*1,204	*129	*1,475,731	*1,435,782	*935,334	*1,165,834	*882,612
Other miscellaneous nondurable goods.....	286,191	101,896	1,017,452	--	499,833	1,872,079	1,084,791

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 1.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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)
Wholesale and retail trade--continued							
Retail trade.....	764,875	360,657	2,360,029	--	1,201,417	2,529,457	1,937,591
Motor vehicle, parts dealers, and gas stations.....	*2,588	*44	*6	--	--	*2,242	*1,651
Furniture and home furnishing stores.....	*3,280	--	*51	--	--	*636	*237
Building materials, garden equipment, and supplies.....	*25,974	--	--	--	--	*1,289	*8
Food and beverages stores.....	*80,993	--	*655,000	--	--	*652,411	*652,341
Apparel and accessory stores.....	149,216	*1,048	686,338	--	*417,489	609,937	522,154
General merchandise stores.....	*214,371	*189,617	*21,988	--	*16,547	*266,805	*116,877
Miscellaneous retail trade.....	288,452	*169,948	996,647	--	*767,382	996,138	644,323
Transportation and warehousing.....	*75,208	11,003,698	1,909,593	--	6,379,511	12,180,144	11,910,382
Air, rail, and water transportation.....	*2,918	6,862,089	*47,338	--	*3,700,886	6,580,130	6,498,597
Water transportation.....	--	*30,660	*32,791	--	*17,055	*8,950	*8,352
Air and rail transportation.....	*2,918	*6,831,429	*14,546	--	*3,683,831	6,571,180	*6,490,246
Pipeline transportation.....	--	*9,167	--	--	--	*4,324	*4,324
Other transportation and warehousing.....	*72,289	4,132,442	1,862,255	--	*2,678,625	5,595,690	5,407,461
Information.....	16,853,015	2,182,357	12,310,416	--	3,883,242	22,445,722	12,079,260
Publishing, motion picture, and sound recording.....	12,814,838	252,781	5,579,057	--	2,119,047	11,906,791	3,821,094
Broadcasting and telecommunications.....	*3,237,289	*640,380	5,900,888	--	*1,364,426	8,283,831	7,038,974
Information services and data processing services.....	800,887	1,289,196	*830,471	--	*399,770	2,255,100	1,219,192
Finance, insurance, real estate, and rental and leasing.....	1,228,181	2,996,595	44,369,993	--	19,174,001	54,065,170	21,781,076
Finance and insurance.....	1,172,651	2,984,304	44,321,300	--	19,154,770	53,997,333	21,737,609
Commercial banking and other depository credit agencies.....	*188	--	*257	--	--	*251,987	*719
Commercial banking.....	--	--	--	--	--	*251,977	*709
Depository credit agencies other than banks.....	*188	--	*257	--	--	*11	*11
Nondepository credit intermediation.....	*130,808	*1,110,089	5,485,876	--	1,602,233	8,569,834	5,362,455
Securities, commodity contracts, and other.....	744,107	525,672	21,601,141	--	6,186,710	26,107,509	4,986,711
Insurance and related activities.....	297,548	1,348,543	17,234,027	--	11,365,827	19,064,736	11,387,195
Insurance agencies and brokerages.....	*1,637	*134,616	*451,349	--	*453,273	*698,967	*461,314
Funds, trusts, and other financial vehicles.....	--	--	--	--	--	*3,268	*529
Real estate and rental and leasing.....	55,530	12,291	48,693	--	*19,231	67,837	43,467
Real estate.....	*18,395	*1,401	20,252	--	--	31,176	26,074
Rentals and leasing.....	37,136	*10,891	*28,441	--	*19,231	36,661	17,393
Services.....	5,689,941	4,841,335	19,745,180	*616,016	39,505,858	51,314,915	19,767,588
Professional, scientific, and technical services.....	2,220,443	3,753,218	2,984,441	--	4,118,707	7,798,964	6,360,145
Management of holding companies.....	2,038,774	95,736	14,356,498	*616,016	33,356,705	39,518,204	10,551,695
Administrative and support and waste management and remediation.....	173,822	643,643	46,553	--	254,127	589,354	463,588
Education services, health care, and social assistance.....	*55,873	*105,752	*43,473	--	*6,810	165,144	*118,266
Arts, entertainment, and recreation.....	*68,056	*171,702	*219,511	--	*23,165	*343,656	*299,998
Accommodation and food services.....	1,125,364	70,896	1,979,786	--	1,656,379	2,782,130	1,879,764
Accommodation.....	*101,872	*63,933	*776,302	--	*567,811	1,044,401	*795,065
Food services and drinking places.....	1,023,492	*6,963	*1,203,484	--	*1,088,568	1,737,728	1,084,699
Other services.....	*7,610	*387	*114,918	--	*89,965	117,464	*94,133
Repair and maintenance services.....	*359	--	*1,190	--	--	*1,120	*1,042
Personal services, religious, grantmaking, civic, professional, etc.....	*7,250	*387	*113,728	--	*89,965	*116,344	*93,092

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 1.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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)	
All industries.....	1,266,866	5,808,503	14,321,642	95,542,885	125,377,761	11,364,335
Agriculture, forestry, fishing, and hunting.....	-	*478	*2	*512	*3,632	*279
Mining.....	149,045	*131,752	503,390	2,467,658	815,926	*11,304
Oil and gas extraction.....	*17,094	*1,363	*3,885	265,919	*21,684	--
Coal mining, metal ore mining.....	*14,988	*79,354	*185,004	1,395,689	548,999	--
Nonmetallic minerals.....	--	*15,803	*333	*31,611	*16,497	--
Support activities for mining.....	*116,964	*35,232	*314,167	*774,439	*228,746	*11,304
Utilities.....	*1,980	*99	*19,311	162,145	509,901	*30,599
Construction.....	*4	*373	*57,102	*7,755	*7,234	*132
Building, developing, and general contracting.....	--	--	*26,605	*192	*1,471	--
Heavy construction.....	--	*373	*30,173	*4,309	*4,177	*31
Special trade contractors.....	*4	--	*324	*3,253	*1,585	*101
Manufacturing.....	651,752	724,524	1,434,003	39,600,878	47,453,467	8,952,473
Food manufacturing.....	*5,624	*95,829	*49,587	1,541,389	1,006,739	41,594
Beverage and tobacco products.....	*814	*7,233	*609	*1,288,617	*2,712,626	*44,967
Tobacco manufacturing.....	--	*7,233	--	*1,090,366	*953,736	*44,967
Textile mills and textile product mills.....	--	--	*252	*40,413	*46,464	*11,528
Apparel manufacturing.....	*481	*7,507	*5,182	*14,890	*274,920	--
Leather and allied product manufacturing.....	--	*14,221	*10,144	*12,526	*3,048	*1,437
Wood product manufacturing.....	--	*11	--	*34,813	*29,118	*61
Paper manufacturing.....	*447	*10,001	*1,378	550,654	381,337	19,600
Printing and related support activities.....	--	*1,210	*3,130	*18,819	*9,369	*1,845
Petroleum and coal products manufacturing.....	--	*317,509	*505,746	11,605,160	2,912,929	*129,341
Chemical manufacturing.....	*14,688	11,007	157,886	4,994,101	8,994,931	2,638,497
Pharmaceutical and medicine manufacturing.....	*14,384	*8,114	*123,381	1,418,982	4,190,537	1,502,328
Other chemical manufacturing.....	*304	2,893	*34,505	3,575,118	4,804,395	1,136,169
Plastics and rubber products manufacturing.....	*9,205	*5,675	*4,106	120,860	278,991	9,328
Nonmetallic mineral product manufacturing.....	--	*793	*8,453	*43,315	132,299	*9,926
Primary metal manufacturing.....	*183,182	*4,007	*3,063	79,124	642,091	*12,969
Fabricated metal products.....	*463	*630	*6,836	1,142,431	579,259	46,871
Machinery manufacturing.....	*1,489	*8,673	113,631	2,110,702	2,785,043	578,221
Computer and electronic product manufacturing.....	*411,765	144,927	61,053	8,876,739	14,529,598	4,408,365
Electrical equipment, appliance and component manufacturing.....	*1,463	28,819	*29,792	2,662,903	5,034,778	127,710
Transportation equipment manufacturing.....	*21,652	*40,138	428,766	3,929,257	5,935,784	720,217
Motor vehicles and related manufacturing.....	*1,300	*4,109	*16,116	2,720,178	5,095,306	462,504
Other transportation equipment manufacturing.....	*20,351	*36,029	*412,650	1,209,079	840,479	*257,712
Furniture and related products.....	--	*11	--	*14,547	*21,680	*2,068
Miscellaneous manufacturing and manufacturing not allocable.....	*479	*26,322	*44,388	519,618	1,142,462	147,929
Wholesale and retail trade.....	18,182	951,756	199,643	4,320,269	2,119,956	25,874
Wholesale trade.....	16,132	180,573	91,728	3,263,827	1,528,089	23,589
Durable goods.....	*1,911	42,965	59,461	1,082,411	320,240	*4,623
Machinery, equipment, and supplies.....	*883	*2,462	*2,268	*62,654	51,987	*82
Other miscellaneous durable goods.....	*1,028	40,503	*57,193	1,019,757	268,254	*4,541
Nondurable goods.....	14,221	137,608	32,267	2,181,416	1,207,849	18,966
Drugs, chemicals, and allied products.....	--	--	*11,586	357,304	130,575	*13,218
Groceries and related products.....	*3,876	*8,659	*15,243	*1,440	*6,764	--
Petroleum and petroleum products.....	*8,208	*1,636	--	*872,767	*283,222	--
Other miscellaneous nondurable goods.....	*2,137	127,312	*5,438	949,904	787,288	*5,747

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 1.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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)
Wholesale and retail trade--continued						
Retail trade.....	*2,050	771,184	*107,915	1,056,442	591,867	*2,285
Motor vehicle, parts dealers, and gas stations.....	--	*1,651	--	--	*591	--
Furniture and home furnishing stores.....	--	*51	--	*186	*399	--
Building materials, garden equipment, and supplies.....	--	*8	--	--	*1,281	--
Food and beverage stores.....	--	*629,522	--	*22,819	*70	--
Apparel and accessory stores.....	*1,384	*120,730	*1,603	398,437	87,783	*256
General merchandise stores.....	*416	*1,021	*95,883	*19,557	*149,928	--
Miscellaneous retail trade.....	*251	*18,201	*10,429	615,442	351,815	*2,029
Transportation and warehousing.....	*1,887	*41,953	6,085,710	5,780,833	269,762	*35,883
Air, rail, and water transportation.....	*484	*1,959	*2,415,434	*4,080,720	*81,533	*14,460
Water transportation.....	--	--	*6,722	*1,629	*599	--
Air and rail transportation.....	*484	*1,959	*2,408,711	*4,079,091	*80,934	*14,460
Pipeline transportation.....	--	--	*4,318	*6	--	--
Other transportation and warehousing.....	*1,403	*39,993	3,665,958	1,700,107	188,229	*21,424
Information.....	*174,628	2,570,329	1,531,146	7,803,157	10,366,462	1,854,585
Publishing, motion picture, and sound recording.....	*133	241,553	118,619	3,460,788	8,085,697	1,685,454
Broadcasting and telecommunications.....	*168,633	*2,250,322	*505,821	4,114,198	1,244,857	*38,015
Information services and data processing services.....	*5,863	*78,453	*906,705	*228,170	1,035,908	*131,116
Finance, insurance, real estate, and rental and leasing.....	59,494	707,442	985,997	20,028,143	32,284,094	*279,882
Finance and insurance.....	*48,561	696,611	979,407	20,013,030	32,259,724	*279,882
Commercial banking and other depository credit agencies.....	--	*11	--	*709	*251,268	--
Commercial banking.....	--	--	--	*709	*251,268	--
Depository credit agencies other than banks.....	--	*11	--	--	--	--
Nondepository credit intermediation.....	*255	*136,840	*485,263	4,740,097	3,207,379	*70,336
Securities, commodity contracts, and other.....	*20	384,006	*123,627	4,479,059	21,120,797	*208,830
Insurance and related activities.....	*48,286	175,734	370,518	10,792,657	7,677,541	*716
Insurance agencies and brokerages.....	--	*1,055	*109,379	*350,881	*237,653	--
Funds, trusts, and other financial vehicles.....	--	*21	--	*508	*2,739	--
Real estate and rental and leasing.....	10,933	10,831	*6,590	15,113	24,370	--
Real estate.....	*4,657	*10,414	*1,620	9,383	*5,102	--
Rentals and leasing.....	*6,276	*417	*4,970	*5,730	19,268	--
Services.....	209,894	679,797	3,505,338	15,372,560	31,547,327	173,324
Professional, scientific, and technical services.....	4,086	536,854	2,961,302	2,857,903	1,438,819	165,766
Management of holding companies.....	*204,353	87,553	*5,176	10,254,613	28,966,510	*577
Administrative and support and waste management and remediation.....	*339	*18,759	401,011	*43,480	125,765	*508
Education services, health care, and social assistance.....	*902	*326	*34,188	*82,849	46,878	*19
Arts, entertainment, and recreation.....	--	*18,096	*85,235	*196,666	*43,658	*5,688
Accommodation and food services.....	*188	*15,737	*15,873	1,847,966	902,366	*36
Accommodation.....	--	*1	*11,538	*783,526	*249,337	--
Food services and drinking places.....	*188	*15,735	*4,336	*1,064,440	*653,029	*36
Other services.....	*25	*2,472	*2,553	*89,083	*23,330	*730
Repair and maintenance services.....	--	--	--	*1,042	*79	--
Personal services, religious, grantmaking, civic, professional, etc.....	*25	*2,472	*2,553	*88,041	*23,252	*730

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 1.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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)	
All industries.....	63,781,017	49,133,088	6,993,759	196,675,289	22,108,420	174,566,903
Agriculture, forestry, fishing, and hunting.....	*949	*535	--	6,683	--	6,683
Mining.....	316,394	404,730	236,820	2,692,785	239,934	2,452,851
Oil and gas extraction.....	*8,391	*12,706	210,563	620,341	*25,314	595,027
Coal mining, metal ore mining.....	*216,520	*270,939	*26,257	642,057	102,184	539,873
Nonmetallic minerals.....	*779	--	--	240,621	--	240,621
Support activities for mining.....	*90,703	*121,085	--	1,189,766	*112,437	1,077,329
Utilities.....	*419,097	*53,710	*7,701	980,638	*131,597	849,041
Construction.....	*4,086	*3,016	--	176,755	*7,453	169,303
Building, developing, and general contracting.....	*1,471	--	--	145,156	--	145,156
Heavy construction.....	*2,521	*1,626	--	20,337	*5,784	14,553
Special trade contractors.....	*94	*1,390	--	10,507	*1,668	8,839
Manufacturing.....	19,473,375	18,617,131	6,230,854	120,771,799	11,741,135	109,030,698
Food manufacturing.....	638,076	305,601	--	3,225,986	43,984	3,182,003
Beverage and tobacco products.....	*591,155	*2,067,574	--	6,901,045	*51,444	6,849,600
Tobacco manufacturing.....	*312,779	*595,990	--	*4,243,590	*36,817	*4,206,773
Textile mills and textile product mills.....	*30,491	*4,321	--	128,634	*4,297	124,337
Apparel manufacturing.....	*99,499	*172,839	--	396,326	*63,671	332,655
Leather and allied product manufacturing.....	*1,128	*482	--	55,266	*8,267	46,999
Wood product manufacturing.....	*21,733	*7,275	--	*48,217	*22,705	*25,512
Paper manufacturing.....	150,912	202,681	--	1,896,928	*18,394	1,878,533
Printing and related support activities.....	*2,745	*3,500	--	43,775	*1,031	42,743
Petroleum and coal products manufacturing.....	2,242,133	529,383	6,230,854	32,460,253	58,516	32,401,722
Chemical manufacturing.....	3,045,108	3,286,236	--	17,964,934	1,914,984	16,049,950
Pharmaceutical and medicine manufacturing.....	1,072,234	1,611,431	--	9,623,141	*1,118,689	8,504,452
Other chemical manufacturing.....	1,972,874	1,674,806	--	8,341,794	796,295	7,545,499
Plastics and rubber products manufacturing.....	165,195	95,415	--	720,901	*1,988	718,913
Nonmetallic mineral product manufacturing.....	87,665	*29,980	--	373,759	(²)	373,759
Primary metal manufacturing.....	374,954	253,927	--	1,311,864	*499,049	812,815
Fabricated metal products.....	333,572	196,601	--	1,954,277	54,080	1,900,198
Machinery manufacturing.....	1,055,214	1,101,936	--	4,518,776	114,646	4,404,130
Computer and electronic product manufacturing.....	1,333,916	8,558,336	--	35,135,487	8,615,742	26,519,745
Electrical equipment, appliance and component manufacturing.....	4,127,448	759,041	--	3,791,590	*39,343	3,752,246
Transportation equipment manufacturing.....	4,777,216	434,059	--	7,766,903	195,148	7,571,755
Motor vehicles and related manufacturing.....	4,326,370	306,028	--	5,525,692	*147,625	5,378,067
Other transportation equipment manufacturing.....	450,846	*128,031	--	2,241,211	*47,523	2,193,688
Furniture and related products.....	*18,025	*1,473	--	57,007	--	57,007
Miscellaneous manufacturing and manufacturing not allocable.....	377,191	606,472	--	2,019,872	33,846	1,986,026
Wholesale and retail trade.....	791,218	1,168,951	*518,384	5,937,359	967,196	4,970,163
Wholesale trade.....	615,992	814,123	*518,384	3,953,367	817,078	3,136,289
Durable goods.....	54,431	234,555	--	728,740	96,715	632,025
Machinery, equipment, and supplies.....	*2,129	*46,726	--	46,342	*20,468	25,874
Other miscellaneous durable goods.....	52,301	187,829	--	682,398	76,247	606,151
Nondurable goods.....	561,562	579,568	*518,384	3,224,627	720,363	2,504,264
Drugs, chemicals, and allied products.....	58,940	*39,064	--	901,771	*23,290	878,480
Groceries and related products.....	*3,219	*1,041	--	70,378	*120	70,258
Petroleum and petroleum products.....	*164,080	*118,707	*518,384	1,210,662	*459,982	750,679
Other miscellaneous nondurable goods.....	335,322	420,755	--	1,041,817	*236,970	804,847

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 1.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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)	
Wholesale and retail trade--continued						
Retail trade.....	175,225	354,827	--	1,983,992	150,118	1,833,874
Motor vehicle, parts dealers, and gas stations.....	*557	--	--	29,844	*3,843	26,001
Furniture and home furnishing stores.....	*382	*11	--	*4,553	--	*4,553
Building materials, garden equipment, and supplies.....	*1,263	*18	--	*31,488	--	*31,488
Food and beverages stores.....	--	--	--	*85,654	*5,656	*79,998
Apparel and accessory stores.....	*20,669	*36,247	--	682,633	*16,990	665,643
General merchandise stores.....	*113,416	*24,803	--	*516,273	(?)	*516,273
Miscellaneous retail trade.....	38,938	*293,750	--	633,548	*123,630	509,919
Transportation and warehousing.....	169,829	59,803	--	1,607,888	45,090	1,562,798
Air, rail, and water transportation.....	*58,204	*8,869	--	520,493	*1,668	518,825
Water transportation.....	*599	--	--	*94,056	*1,668	*92,389
Air and rail transportation.....	*57,605	*8,869	--	426,437	(?)	426,437
Pipeline transportation.....	--	--	--	*21,273	*683	*20,590
Other transportation and warehousing.....	111,625	*50,934	--	1,066,122	*42,739	1,023,383
Information.....	1,242,877	7,199,186	--	13,973,523	2,047,489	11,926,034
Publishing, motion picture, and sound recording.....	216,742	6,121,533	--	9,277,469	1,705,409	7,572,061
Broadcasting and telecommunications.....	*834,297	*372,544	--	3,786,901	*28,999	3,757,902
Information services and data processing services.....	191,838	*705,109	--	909,153	*313,082	596,071
Finance, insurance, real estate, and rental and leasing.....	17,447,669	14,303,866	--	28,380,475	5,741,092	22,639,383
Finance and insurance.....	17,431,770	14,302,654	--	28,314,745	5,727,603	22,587,142
Commercial banking and other depository credit agencies.....	*22,655	*11,557	--	72,812	*194	72,619
Commercial banking.....	*22,655	*11,557	--	*72,076	*194	*71,882
Depository credit agencies other than banks.....	--	--	--	737	--	737
Nondepository credit intermediation.....	*1,090,814	2,043,459	--	1,708,705	*13,412	1,695,293
Securities, commodity contracts, and other.....	15,201,384	5,696,957	--	17,672,980	5,487,636	12,185,344
Insurance and related activities.....	1,114,631	6,550,300	--	8,827,234	226,311	8,600,923
Insurance agencies and brokerages.....	*226,488	*11,009	--	489,544	--	489,544
Funds, trusts, and other financial vehicles.....	*2,285	*381	--	33,014	*50	32,964
Real estate and rental and leasing.....	*15,899	*1,212	--	65,730	13,489	52,241
Real estate.....	*4,192	*910	--	20,533	*2,508	18,025
Rentals and leasing.....	*11,707	*303	--	45,198	*10,981	34,217
Services.....	23,915,524	7,322,160	--	22,147,362	1,187,434	20,959,928
Professional, scientific, and technical services.....	323,935	886,425	--	2,216,789	444,550	1,772,239
Management of holding companies.....	22,885,066	6,038,570	--	17,422,975	518,613	16,904,362
Administrative and support and waste management and remediation.....	75,101	38,582	--	648,601	74,105	574,496
Education services, health care, and social assistance.....	*23,490	*22,227	--	294,877	*46,699	248,178
Arts, entertainment, and recreation.....	*12,988	*14,857	--	124,859	*813	124,046
Accommodation and food services.....	*579,749	*317,292	--	1,380,128	98,982	1,281,147
Accommodation.....	*219,153	*24,950	--	415,806	*41,261	374,545
Food services and drinking places.....	*360,596	*292,342	--	964,322	*57,720	906,602
Other services.....	*15,195	*4,207	--	59,132	*3,673	55,459
Repair and maintenance services.....	*79	--	--	*438	--	*438
Personal services, religious, grantmaking, civic, professional, etc.....	*15,116	*4,207	--	58,694	*3,673	55,021

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 1.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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	Paid or accrued	
					Total	Taxes withheld
(39)	(40)	(41)	(42)	(43)	(44)	
All industries.....	61,506,698	3,412,750	12,405,727	52,513,722	19,799,225	2,203,453
Agriculture, forestry, fishing, and hunting.....	1,985	--	*941	1,044	1,038	30
Mining.....	1,435,065	180,179	539,558	1,075,686	710,417	84,683
Oil and gas extraction.....	257,784	*133,798	149,276	242,306	237,890	*37
Coal mining, metal ore mining.....	706,308	46,381	357,477	395,212	358,353	68,127
Nonmetallic minerals.....	*81,618	--	*2,394	*79,224	*6,997	*6,326
Support activities for mining.....	389,355	--	*30,411	358,944	107,177	*10,194
Utilities.....	478,289	*763	*347,050	132,002	39,625	*29,296
Construction.....	56,898	--	*6,962	49,936	11,294	1,627
Building, developing, and general contracting.....	45,928	--	*2,573	43,355	6,840	1,490
Heavy construction.....	7,373	--	*2,279	5,094	3,504	*97
Special trade contractors.....	3,592	--	*2,110	1,483	945	*38
Manufacturing.....	41,380,033	3,002,723	8,090,590	36,292,166	11,107,356	1,315,979
Food manufacturing.....	1,230,552	--	140,405	1,090,147	183,329	64,787
Beverage and tobacco products.....	2,409,475	--	*45,231	2,364,244	469,092	*156,428
Tobacco manufacturing.....	*1,456,098	--	*44,334	*1,411,764	*135,395	*63,559
Textile mills and textile product mills.....	35,028	--	*2,060	32,968	3,799	*2,108
Apparel manufacturing.....	171,294	--	*83	171,210	27,627	*9,196
Leather and allied product manufacturing.....	10,527	--	*1,189	9,338	8,453	*82
Wood product manufacturing.....	*13,297	--	*1,681	*11,616	*11,363	*73
Paper manufacturing.....	703,021	--	76,714	626,307	120,477	43,623
Printing and related support activities.....	13,903	--	*286	13,617	2,145	*1,299
Petroleum and coal products manufacturing.....	13,955,248	*3,001,943	3,797,643	13,159,548	6,132,885	126,718
Chemical manufacturing.....	6,581,541	--	1,173,053	5,408,488	1,197,594	314,453
Pharmaceutical and medicine manufacturing.....	3,266,759	--	*676,769	2,589,990	576,592	147,875
Other chemical manufacturing.....	3,314,782	--	496,284	2,818,498	621,002	166,577
Plastics and rubber products manufacturing.....	271,151	*31	59,628	211,554	35,123	8,461
Nonmetallic mineral product manufacturing.....	191,882	--	*89,155	102,727	18,119	5,709
Primary metal manufacturing.....	381,799	*726	61,496	321,029	90,726	*10,892
Fabricated metal products.....	857,434	--	202,404	655,030	152,482	24,139
Machinery manufacturing.....	1,547,654	*22	139,202	1,408,475	329,517	56,642
Computer and electronic product manufacturing.....	9,026,914	--	1,612,551	7,414,362	1,625,414	350,679
Electrical equipment, appliance and component manufacturing.....	1,018,823	--	272,442	746,381	179,224	13,003
Transportation equipment manufacturing.....	2,291,427	--	283,589	2,007,838	433,458	105,064
Motor vehicles and related manufacturing.....	1,768,294	--	188,673	1,579,621	312,792	87,213
Other transportation equipment manufacturing.....	523,133	--	94,916	428,217	120,666	17,851
Furniture and related products.....	26,843	--	*4,950	21,893	3,156	*322
Miscellaneous manufacturing and manufacturing not allocable.....	642,219	--	126,828	515,390	83,372	22,303
Wholesale and retail trade.....	1,867,060	*136,208	523,606	1,479,662	365,403	80,590
Wholesale trade.....	1,320,422	*136,208	387,538	1,069,092	246,165	53,359
Durable goods.....	156,938	*70	29,907	127,101	59,058	2,773
Machinery, equipment, and supplies.....	12,552	--	5,230	7,323	6,109	*24
Other miscellaneous durable goods.....	144,386	*70	24,677	119,779	52,949	2,749
Nondurable goods.....	1,163,484	*136,138	357,632	941,991	187,107	50,586
Drugs, chemicals, and allied products.....	371,067	--	*60,490	310,577	38,523	15,030
Groceries and related products.....	25,637	--	*1,643	23,994	3,758	*2,479
Petroleum and petroleum products.....	386,147	*136,138	*232,483	289,802	42,894	*8,643
Other miscellaneous nondurable goods.....	380,634	--	63,016	317,618	101,932	24,435

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 1.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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	Paid or accrued	
					Total	Taxes withheld
(39)	(40)	(41)	(42)	(43)	(44)	
Wholesale and retail trade--continued						
Retail trade.....	546,638	--	136,067	410,571	119,238	27,231
Motor vehicle, parts dealers, and gas stations.....	11,677	--	*1,983	9,694	219	*5
Furniture and home furnishing stores.....	*847	--	--	*847	*236	--
Building materials, garden equipment, and supplies.....	*11,456	--	*2,926	*8,530	*8,530	*4,339
Food and beverages stores.....	*9,234	--	*69	*9,165	*9,108	*20
Apparel and accessory stores.....	195,576	--	*64,037	131,539	41,344	*5,511
General merchandise stores.....	*132,441	--	--	*132,441	*16,557	*6,980
Miscellaneous retail trade.....	185,408	--	*67,053	118,355	43,244	*10,376
Transportation and warehousing.....	300,664	--	21,917	278,747	76,879	12,453
Air, rail, and water transportation.....	68,204	--	*8,238	59,966	27,141	*2,803
Water transportation.....	*30,473	--	*6,192	*24,281	*10,512	*76
Air and rail transportation.....	37,732	--	*2,047	35,685	16,630	*2,727
Pipeline transportation.....	*4,565	--	*1,115	*3,450	*3,450	--
Other transportation and warehousing.....	227,895	--	12,564	215,331	46,287	9,651
Information.....	3,762,019	--	1,120,826	2,641,194	1,427,332	64,183
Publishing, motion picture, and sound recording.....	2,739,477	--	839,414	1,900,064	1,088,456	47,126
Broadcasting and telecommunications.....	850,447	--	*235,227	615,220	259,458	13,039
Information services and data processing services.....	172,095	--	*46,185	125,910	79,417	*4,019
Finance, insurance, real estate, and rental and leasing.....	5,662,106	(?)	1,048,146	4,613,960	3,063,596	247,845
Finance and insurance.....	5,646,964	(?)	1,044,214	4,602,750	3,054,953	247,647
Commercial banking and other depository credit agencies.....	21,623	--	*1,239	20,384	20,377	198
Commercial banking.....	*21,510	--	*1,239	*20,271	*20,271	*139
Depository credit agencies other than banks.....	113	--	--	113	106	59
Nondepository credit intermediation.....	513,261	--	*22,262	490,999	357,662	*121,760
Securities, commodity contracts, and other.....	3,902,695	--	938,081	2,964,614	1,967,516	45,793
Insurance and related activities.....	1,193,775	(?)	82,599	1,111,175	693,822	78,287
Insurance agencies and brokerages.....	172,017	--	*300	171,716	74,354	*3,747
Funds, trusts, and other financial vehicles.....	15,610	--	*32	15,578	15,575	*1,610
Real estate and rental and leasing.....	15,142	--	3,931	11,210	8,643	198
Real estate.....	9,101	--	*2,522	6,580	5,327	192
Rentals and leasing.....	6,040	--	*1,410	4,631	3,317	*6
Services.....	6,562,574	*92,878	706,132	5,949,320	2,996,281	366,765
Professional, scientific, and technical services.....	752,987	--	252,910	500,077	277,001	30,010
Management of holding companies.....	4,824,123	*92,878	264,578	4,652,423	2,243,101	284,942
Administrative and support and waste management and remediation.....	270,072	--	51,132	218,940	109,236	16,507
Education services, health care, and social assistance.....	102,931	--	*13,984	88,947	7,013	*583
Arts, entertainment, and recreation.....	37,017	--	*1,695	35,322	33,249	*1,152
Accommodation and food services.....	551,469	--	116,105	435,364	319,297	30,703
Accommodation.....	136,906	--	*1,002	135,904	85,472	*15,356
Food services and drinking places.....	414,563	--	115,103	299,460	233,825	*15,347
Other services.....	23,974	--	*5,728	18,246	7,385	2,867
Repair and maintenance services.....	*52	--	--	*52	*52	*1
Personal services, religious, grantmaking, civic, professional, etc.....	23,922	--	*5,728	18,194	7,333	*2,866

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 1.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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						Taxes deemed paid
	Foreign taxes available for credit--Continued						
	Paid or accrued--Continued						
	Taxes withheld--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)	
All industries.....	758,147	2,973,513	8,894,314	40,031	301,574	4,628,194	32,714,496
Agriculture, forestry, fishing, and hunting.....	*18	*861	--	--	--	*128	*6
Mining.....	15,254	26,751	206,285	--	5,551	371,893	365,269
Oil and gas extraction.....	*2,283	*4,818	*14,352	--	*524	215,876	*4,417
Coal mining, metal ore mining.....	9,592	3,302	128,568	--	*440	*148,324	*36,859
Nonmetallic minerals.....	*352	--	*36	--	--	*282	*72,227
Support activities for mining.....	*3,027	*18,631	*63,328	--	*4,587	*7,410	*251,767
Utilities.....	*2,410	*725	*1,784	--	*1,204	*4,206	*92,377
Construction.....	*148	*3,156	*236	--	4,190	*1,937	38,643
Building, developing, and general contracting.....	*123	*302	--	--	*3,708	*1,217	*36,515
Heavy construction.....	*2	*2,122	*236	--	*350	*698	*1,589
Special trade contractors.....	*23	*733	--	--	*131	*20	*538
Manufacturing.....	228,307	1,893,420	5,224,158	30,471	63,868	2,351,154	25,184,810
Food manufacturing.....	9,330	65,444	*35,722	*1,515	*2,450	4,082	906,819
Beverage and tobacco products.....	*2,374	*110,276	*186,232	*803	*664	*12,316	*1,895,152
Tobacco manufacturing.....	*10	*67,296	*2,021	--	*656	*1,854	*1,276,369
Textile mills and textile product mills.....	*526	*457	*194	*451	*63	--	*29,169
Apparel manufacturing.....	*886	*16,688	*272	--	*233	*352	*143,583
Leather and allied product manufacturing.....	*34	*6,411	*1,017	--	*34	*874	*886
Wood product manufacturing.....	*10,455	*58	--	--	--	*776	*253
Paper manufacturing.....	1,192	60,857	*4,681	*52	*152	*9,920	505,829
Printing and related support activities.....	*90	*343	*409	*3	--	(2)	*11,473
Petroleum and coal products manufacturing.....	61,468	11,393	*4,101,388	*831	*210	1,830,877	7,026,663
Chemical manufacturing.....	28,184	429,372	345,359	*1,576	26,262	52,388	4,210,894
Pharmaceutical and medicine manufacturing.....	9,008	247,350	133,587	*1,543	*4,594	32,635	2,013,398
Other chemical manufacturing.....	19,176	182,022	211,772	*33	21,669	19,753	2,197,496
Plastics and rubber products manufacturing.....	1,854	18,611	*3,351	--	--	*2,846	176,431
Nonmetallic mineral product manufacturing.....	5,614	5,671	*679	--	*213	*234	84,609
Primary metal manufacturing.....	*4,384	*6,690	*64,095	--	*316	*4,349	*230,303
Fabricated metal products.....	2,241	16,090	28,166	*203	2,014	79,629	502,548
Machinery manufacturing.....	19,956	59,498	123,565	4,140	3,735	61,980	1,078,958
Computer and electronic product manufacturing.....	28,612	931,531	217,942	*3,361	12,581	80,707	5,788,949
Electrical equipment, appliance and component manufacturing.....	15,465	26,416	12,399	*2,047	*596	109,298	567,156
Transportation equipment manufacturing.....	32,905	111,657	64,414	*15,487	*13,796	90,135	1,574,380
Motor vehicles and related manufacturing.....	30,093	70,929	47,863	*63	*10,045	*66,586	1,266,830
Other transportation equipment manufacturing.....	*2,812	40,728	*16,550	*15,425	*3,751	*23,549	307,551
Furniture and related products.....	*1,032	396	*1,217	--	*10	*179	*18,737
Miscellaneous manufacturing and manufacturing not allocable.....	1,705	15,561	33,054	*1	*538	10,211	432,018
Wholesale and retail trade.....	26,722	108,355	119,548	*168	5,370	24,650	1,114,259
Wholesale trade.....	23,593	59,940	83,276	*132	4,899	20,965	822,927
Durable goods.....	6,163	29,497	15,931	--	694	4,000	68,043
Machinery, equipment, and supplies.....	*198	*1,022	*4,019	--	*337	*509	*1,214
Other miscellaneous durable goods.....	5,965	28,475	11,912	--	*357	3,490	66,829
Nondurable goods.....	17,430	30,443	67,345	*132	4,205	16,965	754,884
Drugs, chemicals, and allied products.....	*626	12,972	*8,411	*132	*1,090	*261	272,054
Groceries and related products.....	*160	*578	*193	--	*326	*22	*20,236
Petroleum and petroleum products.....	*5,533	*53	*28,545	--	--	*120	*246,908
Other miscellaneous nondurable goods.....	11,111	16,840	30,197	--	*2,788	16,561	215,686

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 1.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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						Taxes deemed paid
	Foreign taxes available for credit--Continued						
	Paid or accrued--Continued						
	Taxes withheld--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)	
Wholesale and retail trade--continued							
Retail trade.....	3,129	48,415	36,271	*36	*471	3,685	291,332
Motor vehicle, parts dealers, and gas stations.....	*48	*142	--	--	*4	*19	*9,475
Furniture and home furnishing stores.....	*15	*221	--	--	--	--	*610
Building materials, garden equipment, and supplies.....	*377	*3,813	--	--	--	--	--
Food and beverages stores.....	*734	*8,320	*34	--	--	--	*57
Apparel and accessory stores.....	*315	8,383	*26,017	--	--	*1,118	*90,195
General merchandise stores.....	*3	*7,251	*2,196	*36	--	*91	*115,884
Miscellaneous retail trade.....	1,637	20,284	*8,024	--	*466	*2,456	*75,111
Transportation and warehousing.....	3,775	*3,559	34,100	--	14,452	8,540	201,868
Air, rail, and water transportation.....	*60	*45	*9,290	--	*10,009	*4,935	*32,825
Water transportation.....	*3	--	--	--	*6,956	*3,477	*13,769
Air and rail transportation.....	*58	*45	*9,290	--	*3,052	*1,459	*19,055
Pipeline transportation.....	*1,640	--	--	--	*1,810	--	--
Other transportation and warehousing.....	2,074	*3,515	*24,810	--	*2,633	3,605	169,044
Information.....	17,923	703,617	468,808	*4,361	44,789	123,650	1,213,862
Publishing, motion picture, and sound recording.....	2,043	539,472	378,510	*4,361	6,767	110,178	811,607
Broadcasting and telecommunications.....	*13,265	*128,769	*78,692	--	*12,261	13,431	*355,762
Information services and data processing services.....	*2,615	*35,376	*11,606	--	*25,761	*41	46,493
Finance, insurance, real estate, and rental and leasing.....	135,916	22,261	1,147,680	--	47,078	1,462,816	1,550,364
Finance and insurance.....	135,318	17,449	1,147,310	--	46,318	1,460,910	1,547,797
Commercial banking and other depository credit agencies.....	*20,132	*47	--	--	--	--	*7
Commercial banking.....	*20,132	--	--	--	--	--	--
Depository credit agencies other than banks.....	(?)	*47	--	--	--	--	*7
Nondepository credit intermediation.....	11,421	*8,538	*194,084	--	*19,186	*2,674	*133,337
Securities, commodity contracts, and other.....	52,530	*1,704	615,653	--	*3,421	1,248,415	997,098
Insurance and related activities.....	37,269	*7,160	337,573	--	23,712	209,821	417,353
Insurance agencies and brokerages.....	*248	*2	*28,579	--	*13,043	*28,735	*97,363
Funds, trusts, and other financial vehicles.....	*13,965	--	--	--	--	--	*3
Real estate and rental and leasing.....	598	4,811	*370	--	*760	1,905	*2,567
Real estate.....	497	*2,726	--	--	*16	1,896	*1,253
Rentals and leasing.....	*101	2,086	*370	--	*745	*9	*1,314
Services.....	327,675	210,808	1,691,716	*5,032	115,067	279,220	2,953,038
Professional, scientific, and technical services.....	2,168	96,876	98,383	*5,032	36,260	8,273	223,076
Management of holding companies.....	308,423	6,791	1,432,716	--	*100	210,129	2,409,323
Administrative and support and waste management and remediation.....	*1,947	6,919	23,081	--	*60,068	*713	109,705
Education services, health care, and social assistance.....	*6	*4,753	*21	--	*1,603	*48	*81,934
Arts, entertainment, and recreation.....	*144	*2,234	--	--	*13,092	*16,626	*2,074
Accommodation and food services.....	13,819	92,058	135,987	--	*3,814	*42,915	116,067
Accommodation.....	877	*5,674	*18,011	--	*3,744	*41,810	*50,432
Food services and drinking places.....	*12,942	86,384	*117,976	--	*70	*1,106	*65,635
Other services.....	*1,167	*1,177	*1,529	--	*129	*516	*10,861
Repair and maintenance services.....	--	*28	--	--	--	*23	--
Personal services, religious, grantmaking, civic, professional, etc.....	*1,167	*1,148	*1,529	--	*129	*494	*10,861

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Footnotes to Table 1

* 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 Less than \$500.

³ 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.

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 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 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 45 through 51 (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, 2000

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: Total Assets, Income, Taxes, and Credits and Foreign Income, Taxes, and Credit, 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
	(1)	(2)	(3)	(4)	(5)
ALL INDUSTRIES					
All income types.....	5,917	438,992,946	75,966,294	32,715,823	71,045,520
Passive income.....	2,461	11,764,319	5,198,036	574,091	3,197,551
High withholding tax interest.....	265	2,132,112	36,036	*8,023	2,088,053
Financial services income.....	372	137,776,340	10,278,586	3,108,595	58,942,138
Shipping income.....	46	10,578,771	323,537	136,341	72,493
Dividends from each noncontrolled section 902 Corporation.....	407	3,788,295	2,501,088	1,233,551	48,236
Dividends from an IC-DISC or former DISC ¹	4	*68	*68	--	--
Miscellaneous separately calculated limitation.....	6	*9,676	*1,575	--	--
Distributions from a FSC or former FSC ²	78	4,990,728	4,990,728	--	--
General limitation income.....	3,511	267,722,602	52,583,571	27,646,210	6,658,982
Section 901(i) income.....	15	45,418	*14,314	*289	*3,536
Income re-sourced by treaty.....	19	184,617	38,755	8,721	*34,532
AGRICULTURE, FORESTRY, FISHING, AND HUNTING					
All income types.....	151	10,283	268	*6	*454
Passive income.....	75	2,816	*146	--	--
High withholding tax interest.....	**	**	**	**	**
Financial services income.....	--	--	--	--	--
Shipping income.....	--	--	--	--	--
Dividends from each noncontrolled section 902 Corporation.....	**	**	**	**	**
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	59	*7,241	*80	*6	*270
Section 901(j) income.....	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--
MINING					
All income types.....	128	6,760,556	832,671	365,269	314,617
Passive income.....	38	41,091	17,223	*6,831	33,354
High withholding tax interest.....	9	*90,255	*18,893	*4,236	*67,126
Financial services income.....	**	**	**	**	**
Shipping income.....	**	**	**	**	**
Dividends from each noncontrolled section 902 Corporation.....	8	*28,559	*24,759	*3,800	--
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	**	**	**	**	**
General limitation income.....	114	6,585,758	757,879	350,403	214,136
Section 901(j) income.....	**	**	**	**	**
Income re-sourced by treaty.....	--	--	--	--	--
UTILITIES					
All income types.....	23	1,674,074	677,686	*92,377	529,786
Passive income.....	18	105,259	34,805	*189	*40,525
High withholding tax interest.....	**	**	**	**	**
Financial services income.....	**	**	**	**	**
Shipping income.....	--	--	--	--	--
Dividends from each noncontrolled section 902 Corporation.....	6	*26,340	*20,571	*5,452	*64
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	15	1,523,758	*616,498	*86,736	*480,956
Section 901(j) income.....	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: Total Assets, Income, Taxes, and Credits and Foreign Income, Taxes, and Credit, 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
	(1)	(2)	(3)	(4)	(5)
CONSTRUCTION					
All income types.....	193	249,223	94,875	38,643	*2,452
Passive income.....	115	6,924	515	*6	*319
High withholding tax interest.....	**	**	**	**	**
Financial services income.....	24	*218	*8	--	*209
Shipping income.....	--	--	--	--	--
Dividends from each noncontrolled section 902 Corporation.....	**	**	**	**	**
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	55	240,719	93,977	*38,574	*1,000
Section 901(i) income.....	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--
MANUFACTURING					
All income types.....	1,272	210,636,424	54,761,076	25,184,810	9,366,364
Passive income.....	580	7,181,104	3,764,844	339,013	2,631,586
High withholding tax interest.....	66	262,921	*5,910	*1,570	255,440
Financial services income.....	61	6,613,347	1,285,403	253,254	2,022,512
Shipping income.....	19	1,401,897	142,547	*26,039	*4,923
Dividends from each noncontrolled section 902 Corporation.....	172	2,130,438	1,335,419	771,092	14,300
Dividends from a IC-DISC or former DISC ¹	3	*68	*68	--	--
Miscellaneous separately calculated limitation.....	5	*9,675	*1,575	--	--
Distributions from a FSC or former FSC ²	59	4,265,506	4,265,506	--	--
General limitation income.....	947	188,603,901	43,919,062	23,784,944	4,403,005
Section 901(j) income.....	8	*3,406	*2,196	*289	*65
Income re-sourced by treaty.....	14	164,162	38,546	8,609	*34,532
WHOLESALE AND RETAIL TRADE					
All income types.....	647	13,547,187	2,935,861	1,114,259	506,479
Passive income.....	335	852,409	212,246	32,658	118,088
High withholding tax interest.....	42	68,901	*504	*354	68,043
Financial services income.....	10	323,629	*93,457	*14,412	*130,871
Shipping income.....	3	*24,108	*20,770	*3,335	*3
Dividends from each noncontrolled section 902 Corporation.....	38	110,364	86,521	23,496	*-114
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	**	**	**	**	**
Distributions from a FSC or former FSC ²	5	*239,118	*239,118	--	--
General limitation income.....	332	11,911,890	2,280,729	1,039,893	189,571
Section 901(j) income.....	**	**	**	**	**
Income re-sourced by treaty.....	3	*14,442	*210	*112	--
TRANSPORTATION AND WAREHOUSING					
All income types.....	103	13,788,032	482,514	201,868	115,151
Passive income.....	48	57,696	46,991	*2,825	*6,323
High withholding tax interest.....	18	*22,029	--	--	*22,029
Financial services income.....	**	**	**	**	**
Shipping income.....	13	8,870,791	*133,023	*106,943	*59,387
Dividends from each noncontrolled section 902 Corporation.....	**	**	**	**	**
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	55	4,776,539	300,636	91,004	23,958
Section 901(j) income.....	**	**	**	**	**
Income re-sourced by treaty.....	**	**	**	**	**

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: Total Assets, Income, Taxes, and Credits and Foreign Income, Taxes, and Credit, 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
	(1)	(2)	(3)	(4)	(5)
INFORMATION					
All income types.....	178	36,419,245	3,288,768	1,213,862	570,827
Passive income.....	48	2,474,427	614,001	109,566	237,420
High withholding tax interest.....	**	**	**	**	**
Financial services income.....	4	*127,720	--	--	*128
Shipping income.....	5	*212,457	*12,835	*8	*6,621
Dividends from each noncontrolled section 902 Corporation.....	13	585,812	*379,223	*191,324	*15,265
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	4	*366,496	*366,496	--	--
General limitation income.....	156	32,624,894	1,916,213	912,963	310,377
Section 901(i) income.....	**	**	**	**	**
Income re-sourced by treaty.....	**	**	**	**	**
FINANCE, INSURANCE, REAL ESTATE, AND RENTAL AND LEASING					
All income types.....	917	82,445,646	6,175,708	1,551,690	26,123,478
Passive income.....	439	159,661	72,881	2,659	32,207
High withholding tax interest.....	84	441,376	*8,496	*341	432,539
Financial services income.....	144	78,519,890	5,787,287	1,496,064	25,474,816
Shipping income.....	**	**	**	**	**
Dividends from each noncontrolled section 902 Corporation.....	27	187,968	153,191	32,506	*542
Dividends from a IC-DISC or former DISC ¹	**	**	**	**	**
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	**	**	**	**	**
General limitation income.....	338	3,116,700	135,376	20,104	181,816
Section 901(i) income.....	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--
SERVICES					
All income types.....	2,304	73,462,277	6,716,869	2,953,038	33,515,913
Passive income.....	765	882,931	434,384	80,346	97,730
High withholding tax interest.....	38	1,237,585	*2,232	*1,522	1,233,831
Financial services income.....	124	52,130,690	3,106,117	1,344,865	31,312,279
Shipping income.....	**	**	**	**	**
Dividends from each noncontrolled section 902 Corporation.....	119	715,461	499,210	204,721	*18,180
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	8	*111,803	*111,803	--	--
General limitation income.....	1,440	18,331,201	2,563,122	1,321,584	853,894
Section 901(i) income.....	**	**	**	**	**
Income re-sourced by treaty.....	--	--	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: Total Assets, Income, Taxes, and Credits and Foreign Income, Taxes, and Credit, 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				
	Rents, royalties, and license fees	Service income	Other income	Oil and gas extraction income ³	Foreign branch income ³
	(6)	(7)	(8)	(9)	(10)
ALL INDUSTRIES					
All income types.....	67,325,236	25,370,669	166,569,404	25,337,194	94,478,719
Passive income.....	331,611	--	2,463,029	--	196,885
High withholding tax interest.....	--	--	--	--	*85,746
Financial services income.....	4,278,079	1,809,839	59,359,104	--	51,930,771
Shipping income.....	*659,673	*6,714,439	2,672,288	--	*4,622,233
Dividends from each noncontrolled section 902 Corporation.....	*2,040	*981	2,398	--	*109
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	*78	*128	*7,895	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	62,039,107	16,838,488	101,956,244	25,337,194	37,636,181
Section 901(i) income.....	*193	--	*27,086	--	--
Income re-sourced by treaty.....	*14,455	*6,794	*81,360	--	*6,794
AGRICULTURE, FORESTRY, FISHING, AND HUNTING					
All income types.....	*6,982	*960	*1,614	--	*985
Passive income.....	*2,650	--	*21	--	--
High withholding tax interest.....	**	**	**	**	**
Financial services income.....	--	--	--	--	--
Shipping income.....	--	--	--	--	--
Dividends from each noncontrolled section 902 Corporation.....	**	**	**	**	**
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	*4,332	*960	*1,593	--	*985
Section 901(j) income.....	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--
MINING					
All income types.....	363,907	811,684	4,072,408	942,095	2,006,090
Passive income.....	*2,475	--	*-18,792	--	*191
High withholding tax interest.....	--	--	--	--	--
Financial services income.....	**	**	**	**	**
Shipping income.....	**	**	**	**	**
Dividends from each noncontrolled section 902 Corporation.....	--	--	--	--	*109
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	**	**	**	**	**
General limitation income.....	361,432	811,684	4,090,224	942,095	2,005,790
Section 901(j) income.....	**	**	**	**	**
Income re-sourced by treaty.....	--	--	--	--	--
UTILITIES					
All income types.....	*22,309	*81,268	270,649	*16,012	*69,560
Passive income.....	*154	--	*29,587	--	*3,193
High withholding tax interest.....	**	**	**	**	**
Financial services income.....	**	**	**	**	**
Shipping income.....	--	--	--	--	--
Dividends from each noncontrolled section 902 Corporation.....	--	--	*253	--	--
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	*22,155	*76,605	240,809	*16,012	*61,704
Section 901(j) income.....	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: Total Assets, Income, Taxes, and Credits and Foreign Income, Taxes, and Credit, 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				
	Rents, royalties, and license fees	Service income	Other income	Oil and gas extraction income ³	Foreign branch income ³
	(6)	(7)	(8)	(9)	(10)
CONSTRUCTION					
All income types.....	*22,103	74,499	*16,651	--	*2
Passive income.....	*5,101	--	*983	--	*2
High withholding tax interest.....	**	**	**	**	**
Financial services income.....	--	--	--	--	--
Shipping income.....	**	**	**	**	**
Dividends from each noncontrolled section 902 Corporation.....	--	--	--	--	--
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	*17,002	74,499	*15,668	--	--
Section 901(i) income.....	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--
MANUFACTURING					
All income types.....	40,895,717	2,725,763	77,702,694	22,327,290	20,387,613
Passive income.....	146,772	--	298,889	--	175,990
High withholding tax interest.....	--	--	--	--	--
Financial services income.....	*1,045,633	*5,863	2,000,681	--	*339,329
Shipping income.....	*414,098	*769	*813,521	--	*1,627
Dividends from each noncontrolled section 902 Corporation.....	*1,976	*658	6,992	--	--
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	*78	*127	*7,895	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	39,272,512	2,711,552	74,512,826	22,327,290	19,863,873
Section 901(i) income.....	*193	--	*663	--	--
Income re-sourced by treaty.....	*14,455	*6,794	*61,226	--	*6,794
WHOLESALE AND RETAIL TRADE					
All income types.....	2,167,874	652,508	6,170,206	*1,435,782	3,071,857
Passive income.....	41,460	--	447,957	--	*3,607
High withholding tax interest.....	--	--	--	--	--
Financial services income.....	*35,113	*2,589	*47,187	--	*28,189
Shipping income.....	--	--	(⁴)	--	--
Dividends from each noncontrolled section 902 Corporation.....	*65	*323	*74	--	--
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	**	**	**	**	**
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	2,091,237	649,595	5,660,866	*1,435,782	3,040,061
Section 901(i) income.....	**	**	**	**	**
Income re-sourced by treaty.....	--	--	*14,120	--	--
TRANSPORTATION AND WAREHOUSING					
All income types.....	*75,208	11,003,698	1,909,593	--	6,379,511
Passive income.....	--	--	*1,558	--	*98
High withholding tax interest.....	--	--	--	--	--
Financial services income.....	**	**	**	**	**
Shipping income.....	*54,170	*6,713,671	*1,803,596	--	*4,619,508
Dividends from each noncontrolled section 902 Corporation.....	**	**	**	**	**
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	*21,037	4,241,479	98,426	--	1,759,904
Section 901(i) income.....	**	**	**	**	**
Income re-sourced by treaty.....	**	**	**	**	**

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: Total Assets, Income, Taxes, and Credits and Foreign Income, Taxes, and Credit, 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				
	Rents, royalties, and license fees	Service income	Other income	Oil and gas extraction income ³	Foreign branch income ³
	(6)	(7)	(8)	(9)	(10)
INFORMATION					
All income types.....	16,853,015	2,182,357	12,310,416	--	3,883,242
Passive income.....	32,082	--	1,481,359	--	*1,900
High withholding tax interest.....	**	**	**	**	**
Financial services income.....	*125,115	*8	*2,469	--	--
Shipping income.....	*191,405	--	*1,588	--	--
Dividends from each noncontrolled section 902 Corporation.....	--	--	--	--	--
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	16,504,413	2,182,350	10,798,578	--	3,881,342
Section 901(i) income.....	**	**	**	**	**
Income re-sourced by treaty.....	**	**	**	**	**
FINANCE, INSURANCE, REAL ESTATE, AND RENTAL AND LEASING					
All income types.....	1,228,181	2,996,595	44,369,993	--	19,174,001
Passive income.....	*10,902	--	41,012	--	*9,553
High withholding tax interest.....	--	--	--	--	--
Financial services income.....	1,067,926	1,674,385	43,019,412	--	18,295,191
Shipping income.....	**	**	**	**	**
Dividends from each noncontrolled section 902 Corporation.....	--	--	*1,730	--	--
Dividends from a IC-DISC or former DISC ¹	**	**	**	**	**
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	**	**	**	**	**
General limitation income.....	149,353	1,322,210	1,307,840	--	869,257
Section 901(i) income.....	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--
SERVICES					
All income types.....	5,689,941	4,841,335	19,745,180	*616,016	39,505,858
Passive income.....	90,015	--	180,455	--	2,350
High withholding tax interest.....	--	--	--	--	*85,746
Financial services income.....	2,004,292	*73,783	14,289,355	--	33,263,399
Shipping income.....	**	**	**	**	**
Dividends from each noncontrolled section 902 Corporation.....	--	--	*-6,651	--	--
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	3,595,634	4,767,552	5,229,414	*616,016	6,153,265
Section 901(i) income.....	**	**	**	**	**
Income re-sourced by treaty.....	--	--	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: Total Assets, Income, Taxes, and Credits and Foreign Income, Taxes, and Credit, 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	Deductions allocable to specific types of income				
		Total	Depreciation, depletion, and amortization	Other expenses	Service expenses	Other definitely allocable deductions
(11)	(12)	(13)	(14)	(15)	(16)	
ALL INDUSTRIES						
All income types.....	242,317,657	116,939,896	1,266,866	5,808,503	14,321,642	95,542,885
Passive income.....	2,649,026	476,401	*11,291	26,100	*3,844	435,166
High withholding tax interest.....	894,740	59,948	*450	*553	--	58,944
Financial services income.....	95,977,920	33,249,365	238,452	705,056	404,634	31,901,221
Shipping income.....	9,545,695	9,202,699	*37,281	*40,650	*2,329,105	6,795,662
Dividends from each noncontrolled section 902 Corporation.....	880,558	46,373	--	*1,742	*666	43,965
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	*4,269	*1,095	--	--	--	*1,095
Distributions from a FSC or former FSC ²	4,921,200	4,920,769	--	*2,518	--	4,918,252
General limitation income.....	127,387,328	68,981,230	979,391	5,031,883	11,583,392	51,386,563
Section 901(i) income.....	10,050	*2,059	--	--	--	*2,059
Income re-sourced by treaty.....	46,870	*43	--	--	--	*43
AGRICULTURE, FORESTRY, FISHING, AND HUNTING						
All income types.....	*3,600	*-32	--	*478	*2	*-512
Passive income.....	*24	*-857	--	*379	--	*-1,237
High withholding tax interest.....	**	**	**	**	**	**
Financial services income.....	--	--	--	--	--	--
Shipping income.....	--	--	--	--	--	--
Dividends from each noncontrolled section 902 Corporation.....	**	**	**	**	**	**
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--	--
General limitation income.....	*3,576	*826	--	*99	*2	*724
Section 901(i) income.....	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--
MINING						
All income types.....	4,067,771	3,251,845	149,045	*131,752	503,390	2,467,658
Passive income.....	8,472	4,820	*615	*158	*683	*3,364
High withholding tax interest.....	*16,338	*1,052	--	--	--	*1,052
Financial services income.....	**	**	**	**	**	**
Shipping income.....	**	**	**	**	**	**
Dividends from each noncontrolled section 902 Corporation.....	*6,761	*508	--	--	--	*508
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--
Distributions from a FSC or former FSC ²	**	**	**	**	**	**
General limitation income.....	4,031,782	3,241,776	148,430	*131,595	502,707	2,459,045
Section 901(i) income.....	**	**	**	**	**	**
Income re-sourced by treaty.....	--	--	--	--	--	--
UTILITIES						
All income types.....	693,436	183,535	*1,980	*99	*19,311	162,145
Passive income.....	42,673	*725	--	*99	--	*626
High withholding tax interest.....	**	**	**	**	**	**
Financial services income.....	**	**	**	**	**	**
Shipping income.....	--	--	--	--	--	--
Dividends from each noncontrolled section 902 Corporation.....	*28,680	*227	--	--	--	*227
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--	--
General limitation income.....	616,281	180,419	*1,980	--	*17,394	161,046
Section 901(i) income.....	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: Total Assets, Income, Taxes, and Credits and Foreign Income, Taxes, and Credit, 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	Deductions allocable to specific types of income				
		Total	Depreciation, depletion, and amortization	Other expenses	Service expenses	Other definitely allocable deductions
(11)	(12)	(13)	(14)	(15)	(16)	
CONSTRUCTION						
All income types.....	72,468	65,234	*4	*373	*57,102	*7,755
Passive income.....	*6	--	--	--	--	--
High withholding tax interest.....	**	**	**	**	**	**
Financial services income.....	--	--	--	--	--	--
Shipping income.....	--	--	--	--	--	--
Dividends from each noncontrolled section 902 Corporation.....	**	**	**	**	**	**
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--	--
General limitation income.....	72,276	65,234	*4	*373	*57,102	*7,755
Section 901(i) income.....	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--
MANUFACTURING						
All income types.....	89,864,625	42,411,157	651,752	724,524	1,434,003	39,600,878
Passive income.....	2,150,370	359,619	*98	*3,563	--	355,958
High withholding tax interest.....	89,930	23,535	--	--	--	23,535
Financial services income.....	5,005,757	1,745,143	*2,126	*146	*4,087	1,738,784
Shipping income.....	1,202,780	1,039,999	--	*10,872	*24	*1,029,103
Dividends from each noncontrolled section 902 Corporation.....	413,402	32,340	--	*1,639	*666	30,035
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	*4,269	*1,095	--	--	--	*1,095
Distributions from a FSC or former FSC ²	4,265,570	4,265,506	--	--	--	4,265,506
General limitation income.....	76,680,487	34,941,928	649,528	708,304	1,429,227	32,154,869
Section 901(j) income.....	*7,956	*2,036	--	--	--	*2,036
Income re-sourced by treaty.....	44,104	*-43	--	--	--	*-43
WHOLESALE AND RETAIL TRADE						
All income types.....	7,609,806	5,489,850	18,182	951,756	199,643	4,320,269
Passive income.....	194,361	10,631	--	*1,587	*2,524	6,519
High withholding tax interest.....	27,279	*1	--	--	--	*1
Financial services income.....	143,116	*38,450	*354	*5,984	--	*32,112
Shipping income.....	*3,997	*154	--	--	--	*154
Dividends from each noncontrolled section 902 Corporation.....	24,657	*83	--	--	--	*83
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	**	**	**	**	**	**
Distributions from a FSC or former FSC ²	*239,118	*239,118	--	*2,518	--	*236,601
General limitation income.....	6,974,949	5,201,408	17,828	941,667	197,119	4,044,793
Section 901(j) income.....	**	**	**	**	**	**
Income re-sourced by treaty.....	*2,298	--	--	--	--	--
TRANSPORTATION AND WAREHOUSING						
All income types.....	12,180,144	11,910,382	*1,887	*41,953	6,085,710	5,780,833
Passive income.....	*6,655	*635	--	*1	--	*634
High withholding tax interest.....	*1,547	*6	--	--	--	*6
Financial services income.....	**	**	**	**	**	**
Shipping income.....	*8,181,246	*8,044,209	--	*8,074	*2,329,081	*5,707,054
Dividends from each noncontrolled section 902 Corporation.....	**	**	**	**	**	**
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--	--
General limitation income.....	3,945,974	3,821,432	*1,887	*33,878	3,712,528	73,139
Section 901(j) income.....	**	**	**	**	**	**
Income re-sourced by treaty.....	**	**	**	**	**	**

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: Total Assets, Income, Taxes, and Credits and Foreign Income, Taxes, and Credit, 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	Deductions allocable to specific types of income				
		Total	Depreciation, depletion, and amortization	Other expenses	Service expenses	Other definitely allocable deductions
(11)	(12)	(13)	(14)	(15)	(16)	
INFORMATION						
All income types.....	22,445,722	12,079,260	*174,628	2,570,329	1,531,146	7,803,157
Passive income.....	124,928	20,804	--	*2,502	--	18,302
High withholding tax interest.....	**	**	**	**	**	**
Financial services income.....	*304,233	*302,569	--	--	--	*302,569
Shipping income.....	*98,337	*68,735	*37,281	*21,705	--	*9,748
Dividends from each noncontrolled section 902 Corporation.....	235,790	*41	--	--	--	*41
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--
Distributions from a FSC or former FSC ²	*366,496	*366,496	--	--	--	*366,496
General limitation income.....	21,313,983	11,320,614	*137,347	2,546,122	1,531,146	7,106,000
Section 901(i) income.....	**	**	**	**	**	**
Income re-sourced by treaty.....	**	**	**	**	**	**
FINANCE, INSURANCE, REAL ESTATE, AND RENTAL AND LEASING						
All income types.....	54,065,170	21,781,076	59,494	707,442	985,997	20,028,143
Passive income.....	27,924	20,177	*1,219	1,870	*637	16,450
High withholding tax interest.....	242,260	18,806	*450	*522	--	17,834
Financial services income.....	51,748,992	20,651,392	*40,243	*618,675	350,508	19,641,966
Shipping income.....	**	**	**	**	**	**
Dividends from each noncontrolled section 902 Corporation.....	45,934	*12,689	--	*103	--	*12,586
Dividends from a IC-DISC or former DISC ¹	**	**	**	**	**	**
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--
Distributions from a FSC or former FSC ²	**	**	**	**	**	**
General limitation income.....	1,995,678	1,073,896	17,582	86,272	634,852	335,191
Section 901(i) income.....	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--
SERVICES						
All income types.....	51,314,915	19,767,588	209,894	679,797	3,505,338	15,372,560
Passive income.....	93,613	59,848	*9,358	15,941	--	34,549
High withholding tax interest.....	515,769	16,402	--	*32	--	16,370
Financial services income.....	38,726,885	10,465,690	*195,730	*80,251	*4,021	10,185,688
Shipping income.....	**	**	**	**	**	**
Dividends from each noncontrolled section 902 Corporation.....	125,009	*484	--	--	--	*484
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--
Distributions from a FSC or former FSC ²	*42,211	*41,844	--	--	--	*41,844
General limitation income.....	11,752,341	9,133,698	4,806	583,573	3,501,316	5,044,003
Section 901(i) income.....	**	**	**	**	**	**
Income re-sourced by treaty.....	--	--	--	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: Total Assets, Income, Taxes, and Credits and Foreign Income, Taxes, and Credit, 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 not allocable to specific types of income				Deductions from oil and gas extraction income ⁵
	Total	Research and development	Interest	Other	
(17)	(18)	(19)	(20)	(21)	
ALL INDUSTRIES					
All income types.....	125,377,761	11,364,335	63,781,017	49,133,088	6,993,759
Passive income.....	2,172,625	160,626	1,422,541	562,808	--
High withholding tax interest.....	834,792	4,826	678,664	144,296	--
Financial services income.....	62,728,556	213,327	42,685,071	19,596,435	--
Shipping income.....	342,996	*21,220	276,258	45,502	--
Dividends from each noncontrolled section 902 Corporation.....	834,185	11,685	600,128	213,494	--
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	*3,174	*185	*125	*2,723	--
Distributions from a FSC or former FSC ²	*431	--	--	*431	--
General limitation income.....	58,406,098	10,951,681	18,084,008	28,563,802	6,993,759
Section 901(i) income.....	*7,990	*108	*5,818	*2,064	--
Income re-sourced by treaty.....	46,913	*676	*28,404	*1,533	--
AGRICULTURE, FORESTRY, FISHING, AND HUNTING					
All income types.....	*3,632	*279	*949	*535	--
Passive income.....	*881	--	*567	*212	--
High withholding tax interest.....	**	**	**	**	**
Financial services income.....	--	--	--	--	--
Shipping income.....	--	--	--	--	--
Dividends from each noncontrolled section 902 Corporation.....	**	**	**	**	**
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	*2,750	*279	*382	*323	--
Section 901(j) income.....	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--
MINING					
All income types.....	815,926	*11,304	316,394	404,730	236,820
Passive income.....	*3,652	--	*2,422	*1,177	--
High withholding tax interest.....	*15,285	*318	*9,566	*5,401	--
Financial services income.....	**	**	**	**	**
Shipping income.....	**	**	**	**	**
Dividends from each noncontrolled section 902 Corporation.....	*6,254	--	*3,671	*2,583	--
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	**	**	**	**	**
General limitation income.....	790,007	*10,986	300,242	395,333	236,820
Section 901(j) income.....	**	**	**	**	**
Income re-sourced by treaty.....	--	--	--	--	--
UTILITIES					
All income types.....	509,901	*30,599	*419,097	*53,710	*7,701
Passive income.....	*41,948	*27	*36,346	*5,575	--
High withholding tax interest.....	**	**	**	**	**
Financial services income.....	**	**	**	**	**
Shipping income.....	--	--	--	--	--
Dividends from each noncontrolled section 902 Corporation.....	*28,453	*13	*26,378	*2,062	--
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	435,862	*30,514	*353,020	*46,068	*7,701
Section 901(j) income.....	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: Total Assets, Income, Taxes, and Credits and Foreign Income, Taxes, and Credit, 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 not allocable to specific types of income				Deductions from oil and gas extraction income ⁵
	Total	Research and development	Interest	Other	
(17)	(18)	(19)	(20)	(21)	
CONSTRUCTION					
All income types.....	*7,234	*132	*4,086	*3,016	--
Passive income.....	*6	--	*3	*3	--
High withholding tax interest.....	**	**	**	**	**
Financial services income.....	--	--	--	--	--
Shipping income.....	--	--	--	--	--
Dividends from each noncontrolled section 902 Corporation.....	**	**	**	**	**
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	*7,042	*132	*4,012	*2,898	--
Section 901(i) income.....	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--
MANUFACTURING					
All income types.....	47,453,467	8,952,473	19,473,375	18,617,131	6,230,854
Passive income.....	1,790,751	155,292	1,243,899	386,953	--
High withholding tax interest.....	66,395	*1,548	59,850	3,837	--
Financial services income.....	3,260,613	6,377	3,135,332	118,904	--
Shipping income.....	162,781	*1,348	151,487	9,946	--
Dividends from each noncontrolled section 902 Corporation.....	381,062	11,539	303,350	63,966	--
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	*3,174	*185	*125	*2,723	--
Distributions from a FSC or former FSC ²	*64	--	--	*64	--
General limitation income.....	41,738,559	8,775,748	14,548,040	18,028,699	6,230,854
Section 901(i) income.....	*5,920	--	*5,330	*590	--
Income re-sourced by treaty.....	44,147	*436	*25,962	*1,448	--
WHOLESALE AND RETAIL TRADE					
All income types.....	2,119,956	25,874	791,218	1,168,951	*518,384
Passive income.....	183,730	*208	58,384	111,382	--
High withholding tax interest.....	27,278	--	16,491	*8,377	--
Financial services income.....	*104,666	--	*43,354	*54,505	--
Shipping income.....	*3,843	--	*2,613	*1,230	--
Dividends from each noncontrolled section 902 Corporation.....	24,574	*9	14,306	*10,018	--
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	**	**	**	**	**
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	1,773,542	25,417	654,018	983,406	*518,384
Section 901(i) income.....	**	**	**	**	**
Income re-sourced by treaty.....	*2,298	*240	*2,028	*31	--
TRANSPORTATION AND WAREHOUSING					
All income types.....	269,762	*35,883	169,829	59,803	--
Passive income.....	*6,021	*3	*5,649	*369	--
High withholding tax interest.....	*1,542	--	*1,188	*289	--
Financial services income.....	**	**	**	**	**
Shipping income.....	*137,037	*16,270	*100,185	*20,567	--
Dividends from each noncontrolled section 902 Corporation.....	**	**	**	**	**
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	124,542	*19,610	62,266	*38,498	--
Section 901(i) income.....	**	**	**	**	**
Income re-sourced by treaty.....	**	**	**	**	**

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: Total Assets, Income, Taxes, and Credits and Foreign Income, Taxes, and Credit, 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 not allocable to specific types of income				Deductions from oil and gas extraction income ⁵
	Total	Research and development	Interest	Other	
(17)	(18)	(19)	(20)	(21)	
INFORMATION					
All income types.....	10,366,462	1,854,585	1,242,877	7,199,186	--
Passive income.....	104,124	*5,024	57,029	40,944	--
High withholding tax interest.....	**	**	**	**	**
Financial services income.....	*1,664	*322	*960	*382	--
Shipping income.....	*29,603	*3,602	*20,771	*5,229	--
Dividends from each noncontrolled section 902 Corporation.....	235,749	*123	120,129	*115,496	--
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	9,993,369	1,845,406	1,043,458	7,035,818	--
Section 901(i) income.....	**	**	**	**	**
Income re-sourced by treaty.....	**	**	**	**	**
FINANCE, INSURANCE, REAL ESTATE, AND RENTAL AND LEASING					
All income types.....	32,284,094	*279,882	17,447,669	14,303,866	--
Passive income.....	7,747	--	*4,960	*1,899	--
High withholding tax interest.....	223,454	*2,944	159,691	60,330	--
Financial services income.....	31,097,600	*206,601	17,183,277	13,483,473	--
Shipping income.....	**	**	**	**	**
Dividends from each noncontrolled section 902 Corporation.....	33,245	--	18,108	12,172	--
Dividends from a IC-DISC or former DISC ¹	**	**	**	**	**
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	**	**	**	**	**
General limitation income.....	921,781	*70,336	81,366	745,992	--
Section 901(i) income.....	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--
SERVICES					
All income types.....	31,547,327	173,324	23,915,524	7,322,160	--
Passive income.....	33,765	*73	13,280	14,294	--
High withholding tax interest.....	499,367	--	430,672	66,047	--
Financial services income.....	28,261,195	--	22,319,439	5,939,089	--
Shipping income.....	**	**	**	**	**
Dividends from each noncontrolled section 902 Corporation.....	124,525	--	113,994	7,066	--
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	*367	--	--	*367	--
General limitation income.....	2,618,643	173,251	1,037,203	1,286,766	--
Section 901(i) income.....	**	**	**	**	**
Income re-sourced by treaty.....	--	--	--	--	--

Footnotes at end of table.

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Table 2.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: Total Assets, Income, Taxes, and Credits and Foreign Income, Taxes, and Credit, 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) before adjustments	Adjustments to taxable income	Taxable income (less loss) after adjustments	Foreign taxes available for credit	
				Total	Reduction for certain foreign taxes
	(22)	(23)	(24)	(25)	(26)
ALL INDUSTRIES					
All income types.....	196,675,289	22,108,420	174,566,903	61,506,698	3,412,750
Passive income.....	9,115,293	963,986	8,151,307	900,020	(*)
High withholding tax interest.....	1,237,372	21,198	1,216,174	403,145	--
Financial services income.....	41,798,420	6,009,286	35,789,134	9,208,797	--
Shipping income.....	1,033,076	115,978	917,098	193,158	--
Dividends from each noncontrolled section 902 Corporation.....	2,907,737	-231,560	3,139,296	1,908,540	--
Dividends from a IC-DISC or former DISC ¹	*68	--	*102	*2	--
Miscellaneous separately calculated limitation.....	*5,407	*1,381	*4,026	*149	--
Distributions from a FSC or former FSC ²	*69,528	*200	*69,329	--	--
General limitation income.....	140,335,274	15,234,496	125,100,778	48,850,028	3,412,750
Section 901(j) income.....	35,368	-4,707	*40,075	*289	--
Income re-sourced by treaty.....	137,747	-1,837	139,584	42,570	--
AGRICULTURE, FORESTRY, FISHING, AND HUNTING					
All income types.....	6,683	--	6,683	1,985	--
Passive income.....	2,792	*-779	3,571	444	--
High withholding tax interest.....	**	**	**	**	**
Financial services income.....	--	--	--	--	--
Shipping income.....	--	--	--	--	--
Dividends from each noncontrolled section 902 Corporation.....	**	**	**	**	**
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	*3,665	*779	*2,886	*1,408	--
Section 901(j) income.....	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--
MINING					
All income types.....	2,692,785	239,934	2,452,851	1,435,065	180,179
Passive income.....	32,619	*-21,026	53,646	9,666	--
High withholding tax interest.....	*73,918	*10,740	*63,177	*17,610	--
Financial services income.....	**	**	**	**	**
Shipping income.....	**	**	**	**	**
Dividends from each noncontrolled section 902 Corporation.....	*21,798	*-637	*22,435	*6,957	--
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	**	**	**	**	**
General limitation income.....	2,553,976	249,828	2,304,148	1,400,833	180,179
Section 901(j) income.....	**	**	**	**	**
Income re-sourced by treaty.....	--	--	--	--	--
UTILITIES					
All income types.....	980,638	*131,597	849,041	478,289	*763
Passive income.....	62,586	*1,401	61,185	312	--
High withholding tax interest.....	**	**	**	**	**
Financial services income.....	**	**	**	**	**
Shipping income.....	--	--	--	--	--
Dividends from each noncontrolled section 902 Corporation.....	*-2,341	*-16,947	*14,606	*8,796	--
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	907,477	*146,994	760,484	466,642	*763
Section 901(j) income.....	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: Total Assets, Income, Taxes, and Credits and Foreign Income, Taxes, and Credit, 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) before adjustments	Adjustments to taxable income	Taxable income (less loss) after adjustments	Foreign taxes available for credit	
				Total	Reduction for certain foreign taxes
	(22)	(23)	(24)	(25)	(26)
CONSTRUCTION					
All income types.....	176,755	*7,453	169,303	56,898	--
Passive income.....	6,919	*1,581	5,338	596	--
High withholding tax interest.....	**	**	**	**	**
Financial services income.....	*218	--	*218	*22	--
Shipping income.....	--	--	--	--	--
Dividends from each noncontrolled section 902 Corporation.....	**	**	**	**	**
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	168,443	*5,872	162,571	56,125	--
Section 901(i) income.....	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--
MANUFACTURING					
All income types.....	120,771,799	11,741,135	109,030,698	41,380,033	3,002,723
Passive income.....	5,030,734	354,846	4,675,888	532,579	--
High withholding tax interest.....	172,991	2,753	170,238	46,015	--
Financial services income.....	1,607,590	-18,713	1,626,303	361,404	--
Shipping income.....	199,117	19,758	179,359	*32,380	--
Dividends from each noncontrolled section 902 Corporation.....	1,717,036	-67,735	1,784,770	1,233,138	--
Dividends from a IC-DISC or former DISC ¹	*68	--	*101	*2	--
Miscellaneous separately calculated limitation.....	*5,406	*1,381	*4,025	*149	--
Distributions from a FSC or former FSC ²	*-64	*-523	*459	--	--
General limitation income.....	111,923,414	11,461,518	100,461,896	39,139,907	3,002,723
Section 901(i) income.....	*-4,550	*-6,767	*2,217	*289	--
Income re-sourced by treaty.....	120,058	-5,383	125,441	34,171	--
WHOLESALE AND RETAIL TRADE					
All income types.....	5,937,381	967,196	4,970,184	1,867,065	*136,208
Passive income.....	658,048	103,273	554,776	49,080	--
High withholding tax interest.....	41,623	*1,427	40,196	12,772	--
Financial services income.....	180,512	*63,475	117,038	*23,958	--
Shipping income.....	*20,111	*9,085	*11,026	*13,220	--
Dividends from each noncontrolled section 902 Corporation.....	85,706	-1,097	86,804	55,266	--
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	**	**	**	**	**
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	4,936,941	787,223	4,149,717	1,708,503	*136,208
Section 901(i) income.....	**	**	**	**	**
Income re-sourced by treaty.....	*12,144	*2,527	*9,617	*4,265	--
TRANSPORTATION AND WAREHOUSING					
All income types.....	1,607,888	45,090	1,562,798	300,664	--
Passive income.....	51,041	*5,252	45,789	5,089	--
High withholding tax interest.....	*20,482	*684	*19,798	*2,425	--
Financial services income.....	**	**	**	**	**
Shipping income.....	689,545	*-1,393	690,937	147,403	--
Dividends from each noncontrolled section 902 Corporation.....	**	**	**	**	**
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	830,565	*39,024	791,541	141,108	--
Section 901(i) income.....	**	**	**	**	**
Income re-sourced by treaty.....	**	**	**	**	**

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: Total Assets, Income, Taxes, and Credits and Foreign Income, Taxes, and Credit, 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) before adjustments	Adjustments to taxable income	Taxable income (less loss) after adjustments	Foreign taxes available for credit	
				Total	Reduction for certain foreign taxes
	(22)	(23)	(24)	(25)	(26)
INFORMATION					
All income types.....	13,973,523	2,047,489	11,926,034	3,762,019	--
Passive income.....	2,349,499	457,852	1,891,647	122,375	--
High withholding tax interest.....	**	**	**	**	**
Financial services income.....	*-176,514	*-176,521	*8	*2	--
Shipping income.....	*114,120	*95,442	*18,678	*8	--
Dividends from each noncontrolled section 902 Corporation.....	350,023	*-111,458	*461,480	*298,223	--
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	11,310,911	1,782,621	9,528,290	3,339,358	--
Section 901(i) income.....	**	**	**	**	**
Income re-sourced by treaty.....	**	**	**	**	**
FINANCE, INSURANCE, REAL ESTATE, AND RENTAL AND LEASING					
All income types.....	28,380,475	5,741,092	22,639,383	5,662,106	(¹)
Passive income.....	131,737	-4,116	135,853	12,590	(¹)
High withholding tax interest.....	199,116	-3,859	202,975	70,304	--
Financial services income.....	26,770,898	5,606,673	21,164,225	5,434,908	--
Shipping income.....	**	**	**	**	**
Dividends from each noncontrolled section 902 Corporation.....	142,034	1,480	140,554	43,832	--
Dividends from a IC-DISC or former DISC ¹	**	**	**	**	**
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	**	**	**	**	**
General limitation income.....	1,121,022	140,914	980,108	100,456	--
Section 901(i) income.....	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--
SERVICES					
All income types.....	22,147,362	1,187,434	20,959,928	6,562,574	*92,878
Passive income.....	789,318	65,702	723,615	167,290	--
High withholding tax interest.....	721,816	9,968	711,847	252,837	--
Financial services income.....	13,403,805	534,156	12,869,649	3,386,977	--
Shipping income.....	**	**	**	**	**
Dividends from each noncontrolled section 902 Corporation.....	590,451	-35,669	626,120	259,648	--
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	*69,592	*722	*68,870	--	--
General limitation income.....	6,578,860	619,723	5,959,137	2,495,691	*92,878
Section 901(i) income.....	**	**	**	**	**
Income re-sourced by treaty.....	--	--	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: Total Assets, Income, Taxes, and Credits and Foreign Income, Taxes, and Credit, 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					
	Carryover	Total paid, accrued, and deemed paid	Total	Paid or accrued		
				Dividends	Interest	Rents, royalties, and license fees
(27)	(28)	(29)	(30)	(31)	(32)	
ALL INDUSTRIES						
All income types.....	12,405,727	52,513,722	19,799,225	2,203,453	758,147	2,973,513
Passive income.....	62,167	837,854	263,762	77,277	54,665	24,884
High withholding tax interest.....	51,072	352,073	344,049	285	343,764	--
Financial services income.....	1,170,084	8,038,713	4,931,444	471,474	144,984	23,269
Shipping income.....	*17,831	175,327	38,986	*2,229	*347	*3,269
Dividends from each noncontrolled section 902 Corporation.....	587,397	1,321,143	87,592	78,645	*6,737	*184
Dividends from a IC-DISC or former DISC 1.....	--	*2	*2	*2	--	--
Miscellaneous separately calculated limitation.....	--	*149	*149	--	--	*13
Distributions from a FSC or former FSC 2.....	--	--	--	--	--	--
General limitation income.....	10,514,255	41,748,523	14,102,313	1,573,526	207,651	2,921,893
Section 901(i) income.....	--	*289	--	--	--	--
Income re-sourced by treaty.....	*2,921	39,649	*30,928	*14	--	--
AGRICULTURE, FORESTRY, FISHING, AND HUNTING						
All income types.....	*941	1,044	1,038	30	*18	*861
Passive income.....	*2	442	442	*18	--	*421
High withholding tax interest.....	**	**	**	**	**	**
Financial services income.....	--	--	--	--	--	--
Shipping income.....	--	--	--	--	--	--
Dividends from each noncontrolled section 902 Corporation.....	**	**	**	**	**	**
Dividends from a IC-DISC or former DISC 1.....	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--
Distributions from a FSC or former FSC 2.....	--	--	--	--	--	--
General limitation income.....	*831	*576	*571	*5	--	*439
Section 901(j) income.....	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--
MINING						
All income types.....	539,558	1,075,686	710,417	84,683	15,254	26,751
Passive income.....	*242	9,424	2,593	*309	*553	*252
High withholding tax interest.....	*5,425	*12,185	*7,949	--	*7,949	--
Financial services income.....	**	**	**	**	**	**
Shipping income.....	**	**	**	**	**	**
Dividends from each noncontrolled section 902 Corporation.....	*2,157	*4,800	*1,000	*1,000	--	--
Dividends from a IC-DISC or former DISC 1.....	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--
Distributions from a FSC or former FSC 2.....	**	**	**	**	**	**
General limitation income.....	531,734	1,049,278	698,875	83,374	6,752	26,499
Section 901(j) income.....	**	**	**	**	**	**
Income re-sourced by treaty.....	--	--	--	--	--	--
UTILITIES						
All income types.....	*347,050	132,002	39,625	*29,296	*2,410	*725
Passive income.....	--	312	123	*41	*69	*11
High withholding tax interest.....	**	**	**	**	**	**
Financial services income.....	**	**	**	**	**	**
Shipping income.....	--	--	--	--	--	--
Dividends from each noncontrolled section 902 Corporation.....	*2,928	*5,868	*416	*416	--	--
Dividends from a IC-DISC or former DISC 1.....	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--
Distributions from a FSC or former FSC 2.....	--	--	--	--	--	--
General limitation income.....	*343,313	124,092	37,356	*28,840	*1,327	*714
Section 901(j) income.....	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: Total Assets, Income, Taxes, and Credits and Foreign Income, Taxes, and Credit, 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					
	Carryover	Total paid, accrued, and deemed paid	Total	Paid or accrued		
				Dividends	Interest	Rents, royalties, and license fees
(27)	(28)	(29)	(30)	(31)	(32)	
CONSTRUCTION						
All income types.....	*6,962	49,936	11,294	1,627	*148	*3,156
Passive income.....	(⁴)	595	590	31	*34	*510
High withholding tax interest.....	**	**	**	**	**	**
Financial services income.....	--	*22	*22	*1	*21	--
Shipping income.....	--	--	--	--	--	--
Dividends from each noncontrolled section 902 Corporation.....	**	**	**	**	**	**
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--	--
General limitation income.....	*6,962	49,163	10,589	1,594	(⁴)	*2,646
Section 901(i) income.....	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--
MANUFACTURING						
All income types.....	8,090,590	36,292,166	11,107,356	1,315,979	228,307	1,893,420
Passive income.....	45,842	486,737	147,724	38,817	42,161	10,108
High withholding tax interest.....	22,178	23,837	22,267	*192	22,075	--
Financial services income.....	*25,133	336,271	83,017	*26,716	2,369	*663
Shipping income.....	*4,296	*28,084	*2,045	*596	*22	*244
Dividends from each noncontrolled section 902 Corporation.....	414,830	818,308	47,216	44,970	*43	*177
Dividends from a IC-DISC or former DISC ¹	--	*2	*2	*2	--	--
Miscellaneous separately calculated limitation.....	--	*149	*149	--	--	*13
Distributions from a FSC or former FSC ²	--	--	--	--	--	--
General limitation income.....	7,577,402	34,565,228	10,780,284	1,204,673	161,637	1,882,214
Section 901(j) income.....	--	*289	--	--	--	--
Income re-sourced by treaty.....	*910	33,260	*24,651	*14	--	--
WHOLESALE AND RETAIL TRADE						
All income types.....	523,606	1,479,667	365,408	80,590	26,722	108,355
Passive income.....	4,279	44,802	12,143	2,179	4,457	4,371
High withholding tax interest.....	*300	12,473	12,119	*22	12,097	--
Financial services income.....	--	*23,958	*9,546	*599	*1,712	*3,491
Shipping income.....	*9,257	*3,962	*628	*628	--	--
Dividends from each noncontrolled section 902 Corporation.....	27,358	27,908	4,413	4,337	*68	*7
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	**	**	**	**	**	**
Distributions from a FSC or former FSC ²	--	--	--	--	--	--
General limitation income.....	482,399	1,362,311	322,418	72,825	8,388	100,487
Section 901(j) income.....	**	**	**	**	**	**
Income re-sourced by treaty.....	*13	*4,252	*4,140	(⁴)	--	--
TRANSPORTATION AND WAREHOUSING						
All income types.....	21,917	278,747	76,879	12,453	3,775	*3,559
Passive income.....	--	5,089	2,265	*1,776	*96	--
High withholding tax interest.....	*64	*2,361	*2,361	--	*2,361	--
Financial services income.....	**	**	**	**	**	**
Shipping income.....	*4,238	143,165	36,222	*1,005	*325	*3,025
Dividends from each noncontrolled section 902 Corporation.....	**	**	**	**	**	**
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--	--
General limitation income.....	16,371	124,737	33,733	9,509	*993	*535
Section 901(j) income.....	**	**	**	**	**	**
Income re-sourced by treaty.....	**	**	**	**	**	**

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: Total Assets, Income, Taxes, and Credits and Foreign Income, Taxes, and Credit, 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					
	Carryover	Total paid, accrued, and deemed paid	Total	Paid or accrued		
				Dividends	Interest	Rents, royalties, and license fees
(27)	(28)	(29)	(30)	(31)	(32)	
INFORMATION						
All income types.....	1,120,826	2,641,194	1,427,332	64,183	17,923	703,617
Passive income.....	3,685	118,690	9,123	2,421	4,795	1,389
High withholding tax interest.....	**	**	**	**	**	**
Financial services income.....	(¹)	*2	*2	--	--	--
Shipping income.....	--	*8	--	--	--	--
Dividends from each noncontrolled section 902 Corporation.....	*95,600	*202,623	*11,299	*4,675	*6,623	--
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--	--
General limitation income.....	1,019,543	2,319,815	1,406,852	57,086	6,448	702,229
Section 901(i) income.....	**	**	**	**	**	**
Income re-sourced by treaty.....	**	**	**	**	**	**
FINANCE, INSURANCE, REAL ESTATE, AND RENTAL AND LEASING						
All income types.....	1,048,146	4,613,960	3,063,596	247,845	135,916	22,261
Passive income.....	1,433	11,157	8,498	4,381	945	902
High withholding tax interest.....	4,660	65,644	65,303	*64	65,239	--
Financial services income.....	1,027,848	4,407,060	2,912,323	231,910	65,891	*13,523
Shipping income.....	**	**	**	**	**	**
Dividends from each noncontrolled section 902 Corporation.....	*8,826	35,006	*2,500	*2,500	--	--
Dividends from a IC-DISC or former DISC ¹	**	**	**	**	**	**
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--
Distributions from a FSC or former FSC ²	**	**	**	**	**	**
General limitation income.....	5,379	95,076	74,972	8,990	3,841	7,835
Section 901(i) income.....	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--
SERVICES						
All income types.....	706,132	5,949,320	2,996,281	366,765	327,675	210,808
Passive income.....	6,683	160,607	80,261	27,304	1,555	6,919
High withholding tax interest.....	18,446	234,390	232,868	*7	232,861	--
Financial services income.....	*116,294	3,270,683	1,925,818	212,247	74,990	*5,592
Shipping income.....	**	**	**	**	**	**
Dividends from each noncontrolled section 902 Corporation.....	34,348	225,300	20,579	20,576	*3	--
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--	--
General limitation income.....	530,321	2,058,248	736,664	106,630	18,266	198,296
Section 901(i) income.....	**	**	**	**	**	**
Income re-sourced by treaty.....	--	--	--	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: Total Assets, Income, Taxes, and Credits and Foreign Income, Taxes, and Credit, 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				
	Paid or accrued--Continued				Taxes deemed paid
	Other taxes paid or accrued on--				
	Branch income	Specifically allocable income [section 863(b)]	Service income	Other income	
(33)	(34)	(35)	(36)	(37)	
ALL INDUSTRIES					
All income types.....	8,894,314	40,031	301,574	4,628,194	32,714,496
Passive income.....	34,426	*729	*1	71,780	574,091
High withholding tax interest.....	--	--	--	--	*8,023
Financial services income.....	2,580,495	--	41,901	1,669,321	3,107,268
Shipping income.....	*22,083	--	*6,265	*4,792	136,341
Dividends from each noncontrolled section 902 Corporation.....	--	--	--	2,027	1,233,551
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	*18	*117	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	6,255,156	39,301	253,388	2,851,396	27,646,211
Section 901(i) income.....	--	--	--	--	*289
Income re-sourced by treaty.....	*2,154	--	--	*28,760	8,721
AGRICULTURE, FORESTRY, FISHING, AND HUNTING					
All income types.....	--	--	--	*128	*6
Passive income.....	--	--	--	*2	--
High withholding tax interest.....	**	**	**	**	**
Financial services income.....	--	--	--	--	--
Shipping income.....	--	--	--	--	--
Dividends from each noncontrolled section 902 Corporation.....	**	**	**	**	**
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	--	--	--	*126	*6
Section 901(j) income.....	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--
MINING					
All income types.....	206,285	--	5,551	371,893	365,269
Passive income.....	*45	--	--	*1,433	*6,831
High withholding tax interest.....	--	--	--	--	*4,236
Financial services income.....	**	**	**	**	**
Shipping income.....	**	**	**	**	**
Dividends from each noncontrolled section 902 Corporation.....	--	--	--	--	*3,800
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	**	**	**	**	**
General limitation income.....	206,239	--	5,551	370,460	350,403
Section 901(j) income.....	**	**	**	**	**
Income re-sourced by treaty.....	--	--	--	--	--
UTILITIES					
All income types.....	*1,784	--	*1,204	*4,206	*92,377
Passive income.....	--	--	--	*3	*189
High withholding tax interest.....	**	**	**	**	**
Financial services income.....	**	**	**	**	**
Shipping income.....	--	--	--	--	--
Dividends from each noncontrolled section 902 Corporation.....	--	--	--	--	*5,452
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	*1,068	--	*1,204	*4,203	*86,736
Section 901(j) income.....	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: Total Assets, Income, Taxes, and Credits and Foreign Income, Taxes, and Credit, 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				
	Paid or accrued--Continued				Taxes deemed paid
	Other taxes paid or accrued on--				
	Branch income	Specifically allocable income [section 863(b)]	Service income	Other income	
(33)	(34)	(35)	(36)	(37)	
CONSTRUCTION					
All income types.....	*236	--	4,190	*1,937	38,643
Passive income.....	--	--	--	*14	*6
High withholding tax interest.....	**	**	**	**	**
Financial services income.....	--	--	--	--	--
Shipping income.....	--	--	--	--	--
Dividends from each noncontrolled section 902 Corporation.....	**	**	**	**	**
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	*236	--	4,190	*1,923	*38,574
Section 901(i) income.....	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--
MANUFACTURING					
All income types.....	5,224,158	30,471	63,868	2,351,154	25,184,810
Passive income.....	31,882	*729	--	24,027	339,013
High withholding tax interest.....	--	--	--	--	*1,570
Financial services income.....	*9,288	--	*190	*43,790	253,254
Shipping income.....	*104	--	--	*1,079	*26,039
Dividends from each noncontrolled section 902 Corporation.....	--	--	--	*2,027	771,092
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	*18	*117	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	5,180,730	29,741	63,660	2,257,630	23,784,944
Section 901(i) income.....	--	--	--	--	*289
Income re-sourced by treaty.....	*2,154	--	--	*22,483	8,609
WHOLESALE AND RETAIL TRADE					
All income types.....	119,548	*168	5,374	24,650	1,114,259
Passive income.....	*68	--	--	1,068	32,658
High withholding tax interest.....	--	--	--	--	*354
Financial services income.....	*1,222	--	*17	*2,505	*14,412
Shipping income.....	--	--	--	--	*3,335
Dividends from each noncontrolled section 902 Corporation.....	--	--	--	--	23,496
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	**	**	**	**	**
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	118,257	*168	5,357	16,936	1,039,893
Section 901(i) income.....	**	**	**	**	**
Income re-sourced by treaty.....	--	--	--	*4,140	*112
TRANSPORTATION AND WAREHOUSING					
All income types.....	34,100	--	14,452	8,540	201,868
Passive income.....	*30	--	--	*362	*2,825
High withholding tax interest.....	--	--	--	--	--
Financial services income.....	**	**	**	**	**
Shipping income.....	*21,980	--	*6,265	*3,622	*106,943
Dividends from each noncontrolled section 902 Corporation.....	**	**	**	**	**
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	12,090	--	8,187	2,420	91,004
Section 901(i) income.....	**	**	**	**	**
Income re-sourced by treaty.....	**	**	**	**	**

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: Total Assets, Income, Taxes, and Credits and Foreign Income, Taxes, and Credit, 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				
	Paid or accrued--Continued				Taxes deemed paid
	Other taxes paid or accrued on--				
	Branch income	Specifically allocable income [section 863(b)]	Service income	Other income	
(33)	(34)	(35)	(36)	(37)	
INFORMATION					
All income types.....	468,808	*4,361	44,789	123,650	1,213,862
Passive income.....	--	--	--	*518	109,566
High withholding tax interest.....	**	**	**	**	**
Financial services income.....	--	--	*2	--	--
Shipping income.....	--	--	--	--	*8
Dividends from each noncontrolled section 902 Corporation.....	--	--	--	--	*191,324
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	468,808	*4,361	44,788	123,132	912,963
Section 901(j) income.....	**	**	**	**	**
Income re-sourced by treaty.....	**	**	**	**	**
FINANCE, INSURANCE, REAL ESTATE, AND RENTAL AND LEASING					
All income types.....	1,147,680	--	47,078	1,462,816	1,550,364
Passive income.....	*123	--	*1	2,146	2,659
High withholding tax interest.....	--	--	--	--	*341
Financial services income.....	1,138,776	--	41,692	1,420,530	1,494,737
Shipping income.....	**	**	**	**	**
Dividends from each noncontrolled section 902 Corporation.....	--	--	--	--	32,506
Dividends from a IC-DISC or former DISC ¹	**	**	**	**	**
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	**	**	**	**	**
General limitation income.....	8,781	--	5,386	40,139	20,104
Section 901(j) income.....	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--
SERVICES					
All income types.....	1,691,716	*5,032	115,067	279,220	2,953,038
Passive income.....	*2,278	--	--	42,205	80,346
High withholding tax interest.....	--	--	--	--	*1,522
Financial services income.....	1,430,492	--	*1	202,496	1,344,865
Shipping income.....	**	**	**	**	**
Dividends from each noncontrolled section 902 Corporation.....	--	--	--	(⁴)	204,721
Dividends from a IC-DISC or former DISC ¹	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--
Distributions from a FSC or former FSC ²	--	--	--	--	--
General limitation income.....	258,946	*5,032	115,066	34,428	1,321,584
Section 901(j) income.....	**	**	**	**	**
Income re-sourced by treaty.....	--	--	--	--	--

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

** 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.

⁵ Included in deductions shown in columns 12-20.

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

Corporate Foreign Tax Credit, 2000

Table 3.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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]

Selected country	Number of returns	Foreign income and taxes reported on Form 1118				
		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)	
All geographic areas.....	5,917	438,992,946	75,966,294	32,715,823	71,045,520	67,325,236
Canada.....	1,579	28,403,724	5,906,265	3,528,002	4,387,665	3,662,870
Latin America, total.....	1,020	43,241,087	8,966,396	2,115,809	12,684,430	5,055,392
Mexico.....	662	12,115,487	1,683,587	798,755	2,886,598	1,999,783
Central America, total.....	255	1,664,062	384,967	64,528	370,152	139,578
Belize.....	28	9,888	*354	*50	*891	*77
Costa Rica.....	140	220,094	31,284	9,340	22,394	43,535
El Salvador.....	88	189,820	14,071	4,604	48,280	10,591
Guatemala.....	133	289,060	31,252	12,694	61,103	28,206
Honduras.....	78	96,561	23,497	*5,870	14,323	6,475
Nicaragua.....	56	34,946	*6,570	*1,050	*2,783	1,796
Panama (including Canal Zone).....	155	819,081	277,940	30,921	220,379	48,775
Central America not allocable.....	4	*4,611	--	--	--	*123
Caribbean countries, total.....	306	9,107,721	3,850,816	317,772	2,058,418	530,153
Cayman Islands (British).....	164	6,532,278	3,231,354	223,161	1,900,320	414,572
Dominican Republic.....	128	643,679	338,442	82,664	78,917	19,563
Haiti.....	27	64,691	*12	--	*10,469	*1,177
Jamaica.....	83	136,901	*3,785	*2,253	28,398	25,044
Trinidad.....	82	1,021,854	34,308	*7,017	30,030	30,659
Other Caribbean countries.....	88	708,317	242,916	2,677	10,284	39,138
South America, total.....	710	20,179,391	3,046,714	934,753	7,222,714	2,385,731
Argentina.....	374	6,192,344	598,731	265,420	2,764,254	440,723
Bolivia.....	60	90,555	*16,871	*7,379	40,527	5,752
Brazil.....	463	7,307,425	1,217,838	417,365	2,764,954	1,108,619
Chile.....	240	1,806,960	334,612	59,804	750,300	127,912
Colombia.....	269	1,307,488	127,602	56,256	176,058	116,538
Ecuador.....	143	235,951	19,682	3,955	44,034	21,111
Paraguay.....	54	97,074	*1,328	*2,610	62,892	4,333
Peru.....	190	870,783	22,754	7,652	182,085	352,620
Uruguay.....	107	294,665	33,818	6,667	119,023	23,718
Venezuela.....	276	1,738,686	670,765	106,698	297,023	183,068
Other South American countries.....	37	237,459	*2,713	*948	*21,562	*1,336
Latin America not allocable.....	8	*174,425	*312	--	*146,548	*147
Other Western Hemisphere, total.....	279	10,074,086	4,031,228	648,811	2,998,523	914,646
Bahamas.....	94	2,738,545	390,337	66,634	1,414,841	30,110
Bermuda.....	201	6,469,613	3,411,941	556,504	1,234,980	836,785
Netherlands Antilles.....	70	473,963	133,936	16,945	218,668	12,359
Other British West Indies.....	85	321,953	93,846	7,718	117,614	28,305
All other Western Hemisphere.....	46	70,012	*1,170	*1,009	*12,421	7,088
Europe, total.....	2,644	165,718,201	33,575,550	16,273,146	28,634,619	25,606,945
European Union, total.....	2,553	144,525,659	29,337,125	14,928,033	25,713,219	21,754,997
Austria.....	195	764,868	55,346	31,947	131,844	320,770
Belgium.....	318	6,465,009	2,251,299	958,196	635,145	671,472
Denmark.....	237	1,991,299	672,711	197,884	75,848	282,947
Finland.....	299	656,310	49,632	16,063	89,279	320,909
France (including Andorra).....	556	10,482,648	2,032,153	1,136,107	1,723,658	2,688,986
Germany.....	558	20,128,375	4,280,859	3,124,472	1,795,643	4,331,564
Greece.....	149	840,147	69,091	62,682	373,700	145,618
Ireland.....	241	6,024,655	1,794,973	297,498	471,518	2,931,756
Italy (including San Marino).....	427	5,071,809	851,820	632,043	546,154	1,356,877
Luxembourg.....	105	1,683,745	532,571	704,366	222,898	90,812

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 3.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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 reported on Form 1118				
		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)	
Europe--continued						
European Union--continued						
Netherlands.....	884	14,730,199	6,207,358	2,783,166	1,071,647	1,885,475
Portugal.....	172	1,099,498	515,295	156,212	56,463	156,840
Spain.....	407	3,990,984	843,996	648,470	265,945	964,073
Sweden.....	317	3,268,438	829,625	662,932	304,938	890,052
United Kingdom.....	1,681	67,321,001	8,350,131	3,515,615	17,948,538	4,716,846
European Union not allocable.....	4	*6,675	*266	*382	--	--
Other West European countries, total.....	397	15,053,346	3,795,591	1,262,108	2,331,116	2,869,616
Liechtenstein.....	11	12,900	*10,311	*121	*180	*1,843
Monaco.....	15	10,894	*2,998	*1,446	*1,869	*1,009
Norway.....	188	3,606,359	170,130	112,020	197,362	160,369
Switzerland.....	311	8,404,593	3,571,680	1,127,109	720,598	1,670,364
Turkey.....	172	2,082,262	34,101	20,370	1,400,576	171,610
Other West European countries not allocable.....	61	936,337	*6,371	*1,041	*10,531	864,420
East European countries, total.....	358	5,962,154	442,830	83,004	552,487	981,507
Romania.....	68	95,657	13,464	*6,906	2,690	25,472
Former Soviet Union.....	213	2,480,932	227,507	6,602	383,400	241,117
Other East European countries.....	277	3,385,565	201,858	69,496	166,398	714,918
Europe not allocable.....	12	*177,041	*3	--	*37,798	*826
Africa, total.....	392	8,139,796	949,816	426,269	457,387	491,583
North Africa, total.....						
Algeria.....	35	883,286	--	--	*19,380	*313
Egypt.....	112	1,471,080	90,225	29,870	114,638	76,394
Libya.....	9	*10,218	*9,845	--	*482	*30
Morocco.....	60	74,156	*2,565	*2,247	7,108	21,414
Other North African countries.....	40	45,408	*136	--	29,047	*3,471
East Africa, total.....	103	304,210	31,197	13,384	25,249	27,345
Ethiopia.....	19	26,005	--	--	*1,355	*3,191
Kenya.....	52	60,421	*5,454	*2,088	*22,684	5,970
Tanzania.....	16	5,201	*307	*133	*8	*824
Uganda.....	15	5,067	*1,899	*1,054	--	*987
Other East African countries.....	72	207,516	23,538	10,109	1,201	16,373
West and Central Africa, total.....	114	4,321,084	705,524	309,961	58,258	41,500
Gabon.....	20	34,247	*2,930	*1,799	*2,214	*64
Ghana.....	21	483	*921	*281	(²)	*377
Liberia.....	26	50,472	21,085	*1,142	*21,951	*48
Nigeria.....	60	2,257,829	190,597	*56,496	9,399	*14,087
Zaire.....	12	*5,924	*4,218	--	--	*112
Other West and Central African countries.....	68	1,972,127	*485,774	*250,242	24,694	26,813
Southern Africa, total.....	280	1,004,540	109,840	70,316	195,990	318,413
Malawi.....	9	*1,245	*280	*261	--	*312
Zimbabwe.....	34	-8,931	*17,151	*8,559	*57	2,182
South Africa (including Namibia).....	272	1,005,486	90,042	58,916	195,932	314,432
Zambia.....	13	3,720	*814	*2,010	(²)	*544
Other Southern African countries.....	20	3,020	*1,553	*569	*1	*943
Africa not allocable.....	9	*25,814	*484	*490	*7,235	*2,703

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 3.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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 reported on Form 1118				
		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)	
Asia, total.....	1,423	94,707,593	13,382,896	8,673,926	12,214,099	19,617,245
Middle East, total.....	334	6,294,130	261,856	71,979	1,129,278	608,710
Bahrain.....	62	808,294	*5,602	--	805,051	4,650
Iran.....	13	10,025	*3,309	*289	*55	*1,169
Iraq.....	8	*1,355	*366	--	*109	*52
Israel.....	230	789,270	112,170	52,466	154,043	229,944
Kuwait.....	62	125,600	*1,947	*618	*5,247	15,296
Lebanon.....	60	57,264	*917	*61	21,376	20,779
Qatar.....	45	416,107	*10	--	23,672	2,810
Saudi Arabia.....	138	2,400,885	89,576	*4,338	9,592	180,699
United Arab Emirates.....	104	783,915	44,314	*13,806	93,833	58,027
Other areas of Arabian Peninsula.....	47	637,487	--	--	*6,014	59,468
Other Middle East countries.....	83	263,929	*3,644	*401	10,286	35,818
Southern and Southeast Asia, total.....	638	24,788,526	3,200,903	1,205,618	3,538,614	6,214,665
Bangladesh.....	27	43,098	*351	*237	*15,710	*2,572
India.....	237	1,357,207	61,237	34,007	596,054	142,427
Indonesia.....	214	5,186,978	991,933	594,419	405,891	103,201
Malaysia.....	258	2,384,561	283,256	38,691	104,939	405,061
Pakistan.....	79	255,979	5,856	*3,269	129,679	9,398
Philippines.....	222	3,310,309	294,614	187,686	644,297	157,264
Singapore.....	423	10,303,795	1,282,697	220,273	1,227,420	5,186,611
Sri Lanka.....	42	33,835	*2,388	*1,322	*15,004	*1,418
Thailand.....	260	1,687,566	271,387	120,266	354,255	193,721
Vietnam.....	53	111,880	*300	*119	22,693	1,246
Other Southern and Southeast Asian countries.....	47	113,320	*6,886	*5,328	22,673	11,745
Eastern Asia, total.....	1,269	62,752,073	9,920,137	7,396,329	7,114,093	12,704,122
China.....	331	2,635,883	251,298	68,694	216,421	1,230,714
Taiwan.....	357	6,291,966	331,982	103,569	1,212,522	1,223,011
Hong Kong.....	366	9,109,322	1,546,606	263,177	1,932,412	501,484
Japan (including Okinawa and Ryukyu Islands).....	1,034	39,950,878	7,341,228	6,768,001	2,508,313	8,182,693
South Korea, Republic of.....	361	4,714,208	449,023	192,888	1,236,607	1,552,889
Other Eastern Asian countries.....	23	49,816	--	--	*7,818	*13,330
Asia not allocable.....	15	872,863	--	--	*432,113	*89,748
Oceania, total.....	662	10,491,269	1,556,169	691,667	1,531,555	1,180,733
Australia.....	617	9,312,258	1,235,376	575,547	1,319,008	1,064,684
New Zealand.....	272	903,372	248,072	104,344	209,789	97,433
Other countries of Oceania.....	51	275,640	*72,720	*11,776	*2,758	18,616
Puerto Rico and U.S. Possessions, total.....	462	12,230,992	1,119,084	126,667	1,407,746	5,145,318
Puerto Rico.....	415	11,424,030	967,520	113,290	1,110,778	5,113,825
U.S. Possessions, total.....	143	806,962	151,564	13,377	296,967	31,494
American Samoa.....	18	102,632	*90,671	--	*8,076	*201
Guam.....	95	380,270	47,404	*10,776	139,282	19,825
Virgin Islands, U.S.....	80	300,754	*1,603	*900	143,170	10,698
Other U.S. Possessions.....	18	23,749	*11,885	*1,701	*6,440	*1,213
Country not stated.....	2,462	57,212,723	2,760,300	343,433	10,830,634	13,489,452
Section 863(b), 863(c), 863(e) income.....	251	22,333,891	--	--	*605	*9,965
Foreign Sales Corporation dividends ¹	77	19,573,217	19,573,217	--	--	--
Interest-Charge Domestic International Sales Corporation dividends ¹	3	*68	*68	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 3.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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 reported on Form 1118--Continued				
	Gross income (less loss)--Continued				Total deductions
	Service income	Other income	Oil and gas extraction income ³	Foreign branch income ³	
(7)	(8)	(9)	(10)	(11)	
All geographic areas.....	25,370,669	166,569,404	25,337,194	94,478,719	242,317,657
Canada.....	1,046,686	9,872,237	*924,858	4,072,912	12,592,961
Latin America, total.....	1,563,932	12,855,128	663,934	8,844,900	22,816,894
Mexico.....	367,910	4,378,854	*12	2,160,741	6,590,302
Central America, total.....	37,282	667,555	*99	441,712	824,665
Belize.....	*59	8,458	--	*147	2,745
Costa Rica.....	11,509	102,032	--	67,162	117,574
El Salvador.....	2,910	109,364	*99	34,510	85,530
Guatemala.....	4,209	151,596	--	103,683	142,420
Honduras.....	7,642	38,755	--	29,056	47,971
Nicaragua.....	*924	21,824	--	*2,049	9,137
Panama (including canal zone).....	8,906	232,161	(²)	203,982	413,935
Central America not allocable.....	*1,123	*3,365	--	*1,123	*5,353
Caribbean countries, total.....	101,714	2,248,848	*100,210	1,241,107	3,444,962
Cayman Islands (British).....	*12,290	750,581	*2	934,467	2,320,607
Dominican Republic.....	15,855	108,239	--	107,433	130,614
Haiti.....	*4,301	48,732	--	*17,265	46,708
Jamaica.....	1,546	75,876	--	36,923	98,344
Trinidad.....	66,701	853,139	*100,209	129,251	457,950
Other Caribbean countries.....	*1,022	412,281	(²)	*15,768	390,738
South America, total.....	1,040,344	5,549,135	563,612	5,001,078	11,806,644
Argentina.....	442,338	1,680,878	*32,836	1,470,595	4,084,172
Bolivia.....	6,057	13,969	--	*34,004	79,962
Brazil.....	268,415	1,530,234	*35,235	1,719,546	4,196,164
Chile.....	35,439	498,892	*679	674,245	878,531
Columbia.....	70,231	760,802	*284,877	292,410	720,839
Ecuador.....	5,770	141,399	*51,758	24,438	100,172
Paraguay.....	*1,296	24,616	--	70,714	65,927
Peru.....	18,874	286,797	*636	144,815	671,446
Uruguay.....	*21,603	89,836	*-48	189,450	203,476
Venezuela.....	50,579	430,553	*157,638	299,279	612,122
Other South American countries.....	*119,742	91,158	--	*81,580	193,832
Latin America not allocable.....	*16,682	*10,736	--	*262	*150,320
Other Western Hemisphere, total.....	180,761	1,300,117	*1,403,204	1,919,259	3,525,060
Bahamas.....	3,133	833,491	*66,639	*1,727,070	1,367,770
Bermuda.....	158,934	270,469	*1,336,565	129,722	1,736,251
Netherlands Antilles.....	*3,628	88,427	--	*-2,137	180,101
Other British West Indies.....	5,117	69,353	--	*38,899	190,639
All other Western Hemisphere.....	*9,949	38,376	--	*25,704	50,298
Europe, total.....	6,327,529	55,300,411	9,348,189	34,171,186	85,353,208
European Union, total.....	5,639,084	47,153,201	6,342,812	30,079,535	76,824,146
Austria.....	29,084	195,877	*164	148,766	577,507
Belgium.....	53,941	1,894,956	*127,453	1,618,635	2,817,521
Denmark.....	7,415	754,496	*504,637	652,508	776,880
Finland.....	29,936	150,491	*4,484	48,269	296,749
France (including Andorra).....	506,298	2,395,446	*3	794,140	5,593,484
Germany.....	1,386,717	5,209,120	*75,295	4,571,442	9,932,118
Greece.....	25,325	163,730	*11,311	446,739	556,455
Ireland.....	89,290	439,621	--	305,690	2,100,502
Italy (including San Marino).....	257,496	1,427,418	(²)	977,144	2,929,869
Luxembourg.....	*5,128	127,971	--	*84,747	329,962

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 3.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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 reported on Form 1118--Continued				Total 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)
Europe--continued					
European Union--continued					
Netherlands.....	252,437	2,530,116	*353,890	656,548	5,604,330
Portugal.....	18,995	195,693	--	125,325	400,963
Spain.....	126,451	1,142,049	*177,396	478,349	2,109,544
Sweden.....	52,119	528,773	--	268,171	1,949,706
United Kingdom.....	2,798,452	29,991,419	*5,088,179	18,901,459	40,847,425
European Union not allocable.....	-	*6,027	--	*1,603	*1,130
Other West European countries, total.....	158,801	4,636,114	*1,880,826	3,016,636	5,785,574
Liechtenstein.....	*23	*423	--	*10,355	2,196
Monaco.....	*469	*3,104	--	*2,806	6,663
Norway.....	30,144	2,936,334	*1,880,598	1,426,044	1,213,876
Switzerland.....	113,335	1,201,506	--	831,046	2,829,498
Turkey.....	13,857	441,747	*228	745,727	1,185,417
Other West European countries not allocable.....	*973	53,001	--	*658	547,925
East European countries, total.....	442,505	3,459,821	*1,124,552	1,075,141	2,521,238
Romania.....	*4,509	42,616	--	*36,346	61,265
Former Soviet Union.....	126,316	1,495,990	*1,124,552	593,608	1,300,816
Other East European countries.....	311,680	1,921,215	--	445,187	1,159,156
Europe not allocable.....	*87,139	*51,275	--	*-125	222,250
Africa, total.....	547,105	5,267,636	3,989,035	2,052,059	3,355,770
North Africa, total.....	51,997	2,024,986	*859,718	1,137,405	1,395,741
Algeria.....	*3,918	859,674	*846,758	*870,786	412,415
Egypt.....	43,771	1,116,182	*12,960	198,324	885,887
Libya.....	--	*-140	--	--	*6,036
Morocco.....	*3,308	37,515	--	*36,804	41,958
Other North African countries.....	*1,000	11,755	(²)	*31,491	49,446
East Africa, total.....	3,689	203,347	*24,822	45,221	170,889
Ethiopia.....	*171	21,289	--	*7,865	24,832
Kenya.....	2,244	21,981	--	35,733	38,171
Tanzania.....	*68	*3,861	--	*57	806
Uganda.....	*130	*997	--	*119	1,974
Other East African countries.....	*1,076	155,219	*24,822	*1,447	105,104
West and Central Africa, total.....	366,099	2,839,742	*3,104,011	452,297	1,056,401
Gabon.....	*530	26,710	*22,258	*7,449	13,726
Ghana.....	*205	-1,301	--	*204	2,557
Liberia.....	*769	*5,477	--	--	21,355
Nigeria.....	11,902	1,975,349	*1,797,546	*82,552	337,002
Zaire.....	*1,377	*218	--	--	1,615
Other West and Central African countries.....	351,316	833,290	*1,284,207	362,092	680,145
Southern Africa, total.....	110,488	199,493	--	417,137	711,955
Malawi.....	*183	*209	--	--	*433
Zimbabwe.....	*183	-37,063	--	*225	5,057
South Africa (include Namibia).....	110,085	236,079	--	416,912	703,360
Zambia.....	--	*352	--	--	583
Other Southern African countries.....	*37	*-84	--	--	2,522
Africa not allocable.....	*14,833	*68	*484	--	*20,785

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 3.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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 reported on Form 1118--Continued				Total 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)
Asia, total	2,736,673	38,082,753	7,071,242	31,896,919	53,685,441
Middle East, total.....	410,220	3,812,087	*1,986,047	2,935,143	3,990,811
Bahrain.....	12,096	-19,106	--	*770,120	437,146
Iran.....	--	*5,204	--	--	1,263
Iraq.....	*20	*808	--	*400	*339
Israel.....	22,851	217,797	--	50,557	376,390
Kuwait.....	41,178	61,313	--	29,730	92,131
Lebanon.....	*413	13,718	--	*25,477	37,850
Qatar.....	*11,032	378,584	*110,705	*13,009	185,713
Saudi Arabia.....	240,328	1,876,353	*1,205,631	1,509,772	1,939,807
United Arab Emirates.....	44,114	529,820	*155,749	328,638	548,755
Other areas of Arabian Peninsula.....	*8,870	563,136	*513,962	*78,525	207,050
Other Middle East countries.....	29,319	184,461	--	128,915	164,365
Southern and Southeast Asia, total.....	868,413	9,760,314	*3,670,731	6,740,788	13,962,274
Bangladesh.....	*507	23,720	--	*11,572	28,964
India.....	52,756	470,726	--	632,884	1,318,895
Indonesia.....	90,936	3,000,598	*2,299,865	752,776	2,423,261
Malaysia.....	32,938	1,519,676	*928,280	96,361	926,255
Pakistan.....	5,506	102,270	*11,570	136,853	157,769
Philippines.....	32,097	1,994,353	*34,154	1,927,285	2,287,081
Singapore.....	481,691	1,905,103	*311	2,370,824	5,553,936
Sri Lanka.....	*2,095	11,608	--	*13,513	21,501
Thailand.....	152,898	595,038	*396,592	721,085	1,115,083
Vietnam.....	*12,679	74,843	*40	*41,328	68,029
Other Southern and Southeast Asian countries.....	*4,309	62,380	--	*36,307	61,501
Eastern Asia, total.....	1,264,679	24,352,713	*1,414,464	22,128,740	34,751,102
China.....	114,578	754,178	*98,844	370,113	1,580,048
Taiwan.....	237,253	3,183,629	--	3,466,171	4,590,437
Hong Kong.....	322,796	4,542,848	--	4,103,708	5,945,555
Japan (including Okinawa and Ryukyu Islands).....	468,313	14,682,330	*1,303,606	12,731,984	20,064,423
South Korea, Republic of.....	102,931	1,179,869	*12,015	1,426,621	2,534,853
Other Eastern Asian countries.....	*18,808	*9,859	--	*30,144	35,786
Asia not allocable.....	*193,361	*157,640	--	*92,248	981,254
Oceania, total	387,912	5,143,233	*884,253	2,637,966	5,760,432
Australia.....	359,695	4,757,947	*748,636	2,430,903	5,204,955
New Zealand.....	21,413	222,321	--	160,471	477,860
Other countries of Oceania.....	*6,804	162,965	*135,616	*46,592	77,617
Puerto Rico and U.S. Possessions, total	1,169,758	3,262,419	*6,686	2,108,138	6,475,953
Puerto Rico.....	1,078,648	3,039,969	*21	1,825,187	5,802,076
U.S. Possessions, total.....	91,110	222,450	*6,665	282,951	673,876
American Samoa.....	*84	3,601	--	*9,585	133,710
Guam.....	60,359	102,624	--	198,421	273,449
Virgin Islands, U.S.....	30,189	114,195	--	66,439	256,777
Other U.S. Possessions.....	*479	*2,030	*6,665	*8,506	10,286
Country not stated	10,941,160	18,847,743	1,045,793	8,982,729	107,222,500
Section 863(b), 863(c), 863(e) income	*480,214	21,843,106	--	--	15,874,429
Foreign Sales Corporation dividends ¹	--	--	--	--	19,503,689
Inter-Charge Domestic International Sales Corporation dividends ¹	--	--	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 3.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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 reported on Form 1118--Continued					
	Deductions from oil and gas extraction income ⁴	Taxable income (less loss) before adjustment	Total	Foreign taxes paid, accrued, and deemed paid		
				Total	Foreign taxes paid or accrued	
					Dividends	Interest
(12)	(13)	(14)	(15)	(16)	(17)	
All geographic areas.....	6,993,759	196,675,289	52,515,048	19,799,225	2,203,453	758,147
Canada.....	*124,394	15,810,764	4,404,188	876,186	232,790	89,561
Latin America, total.....	272,228	20,424,193	4,633,315	2,517,574	285,894	241,706
Mexico.....	*16	5,525,185	1,576,121	777,373	70,638	50,920
Central America, total.....	*28	839,397	118,684	54,156	5,578	1,224
Belize.....	--	7,143	*224	*174	--	*20
Costa Rica.....	--	102,520	26,289	16,949	1,603	*303
El Salvador.....	--	104,290	8,540	3,936	*108	*203
Guatemala.....	*28	146,640	26,798	14,104	*302	*317
Honduras.....	--	48,591	12,623	6,753	*2,437	*200
Nicaragua.....	--	25,809	1,940	890	--	*146
Panama (including canal zone).....	--	405,146	41,039	10,118	*1,128	*35
Central America not allocable.....	--	*743	*1,232	*1,232	--	--
Caribbean countries, total.....	*102,261	5,662,759	601,289	283,517	7,079	3,184
Cayman Islands (British).....	--	4,211,671	225,171	*2,010	*1,985	*24
Dominican Republic.....	--	513,066	105,647	22,983	*1,230	*1,223
Haiti.....	--	17,982	*2,425	*2,425	--	--
Jamaica.....	(²)	38,557	9,918	7,666	*1,072	*856
Trinidad.....	*102,261	563,903	250,565	243,548	*2,791	*975
Other Caribbean countries.....	--	317,579	7,562	4,885	--	*104
South America, total.....	169,923	8,372,747	2,337,221	1,402,528	202,599	186,378
Argentina.....	*13,923	2,108,172	643,102	377,682	*4,860	75,666
Bolivia.....	*5,991	10,593	18,533	11,154	*103	*444
Brazil.....	*18,526	3,111,261	871,632	454,267	74,471	84,544
Chile.....	--	928,429	297,334	237,590	117,068	7,640
Columbia.....	*56,458	586,649	244,429	188,173	5,815	*211
Ecuador.....	*4,603	135,779	13,105	9,150	--	*923
Paraguay.....	*2,751	31,148	9,652	7,042	*34	*466
Peru.....	*13,052	199,336	32,549	24,897	*172	1,421
Uruguay.....	*1,637	91,189	16,565	9,898	--	*34
Venezuela.....	*52,975	1,126,564	170,620	63,922	*76	14,929
Other South American countries.....	*7	43,626	*19,700	*18,753	--	*100
Latin America not allocable.....	--	*24,105	--	--	--	--
Other Western Hemisphere, total.....	*32,373	6,549,026	671,780	22,969	*6,021	--
Bahamas.....	*3,631	1,370,775	67,000	*367	--	--
Bermuda.....	*28,742	4,733,361	556,725	*221	*8	--
Netherlands Antilles.....	--	293,861	28,429	*11,484	*9	--
Other British West Indies.....	--	131,314	13,929	6,211	*6,003	--
All other Western Hemisphere.....	--	19,715	*5,696	*4,686	(²)	--
Europe, total.....	2,587,746	80,364,993	22,913,258	6,640,112	764,359	226,160
European Union, total.....	1,643,082	67,701,513	19,379,724	4,451,691	656,403	67,739
Austria.....	--	187,361	45,127	13,180	7,148	*249
Belgium.....	*788	3,647,487	1,344,848	386,653	50,476	1,821
Denmark.....	*155,900	1,214,419	228,321	30,438	568	*6
Finland.....	--	359,561	36,604	20,541	1,708	*29
France (including Andorra).....	*77	4,889,164	1,383,678	247,571	54,437	*368
Germany.....	*1,060	10,196,257	3,930,804	806,332	241,200	780
Greece.....	*772	283,692	112,593	49,911	*158	*609
Ireland.....	--	3,924,153	317,602	20,104	6,334	--
Italy (including San Marino).....	*807	2,141,939	793,282	161,239	19,704	5,265
Luxembourg.....	*97	1,353,783	717,164	12,798	10,919	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 3.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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 reported on Form 1118--Continued					
	Deductions from oil and gas extraction income ¹	Taxable income (less loss) before adjustment	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)
Europe--continued						
European Union--continued						
Netherlands.....	*47,144	9,125,869	2,998,830	215,664	77,055	*1,745
Portugal.....	--	698,535	189,887	33,675	2,233	841
Spain.....	*9	1,881,440	764,192	115,723	25,718	1,814
Sweden.....	--	1,318,732	686,569	23,637	8,426	*4,809
United Kingdom.....	*1,436,429	26,473,575	5,829,741	2,314,126	150,319	49,403
European Union not allocable.....	--	*5,545	*481	*99	--	--
Other West European countries, total.....	*570,047	9,267,772	3,087,644	1,825,536	94,580	138,791
Liechtenstein.....	--	10,704	*121	--	--	--
Monaco.....	--	4,231	*1,495	*49	--	--
Norway.....	*569,214	2,392,483	1,573,597	1,461,577	5,853	*1
Switzerland.....	--	5,575,095	1,264,589	137,480	85,218	*162
Turkey.....	*834	896,845	245,536	225,166	2,266	*138,628
Other West European countries not allocable.....	--	388,413	*2,306	*1,265	*1,244	--
East European countries, total.....	*374,616	3,440,916	445,455	362,450	13,375	19,629
Romania.....	*4	34,392	15,968	9,062	*1,152	*223
Former Soviet Union.....	*328,816	1,180,116	303,559	296,957	1,717	*19,290
Other East European countries.....	*45,796	2,226,409	125,927	56,431	10,506	*117
Europe not allocable.....	--	-45,209	*435	*435	*1	--
Africa, total.....	894,548	4,784,026	2,051,273	1,625,004	10,197	107
North Africa, total.....						
Algeria.....	*395,184	1,088,408	286,099	253,982	*525	*61
Egypt.....	*3,175	585,193	255,727	225,857	*47	*61
Libya.....	*924	*4,182	--	--	--	--
Morocco.....	(²)	32,199	9,958	7,711	*478	--
Other North African countries.....	*31	-4,037	*1,233	*1,233	--	(²)
East Africa, total.....	*61,072	133,322	21,620	8,236	*1,120	(²)
Ethiopia.....	--	1,173	*1,912	*1,912	--	--
Kenya.....	--	22,250	6,659	4,571	*166	--
Tanzania.....	--	4,394	*194	*62	*25	--
Uganda.....	--	3,092	*1,477	*423	*423	--
Other East African countries.....	*61,072	102,412	11,377	1,268	*506	(²)
West and Central Africa, total.....	*438,291	3,264,683	1,651,943	1,341,982	4,848	*46
Gabon.....	*5,193	20,522	*17,929	*16,130	*612	--
Ghana.....	--	-2,074	*450	*168	*167	--
Liberia.....	--	29,117	*1,160	*18	*18	--
Nigeria.....	*205,800	1,920,827	1,187,738	1,131,242	*3,071	*44
Zaire.....	*217	4,309	*2	*2	--	--
Other West and Central African countries.....	*227,080	1,291,982	444,665	194,423	*981	*2
Southern Africa, total.....	*2	292,584	91,038	20,722	3,695	*1
Malawi.....	--	*812	*261	--	--	--
Zimbabwe.....	--	-13,989	13,206	4,647	*3,042	--
South Africa (include Namibia).....	*2	302,126	74,673	15,758	*408	*1
Zambia.....	--	3,137	*2,077	*67	--	--
Other Southern African countries.....	--	498	*820	*251	*246	--
Africa not allocable.....	--	*5,029	*573	*82	*8	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 3.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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 reported on Form 1118--Continued					
	Deductions from oil and gas extraction income ⁴	Taxable income (less loss) before adjustment	Total	Foreign taxes paid, accrued, and deemed paid		
				Total	Foreign taxes paid or accrued	
					Dividends	Interest
(12)	(13)	(14)	(15)	(16)	(17)	
Asia, total.....	2,546,154	41,022,152	13,919,195	5,245,269	632,323	84,282
Middle East, total.....	*1,393,233	2,303,320	599,710	527,731	45,930	635
Bahrain.....	(²)	371,147	*1	*1	--	--
Iran.....	--	8,762	*289	--	--	--
Iraq.....	--	*1,015	--	--	--	--
Israel.....	--	412,880	111,729	59,263	8,408	585
Kuwait.....	*6,631	33,469	*6,265	*5,647	--	--
Lebanon.....	--	19,414	1,945	1,884	--	*50
Qatar.....	*60,746	230,394	*36,653	*36,653	(²)	--
Saudi Arabia.....	*1,107,789	461,077	209,413	205,075	*37,017	*1
United Arab Emirates.....	*79,718	235,160	63,227	*49,421	--	--
Other areas of Arabian Peninsula.....	*138,242	430,437	*162,674	*162,674	--	--
Other Middle East countries.....	*107	99,564	7,514	7,113	*504	--
Southern and Southeast Asia, total.....	*1,082,058	10,826,252	3,126,465	1,920,847	71,930	44,475
Banladesh.....	*68	14,134	*3,892	*3,655	*53	--
India.....	*4	38,311	163,766	129,759	2,328	*309
Indonesia.....	*643,119	2,763,717	1,452,628	858,209	6,418	11,089
Malaysia.....	*247,120	1,458,307	443,284	404,593	925	1,446
Pakistan.....	*3,100	98,210	37,752	34,483	*800	*20
Philippines.....	*111,417	1,023,229	323,127	135,441	51,031	23,365
Singapore.....	*1,742	4,749,859	432,924	212,650	2,191	3,024
Sri Lanka.....	--	12,334	4,505	3,183	*201	--
Thailand.....	*73,619	572,482	252,864	132,598	7,983	5,168
Vietnam.....	*1,862	43,851	2,055	1,936	--	*54
Other Southern and Southeast Asian countries.....	*7	51,819	*9,668	*4,340	--	--
Eastern Asia, total.....	*70,863	28,000,971	10,164,090	2,767,761	514,464	39,171
China.....	*62,073	1,055,835	177,797	109,103	621	2,146
Taiwan.....	*3	1,701,530	462,459	358,890	77,705	19,477
Hong Kong.....	*295	3,163,767	403,495	140,318	14,535	*1,145
Japan (including Okinawa and Ryukyu Islands).....	*787	19,886,455	8,520,428	1,752,428	364,785	11,447
South Korea, Republic of.....	*7,704	2,179,355	599,816	406,927	56,819	4,956
Other Eastern Asian countries.....	--	14,029	*95	*95	--	--
Asia not allocable.....	--	-108,391	*28,930	*28,930	--	--
Oceania, total.....	*365,740	4,730,837	1,431,709	740,042	47,314	18,614
Australia.....	*327,111	4,107,303	1,236,210	660,662	33,729	16,827
New Zealand.....	*14	425,512	144,616	40,272	12,605	1,787
Other countries of Oceania.....	*38,615	198,022	50,883	39,107	*980	--
Puerto Rico and U.S. Possessions, total.....	*114	5,755,039	778,389	651,722	5,177	13,871
Puerto Rico.....	*106	5,621,954	736,378	623,088	5,177	7,897
U.S. Possessions, total.....	*8	133,085	42,011	28,634	--	*5,974
American Samoa.....	--	-31,078	*1,070	*1,070	--	--
Guam.....	--	106,821	29,622	18,846	--	*11
Virgin Islands, U.S.....	*8	43,977	9,553	8,653	--	*5,962
Other U.S. Possessions.....	--	13,462	*1,767	*65	--	--
Country not stated.....	170,461	-50,009,778	4,675,714	4,332,212	487,390	135,561
Section 863(b), 863(c), 863(e) income.....	--	6,459,462	36,555	36,555	--	--
Foreign Sales Corporation dividends ¹.....	--	*69,528	--	--	--	--
Interest-Charge Domestic International Sales Corporation dividends ¹.....	--	*68	*2	*2	*2	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 3.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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 reported on Form 1118--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	
(18)	(19)	(20)	(21)	(22)	(23)	
All geographic areas.....	2,973,513	8,894,314	40,031	301,574	4,628,194	32,715,823
Canada.....	137,933	223,965	*1,728	16,428	173,780	3,528,002
Latin America, total.....	443,332	683,250	*1,112	53,371	808,909	2,115,740
Mexico.....	152,004	271,581	*1,112	7,646	223,472	798,748
Central America, total.....	19,373	17,038	--	2,107	8,835	64,528
Belize.....	*2	*136	--	--	*16	*50
Costa Rica.....	5,610	*5,145	--	*846	*3,442	9,340
El Salvador.....	1,318	*2,097	--	*86	*123	4,604
Guatemala.....	7,184	*5,138	--	*168	*994	12,694
Honduras.....	1,062	*299	--	*648	*2,108	*5,870
Nicaragua.....	*253	*185	--	*14	*292	*1,050
Panama (including canal zone).....	3,945	*2,806	--	*345	*1,860	30,921
Central America not allocable.....	--	*1,232	--	--	--	--
Caribbean countries, total.....	6,318	27,227	--	4,456	235,252	317,772
Cayman Islands (British).....	--	(²)	--	--	--	223,161
Dominican Republic.....	3,023	*13,773	--	*1,081	*2,653	82,664
Haiti.....	--	*1,472	--	--	*952	--
Jamaica.....	870	4,660	--	*61	*147	*2,253
Trinidad.....	1,692	*5,289	--	*3,178	*229,624	*7,017
Other Caribbean countries.....	*734	*2,034	--	*137	*1,876	2,677
South America, total.....	265,636	367,404	--	39,162	341,349	934,693
Argentina.....	65,313	157,185	--	17,736	56,922	265,420
Bolivia.....	341	*112	--	*355	*9,798	*7,379
Brazil.....	108,755	53,331	--	13,484	119,683	417,365
Chile.....	24,273	27,609	--	1,161	59,839	59,744
Columbia.....	25,839	78,218	--	1,066	77,024	56,256
Ecuador.....	5,069	*1,012	--	*132	*2,014	3,955
Paraguay.....	2,419	*3,355	--	--	*769	*2,610
Peru.....	12,211	*5,513	--	583	*4,997	7,652
Uruguay.....	3,623	*5,628	--	*168	*445	6,667
Venezuela.....	17,723	17,561	--	3,880	9,752	106,698
Other South American countries.....	*70	*17,882	--	*596	*105	*948
Latin America not allocable.....	--	--	--	--	--	--
Other Western Hemisphere, total.....	*2,156	*2,097	*67	*11	*12,618	648,811
Bahamas.....	*8	--	--	--	*359	66,634
Bermuda.....	--	--	--	--	*213	556,504
Netherlands Antilles.....	*1	*376	--	--	*11,097	16,945
Other British West Indies.....	*6	*116	*67	--	*19	7,718
All other Western Hemisphere.....	*2,142	*1,604	--	*11	*930	*1,009
Europe, total.....	342,630	3,247,727	*99	110,597	1,948,541	16,273,146
European Union, total.....	293,864	1,892,128	*96	99,697	1,441,764	14,928,033
Austria.....	*1,165	*4,198	--	*152	*268	31,947
Belgium.....	1,354	331,496	--	*834	*672	958,196
Denmark.....	*4	27,634	--	*278	*1,949	197,884
Finland.....	12,098	*5,713	--	*52	*942	16,063
France (including Andorra).....	58,049	58,415	--	57,600	18,702	1,136,107
Germany.....	12,801	284,505	--	*6,942	260,104	3,124,472
Greece.....	5,887	*42,742	--	*23	*493	62,682
Ireland.....	*2,484	*5,360	--	*1,077	*4,850	297,498
Italy (including San Marino).....	70,270	59,791	--	1,622	4,588	632,043
Luxembourg.....	*8	*327	--	--	*1,543	704,366

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 3.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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 reported on Form 1118--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)	
Europe--continued						
European Union--continued						
Netherlands.....	28,978	87,273	--	*835	19,778	2,783,166
Portugal.....	13,339	*14,257	--	*267	*2,738	156,212
Spain.....	68,648	4,301	--	1,847	13,394	648,470
Sweden.....	*916	8,366	--	*72	*1,049	662,932
United Kingdom.....	17,862	957,652	*96	28,098	1,110,696	3,515,615
European Union not allocable.....	--	*99	--	--	(²)	*382
Other West European countries, total.....	23,364	1,186,786	--	*2,261	379,755	1,262,108
Liechtenstein.....	--	--	--	--	--	*121
Monaco.....	*49	--	--	--	--	*1,446
Norway.....	*18	*1,102,187	--	*990	*352,564	112,020
Switzerland.....	*4,319	30,164	--	*1,084	16,533	1,127,109
Turkey.....	18,993	54,435	--	*187	*10,658	20,370
Other West European countries not allocable.....	*21	--	--	--	--	*1,041
East European countries, total.....	25,402	168,814	*3	8,205	127,022	83,004
Romania.....	1,795	*5,612	--	*280	--	*6,906
Former Soviet Union.....	3,115	148,472	*3	*1,395	122,967	6,602
Other East European countries.....	20,493	14,730	--	*6,530	4,056	69,496
Europe not allocable.....	--	--	--	*435	--	--
Africa, total.....	15,954	1,324,311	--	3,549	270,885	426,269
North Africa, total.....						
Algeria.....	--	*31,714	--	971	*212,782	32,117
Egypt.....	6,438	*6,869	--	*833	*211,609	29,870
Libya.....	--	--	--	--	--	--
Morocco.....	1,367	*4,555	--	*138	*1,173	*2,247
Other North African countries.....	*123	*1,110	--	--	*1	--
East Africa, total.....	1,165	*5,645	--	*300	*6	13,384
Ethiopia.....	*134	*1,778	--	--	--	--
Kenya.....	385	*3,715	--	*300	*5	*2,088
Tanzania.....	*37	--	--	--	--	*133
Uganda.....	--	--	--	--	--	*1,054
Other East African countries.....	*610	*152	--	--	(²)	10,109
West and Central Africa, total.....	*4,106	*1,273,880	--	*1,997	57,105	309,961
Gabon.....	--	*1,519	--	--	*13,999	*1,799
Ghana.....	*1	--	--	--	--	*281
Liberia.....	--	--	--	--	(²)	*1,142
Nigeria.....	*287	*1,129,074	--	*219	*-1,453	*56,496
Zaire.....	--	--	--	*2	--	--
Other West and Central African countries.....	*3,818	*143,287	--	*1,776	*44,558	*250,242
Southern Africa, total.....	2,755	13,072	--	*207	*992	70,316
Malawi.....	--	--	--	--	--	*261
Zimbabwe.....	*126	*1,474	--	--	*5	*8,559
South Africa (include Namibia).....	2,611	11,549	--	*201	*987	58,916
Zambia.....	*18	*49	--	--	--	*2,010
Other Southern African countries.....	--	--	--	*6	--	*569
Africa not allocable.....	--	--	--	*74	--	*490

Footnotes at end of table.

Corporate Foreign Tax Credit, 2000

Table 3.--U.S. Corporation Returns with a Foreign Tax Credit, 2000: 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 reported on Form 1118--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)
Asia, total	1,247,631	2,509,633	*340	34,205	736,854	8,673,926
Middle East, total.....	35,043	269,484	--	3,199	173,440	71,979
Bahrain.....	--	--	--	--	*1	--
Iran.....	--	--	--	--	--	*289
Iraq.....	--	--	--	--	--	--
Israel.....	16,334	*7,570	--	*216	26,151	52,466
Kuwait.....	*1,401	*1,665	--	(²)	*2,581	*618
Lebanon.....	*330	*1,416	--	*11	*77	*61
Qatar.....	*57	*33,833	--	--	*2,763	--
Saudi Arabia.....	16,221	130,740	--	2,770	*18,326	*4,338
United Arab Emirates.....	*2	*22,669	--	*16	*26,734	*13,806
Other areas of Arabian Peninsula.....	*25	*66,073	--	--	*96,575	--
Other Middle East countries.....	673	*5,519	--	*186	*232	*401
Southern and Southeast Asia, total.....	162,162	1,257,982	*199	8,418	375,681	1,205,618
Bangladesh.....	--	*3,602	--	--	--	*237
India.....	12,099	103,812	--	1,468	9,743	34,007
Indonesia.....	8,928	507,616	--	869	323,290	594,419
Malaysia.....	31,551	366,548	*3	838	3,283	38,691
Pakistan.....	580	*13,172	--	*37	*19,874	*3,269
Philippines.....	16,129	39,236	--	1,772	*3,908	187,686
Singapore.....	41,139	154,648	*197	2,131	9,321	220,273
Sri Lanka.....	*42	*2,928	--	*12	--	*1,322
Thailand.....	51,503	60,441	--	1,267	6,237	120,266
Vietnam.....	*57	*1,779	--	*25	*21	*119
Other Southern and Southeast Asian countries.....	*134	*4,201	--	--	*5	*5,328
Eastern Asia, total.....	1,050,421	954,002	*141	21,829	187,733	7,396,329
China.....	67,906	10,680	*2	5,237	22,512	68,694
Taiwan.....	115,910	134,527	*6	3,170	8,095	103,569
Hong Kong.....	7,979	81,916	*116	1,558	33,069	263,177
Japan (including Okinawa and Ryukyu Islands).....	670,206	581,259	*18	10,822	113,891	6,768,001
South Korea, Republic of.....	188,421	145,524	--	1,042	10,166	192,888
Other Eastern Asian countries.....	--	*95	--	--	--	--
Asia not allocable.....	*5	*28,165	--	*759	--	--
Oceania, total	80,251	301,425	*20	13,848	278,570	691,667
Australia.....	72,551	284,099	--	13,686	239,771	575,547
New Zealand.....	7,500	3,845	*20	*158	*14,358	104,344
Other countries of Oceania.....	*200	*13,481	--	*5	*24,441	*11,776
Puerto Rico and U.S. Possessions, total	456,607	94,124	*269	21,479	60,196	126,667
Puerto Rico.....	455,200	78,999	*252	19,117	56,446	113,290
U.S. Possessions, total.....	*1,406	15,124	*17	2,363	3,751	13,377
American Samoa.....	*2	*1,067	--	*1	--	--
Guam.....	*718	13,225	*17	*1,178	3,698	*10,776
Virgin Islands, U.S.....	*672	*832	--	*1,184	*2	*900
Other U.S. Possessions.....	*14	--	--	--	*51	*1,701
Country not stated	373,110	2,549,725	*352	306,071	480,003	343,502
Section 863(b), 863(c), 863(e) income	*404	--	36,044	--	*107	--
Foreign Sales Corporation dividends ¹	--	--	--	--	--	--
Interest-Charge Domestic International Sales Corporation dividends ¹	--	--	--	--	--	--

* 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 Less than \$500.

³ Included in gross income (less loss), columns 2-8.

⁴ Included in total deductions, column 11.

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