

# Foreign Income, Taxes and Credit on U.S. Corporation Returns, 1978

By Vergie Mose\*

For Income Year 1978, corporations reduced their tentative U.S. income tax of \$107.9 billion by more than \$26 billion by using the foreign tax credit provisions of U.S. tax law. These provisions allowed a credit against the portion of U.S. income tax attributed to foreign source income for income taxes paid [1] to foreign countries. U.S. corporations primarily engaged in petroleum-related activities were the principal users of the foreign tax credit provisions. These corporations claimed \$17.1 billion in foreign tax credits which reduced their total U.S. corporate income tax from \$21.8 billion to \$4.7 billion, or 22 percent of what would otherwise have been their liability.

## BACKGROUND

The foreign tax credit was designed to alleviate the double taxation that can occur for U.S. taxpayers with international sources of income because their foreign source income is typically subject to foreign as well as U.S. tax. For the purpose of computing a foreign tax credit for corporations, foreign source taxable income includes such items as foreign branch profits and dividends [2], interest and royalties remitted from foreign corporations. The foreign tax credit is subtracted from the U.S. tax on worldwide income to compensate for taxes paid to foreign countries on the foreign source income.

The amount of foreign tax credit that corporations could claim was subject to certain limitations. Beginning in 1976, corporations were required to compute the credit limitation on an overall basis, rather than country by country. They also were required to allocate their foreign income into five categories or "types of foreign income" [3]. For each type of foreign income reported, the foreign tax credit was limited to the smaller of the amount of foreign taxes available for credit or the portion of the U.S. tax imposed on that type of foreign source taxable income. The total foreign tax credit claimed was the sum of these separate types of income credits. In certain instances, the total foreign tax credit was reduced because U.S. corporations participated in international boycotts [4].

## FOREIGN ACTIVITY FOR ALL CORPORATIONS

For 1978, foreign source taxable income amounted to \$65.2 billion for all corporations which claimed a foreign tax credit and filed supporting schedules for the credit. This amount was 46 percent of their \$141.7 billion of total taxable income (both domestic and foreign source income).

The importance of foreign source taxable income for those corporation returns with total assets of \$250 million or more is shown in Figure A. The foreign source taxable income for this group of large corporations accounted for 96 percent of total foreign source taxable income for all corporations, and 26 percent of total corporate taxable income, for 1978.

These same large companies reported \$39.6 billion of foreign taxes paid. This was 97 percent of the foreign taxes paid by all corporations for 1978.

The importance of these large companies on the total amount of foreign tax credit claimed for all corporations from 1972 through 1978 is shown in Figure B. These large corporations comprised over 91 percent of the total foreign tax credit for each of the years shown, with a high of 97 percent for 1978.

Finally, the foreign tax credit of \$25.5 billion offset 42 percent of the \$61.0 billion of U.S. corporate tax reported on returns with total assets of \$250 million or more. This compares to only \$900 million of foreign tax credit, or less than 2 percent of the \$46.9 billion of U.S. corporate tax, reported by smaller companies. Figure C shows foreign tax credit data as related to the U.S. corporate tax.

## FOREIGN ACTIVITY OF PETROLEUM CORPORATIONS

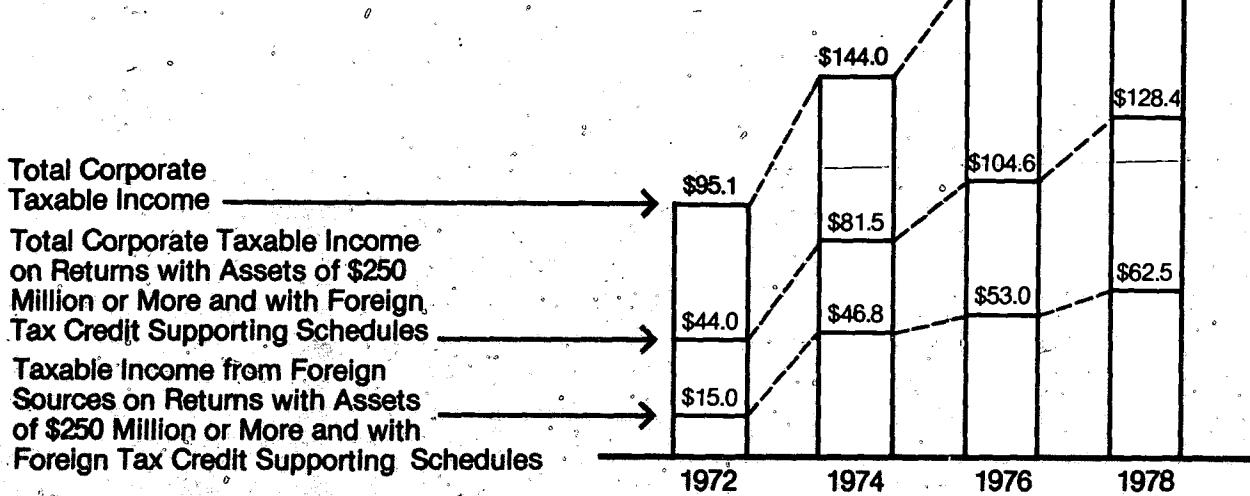
The foreign operations of U.S. corporations with total assets of \$250 million or more that were primarily engaged in petroleum-related activities (oil and gas extraction and refining) have historically had the greatest impact on foreign income and tax data. As shown in Figure D, these corporations reported over one half of the total foreign source taxable income, more than three quarters of the total foreign taxes paid and more than two thirds of the foreign tax credit claimed by all large corporations. The impact of corporations primarily engaged in these industrial activities has become more pronounced since 1973 when Statistics of Income data first reflected the sharp rise in the world price of oil. Since that year corporations with operations in the Middle East have accounted for the major portion of all foreign income and taxes paid, and foreign tax credit claimed.

The foreign operations of U.S. corporations primarily engaged in petroleum-related activities have historically generated significantly more taxable income than their domestic operations. Foreign source taxable income accounted for 93 percent of the \$7.2 billion in worldwide taxable income for 1972. Even with an increase in domestic taxable income, foreign source taxable income accounted for 84 percent of the \$42.7 billion in worldwide taxable income for 1978.

Taxes paid to foreign governments far exceeded the allowable foreign tax credit. The largest portion of total foreign taxes paid were taxes paid on foreign income from oil and gas extraction. Those U.S. corporations primarily engaged in petroleum-related activities paid \$18 billion in foreign taxes on \$22.3 billion of foreign income from oil and gas extraction for 1978, or nearly half of the total \$40.7 billion in foreign taxes paid by all U.S. corporations which claimed a foreign tax credit and filed supporting schedules for the credit. However, beginning in 1976, U.S. corporations were not allowed to include all of the taxes paid on foreign oil and gas extraction taxable income in the computation of their foreign tax

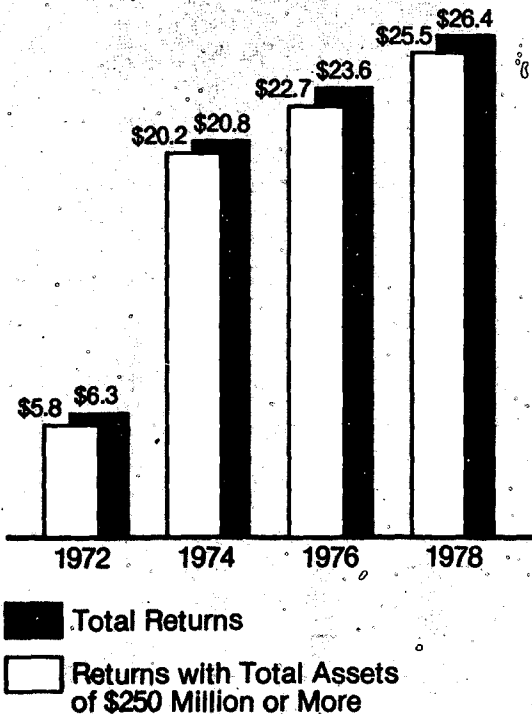
\*Foreign Returns Analysis Section. Prepared under the direction of James R. Hobbs, Chief.

**Figure A**  
**Total Corporate Taxable Income<sup>1</sup>**  
**and Taxable Income from Foreign**  
**Sources, 1972, 1974, 1976, and 1978**  
**(Billions of Dollars)**



<sup>1</sup>Equals Income Subject to U.S. Tax in the Tables.

**Figure B**  
**Amount of Foreign Tax Credit**  
**Claimed, 1972, 1974, 1976, and 1978**  
**(Billions of Dollars)**



credit. Those taxes excluded from the computation of the foreign tax credit were taxes in excess of the U.S. tax rate applicable to the foreign oil and gas extraction taxable income. For 1978, corporations primarily engaged in petroleum-related activities were required to exclude \$7.5 billion of foreign taxes paid on foreign oil and gas extraction taxable income. Thus, the foreign oil and gas extraction taxes in excess of 48 percent of the foreign oil and gas extraction taxable income, were reduced to the 48 percent rate, which was equivalent to the basic U.S. corporate tax rate for 1978.

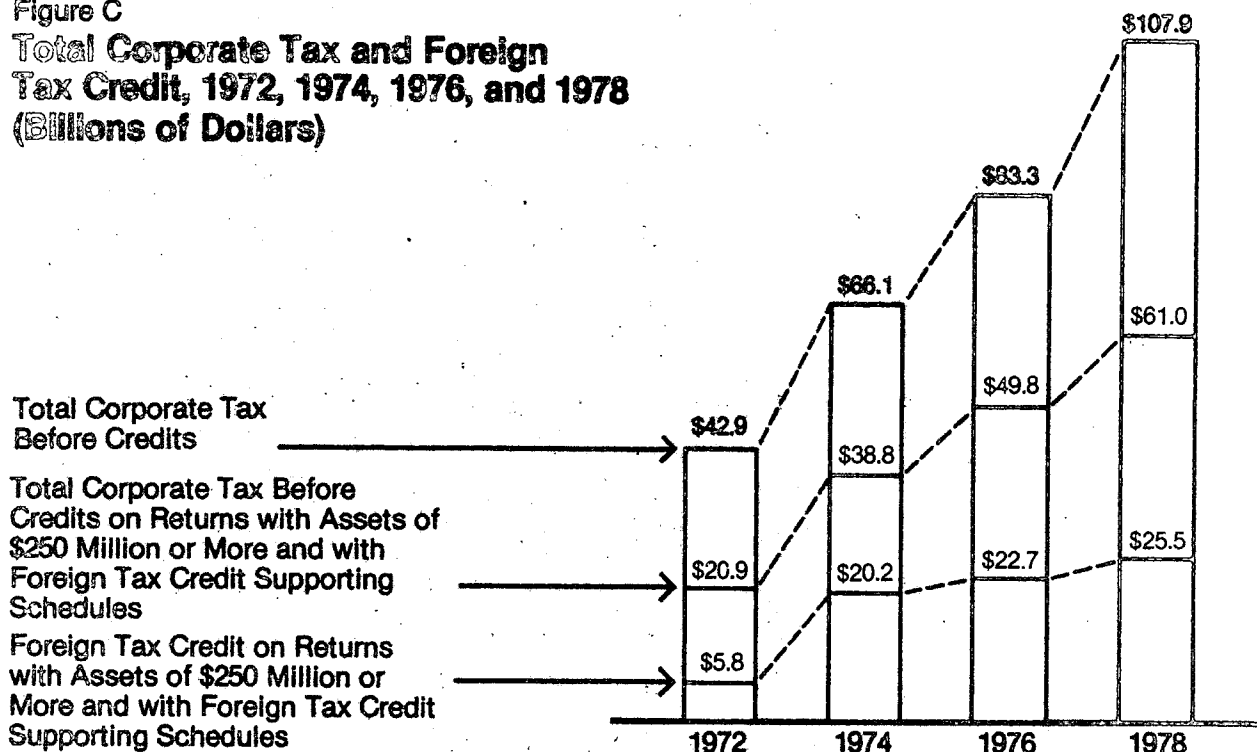
In 1978, large corporations primarily engaged in petroleum-related activities generated 84 percent of their \$42.7 billion of worldwide taxable income, or \$35.7 billion, from foreign operations and only 16 percent, or \$7.0 billion, from their domestic operations. The U.S. income tax on the foreign income was almost completely offset by \$16.9 billion in foreign tax credits, leaving a net U.S. tax of \$3.4 billion, almost entirely on domestic income.

**DATA SOURCES AND LIMITATIONS**

The foreign tax credit is claimed under section 901 of the Internal Revenue Code. Corporations which claim a foreign tax credit provide supporting foreign income and tax data on the Form 1118, "Computation of Foreign Tax Credit - Corporations," attached to the U.S. income tax return. Forms 1120, 1120F, 1120L, and 1120M were the sources for the foreign tax credit data. The Form 1118 was the source of the foreign income and tax data for this article. Taxable income reported from foreign sources (including U.S. possessions) is defined under U.S. tax law. However, foreign taxes paid are defined by the tax statutes of the foreign countries (including U.S. possessions).

A certain amount of undercoverage of foreign income and tax data is attributable to various reasons. Less than one percent of the total foreign tax credit was

Figure C  
**Total Corporate Tax and Foreign  
 Tax Credit, 1972, 1974, 1976, and 1978**  
 (Billions of Dollars)



claimed by U.S. corporations which did not provide foreign income and tax data to support the foreign tax credit claimed. Some corporations with foreign income and taxes operated at a deficit and had no U.S. tax liability and consequently could not claim a foreign tax credit. Data from such returns were excluded from this study. Corporations can choose to treat foreign taxes paid as a deduction from gross income as an alternative to the foreign tax credit on their U.S. income tax returns. However, because it is generally more advantageous to claim a credit against tax rather than reduce income by a deduction, it is probable that the number of corporations taking the deduction, as well as the foreign income and taxes involved, were negligible.

Data were derived from the unaudited returns of corporations which claimed a foreign tax credit that were included in the sample used for the 1978 returns contained in Statistics of Income--1978-1979, Corporation Income Tax Returns. The foreign tax credit claimed can be subject to change during audit when the acceptability of the foreign income and taxes reported for purposes of this credit is determined. Additionally, some corporations provided preliminary foreign income and tax data with their U.S. tax returns because not all the information on their foreign operations was available at the time the U.S. income tax return was filed.

Returns with total assets of \$250 million or more accounted for virtually all of the foreign tax credit reported on corporation income tax returns. Because these returns were sampled at the 100 percent rate, data from them are not affected by sampling variability.

Statistical studies on the foreign income and tax data of U.S. corporations which claim a foreign tax credit are conducted biennially in even years. A more complete explanation of the limitations of these data,

and explanations of the terms used and applicable law changes, can be found in Statistics of Income--1976 - 1979, Supplemental Report, International Income and Taxes, Foreign Income and Taxes Reported on U.S. Income Tax Returns and in Statistics of Income--1974, Supplemental Report, International Income and Taxes, Foreign Tax Credit Claimed on Corporation Income Tax Returns.

#### NOTES AND REFERENCES

- [1] "Taxes paid" include taxes paid, accrued, and deemed paid.
- [2] Includes dividends constructively received, i.e., certain undistributed profits of foreign subsidiaries under specially defined circumstances and dividend gross-up resulting from taxes deemed paid by U.S. parent corporations. Taxes were considered deemed paid upon actual or constructive receipt of a dividend from a related foreign corporation of which the U.S. corporation owned at least 10 percent of the voting stock.
- [3] The five types of foreign income were: Section 904(d) Interest Income, Dividends from a DISC or Former DISC, Foreign Oil Related Income and All Other Income from Sources Without the U.S.
- [4] Department of Treasury, The Operation and Effect of the International Boycott Provisions of the Internal Revenue Code - Third Report, May 1982.

Figure D.--Returns With Total Assets of \$250 Million or More and With Foreign Tax Credit Supporting Schedules:  
Number of Returns, Foreign Income, Taxes, and Credit by Selected Industry, 1976 and 1978

[Money amounts are in millions of dollars]

Selected industry	Number of returns		Taxable income from all sources		Taxable income from foreign sources	
	1976	1978	1976	1978	1976	1978
	(1)	(2)	(3)	(4)	(5)	(6)
All industrial divisions.....	760	878	104,585	128,391	52,980	62,486
Mining.....	21	23	28,100	26,512	27,528	25,878
Oil and gas extraction.....	12	18	27,507	26,141	27,204	25,734
Manufacturing.....	372	418	58,295	75,540	19,306	26,268
Petroleum (including integrated) and coal products.....	20	22	16,072	16,555	8,658	10,000
Transportation and public utilities.....	45	50	6,414	9,339	275	751
Wholesale and retail trade.....	42	53	3,412	4,082	1,444	1,230
Finance, insurance, and real estate.....	256	307	7,556	11,587	4,080	7,914

Selected industry	U.S. tax before credits		Foreign taxes paid		Foreign tax credit claimed	
	1976	1978	1976	1978	1976	1978
	(7)	(8)	(9)	(10)	(11)	(12)
All industrial divisions.....	49,788	60,965	38,310	39,587	22,717	25,452
Mining.....	13,493	12,671	25,892	24,025	13,162	12,321
Oil and gas extraction.....	13,205	12,516	25,747	23,974	13,022	12,270
Manufacturing.....	27,597	35,693	10,490	13,442	7,957	11,210
Petroleum (including integrated) and coal products.....	7,637	7,808	6,528	6,870	4,070	4,664
Transportation and public utilities.....	3,089	4,527	90	199	83	209
Wholesale and retail trade.....	1,631	1,930	968	788	631	517
Finance, insurance, and real estate.....	3,593	5,516	767	993	771	1,066











Table 1. — Total Assets, Income, Taxes and Credits and Foreign Income, Taxes and Credit, by Major Industry — Continued

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

Major industry	Foreign income and taxes reported on Form 1118 — Continued									
	Deductions other than from branch operations and specially allocable income — Continued			Deductions from oil and gas extraction income			Taxable income (less loss)			
	Deductions not allocable to specific types of income — Continued			Total	Allocable to specific types of income	Not allocable to specific types of income	Before loss recapture			
	Research and development expenses	Interest expenses	General and administrative expenses				Total	Foreign branch income	Specially allocable income (Section 863(B))	Other than from branch operations and specially allocable income
(41)	(42)	(43)	(44)	(45)	(46)	(47)	(48)	(49)	(50)	
All industries .....	94,859	283,614	245,599	21,491,295	18,853,852	2,637,443	65,150,411	11,274,653	929,496	52,946,263
Agriculture, forestry, and fishing .....	—	—	—	—	—	—	*35,310	—	—	*35,310
Mining .....	377	28,578	10,581	10,980,579	8,977,468	2,003,112	26,329,075	602,653	1,706	25,724,716
Metal mining .....	—	—	—	—	—	—	*177,239	*2,729	—	*174,510
Coal mining .....	—	—	—	—	—	—	4,004	—	—	4,004
Oil and gas extraction .....	377	28,578	10,581	10,980,579	8,977,468	2,003,112	26,143,653	598,790	1,706	25,543,157
Nonmetallic minerals, except fuels .....	—	—	—	—	—	—	4,179	1,134	—	3,045
Construction .....	—	42	—	6,153	5,904	249	322,734	13,142	-123	309,716
General building contractors and operative builders .....	—	—	—	6,153	5,904	249	113,493	101	-123	113,516
Heavy construction contractors .....	—	42	—	—	—	—	193,064	11,459	—	181,605
Special trade contractors .....	—	—	—	—	—	—	16,177	5,822	—	14,595
Manufacturing .....	90,947	87,000	230,106	2,370,598	1,747,758	622,840	27,582,786	5,605,850	875,595	21,101,340
Food and kindred products .....	2,363	7,646	20,773	—	—	—	1,259,126	40,789	10,188	1,208,149
Tobacco manufactures .....	—	—	—	5,340	5,340	—	37,925	-12,731	32,814	117,842
Textile mill products .....	—	—	—	—	—	—	33,217	340	206	32,672
Apparel and other textile products .....	—	—	—	—	—	—	146,427	7,233	66	139,127
Lumber and wood products .....	46	190	56	—	—	—	67,669	38	15,165	52,465
Furniture and fixtures .....	2	(1)	3	—	—	—	7,487	—	—	7,487
Paper and allied products .....	96	874	2,522	—	—	—	469,228	1,583	14,423	453,222
Printing and publishing .....	—	37	171	—	—	—	245,366	37,098	4,874	203,393
Chemicals and allied products .....	28,987	13,963	32,096	49,430	49,430	—	3,021,265	436,045	125,290	2,459,930
Petroleum (including integrated) and coal products .....	—	2,084	—	2,311,991	1,689,151	622,840	10,004,839	4,121,778	32,713	5,850,348
Rubber and miscellaneous plastics products .....	21,072	12,267	20,673	—	—	—	352,431	4,766	1,445	346,220
Leather and leather products .....	—	—	—	—	—	—	7,778	668	—	7,110
Stone, clay, and glass products .....	1,100	1,307	1,366	—	—	—	306,050	13,512	583	291,955
Primary metal industries .....	3,583	6,115	6,592	—	—	—	835,440	204,937	4,217	626,286
Fabricated metal products .....	3,372	6,463	12,676	1,149	1,149	—	501,946	63,736	3,262	434,948
Machinery, except electrical .....	7,030	8,529	14,143	—	—	—	4,437,551	182,806	154,761	4,099,983
Electrical and electronic equipment .....	—	2,787	2,167	2,688	2,688	—	1,772,694	380,798	77,949	1,313,946
Motor vehicles and equipment .....	12,857	16,455	113,054	—	—	—	2,659,456	56,279	318,048	2,285,129
Transportation equipment, except motor vehicles .....	5,824	982	1,032	—	—	—	429,079	4,035	2,144	422,900
Instruments and related products .....	696	712	1,481	—	—	—	774,751	61,838	80,922	631,991
Miscellaneous manufacturing and manufacturing not allocable .....	1,133	839	1,300	—	—	—	113,062	302	-3,477	116,237
Transportation and public utilities .....	—	835	443	60,229	58,793	1,437	808,392	87,188	50,456	670,749
Transportation .....	—	—	—	58	58	—	448,595	36,508	54,060	358,028
Communication .....	—	—	—	—	—	—	244,205	13,526	-20,239	250,917
Electric, gas, and sanitary services .....	—	835	443	60,171	58,735	1,437	115,591	37,154	16,635	61,803
Wholesale and retail trade .....	—	2,284	(1)	8,068,754	8,062,863	5,890	1,464,847	306,125	-1,227	1,159,949
Wholesale trade .....	—	327	(1)	8,063,216	8,057,326	5,890	1,194,291	272,723	-826	922,394
Groceries and related products .....	—	—	—	—	—	—	6,755	-142	—	6,897
Machinery, equipment, and supplies .....	—	114	—	—	—	—	80,174	22,591	—	57,582
Miscellaneous wholesale trade .....	—	213	(1)	8,063,216	8,057,326	5,890	1,107,363	250,274	-826	857,914
Drugs, drug proprietaries and druggists' sundries .....	—	—	—	—	—	—	*1,258	*261	—	*996
Chemicals and allied products .....	—	—	—	—	—	—	*14,431	*5,728	—	*8,703
Petroleum and petroleum products .....	—	183	—	8,056,727	8,050,837	5,890	857,527	228,500	-699	629,725
Other miscellaneous wholesale trade .....	—	30	(1)	6,489	6,489	—	234,147	15,784	-127	218,489
Retail trade .....	—	1,956	—	5,538	5,538	—	270,556	33,402	-401	237,555
Building materials, garden supplies, and mobile home dealers .....	—	—	—	—	—	—	206	—	—	206
General merchandise stores .....	—	—	—	—	—	—	166,310	22,916	—	143,394
Food stores .....	—	—	—	—	—	—	51,939	1,459	—	50,479
Automotive dealers and service stations .....	—	—	—	—	—	—	74	—	—	74
Apparel and accessory stores .....	—	—	—	—	—	—	*527	—	—	*527
Furniture and home furnishings stores .....	—	—	—	—	—	—	283	—	—	283
Eating and drinking places .....	—	1,929	—	—	—	—	18,700	2,506	—	16,194
Miscellaneous retail stores .....	—	27	—	5,538	5,538	—	32,517	6,520	-401	26,398
Finance, insurance, and real estate .....	2,374	164,795	3,962	4,982	1,066	3,916	8,083,929	4,646,339	2,692	3,434,897
Banking .....	2,374	164,757	2,503	—	—	—	6,733,045	4,471,631	-1,728	2,263,142
Credit agencies other than banks .....	—	—	—	—	—	—	143,236	40,824	2,199	100,213
Security, commodity brokers and services .....	—	—	—	—	—	—	25,037	5,581	1	19,455
Insurance .....	—	38	1,459	4,893	977	3,916	1,005,287	126,875	2,220	876,192
Insurance agents brokers and services .....	—	—	—	—	—	—	32,846	305	—	32,540
Real estate .....	—	—	—	—	—	—	17,522	1,124	—	16,398
Holding and other investment companies except bank holding companies .....	—	—	—	89	89	—	126,956	—	—	126,956
Services .....	1,160	79	506	—	—	—	523,339	13,355	398	509,586
Hotels and other lodging places .....	—	—	—	—	—	—	—	*15,681	—	*14,337
Personal services .....	—	—	—	—	—	—	*15,093	*87	—	*15,006
Business services .....	1,160	79	506	—	—	—	178,428	12,586	347	165,495
Auto repair, miscellaneous repair services .....	—	—	—	—	—	—	*359	—	—	*359
Amusement and recreational services .....	—	—	—	—	—	—	251,244	-6,048	—	257,292
Other services .....	—	—	—	—	—	—	62,533	5,387	50	57,096
Nature of business not allocable .....	—	—	—	—	—	—	1	—	—	1

Footnotes at end of table.

## All Corporation Returns with Foreign Tax Credit, 1978

Table 1. — Total Assets, Income, Taxes and Credits and Foreign Income, Taxes and Credit, by Major Industry — Continued

(All figures are estimates based on samples — money amounts are in thousands of dollars)

Major industry	Foreign income and taxes reported on Form 1118 — Continued									
	Taxable income (less loss) — Continued		Foreign taxes available for credit							
	Recapture of prior year foreign losses	After loss recapture	Total after reduction	Reduction for certain foreign taxes	Total before reduction	Total	Paid or accrued:			Other taxes paid or accrued on
							Tax withheld at source on			
(51)	(52)	(53)	(54)	(55)	(56)	Dividends	Interest	Rents, royalties and license fees	Branch income	(60)
All Industries .....	96,775	65,053,636	52,064,242	7,848,217	59,912,459	33,373,811	903,173	368,238	427,628	5,036,283
Agriculture, forestry, and fishing .....	—	*35,310	*13,238	*510	*13,748	*7,218	—	*54	*59	—
Mining .....	2,869	26,326,205	36,253,031	5,844,432	42,097,463	24,277,648	5,701	3,648	6,321	478,045
Metal mining .....	—	*177,239	*84,997	*1,617	*86,614	*17,793	*1,547	*1,706	*418	*1,234
Coal mining .....	—	4,004	1,654	—	1,654	1,654	1	99	3	—
Oil and gas extraction .....	2,869	26,140,783	36,164,219	5,842,815	42,007,035	24,256,544	4,096	1,835	5,898	476,233
Nonmetallic minerals, except fuels .....	—	4,179	2,161	—	2,161	1,658	57	9	1	579
Construction .....	6,336	316,398	139,660	5,726	145,386	68,781	5,673	318	1,006	6,336
General building contractors and operative builders .....	5,625	107,868	58,084	5,598	63,682	31,200	1,016	38	112	—
Heavy construction contractors .....	18	193,047	77,585	128	77,713	35,810	4,229	232	612	5,702
Special trade contractors .....	693	15,483	3,991	—	3,991	1,771	427	48	282	634
Manufacturing .....	79,401	27,503,385	13,295,106	1,715,718	15,010,824	7,818,266	814,474	76,144	345,061	4,066,313
Food and kindred products .....	8,326	1,250,800	577,766	352	578,118	192,460	54,495	8,557	21,228	31,001
Tobacco manufactures .....	—	137,925	124,794	6,508	131,302	36,776	2,774	473	4,668	21
Textile mill products .....	—	33,217	10,762	—	10,762	3,886	1,115	399	1,405	255
Apparel and other textile products .....	—	146,427	58,381	—	58,381	13,061	3,922	352	5,767	2,305
Lumber and wood products .....	—	67,669	22,024	—	22,024	3,583	1,751	1,359	230	172
Furniture and fixtures .....	—	7,487	3,334	—	3,334	854	412	33	301	—
Paper and allied products .....	45	469,182	189,291	—	189,291	38,386	22,192	4,148	9,670	1,304
Printing and publishing .....	98	245,268	89,997	55	90,052	33,622	8,270	1,164	4,406	16,883
Chemicals and allied products .....	657	3,020,607	1,243,481	16,867	1,260,347	442,680	107,787	12,793	61,605	209,832
Petroleum (including integrated) and coal products .....	27,922	9,976,917	5,725,698	1,685,974	7,411,672	5,436,284	74,504	7,218	6,248	3,385,745
Rubber and miscellaneous plastics products .....	1,411	351,020	147,063	2	147,065	46,156	20,434	1,482	18,511	1,730
Leather and leather products .....	—	7,778	4,264	9	4,273	2,191	145	19	429	229
Stone, clay, and glass products .....	—	306,500	119,516	258	119,773	34,995	14,857	1,959	8,963	5,879
Primary metal industries .....	27,427	808,013	423,501	4,712	428,213	144,811	20,541	3,508	15,463	73,381
Fabricated metal products .....	5,033	496,913	207,708	6	207,715	65,838	23,705	1,291	9,117	27,324
Machinery, except electrical .....	166	4,437,385	1,960,811	122	1,960,933	454,218	178,071	19,638	101,985	109,271
Electrical and electronic equipment .....	6,834	1,765,860	815,380	811	816,191	324,406	62,032	5,625	35,673	153,790
Motor vehicles and equipment .....	—	2,659,456	1,078,726	13	1,078,739	237,969	174,192	6,171	18,398	22,891
Transportation equipment, except motor vehicles Instruments and related products .....	1,480	429,079	183,900	—	183,900	29,104	8,143	812	7,556	1,626
Miscellaneous manufacturing and manufacturing not allocable .....	—	113,062	48,413	—	48,413	10,006	5,073	502	2,650	622
Transportation and public utilities .....	1,438	806,953	255,470	5,347	260,817	117,480	11,149	2,802	13,193	17,072
Transportation .....	7	448,588	123,629	1,869	125,498	41,993	3,540	1,151	5,727	5,202
Communication .....	—	244,205	63,397	—	63,397	22,943	4,008	1,348	6,245	6,120
Electric, gas, and sanitary services .....	1,431	114,161	68,445	3,478	71,923	52,544	3,601	304	1,221	5,749
Wholesale and retail trade .....	3,940	1,460,907	750,044	273,024	1,023,068	301,940	30,765	7,522	5,659	200,930
Wholesale trade .....	2,559	1,191,733	606,415	273,024	879,439	270,200	17,543	6,150	4,117	195,755
Groceries and related products .....	—	6,755	1,412	—	1,412	697	22	174	80	233
Machinery, equipment, and supplies .....	—	80,174	17,886	—	17,886	11,326	503	347	1,546	6,979
Miscellaneous wholesale trade .....	2,559	1,104,804	587,117	273,024	860,141	258,177	17,018	5,830	2,491	188,543
Drugs, drug proprietaries and druggists' sundries .....	—	*1,258	*261	—	*261	*192	*36	*4	—	*153
Chemicals and allied products .....	*1,887	*12,544	*7,740	—	*7,740	*4,653	*1,357	*51	*428	*2,808
Petroleum and petroleum products .....	401	857,126	505,419	273,006	778,425	226,604	10,146	1,134	6	177,140
Other miscellaneous wholesale trade .....	270	233,877	73,697	19	73,716	26,728	5,479	4,441	2,057	8,443
Retail trade .....	1,382	269,174	143,629	—	143,629	31,740	13,223	1,372	1,543	5,175
Building materials, garden supplies, and mobile home dealers .....	—	206	53	—	53	53	—	53	26	—
General merchandise stores .....	—	166,310	97,060	—	97,060	15,652	10,689	854	—	1,914
Food stores .....	1,321	50,818	25,424	—	25,424	3,937	853	114	564	808
Automotive dealers and service stations .....	—	74	29	—	29	3	—	—	—	—
Apparel and accessory stores .....	—	*527	*107	—	*107	*73	—	—	*46	—
Furniture and home furnishings stores .....	—	283	21	—	21	13	—	—	—	—
Eating and drinking places .....	—	18,700	7,288	—	7,288	4,967	699	154	673	1,088
Miscellaneous retail stores .....	61	32,456	13,647	—	13,647	7,043	981	188	233	1,365
Finance, insurance, and real estate .....	209	8,083,720	1,182,216	3,455	1,185,671	897,213	27,025	278,939	32,698	255,506
Banking .....	—	6,733,045	798,484	10	798,494	674,690	9,927	236,126	28,867	200,561
Credit agencies other than banks .....	—	143,236	49,399	2,853	52,051	24,046	8,429	8,407	381	2,193
Security, commodity brokers and services .....	—	25,037	4,205	235	4,441	3,649	125	182	—	3,114
Insurance .....	209	1,005,078	251,477	557	252,034	179,713	3,201	30,444	1,482	48,242
Insurance agents brokers and services .....	—	32,846	11,590	—	11,590	2,247	1,441	58	70	228
Real estate .....	—	17,522	5,008	—	5,008	4,359	202	1,026	1,849	1,168
Holding and other investment companies except bank holding companies .....	—	126,956	62,053	—	62,053	8,508	2,700	695	68	—
Services .....	2,581	520,757	175,477	4	175,482	85,264	8,386	811	23,631	12,081
Hotels and other lodging places .....	*1,127	*14,554	*8,047	—	*8,047	*4,320	—	*15	*3	*1,493
Personal services .....	—	*15,093	*8,550	—	*8,550	*2,123	*948	*72	*9	*84
Business services .....	266	178,182	82,087	3	82,090	25,633	4,822	586	2,500	8,066
Auto repair; miscellaneous repair services .....	—	*359	*54	—	*54	*54	—	*35	*17	—
Amusement and recreational services .....	14	251,230	48,432	1	48,433	29,568	2,289	91	20,709	1,453
Other services .....	1,174	61,359	28,307	—	28,307	23,566	427	11	392	985
Nature of business not allocable .....	—	1	( <sup>1</sup> )	—	( <sup>1</sup> )	( <sup>1</sup> )	—	( <sup>1</sup> )	( <sup>1</sup> )	—

Footnotes at end of table.

All Corporation Returns with Foreign Tax Credit, 1978

Table 1. — Total Assets, Income, Taxes and Credits and Foreign Income, Taxes and Credit, by Major Industry — Continued

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

Major industry	Foreign income and taxes reported on Form 1118 — Continued							
	Foreign taxes available for credit — Continued					Foreign tax credit computed		
	Paid or accrued			Deemed paid	Carryover	Before reduction for international boycott operations	Reduction for international boycott operations	After reduction for international boycott operations
	Service income	Partnership income	Other income					
(61)	(62)	(63)	(64)	(65)	(66)	(67)	(68)	
<b>All industries</b> .....	<b>233,717</b>	<b>93,581</b>	<b>26,311,192</b>	<b>7,278,632</b>	<b>19,260,016</b>	<b>26,345,731</b>	<b>1,060</b>	<b>26,344,670</b>
<b>Agriculture, forestry, and fishing</b> .....	—	—	<b>*7,106</b>	<b>*5,936</b>	<b>*594</b>	<b>*13,210</b>	—	<b>*13,210</b>
<b>Mining</b> .....	<b>11,177</b>	<b>65,115</b>	<b>23,707,641</b>	<b>74,746</b>	<b>17,745,069</b>	<b>12,512,775</b>	<b>2</b>	<b>12,512,774</b>
Metal mining.....	*12	—	*12,876	*53,129	*15,692	*63,516	—	*63,516
Coal mining.....	—	( <sup>1</sup> )	1,551	—	—	1,654	—	1,654
Oil and gas extraction.....	11,165	64,208	23,693,109	21,338	17,729,153	12,445,706	2	12,445,705
Nonmetallic minerals, except fuels.....	—	906	106	279	224	1,899	—	1,899
<b>Construction</b> .....	<b>20,315</b>	<b>2,969</b>	<b>32,164</b>	<b>59,423</b>	<b>17,182</b>	<b>115,479</b>	—	<b>115,479</b>
General building contractors and operative builders.....	13,669	1,135	15,231	21,921	10,561	46,950	—	46,950
Heavy construction contractors.....	6,361	1,835	16,838	35,356	6,547	64,566	—	64,566
Special trade contractors.....	285	—	95	—	74	3,963	—	3,963
<b>Manufacturing</b> .....	<b>137,127</b>	<b>8,820</b>	<b>2,170,327</b>	<b>6,271,450</b>	<b>1,121,108</b>	<b>11,650,229</b>	<b>1,051</b>	<b>11,649,179</b>
Food and kindred products.....	4,811	41	75,026	366,553	19,105	539,759	148	539,611
Tobacco manufactures.....	94	—	1,643	23,269	71,256	49,588	—	49,588
Textile mill products.....	424	—	288	6,327	549	10,102	—	10,102
Apparel and other textile products.....	140	—	575	44,868	452	58,027	—	58,027
Lumber and wood products.....	4	—	66	16,592	1,849	20,377	—	20,377
Furniture and fixtures.....	4	—	103	2,335	146	3,134	—	3,134
Paper and allied products.....	395	—	678	150,765	140	188,573	—	188,573
Printing and publishing.....	73	1,181	1,643	53,036	3,394	88,120	—	88,120
Chemicals and allied products.....	4,257	910	45,495	751,363	66,305	1,155,909	41	1,155,869
Petroleum (including integrated) and coal products.....	79,015	20	1,883,534	1,434,343	541,045	4,665,180	—	4,665,180
Rubber and miscellaneous plastics products.....	2,200	38	1,761	100,350	558	112,416	17	112,400
Leather and leather products.....	5	—	1,365	604	1,479	2,493	—	2,493
Stone, clay, and glass products.....	1,232	—	2,106	80,149	4,628	114,951	4	114,947
Primary metal industries.....	591	3,735	27,592	126,762	156,639	322,824	—	322,824
Fabricated metal products.....	306	—	4,094	130,439	11,438	197,797	8	197,789
Machinery, except electrical.....	2,442	143	42,868	1,485,869	20,846	1,912,494	486	1,912,008
Electrical and electronic equipment.....	18,753	2,626	45,906	327,819	163,966	723,325	16	723,309
Motor vehicles and equipment.....	14,135	126	2,058	831,972	8,798	1,037,232	1	1,037,231
Transportation equipment, except motor vehicles.....	7,483	—	3,484	116,811	37,985	150,851	109	150,742
Instruments and related products.....	179	—	2,564	190,506	2,841	255,175	220	254,955
Miscellaneous manufacturing and manufacturing not allocable.....	584	( <sup>1</sup> )	575	30,719	7,688	41,903	—	41,903
<b>Transportation and public utilities</b> .....	<b>27,043</b>	<b>2,038</b>	<b>44,185</b>	<b>95,415</b>	<b>47,923</b>	<b>222,337</b>	—	<b>222,337</b>
Transportation.....	16,637	148	9,589	45,872	37,632	113,637	—	113,637
Communication.....	1,017	—	4,206	40,438	16	61,965	—	61,965
Electric, gas, and sanitary services.....	9,389	1,889	30,390	9,105	10,274	46,736	—	46,736
<b>Wholesale and retail trade</b> .....	<b>7,532</b>	—	<b>49,531</b>	<b>568,720</b>	<b>152,409</b>	<b>591,519</b>	<b>8</b>	<b>591,511</b>
Wholesale trade.....	6,726	—	39,909	484,006	125,233	475,945	8	475,937
Groceries and related products.....	94	—	95	533	183	1,271	—	1,271
Machinery, equipment, and supplies.....	1,229	—	722	5,139	1,421	16,385	3	16,382
Miscellaneous wholesale trade.....	5,403	—	39,092	478,335	123,629	458,289	6	458,284
Drugs, drug proprietaries and druggists' sundries.....	—	—	—	( <sup>1</sup> )	*68	*161	—	*161
Chemicals and allied products.....	( <sup>1</sup> )	—	*10	*3,008	*80	*5,904	—	*5,904
Petroleum and petroleum products.....	938	—	37,240	439,867	111,954	391,338	6	391,333
Other miscellaneous wholesale trade.....	4,465	—	1,843	35,460	11,527	60,887	—	60,887
Retail trade.....	806	—	9,622	84,714	27,175	115,574	—	115,574
Building materials, garden supplies, and mobile home dealers.....	—	—	—	—	—	53	—	53
General merchandise stores.....	391	—	1,777	56,538	24,870	72,335	—	72,335
Food stores.....	20	—	1,578	20,638	849	23,643	—	23,643
Automotive dealers and service stations.....	—	—	3	27	—	26	—	26
Apparel and accessory stores.....	—	—	*26	—	*34	*82	—	*82
Furniture and home furnishings stores.....	4	—	—	8	—	21	—	21
Eating and drinking places.....	286	—	2,066	1,831	490	6,407	—	6,407
Miscellaneous retail stores.....	105	—	4,172	5,672	932	13,006	—	13,006
<b>Finance, insurance, and real estate</b> .....	<b>5,076</b>	<b>13,334</b>	<b>286,636</b>	<b>133,220</b>	<b>155,238</b>	<b>1,100,988</b>	<b>(<sup>1</sup>)</b>	<b>1,100,988</b>
Banking.....	1,083	43	198,084	42,850	80,954	767,858	—	767,858
Credit agencies other than banks.....	—	2,819	818	19,633	8,372	42,705	—	42,705
Security, commodity brokers and services.....	228	—	( <sup>1</sup> )	123	669	3,975	—	3,975
Insurance.....	3,637	10,319	82,409	15,131	57,190	218,951	—	218,951
Insurance agents brokers and services.....	46	108	295	9,150	193	11,573	—	11,573
Real estate.....	13	12	89	528	121	4,491	—	4,491
Holding and other investment companies except bank holding companies.....	70	33	4,941	45,805	7,740	51,435	( <sup>1</sup> )	51,435
<b>Services</b> .....	<b>25,448</b>	<b>1,305</b>	<b>13,603</b>	<b>69,724</b>	<b>20,493</b>	<b>139,193</b>	<b>(<sup>1</sup>)</b>	<b>139,193</b>
Hotels and other lodging places.....	—	—	*2,808	*1,640	*2,087	*6,091	—	*6,091
Personal services.....	*20	—	*1,090	*5,314	*1,113	*6,658	—	*6,658
Business services.....	8,640	702	317	40,357	16,099	60,129	( <sup>1</sup> )	60,129
Auto repair, miscellaneous repair services.....	*1	—	*1	—	—	*54	—	*54
Amusement and recreational services.....	646	69	4,310	18,489	377	48,132	—	48,132
Other services.....	16,142	534	5,075	3,925	817	18,128	—	18,128
<b>Nature of business not allocable</b> .....	—	—	—	—	—	( <sup>1</sup> )	—	( <sup>1</sup> )

\*This estimate should be used with caution because of the small number of sample returns on which it was based.  
<sup>1</sup>Less than \$500 per return.  
 NOTE: Detail may not add to total because of rounding.

Corporation Returns with Form 1118 Filed in Support of Foreign Tax Credit Claimed, 1978

Table 2. — Total Assets, Income, Taxes and Credits and Foreign Income, Taxes and Credit, by Size of Total Assets

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

Size of total assets	Number of returns	Total assets	Total receipts	Dividends received from foreign corporations	Dividends received from DISC's	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Net income (less deficit)	Western Hemisphere Trade Corporation deduction	Income subject to U.S. tax
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
<b>Total</b>	<b>5,219</b>	<b>2,708,678,170</b>	<b>1,781,831,854</b>	<b>8,498,048</b>	<b>2,926,552</b>	<b>1,446,428</b>	<b>7,273,586</b>	<b>146,555,196</b>	<b>268,852</b>	<b>141,684,455</b>
Zero assets	68	—	4,787,670	12,288	5,092	105	7,326	206,808	71	203,918
\$1 under \$1,000,000	1,062	449,617	802,144	1,971	54	—	375	85,785	—	73,404
\$1,000,000 under \$10,000,000	1,479	6,093,357	10,085,096	37,009	28,813	1,224	23,763	916,901	3,502	860,971
\$10,000,000 under \$50,000,000	976	23,861,865	37,200,618	116,121	74,698	17,557	89,781	3,176,946	2,231	3,062,221
\$50,000,000 under \$100,000,000	364	25,927,803	36,658,721	129,897	61,403	25,172	96,308	2,710,145	4,459	2,570,122
\$100,000,000 under \$250,000,000	392	63,313,382	80,925,993	297,805	142,594	52,527	226,622	6,718,058	4,268	6,522,404
\$250,000,000 under \$500,000,000	252	88,482,348	101,853,868	443,842	221,703	67,379	374,569	8,109,883	22,359	7,860,000
\$500,000,000 under \$1,000,000,000	195	137,500,143	140,354,679	543,187	239,437	100,009	422,064	10,159,496	15,981	9,871,223
\$1,000,000,000 or more	431	2,363,049,655	1,369,163,066	6,915,928	2,152,758	1,182,454	6,032,780	114,471,174	215,981	110,660,193

Size of total assets	U.S. income tax before credits		Foreign tax credit claimed	U.S. possessions tax credit	Investment credit	Work incentive (WIN) credit	Jobs credit	U.S. income tax after credits	Foreign income and taxes reported on Form 1118	
	Total	U.S. normal tax, surtax, and alternative tax							Gross income excluding branch operations and specially allocable income (less loss)	
									Total	Dividends
	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)
<b>Total</b>	<b>67,199,697</b>	<b>66,807,729</b>	<b>26,343,630</b>	<b>75,064</b>	<b>6,927,231</b>	<b>8,819</b>	<b>152,156</b>	<b>33,692,797</b>	<b>88,471,154</b>	<b>11,234,228</b>
Zero assets	97,638	94,435	14,469	—	13,529	2	682	68,956	591,227	12,682
\$1 under \$1,000,000	25,314	25,219	3,609	71	572	—	3,744	17,318	119,513	1,971
\$1,000,000 under \$10,000,000	387,828	386,126	70,871	1,421	17,186	39	21,472	276,839	437,132	49,943
\$10,000,000 under \$50,000,000	1,441,847	1,435,601	194,140	18,078	77,506	252	37,897	1,113,975	876,034	136,305
\$50,000,000 under \$100,000,000	1,208,326	1,201,735	151,250	2,236	98,714	111	17,828	938,187	576,192	160,365
\$100,000,000 under \$250,000,000	3,073,506	3,058,520	457,406	19,256	204,827	201	20,689	2,371,127	1,791,976	347,855
\$250,000,000 under \$500,000,000	3,720,583	3,697,178	678,706	34,003	309,733	453	11,996	2,685,692	2,225,836	532,162
\$500,000,000 under \$1,000,000,000	4,632,004	4,599,692	728,643	—	472,420	293	10,528	3,420,121	2,948,303	665,868
\$1,000,000,000 or more	52,612,649	52,309,223	24,044,536	—	5,732,744	7,467	27,320	22,800,582	78,904,939	9,327,078

Size of total assets	Foreign income and taxes reported on Form 1118 — continued									
	Gross income excluding branch operations and specially allocable income (less loss) — continued			Total gross income (less loss) from extraction of oil or gas	Total deductions excluding branch operations and specially allocable income	Total deductions from oil and gas extraction income	Taxable income (less loss)			
	Dividend gross-up	Interest	Other income				Before loss recapture			
							Total	Foreign branch income	Specially allocable income (Section 863(B))	Other than from branch operations and specially allocable income
	(21)	(22)	(23)	(24)	(25)	(26)	(27)	(28)	(29)	(30)
<b>Total</b>	<b>7,273,586</b>	<b>7,028,592</b>	<b>62,934,748</b>	<b>44,855,608</b>	<b>35,524,891</b>	<b>21,491,295</b>	<b>65,150,411</b>	<b>11,274,853</b>	<b>929,496</b>	<b>52,946,263</b>
Zero assets	7,326	316,497	254,722	2,174	487,296	—	101,239	—965	—1,728	103,931
\$1 under \$1,000,000	375	513	116,655	—	87,091	—	35,017	—	2,595	32,421
\$1,000,000 under \$10,000,000	23,763	7,257	356,169	11,805	230,110	3,187	243,545	35,804	719	207,022
\$10,000,000 under \$50,000,000	89,781	29,938	620,009	155,689	393,535	38,758	560,169	75,269	2,401	482,499
\$50,000,000 under \$100,000,000	96,308	30,743	288,775	48,767	163,363	18,145	446,416	24,194	9,393	412,829
\$100,000,000 under \$250,000,000	228,622	83,490	1,134,010	268,264	823,747	16,258	1,277,877	289,558	20,089	968,230
\$250,000,000 under \$500,000,000	374,569	99,950	1,219,155	498,985	807,861	116,815	1,753,826	300,441	35,410	1,417,975
\$500,000,000 under \$1,000,000,000	422,064	261,493	1,598,878	164,279	1,130,144	95,273	1,998,714	177,134	3,421	1,818,159
\$1,000,000,000 or more	6,032,780	6,198,710	57,346,372	43,705,645	31,401,743	21,202,860	58,733,609	10,373,217	857,195	47,503,196

Footnotes at end of table.

Table 2. — Total Assets, Income, Taxes and Credits and Foreign Income, Taxes and Credit, by Size of Total Assets — Continued

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

Size of total assets	Foreign income and taxes reported on Form 1118 — continued									
	Taxable income (less loss) — continued		Foreign taxes available for credit							
	Recapture of prior year foreign losses	After loss recapture	Total after reduction	Reduction for certain foreign taxes	Total before reduction	Paid or accrued on:				
						Total	Dividends	Interest	Rents, royalties and license fees	Branch income
(31)	(32)	(33)	(34)	(35)	(36)	(37)	(38)	(39)	(40)	
<b>Total</b>	<b>96,775</b>	<b>65,053,836</b>	<b>52,064,242</b>	<b>7,848,217</b>	<b>59,912,459</b>	<b>33,373,811</b>	<b>903,173</b>	<b>368,238</b>	<b>427,628</b>	<b>5,036,283</b>
Zero assets.....	—	101,239	15,916	9	15,925	8,235	2,005	4,426	373	105
\$1 under \$1,000,000.....	819	34,198	7,193	—	7,193	6,468	195	25	1,158	—
\$1,000,000 under \$10,000,000.....	3,711	239,834	92,618	—	92,618	52,242	2,804	772	9,628	12,849
\$10,000,000 under \$50,000,000.....	815	559,353	242,099	10,371	252,471	129,201	13,147	2,641	12,547	32,475
\$50,000,000 under \$100,000,000.....	2,187	444,229	180,115	7,358	187,474	66,318	17,639	2,029	9,867	10,727
\$100,000,000 under \$250,000,000.....	6,863	1,271,013	539,166	115,184	654,350	357,544	26,780	3,601	18,488	252,693
\$250,000,000 under \$500,000,000.....	4,024	1,749,803	732,808	68,756	821,566	414,216	46,372	6,129	26,852	208,415
\$500,000,000 under \$1,000,000,000.....	5,866	1,993,048	796,870	10,144	807,014	317,052	62,457	12,013	42,023	77,515
\$1,000,000,000 or more.....	72,689	58,660,920	49,457,456	7,616,392	57,073,849	32,022,535	731,774	336,602	306,891	4,441,503

Size of total assets	Foreign income and taxes reported on Form 1118 — continued					
	Foreign taxes available for credit — continued			Foreign tax credit computed		
	Paid or accrued on	Total deemed paid	Carryover available for credit	Before reduction for international boycott operations	Reduction for international boycott operations	After reduction for international boycott operations
(41)	(42)	(43)	(44)	(45)	(46)	
<b>Total</b>	<b>26,638,490</b>	<b>7,278,632</b>	<b>19,260,016</b>	<b>26,345,731</b>	<b>1,060</b>	<b>26,344,670</b>
Zero assets.....	1,326	7,327	363	14,469	—	14,469
\$1 under \$1,000,000.....	5,090	375	351	3,609	—	3,609
\$1,000,000 under \$10,000,000.....	26,190	23,763	16,613	70,879	3	70,877
\$10,000,000 under \$50,000,000.....	68,391	89,831	33,438	194,233	12	194,221
\$50,000,000 under \$100,000,000.....	26,057	96,613	24,542	151,259	—	151,259
\$100,000,000 under \$250,000,000.....	55,983	227,084	69,722	457,410	4	457,406
\$250,000,000 under \$500,000,000.....	126,648	374,643	32,706	678,708	1	678,707
\$500,000,000 under \$1,000,000,000.....	123,044	423,059	66,903	728,950	308	728,643
\$1,000,000,000 or more.....	26,205,764	6,035,936	19,015,377	24,046,213	732	24,045,480

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

Corporation Returns with Form 1118 Filed in Support of Foreign Tax Credit Claimed, 1978

Table 3.—Total Assets, Income, Taxes and Credits and Foreign Income, Taxes and Credit, by Type of Foreign Income for which Separate Credit was Computed

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

Type of foreign income for which separate credit was computed	Number of returns	Total assets	Total receipts	Dividends received from foreign corporations	Dividends received from DISC's	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Net income (less deficit)	Western Hemisphere Trade Corporation deduction	Income subject to U.S. tax
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
<b>Total</b>	<b>5,219</b>	<b>2,708,678,170</b>	<b>1,781,831,854</b>	<b>8,498,048</b>	<b>2,926,552</b>	<b>1,446,428</b>	<b>7,273,586</b>	<b>146,555,196</b>	<b>268,852</b>	<b>141,684,455</b>
Certain interest income	313	382,368,177	427,537,467	2,027,049	971,795	357,947	2,045,567	32,860,719	128,595	32,218,420
Dividends received from DISC's	61	113,420,624	142,101,978	1,184,482	790,340	156,024	909,685	13,614,938	18,779	13,530,682
Foreign oil related income	101	324,157,674	412,837,361	1,911,265	304,746	360,629	1,961,311	48,569,783	178,526	47,581,777
Income from U.S. possessions not elsewhere included	352	448,589,922	344,545,413	2,859,168	285,030	330,096	2,427,327	26,636,733	49,103	25,432,360
All other foreign source income	4,811	2,637,951,289	1,699,285,650	8,459,410	2,907,397	1,440,263	7,235,464	119,767,807	264,116	115,043,912

Type of foreign income for which separate credit was computed	U.S. income tax before credits		Foreign tax credit claimed	U.S. possessions tax credit	Investment credit	Work incentive (WIN) credit	Jobs credit	U.S. income tax after credits	Foreign income and taxes reported on Form 1118	
	Total	U.S. normal tax, surtax, and alternative tax							Gross income excluding branch operations and specially allocable income (less loss)	
									Total	Dividends
	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)
<b>Total</b>	<b>67,199,697</b>	<b>66,807,729</b>	<b>26,343,630</b>	<b>75,064</b>	<b>6,927,231</b>	<b>8,819</b>	<b>152,156</b>	<b>33,692,797</b>	<b>88,471,154</b>	<b>11,234,228</b>
Certain interest income	15,170,366	15,074,973	4,624,651	38,384	1,575,959	2,290	9,526	8,919,557	404,653	—
Dividends received from DISC's	6,498,155	6,475,880	1,170,297	—	697,956	5,170	3,738	4,620,994	783,150	779,335
Foreign oil related income	22,663,578	22,623,159	17,918,202	—	1,002,875	230	3,009	3,739,263	49,110,493	2,311,480
Income from U.S. possessions not elsewhere included	12,204,811	12,087,789	3,832,263	4,441	2,184,109	345	7,994	6,175,660	269,507	16,235
All other foreign source income	54,422,773	54,035,941	14,448,658	36,299	6,858,391	8,798	146,690	32,923,937	37,903,351	8,127,179

Type of foreign income for which separate credit was computed	Foreign income and taxes reported on Form 1118 — continued									
	Gross income excluding branch operations and specially allocable income (less loss) — continued			Total gross income (less loss) from extraction of oil or gas	Total deductions excluding branch operations and specially allocable income	Total deductions from oil and gas extraction income	Taxable income (less loss)			
	Dividend gross-up	Interest income	Other income				Before loss recapture			
	(21)	(22)	(23)	(24)	(25)	(26)	(27)	(28)	(29)	(30)
<b>Total</b>	<b>7,273,586</b>	<b>7,028,592</b>	<b>62,934,748</b>	<b>44,855,608</b>	<b>35,524,891</b>	<b>21,491,295</b>	<b>65,150,411</b>	<b>11,274,653</b>	<b>929,496</b>	<b>52,946,263</b>
Certain interest income	—	404,653	—	—	125,192	—	279,461	—	—	279,461
Dividends received from DISC's	3,815	—	—	—	299,986	—	483,164	—	—	483,164
Foreign oil related income	1,802,997	404,178	44,591,837	44,855,608	17,865,987	21,491,295	36,461,654	5,192,802	24,346	31,244,506
Income from U.S. possessions not elsewhere included	14,528	6,662	232,084	—	154,185	—	143,681	31,736	-3,378	115,323
All other foreign source income	5,452,246	6,213,099	18,110,827	—	17,079,541	—	27,782,452	6,050,115	908,528	20,823,809

Type of foreign income for which separate credit was computed	Foreign income and taxes reported on Form 1118 — continued									
	Taxable income (less loss) — continued			Foreign taxes available for credit						
	Recapture of prior year foreign losses	After loss recapture	Total after reduction	Reduction for certain foreign taxes	Total before reduction	Paid or accrued on:				
	(31)	(32)	(33)	(34)	(35)	(36)	(37)	(38)	(39)	(40)
<b>Total</b>	<b>96,775</b>	<b>65,053,636</b>	<b>52,064,242</b>	<b>7,848,217</b>	<b>59,912,459</b>	<b>33,373,811</b>	<b>903,173</b>	<b>368,238</b>	<b>427,628</b>	<b>5,036,283</b>
Certain interest income	1,954	277,507	13,233	—	13,233	12,994	—	12,994	—	—
Dividends received from DISC's	—	483,164	4,309	—	4,309	481	—	—	—	—
Foreign oil related income	32,793	36,428,861	42,375,084	7,833,404	50,208,488	29,975,045	59,197	1,391	6,604	4,148,152
Income from U.S. possessions not elsewhere included	—	143,681	38,857	—	38,857	23,724	550	946	1,865	8,912
All other foreign source income	62,028	27,720,424	9,632,759	14,813	9,647,572	3,361,567	842,945	352,907	419,158	879,219

Type of foreign income for which separate credit was computed	Foreign income and taxes reported on Form 1118 — continued						
	Foreign taxes available for credit — continued			Foreign tax credit computed			
	Paid or accrued on — continued	Total deemed paid	Carryover	Before reduction for international boycott operations	Reduction for international boycott operations	After reduction for international boycott operations	
							Other income
<b>Total</b>		<b>26,638,490</b>	<b>7,278,632</b>	<b>19,260,016</b>	<b>26,345,731</b>	<b>1,060</b>	<b>26,344,670</b>
Certain interest income	—	—	—	239	13,190	—	—
Dividends received from DISC's	—	—	3,828	—	4,281	—	—
Foreign oil related income	25,759,701	1,802,997	18,430,446	—	17,424,843	—	—
Income from U.S. possessions not elsewhere included	11,450	14,528	606	—	35,280	—	—
All other foreign source income	867,338	5,457,279	828,725	—	8,868,136	—	—

NOTE: The data in columns 1-18 pertain to the total activity of the domestic parent corporation. Since many firms compute a foreign tax credit for more than one type of foreign income, the data in these columns are not additive. The data in columns 45 and 46 are reported as corporate totals only, not by type of income. Form 1118 detail may not add to totals because of rounding.