

Controlled Foreign Corporations, 2000

by Lee Mahony and Jason Wenrich

For Tax Year 2000, the 7,500 largest foreign corporations controlled by large U.S. multinational corporations held \$4.4 trillion in assets and reported receipts of \$2.2 trillion. These amounts increased from Tax Year 1998 by 35.6 percent and 23.3 percent, respectively [1]. The 7,500 largest foreign corporations paid \$43.1 billion in income taxes on \$207.6 billion in earnings and profits (less deficit) before income taxes. These amounts are 24.2 percent and 44.3 percent increases from Tax Year 1998, respectively.

Almost 78 percent, or 5,849, of the 7,500 largest controlled foreign corporations (CFC's) were concentrated in three major industrial sectors: goods production, services, and finance, insurance, real estate, and rental and leasing. These three industrial sectors accounted for 84.5 percent of assets (\$3,688.7 billion), 70.6 percent of total receipts (\$1,522.9 billion), 69.0 percent of income taxes (\$29.8 billion), and 79.0 percent of earnings and profits (less deficit) before income taxes (\$164.0 billion).

For Tax Year 2000, the 7,500 largest CFC's were incorporated in 107 different countries [2]. Almost 53 percent, or 3,951 CFC's, were incorporated in Europe. More than 92 percent of these European CFC's were based in European Union countries. Latin America and Asia accounted for 16.5 percent and 11.1 percent of the 7,500 largest CFC's, respectively.

Controlled Foreign Corporations

Direct foreign investment by U.S. persons may take several forms, including establishing foreign branches, partnerships with foreign entities, and separate corporations. For U.S. income tax purposes, a foreign corporation is "controlled" if U.S. shareholders own more than 50 percent of its outstanding voting stock, or more than 50 percent of the value of all its outstanding stock (directly, indirectly, or constructively) on any day during the foreign corporation's tax year. A "noncontrolled" foreign corporation is any foreign corporation that fails to meet either of the above requirements for control.

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For purposes of determining control, a U.S. shareholder is defined as a U.S. person who owns 10 percent or more of the foreign corporation's total combined voting stock [3]. However, for SOI purposes, a foreign corporation is controlled only if one U.S. corporation satisfies either of the above 50-percent ownership requirements for an uninterrupted period of at least 30 days during the foreign corporation's tax year. For Tax Year 2000, there were 1,087 U.S. corporations that controlled the 7,500 largest CFC's.

In general, the foreign source income of a foreign corporation is not taxable to the U.S. shareholders until repatriated in the form of a dividend. Recognizing that income could be accumulated in a CFC, thus deferring U.S. tax on this income indefinitely, Congress enacted the Subpart F provisions of the Internal Revenue Code in 1962. These provisions require certain items of income to be treated as dividends deemed paid to the U.S. shareholders and, therefore, subject to U.S. taxation. Currently, a U.S. shareholder of a CFC may be required to include in gross income the shareholder's ratable share of the CFC's: (1) Subpart F income (see *Subpart F Income* in the *Explanation of Selected Terms*); (2) earnings invested in U.S. property; (3) previously excluded Subpart F income withdrawn from "qualified investments" in less developed countries and in "foreign base company" shipping operations; (4) previously excluded export trade income withdrawn from investment in export trade assets; and (5) factoring income (income derived from the acquisition of a trade or service receivable).

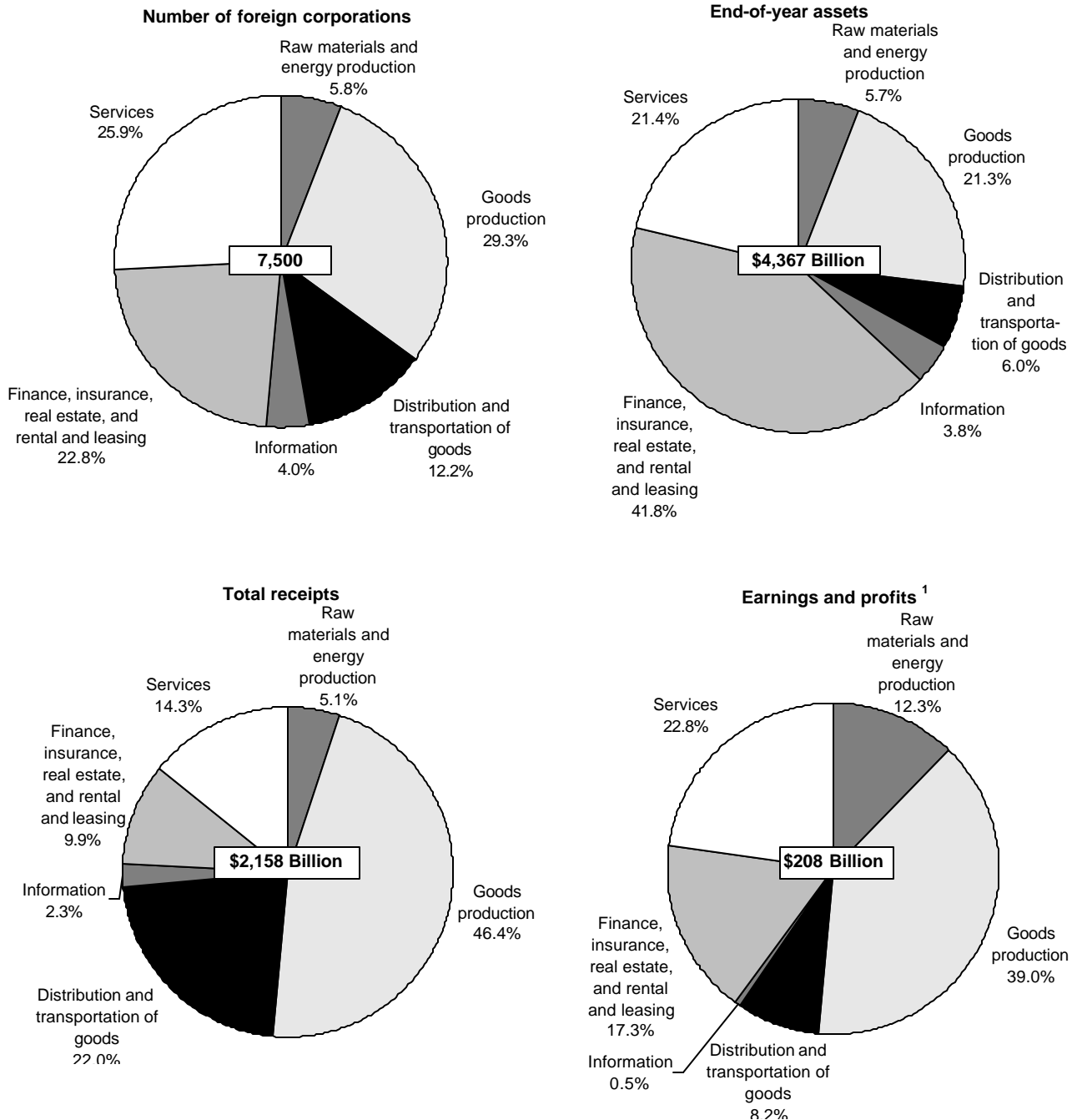
CFC's by Industrial Sector

For Tax Year 2000, CFC's engaged in finance, insurance, real estate, and rental and leasing accounted for 41.8 percent of end-of-year assets, 9.9 percent of total receipts, and 17.3 percent of current earnings and profits (less deficit) before income taxes reported by the 7,500 largest CFC's (Figure A and Table 1). Nearly 63 percent of the total receipts and 48.3 percent of earnings and profits (less deficit) before income taxes for this industrial grouping were accounted for by two subsectors: security, commodity contracts, and other financial investments and related products; and insurance carriers and related activities. Goods producers accounted for 21.3

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Figure A

U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, End-of-Year Assets, Receipts, and Earnings and Profits, by North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation, Tax Year 2000



¹ Less deficits and before income taxes.

NOTES: Includes "Nature of business not allocable," not shown separately. Detail may not add to 100 percent because of rounding.

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percent of end-of-year assets, 46.4 percent of total receipts, and 39.0 percent of earnings and profits (less deficit) before income taxes of the largest 7,500 CFC's. Chemical, computer and electronic product, and transportation equipment manufacturing collectively reported 60.8 percent of end-of-year assets, 63.0 percent of total receipts, and 62.5 percent of earnings and profits (less deficits) before income taxes for all goods producers.

The two major industrial sectors experiencing the largest growth between Tax Years 1998 and 2000 were services and information (Figure B). For Tax Year 2000, CFC's engaged in services reported \$933.0 billion in end-of-year assets, \$308.0 billion in total receipts, and \$47.2 billion in earnings and profits (less deficit) before income taxes. These amounts increased from Tax Year 1998 by 47.7 percent, 70.5 percent, and 54.1 percent, respectively. Over 92 percent of end-of-year assets, total receipts, and current earnings and profits (less deficit) before income taxes in services were reported by CFC's engaged in professional and business services, a group that includes the management of companies and enterprises sector. CFC's in the information sector reported \$165.9 billion in end-of-year assets and \$49.8 billion in total receipts for Tax Year 2000. These amounts increased from Tax Year 1998 by 130.9 percent and 53.3 percent, respectively.

While all major industrial sectors experienced considerable growth in end-of-year assets and total receipts between Tax Years 1998 and 2000, there was moderate change in the percentage of the largest 7,500 CFC's included in each major industrial sector. The percentage of the largest 7,500 CFC's engaged in goods production declined from 33.0 percent to 29.3 percent between Tax Years 1998 and 2000. CFC's included in the information sector grew from 2.9 percent of the largest 7,500 CFC's in Tax Year 1998 to 4.0 percent in Tax Year 2000. The services sector accounted for 23.6 percent of the largest 7,500 CFC's in Tax Year 1998 and 25.9 percent in Tax Year 2000.

Geographic Distribution of CFC's

For Tax Year 2000, Europe accounted for 61.2 percent of end-of-year assets, 54.3 percent of total receipts, and 55.4 percent of earnings and profits (less deficit) before income taxes for the 7,500 largest CFC's (Figure C and Tables 2 and 3). These amounts represent slight declines from Tax Year 1998 in the European-based CFC's share of the largest 7,500 CFC's total end-of-year assets, total receipts, and total earnings and profits (less deficit) before income taxes. The two geographic groupings with the smallest representation in the 7,500 largest CFC's were Africa and U.S. Possessions (including

Figure B

U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number and Receipts by Selected North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation, Tax Years 1998 and 2000

[Money amounts are in thousands of dollars]

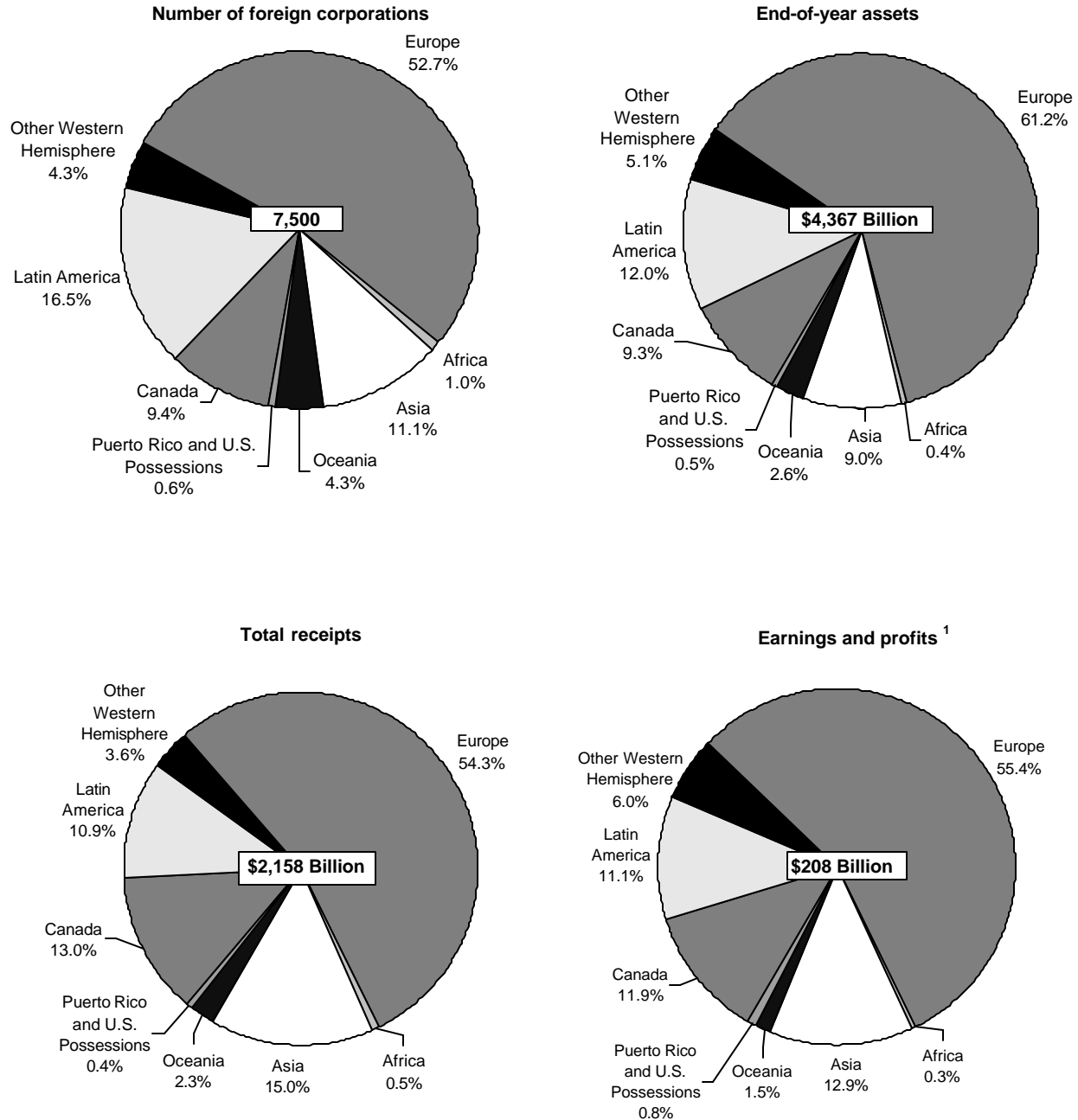
Industrial sector of 7,500 largest Controlled Foreign Corporations	Number of foreign corporations		Total receipts	
	1998	2000	1998	2000
	(1)	(2)	(3)	(4)
All industries ¹	7,500	7,500	1,749,516,820	2,157,736,289
Raw materials and energy production.....	405	435	71,311,519	109,464,006
Goods production.....	2,477	2,197	923,232,646	1,002,032,315
Distribution and transportation of goods.....	1,001	915	355,151,932	475,399,981
Information.....	216	298	32,507,167	49,818,018
Finance, insurance, real estate, and rental and leasing.....	1,612	1,713	185,490,963	212,915,499
Services.....	1,770	1,939	180,629,840	307,993,046

¹ Includes "Nature of business not allocable," not shown separately.

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Figure C

U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, End-of-Year Assets, Receipts, and Earnings and Profits, by Major Geographic Region of Incorporation of Controlled Foreign Corporation, Tax Year 2000



¹ Less deficits and before income taxes.
 NOTES: Detail may not add to 100 percent because of rounding.

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Puerto Rico). These two regions collectively accounted for less than 1.0 percent of end-of-year assets and total receipts and slightly more than 1.0 percent of earnings and profits (less deficit) before income taxes.

Two regions experienced significant growth between Tax Years 1998 and 2000. For Tax Year 2000, CFC's based in other Western Hemisphere countries reported \$221.2 billion in end-of-year assets, \$77.7 billion in total receipts, and \$12.5 billion in earnings and profits (less deficit) before income taxes. These amounts increased from Tax Year 1998 by 83.4 percent, 119.8 percent, and 186.8 percent, respectively. Asian CFC's reported \$392.1 billion in end-of-year assets, \$324.6 billion in total receipts, and \$26.8 billion in earnings and profits (less deficit) before income taxes. These totals represent increases from Tax Year 1998 of 34.7 percent, 46.0 percent, and 89.7 percent, respectively.

Figure D, which shows the number of CFC's and total receipts for selected countries for the largest 7,500 CFC's for Tax Years 1996, 1998, and 2000, indicates that several individual countries experienced large growth in total receipts between Tax Years 1996 and 2000. Total receipts of Chinese CFC's grew 167.1 percent despite only a 9.1-percent rise in the number of Chinese corporations included in the largest 7,500 CFCs. Total receipts of Venezuelan CFC's grew 117.9 percent between Tax Years 1996 and 2000. Mexican and Swiss CFC's also experienced large growth, reporting a 105.5-percent and 100.7-percent increase in total receipts, respectively, between Tax Years 1996 and 2000.

Profitability

For purposes of this article, two measures are used to assess pretax profitability for the 7,500 largest CFC's: rate of return on assets and profit margin. Rate of return on assets is defined as current earnings and profits (less deficit) before income taxes divided by end-of-year assets. Profit margin is defined as current earnings and profits (less deficit) before income taxes divided by total receipts.

Both measures of profitability increased from Tax Year 1992 to Tax Year 1996, decreased from Tax Year 1996 to Tax Year 1998, and increased again from Tax Year 1998 to Tax Year 2000. Between Tax Year 1992 and Tax Year 1996, the aggre-

gate rate of return on assets increased from 4.4 percent to 5.1 percent. The rate of return on assets fell to 4.5 percent in Tax Year 1998 before rising to 4.8 percent in Tax Year 2000. Profit margins increased from 5.7 percent in Tax Year 1992 to 8.4 percent in Tax Year 1996 before decreasing to 8.2 percent in Tax Year 1998. Profit margins then increased to a decade high of 9.6 percent in Tax Year 2000.

For Tax Year 2000, profitability measures varied among the six different major industrial sectors. Of the largest 7,500 CFC's, those engaged in raw materials and energy production reported a 10.3-percent rate of return on assets and a 23.4-percent profit margin. These CFC's reported a 5.6-percent rate of return on assets and a 13.9-percent profit margin for Tax Year 1998. CFC's involved in the service industry reported a 5.1-percent rate of return on assets and a 15.3-percent profit margin for Tax Year 2000. For Tax Year 1998, these CFC's reported a 4.9-percent rate of return on assets and a 17.0-percent profit margin.

Distributions of Earnings and Profits

The 7,500 largest CFC's distributed \$94.9 billion to U.S. and foreign shareholders out of earnings and profits in Tax Year 2000. Slightly more than 65 percent of distributions out of earnings and profits were from not previously taxed earnings and profits (\$62.0 billion), while the remainder was distributed from previously taxed earnings and profits (\$32.8 billion).

The majority of distributions out of earnings and profits are attributable to CFC's doing business in the goods production and services sectors. These two industrial sectors distributed \$56.6 billion out of earnings and profits or 59.7 percent of total distributions out of earnings and profits for all industries. Of this total, \$38.0 billion were from not previously taxed earnings and profits, with the remaining \$18.6 billion coming out of previously taxed earnings and profits. Several industrial sectors had significant increases of distributions out of earnings and profits from Tax Year 1998 to Tax Year 2000. CFC's engaged in the raw materials and energy production, information, and finance, insurance, real estate, and rental and leasing sectors reported increases of distributions out of earnings and profits of 59.3 percent, 70.2 percent, and 46.3 percent, respectively.

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Figure D

U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number and Receipts by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Years 1996, 1998, and 2000

[Money amounts are in millions of dollars]

Selected country	Number of foreign corporations			Total receipts		
	1996	1998	2000	1996	1998	2000
	(1)	(2)	(3)	(4)	(5)	(6)
All countries.....	7,500	7,500	7,500	1,676,659	1,749,517	2,157,736
Argentina.....	122	133	148	16,199	19,911	20,655
Australia.....	332	294	273	47,187	44,912	43,735
Austria.....	37	37	26	9,346	8,308	9,237
Bahamas.....	40	55	63	4,274	5,040	14,437
Belgium.....	206	171	141	33,721	29,869	28,826
Bermuda.....	163	164	181	16,949	18,554	44,997
Brazil.....	241	260	252	54,114	63,246	57,718
Canada.....	685	682	708	195,744	209,536	279,854
Cayman Islands (British).....	128	216	283	15,505	25,315	39,443
Chile.....	69	69	70	5,262	5,628	5,733
China.....	55	62	60	5,259	7,595	14,046
Colombia.....	31	30	30	4,222	4,081	3,359
Czech Republic.....	14	20	19	1,824	1,249	1,874
Denmark.....	38	39	48	4,603	4,355	5,547
Finland.....	22	18	20	2,649	3,029	3,850
France (including Andorra).....	521	479	410	108,632	100,922	91,435
Germany.....	535	516	431	184,869	172,700	144,302
Greece.....	22	14	6	2,638	1,411	705
Hong Kong.....	155	127	111	34,920	28,162	31,533
India.....	27	30	32	2,159	1,998	3,382
Indonesia.....	24	11	8	1,268	462	965
Ireland.....	135	157	176	19,338	30,729	49,368
Israel.....	15	22	33	2,699	3,776	7,021
Italy (including San Marino).....	295	242	197	61,410	58,879	46,973
Japan (including Okinawa and Ryukyu Islands).....	266	236	248	103,660	100,278	157,629
Liberia.....	22	18	16	3,615	3,561	2,194
Luxembourg.....	34	51	73	4,051	7,314	19,018
Malaysia.....	56	45	40	12,250	9,709	10,369
Mexico.....	201	244	271	41,564	51,502	85,409
Netherlands.....	462	523	554	117,047	168,177	219,551
Netherlands Antilles.....	46	26	27	909	901	931
New Zealand.....	61	40	38	6,074	4,782	3,869
Nigeria.....	9	8	9	1,998	1,289	875
Norway.....	36	45	30	8,045	9,077	12,376
Panama (including Canal Zone).....	40	34	37	5,554	4,023	3,514
Peru.....	14	20	19	1,444	2,082	1,499
Philippines.....	30	32	35	3,364	3,598	5,151
Poland.....	20	32	33	2,565	4,669	4,271
Portugal.....	47	39	29	5,436	5,476	4,982
Puerto Rico.....	31	37	42	3,104	5,276	8,910
Russia.....	**	17	10	**	1,321	1,560
Singapore.....	114	111	109	39,656	43,336	54,784
South Africa (including Namibia).....	27	32	24	3,472	4,278	4,424
South Korea, Republic of.....	52	41	62	10,795	5,644	14,948
Spain.....	203	177	151	38,921	38,256	36,404
Sweden.....	81	72	83	14,414	15,701	28,823
Switzerland.....	157	147	173	39,974	49,535	80,221
Taiwan.....	48	41	43	11,712	11,880	15,049
Thailand.....	51	40	37	8,944	4,550	8,026
Turkey.....	27	26	18	5,783	6,712	5,208
United Kingdom.....	1,200	1,255	1,291	310,606	301,366	372,709
Uruguay.....	17	12	11	456	363	599
Venezuela.....	43	47	52	5,214	8,951	11,360

** Not shown to avoid disclosure of information on specific corporations.

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European-based CFC's accounted for 57.2 percent (\$54.3 billion) of all distributions out of earnings and profits. Slightly more than 62 percent of these distributions were from not previously taxed earnings and profits (\$33.7 billion), with the remainder distributed from previously taxed earnings and profits (\$20.5 billion). Foreign entities incorporated in Asian countries distributed \$12.6 billion out of earnings and profits in Tax Year 2000. This represents an 81.6-percent increase over Tax Year 1998. Latin American-based CFC's distributed \$10.5 billion out of earnings and profits in Tax Year 2000, a 24.9-percent increase over Tax Year 1998.

From Tax Year 1998 to Tax Year 2000, four of the six major industrial sectors saw a decline in the taxable payout ratio, defined as taxable dividends paid to a U.S. person by a CFC with positive current earnings and profits net of current year Subpart F income divided by positive current earnings and profits net of current year Subpart F income (Figure E) (see definition of "U.S. person," "Current earnings and profits," and "Subpart F Income" in the *Explanation of Selected Terms*). Among the largest 7,500 CFC's, the taxable dividend payout ratio declined from 19.8 percent to 8.7 percent (a 56.1-percent decline) and from 25.2 percent to 15.2 percent (36.9 percent) for the distribution and transportation of

goods and services sectors, respectively [4]. From Tax Year 1998 to Tax Year 2000, foreign corporations engaged in the raw materials and energy production and information sectors reported increases in the taxable payout ratio from 21.9 percent to 23.6 percent (a 7.8-percent increase) and from 4.5 percent to 10.1 percent (124.4 percent), respectively [5].

Data Sources and Limitations

The statistics presented in this article are based on information collected from corporation tax returns with accounting periods ending July 2000 through June 2001 and their attached Form(s) 5471, *Information Return of U.S. Persons with Respect to Certain Foreign Corporations*. A U.S. corporation is required by Internal Revenue Service regulations to submit a Form 5471 for any Controlled Foreign Corporation (CFC) with an accounting period ending with or within the U.S. parent's accounting period. Thus, the CFC's accounting period may have ended as early as July 1999 and as late as June 2001. However, most CFC activity occurred in Calendar Year 2000.

These statistics report data for the largest (in terms of total assets (see definition of "Total assets" in the *Explanation of Selected Terms*)) active 7,500 foreign corporations controlled by U.S. corporations

Figure E

U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number of Foreign Corporations with Positive Current Earnings and Profits Net of Current Year Subpart F Income and Taxable Payout Ratios by Selected North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation, Tax Years 1998 and 2000

Industrial sector of 7,500 largest Controlled Foreign Corporations	Number of foreign corporations with positive current earnings and profits net of current year Subpart F income		Taxable payout ratio (percentage)	
	1998	2000	1998	2000
	(1)	(2)	(3)	(4)
All industries ¹	4,558	4,559	16.0	11.9
Raw materials and energy production.....	221	305	21.9	23.6
Goods production.....	1,747	1,578	12.9	10.2
Distribution and transportation of goods.....	610	567	19.8	8.7
Information.....	117	117	4.5	10.1
Finance, insurance, real estate, and rental and leasing.....	872	996	6.3	5.2
Services.....	982	994	25.2	15.2

¹ Includes "Nature of business not allocable," not shown separately.

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with total assets of \$500 million or more (see definition of “Active versus inactive Controlled Foreign Corporations” in the *Explanation of Selected Terms*). The 7,500 largest CFC’s accounted for 90.1 percent of total end-of-year assets, 80.5 percent of total receipts, and 88.1 percent of current earnings and profits (less deficit) before income taxes reported by all active CFC’s of these U.S. corporations with assets of \$500 million or more [6]. The amount of total assets for these 7,500 largest CFC’s ranged from approximately \$75 million to \$229 billion [7].

Since the 1,087 parent corporations with assets of \$500 million or more and CFC’s included in the largest 7,500 controlled foreign corporations were selected at a 100-percent rate for the Statistics of Income sample of all corporation income tax returns, the data are not subject to sampling variability, although they may be subject to nonsampling error.

Several limitations apply when making comparisons to prior-year statistics for the 7,500 largest CFC’s. First, the composition of the 7,500 largest CFC’s is not consistent across tax years. For example, approximately two thirds of the largest 7,500 CFC’s for Tax Year 2000 were also included in the 7,500 largest CFC’s for Tax Year 1998. Many of the 7,500 largest CFC’s for Tax Year 1998 that were not included among the largest 7,500 CFC’s for Tax Year 2000 were still controlled by U.S. corporations, but the size of their total assets for Tax Year 2000 excluded them from this group. In addition, some of the 7,500 largest CFC’s for Tax Year 1998 were not included for Tax Year 2000 because they were no longer “controlled” or because the size of the U.S. parent’s total assets had fallen under \$500 million.

Second, statistics previously published by Statistics of Income for tax years before 1986 were for all CFC’s controlled by U.S. corporations with total assets of \$250 million or more, not just the largest 7,500 CFC’s controlled by U.S. corporations with total assets of \$500 million or more. Therefore, the statistics for these years include smaller and inactive CFC’s. For this reason, comparisons between statistics on the largest CFC’s and statistics for years before 1986 should be made with caution.

Finally, caution should be used when comparing data by industrial groupings. For Tax Years 1998 and 2000, CFC’s were classified under the North American Industry Classification System (NAICS), which differs from the Standard Industrial Classifica-

tion (SIC) system used before Tax Year 1998. While most industries were not affected by the implementation of NAICS, the grouping of some economic activity was changed. The most significant change was the movement of the management of companies and enterprises sector from finance, insurance, real estate, and rental leasing under the SIC system to services under NAICS.

It should also be noted that the industrial mix of the 7,500 largest CFC’s is not representative of the industrial mix of all active foreign corporations controlled by U.S. corporations reporting \$500 million or more in assets. For example, 12.2 percent of the largest 7,500 CFC’s for Tax Year 2000 were primarily engaged in distribution and transportation of goods, while almost 21.0 percent of all active CFC’s of U.S. corporations reporting \$500 million or more in total assets were involved in the same sector [8]. Conversely, only 13.6 percent of all active CFC’s of U.S. corporations reporting \$500 million or more in total assets were classified in business in the finance, insurance, real estate, and rental and leasing sector, while 22.8 percent of the largest 7,500 CFC’s for Tax Year 2000 were engaged in this industrial sector [9]. Furthermore, CFC’s were classified by industry based on their principal business activity as reported on Form 5471. However, assets, receipts, and profits may have also been related to secondary business activities. It is not possible to measure the extent of these secondary business activities because these activities were not detailed on Form 5471.

Explanation of Selected Terms

Active versus inactive Controlled Foreign Corporations.--In general, a foreign corporation was considered “active” if earnings and profits, incomes taxes, receipts, expenses, or certain transactions between the foreign corporation and its subsidiaries or majority shareholder were reported on Form 5471, *Information Return of U.S. Persons with Respect to Certain Foreign Corporations*. The filing of Form 5471 was required even if a CFC was dormant or inactive for Tax Year 2000. All CFC’s included in the largest 7,500 CFC’s grouping were active for Tax Year 2000.

Controlled Foreign Corporation.--Section 957 of the Internal Revenue Code defines a foreign corporation as “controlled” if more than 50 percent of the total combined voting power of all classes of

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stock entitled to vote, or 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. A U.S. shareholder for purposes of determining control is defined as a "U.S. person" (see definition below) owning 10 percent or more of the foreign corporation's voting stock. For purposes of these statistics, a foreign corporation was "controlled" only if a single U.S. corporation satisfied the ownership requirements for an uninterrupted period of at least 30 days. A CFC could be controlled indirectly through a partnership if the U.S. corporation was a controlling partner. To the extent possible, these CFC's were also included in the statistics.

Country of incorporation.--The country of incorporation is the country under whose laws the CFC is legally created. The country of incorporation of a CFC was not necessarily the principal place of business. Two hundred eighty (3.7 percent) of the largest 7,500 CFC's reported a principal place of business other than their countries of incorporation for Tax Year 2000. Tables 2 and 3 provide data by country of incorporation; data by principal place of business are not included in these statistics.

Current earnings and profits.--"Current earnings and profits" represent the difference between total earnings and profits of the foreign corporation at the end of the current year (before reduction by dividends paid during the year) and the accumulated earnings and profits of the corporation at the beginning of the year. Although current earnings and profits typically are an after-tax measure of profits, they are shown in these statistics both before and after taxes. Earnings and profits are a tax concept referring to the economic capacity of a corporation to make a distribution to shareholders that is not a return on capital. The concept is similar to the notion of retained earnings. The term "earnings and profits" is not specifically defined in the Internal Revenue Code. In those instances where current earnings and profits were not reported for the foreign corporation, net income per books was used in the place of missing earnings and profits.

Distributions out of earnings and profits.--A distribution comes first from current earnings and profits and then from accumulated earnings and profits.

European Monetary Union.--The members of the European Monetary Union for all of Tax Year 2000 were: Austria, Belgium, Finland, France, Ger-

many, Ireland, Italy, Luxembourg, Netherlands, Portugal, and Spain. Greece joined the European Monetary Union in January 2001.

Income taxes.--CFC's reported income, war profits, and excess profits taxes paid or accrued for their annual accounting period to any foreign country or a U.S. Possession as income tax.

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

Previously taxed earnings and profits.--This includes any earnings and profit amounts that were subject to U.S. tax in the current year or in a prior year but not distributed. Previously taxed earnings and profits include amounts related to Subpart F income (see definition below), earnings related to investments in certain U.S. property, previously excluded Subpart F income withdrawn from qualified investments, previously excluded export trade income withdrawn from investment in export trade assets, factoring income, and earnings invested in excess passive assets.

Subpart F income.--Internal Revenue Code sections 951 and 952 stipulate specific cases in which earnings and profits are deemed to have been paid by a CFC to the U.S. shareholder. Such income is subject to U.S. tax whether or not it is repatriated to U.S. shareholders in the form of an actual dividend. Internal Revenue Code section 951 provides that U.S. shareholders include in their gross incomes certain undistributed profits of foreign corporations controlled by U.S. shareholders. Subpart F income from a CFC includes certain insurance income of U.S. risks, "foreign base company" income, international boycott participation income, bribes and other illegal payments to foreign government officials, and income from any country which the United States does not recognize or with which it has severed relations, or which repeatedly provides support for acts of international terrorism.

Total assets.--For purposes of determining the largest 7,500 CFC's for these statistics, total assets are defined as the larger of the foreign corporation's beginning-of-year and end-of-year assets.

Total receipts.--Total receipts equal business receipts (gross receipts from sales and operations), plus income from investment. In the statistics re-

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ported prior to 1990, business receipts were used to describe the larger of gross receipts from sales and operations and “total income.” The latter is a tax return concept used to describe the sum of business receipts less cost of sales and operations (i.e., gross profit), plus income (less loss) from investments.

U.S. person.--A U.S. person can be a U.S. citizen or resident, a domestic partnership, a domestic corporation, or an estate or trust (other than a foreign estate or trust whose income from sources outside the United States is not includable in the beneficiaries' gross incomes).

Notes and References

[1] Statistics of Income studies of Controlled Foreign Corporations are conducted for even-numbered tax years. For 1998 data, see Comisky, John, “Controlled Foreign Corporations, 1998,” *Statistics of Income Bulletin*, Winter 2002-2003, Volume 22, Number 3.

[2] Based on unpublished data.

[3] The current definition of a Controlled Foreign Corporation is given in Internal Revenue Code section 957. Ownership attribution rules are discussed in section 958.

[4] Based on unpublished data.

[5] Based on unpublished data.

[6] Based on unpublished data. For Tax Year 2000, there were 2,012 U.S. corporate returns with \$500 million or more in total assets with 52,409 active controlled foreign corporations. For Tax Year 2000, the 52,409 active CFC's reported total end-of-year assets of \$4,848.1 billion, total receipts of \$2,680.5 billion, and total current earnings and profits (less deficit) before income taxes of \$235.6 billion.

[7] Based on unpublished data.

[8] Based on unpublished data.

[9] Based on unpublished data.

Source: IRS Statistics of Income Bulletin, Summer 2004, Publication 1136 (Rev. 09-2004.)

Controlled Foreign Corporations, 2000

Table 1.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation

[Money amounts are in thousands of dollars]

Selected industrial sector of 7,500 largest Controlled Foreign Corporations	Number of U.S. corporation returns ¹	7,500 largest Controlled Foreign Corporations			
		Number of foreign corporations	Total assets		Total receipts
			Beginning of year	End of year	
	(1)	(2)	(3)	(4)	(5)
All industries.....	1,087	7,500	3,563,713,908	4,367,374,661	2,157,736,289
Raw materials and energy production.....	107	435	210,629,058	249,030,747	109,464,006
Agriculture, forestry, fishing, and hunting.....	15	27	9,431,242	5,040,554	4,025,386
Mining.....	63	248	111,404,874	124,352,183	56,670,339
Oil and gas extraction.....	46	189	94,833,978	103,432,694	49,221,824
Coal mining.....	3	5	797,946	634,891	202,275
Metal ore mining.....	8	21	9,228,417	11,124,300	3,790,541
Other mining.....	18	33	6,544,532	9,160,298	3,455,699
Utilities.....	36	160	89,792,942	119,638,010	48,768,282
Goods production.....	496	2,197	861,568,486	930,057,315	1,002,032,315
Construction.....	17	41	7,470,477	8,291,965	8,861,969
Building, developing, and general contracting.....	4	5	1,008,772	1,121,175	686,702
Heavy construction.....	4	10	2,346,392	2,629,139	2,570,333
Special trade contractors.....	9	26	4,115,313	4,541,650	5,604,934
Manufacturing.....	484	2,156	854,098,009	921,765,350	993,170,346
Food manufacturing.....	34	170	47,588,841	49,026,343	52,907,902
Beverage and tobacco product manufacturing.....	14	83	42,736,222	37,764,448	45,733,149
Textile mills and textile product mills.....	5	7	1,107,455	770,886	843,155
Apparel manufacturing.....	9	20	4,461,384	4,012,305	4,624,405
Wood product manufacturing.....	7	12	1,695,686	2,114,077	1,546,129
Paper manufacturing.....	29	96	35,317,507	36,107,708	20,589,018
Petroleum and coal products manufacturing.....	14	52	45,942,969	39,225,986	74,210,582
Chemical manufacturing.....	106	511	216,292,739	243,704,334	162,429,897
Pharmaceutical and medicine manufacturing.....	29	162	114,337,140	141,214,362	79,220,248
Other chemical manufacturing.....	85	349	101,955,599	102,489,971	83,209,649
Plastics and rubber products manufacturing.....	30	83	23,073,668	24,476,399	21,758,684
Nonmetallic mineral product manufacturing.....	16	51	24,097,287	25,396,229	9,185,264
Primary metal manufacturing.....	15	31	10,732,559	11,590,676	9,358,335
Fabricated metal product manufacturing.....	33	87	16,513,090	16,384,129	13,206,911
Machinery manufacturing.....	41	112	32,244,346	32,216,073	34,860,488
Computer and electronic product manufacturing.....	92	298	152,694,357	186,829,245	232,616,876
Electric equipment, appliance, and component manufacturing.....	47	120	22,035,658	27,009,074	28,263,878
Transportation equipment manufacturing.....	47	234	131,649,034	134,648,904	236,487,526
Motor vehicles and parts manufacturing.....	37	212	126,034,407	127,748,900	230,403,619
Other transportation equipment manufacturing.....	15	22	5,614,627	6,900,003	6,083,908
Furniture and related product manufacturing.....	6	8	1,131,436	1,786,199	1,413,435
Miscellaneous manufacturing.....	73	181	44,783,771	48,702,337	43,134,713

Footnotes at end of table.

Controlled Foreign Corporations, 2000

Table 1.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected industrial sector of 7,500 largest Controlled Foreign Corporations	Number of U.S. corporation returns ¹	7,500 largest Controlled Foreign Corporations			
		Number of foreign corporations	Total assets		Total receipts
			Beginning of year	End of year	
	(1)	(2)	(3)	(4)	(5)
Distribution and transportation of goods.....	290	915	235,698,565	263,081,889	475,399,981
Wholesale and retail trade.....	266	838	221,209,165	246,878,967	465,542,971
Wholesale trade.....	220	700	174,980,529	192,032,064	366,808,400
Machinery, equipment, and supplies wholesalers.....	29	88	29,218,635	36,468,936	63,730,075
Drugs and druggists' sundries wholesalers.....	20	60	17,637,895	20,149,938	21,967,953
Grocery and related product wholesalers.....	13	16	4,500,612	4,314,808	5,301,536
Petroleum and petroleum products wholesalers.....	13	68	26,343,697	23,441,688	71,746,897
Other wholesale trade.....	167	468	97,279,690	107,656,695	204,061,939
Retail trade.....	63	138	46,228,636	54,846,902	98,734,571
Motor vehicle dealers and parts dealers.....	5	14	1,096,347	2,190,444	3,786,341
Building materials and garden equipment and supplies dealers.....	3	8	1,677,165	1,947,417	2,581,198
Food and beverage stores.....	6	6	2,356,188	2,551,093	7,919,384
Clothing and clothing accessories stores.....	7	15	2,416,192	3,624,923	3,601,672
General merchandise stores.....	6	19	21,482,434	25,652,605	37,222,306
Other retailers.....	37	76	17,200,310	18,880,420	43,623,669
Transportation and warehousing.....	39	77	14,489,401	16,202,922	9,857,010
Transportation.....	29	64	11,971,722	12,949,638	8,580,928
Warehousing and storage.....	11	13	2,517,679	3,253,284	1,276,082
Information.....	85	298	114,288,514	165,895,788	49,818,018
Publishing industries.....	18	36	10,477,711	12,691,323	6,633,442
Broadcasting and telecommunications.....	43	198	85,714,520	134,473,709	31,064,751
Other information industries.....	27	64	18,096,282	18,730,756	12,119,825
Finance, insurance, real estate, and rental and leasing.....	360	1,713	1,418,627,626	1,825,708,854	212,915,499
Depository credit intermediation.....	31	123	156,376,234	204,329,920	18,599,199
Nondepository credit intermediation.....	105	356	268,347,697	308,442,542	30,852,167
Security, commodity contracts and other financial investments and related products.....	178	570	658,953,011	886,031,261	79,808,635
Insurance carriers and related activities.....	79	253	162,797,859	198,460,895	54,060,934
Funds, trusts, and other financial activities.....	71	173	115,375,525	155,541,662	16,298,792
Real estate and rental and leasing.....	73	238	56,777,300	72,902,575	13,295,772
Services.....	568	1,939	722,822,958	932,952,141	307,993,046
Professional and business services.....	553	1,812	689,802,418	898,823,111	286,015,044
Education, health, and social assistance.....	6	12	1,248,625	2,094,395	548,780
Leisure, accommodation, and food services.....	20	81	25,211,139	25,302,937	15,285,042
Other services.....	19	34	6,560,776	6,731,697	6,144,181
Nature of business not allocable.....	3	3	78,701	647,928	113,424

Footnotes at end of table.

Controlled Foreign Corporations, 2000

Table 1.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected industrial sector of 7,500 largest Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued					
	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes		
				Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes
	(6)	(7)	(8)	(9)	(10)	(11)
All industries.....	207,576,012	43,143,111	164,432,900	243,215,063	42,159,723	201,055,340
Raw materials and energy production.....	25,618,867	7,903,885	17,714,982	27,627,272	7,858,067	19,769,204
Agriculture, forestry, fishing, and hunting.....	80,118	12,021	68,097	129,364	4,781	124,583
Mining.....	21,879,373	7,547,828	14,331,544	23,150,120	7,480,758	15,669,361
Oil and gas extraction.....	21,687,364	7,301,689	14,385,675	22,359,410	7,280,959	15,078,451
Coal mining.....	-122,388	11,631	-134,019	27,777	11,288	16,490
Metal ore mining.....	36,133	87,353	-51,220	366,624	89,271	277,353
Other mining.....	278,263	147,155	131,108	396,307	99,240	297,067
Utilities.....	3,659,377	344,036	3,315,341	4,347,788	372,528	3,975,260
Goods production.....	80,911,319	17,212,236	63,699,083	91,707,861	16,957,678	74,750,183
Construction.....	874,850	214,756	660,094	921,128	209,979	711,149
Building, developing, and general contracting.....	93,776	19,193	74,584	93,776	19,193	74,584
Heavy construction.....	159,639	71,601	88,038	163,639	71,601	92,038
Special trade contractors.....	621,435	123,962	497,472	663,713	119,186	544,528
Manufacturing.....	80,036,470	16,997,480	63,038,989	90,786,732	16,747,699	74,039,034
Food manufacturing.....	4,222,530	1,115,503	3,107,027	4,558,814	1,109,431	3,449,383
Beverage and tobacco product manufacturing.....	6,955,717	1,391,495	5,564,222	7,120,335	1,392,587	5,727,748
Textile mills and textile product mills.....	87,039	29,369	57,669	90,480	29,369	61,111
Apparel manufacturing.....	413,590	38,308	375,282	436,409	36,210	400,199
Wood product manufacturing.....	61,127	24,897	36,229	78,529	25,473	53,055
Paper manufacturing.....	1,548,849	449,651	1,099,197	1,832,249	469,117	1,363,132
Petroleum and coal products manufacturing.....	3,418,399	1,199,994	2,218,406	4,099,510	1,195,622	2,903,888
Chemical manufacturing.....	26,817,021	4,042,459	22,774,562	28,317,084	3,974,158	24,342,926
Pharmaceutical and medicine manufacturing.....	18,690,520	2,184,520	16,505,999	19,215,826	2,131,652	17,084,174
Other chemical manufacturing.....	8,126,501	1,857,939	6,268,563	9,101,257	1,842,505	7,258,752
Plastics and rubber products manufacturing.....	1,400,650	355,980	1,044,670	1,563,781	355,115	1,208,667
Nonmetallic mineral product manufacturing.....	1,379,810	326,518	1,053,292	1,459,648	325,818	1,133,830
Primary metal manufacturing.....	1,347,155	446,723	900,432	1,434,017	440,128	993,889
Fabricated metal product manufacturing.....	712,976	215,194	497,782	790,581	205,578	585,003
Machinery manufacturing.....	1,562,215	455,503	1,106,712	2,052,975	440,676	1,612,299
Computer and electronic product manufacturing.....	17,032,926	3,439,318	13,593,608	20,194,172	3,309,276	16,884,896
Electric equipment, appliance, and component manufacturing.....	2,432,205	417,612	2,014,593	2,665,272	416,368	2,248,904
Transportation equipment manufacturing.....	6,742,697	2,107,621	4,635,076	9,750,773	2,113,160	7,637,614
Motor vehicles and parts manufacturing.....	6,066,381	1,977,483	4,088,898	9,015,017	1,983,016	7,032,001
Other transportation equipment manufacturing.....	676,315	130,137	546,178	735,757	130,144	605,613
Furniture and related product manufacturing.....	113,985	39,253	74,732	121,396	39,253	82,143
Miscellaneous manufacturing.....	3,787,580	902,081	2,885,500	4,220,709	870,361	3,350,348

Footnotes at end of table.

Controlled Foreign Corporations, 2000

Table 1.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected industrial sector of 7,500 largest Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued					
	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes		
				Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes
	(6)	(7)	(8)	(9)	(10)	(11)
Distribution and transportation of goods.....	16,919,764	4,447,881	12,471,883	20,529,594	4,233,135	16,296,459
Wholesale and retail trade.....	16,499,042	4,295,401	12,203,641	19,831,794	4,097,863	15,733,931
Wholesale trade.....	12,519,802	3,005,249	9,514,553	15,158,323	2,809,706	12,348,616
Machinery, equipment, and supplies wholesalers.....	2,312,457	417,981	1,894,476	2,596,906	394,354	2,202,552
Drugs and druggists' sundries wholesalers.....	2,689,324	533,450	2,155,875	2,817,846	531,273	2,286,573
Grocery and related product wholesalers.....	258,368	64,266	194,102	273,390	63,644	209,746
Petroleum and petroleum products wholesalers.....	-99,640	180,189	-279,829	843,372	128,278	715,094
Other wholesale trade.....	7,359,293	1,809,363	5,549,929	8,626,809	1,692,157	6,934,652
Retail trade.....	3,979,240	1,290,152	2,689,088	4,673,472	1,288,157	3,385,315
Motor vehicle dealers and parts dealers.....	-4,153	1,616	-5,768	47,269	506	46,762
Building materials and garden equipment and supplies dealers.....	63,790	52,673	11,117	93,011	51,171	41,840
Food and beverage stores.....	139,070	119,136	19,934	174,507	119,136	55,370
Clothing and clothing accessories stores.....	369,875	76,032	293,843	409,945	76,032	333,913
General merchandise stores.....	1,407,120	476,149	930,970	1,771,951	478,937	1,293,014
Other retailers.....	2,003,537	564,545	1,438,992	2,176,789	562,375	1,614,414
Transportation and warehousing.....	420,722	152,480	268,242	697,800	135,272	562,528
Transportation.....	420,393	144,191	276,203	670,651	132,885	537,766
Warehousing and storage.....	329	8,289	-7,960	27,149	2,387	24,762
Information.....	1,001,517	1,021,597	-20,081	7,319,600	1,013,341	6,306,259
Publishing industries.....	2,121,781	136,160	1,985,621	2,161,638	135,801	2,025,838
Broadcasting and telecommunications.....	-2,358,824	656,795	-3,015,619	3,543,931	597,068	2,946,863
Other information industries.....	1,238,560	228,642	1,009,918	1,614,030	280,472	1,333,559
Finance, insurance, real estate, and rental and leasing.....	35,858,768	6,541,456	29,317,313	40,663,041	6,393,611	34,269,430
Depository credit intermediation.....	4,692,564	980,172	3,712,392	4,843,715	979,104	3,864,611
Nondepository credit intermediation.....	6,820,541	1,262,207	5,558,335	7,762,054	1,233,784	6,528,270
Security, commodity contracts and other financial investments and related products.....	13,457,056	2,376,297	11,080,760	14,541,378	2,304,853	12,236,526
Insurance carriers and related activities.....	3,851,586	1,022,225	2,829,361	5,573,622	1,025,067	4,548,555
Funds, trusts, and other financial activities.....	4,384,092	519,814	3,864,278	4,675,897	521,716	4,154,181
Real estate and rental and leasing.....	2,652,929	380,742	2,272,187	3,266,374	329,086	2,937,287
Services.....	47,229,104	6,015,238	41,213,866	55,330,619	5,703,073	49,627,546
Professional and business services.....	45,378,437	5,509,708	39,868,729	53,108,009	5,234,385	47,873,623
Education, health, and social assistance.....	29,678	17,507	12,170	74,866	15,928	58,938
Leisure, accommodation, and food services.....	1,278,275	426,428	851,847	1,538,360	405,771	1,132,589
Other services.....	542,713	61,595	481,119	609,385	46,989	562,396
Nature of business not allocable.....	36,672	818	35,854	37,077	818	36,259

Footnotes at end of table.

Controlled Foreign Corporations, 2000

Table 1.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected industrial sector of 7,500 largest Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued				
	Distributions out of earnings and profits			Dividends paid to controlling U.S. corporation	Total Subpart F income
	Total	Not previously taxed earnings and profits	Previously taxed earnings and profits		
(12)	(13)	(14)	(15)	(16)	
All industries.....	94,882,197	62,037,300	32,844,897	31,917,740	29,372,318
Raw materials and energy production.....	12,635,223	11,753,187	882,035	5,019,537	843,985
Agriculture, forestry, fishing, and hunting.....	3,175	2,384	791	--	2,181
Mining.....	10,782,199	10,137,311	644,888	5,007,993	715,992
Oil and gas extraction.....	10,539,000	9,925,473	613,526	4,898,456	660,687
Coal mining.....	25,168	25,168	--	--	--
Metal ore mining.....	79,422	79,422	--	40,363	18,019
Other mining.....	138,610	107,248	31,362	69,174	37,286
Utilities.....	1,849,848	1,613,492	236,356	11,545	125,812
Goods production.....	32,155,917	24,228,910	7,927,007	14,296,179	7,991,909
Construction.....	275,371	237,516	37,856	35,423	19,251
Building, developing, and general contracting.....	262	262	--	--	--
Heavy construction.....	140,448	110,651	29,798	--	8,473
Special trade contractors.....	134,661	126,603	8,058	35,423	10,778
Manufacturing.....	31,880,545	23,991,394	7,889,152	14,260,756	7,972,658
Food manufacturing.....	2,846,691	2,428,293	418,399	1,203,838	509,746
Beverage and tobacco product manufacturing.....	3,857,974	3,322,239	535,735	985,268	352,353
Textile mills and textile product mills.....	24,326	961	23,365	187	25,467
Apparel manufacturing.....	171,033	16,168	154,865	11,748	16,958
Wood product manufacturing.....	13,461	13,461	--	13,332	303
Paper manufacturing.....	220,079	154,556	65,523	46,111	185,175
Petroleum and coal products manufacturing.....	2,793,088	2,628,150	164,937	1,393,110	364,415
Chemical manufacturing.....	8,136,230	5,073,223	3,063,007	2,790,425	2,424,183
Pharmaceutical and medicine manufacturing.....	4,503,973	2,510,349	1,993,624	1,641,333	1,666,921
Other chemical manufacturing.....	3,632,257	2,562,874	1,069,383	1,149,093	757,262
Plastics and rubber products manufacturing.....	612,338	388,143	224,196	107,910	20,902
Nonmetallic mineral product manufacturing.....	134,713	31,253	103,460	10,249	255,037
Primary metal manufacturing.....	481,479	385,674	95,806	230,208	149,094
Fabricated metal product manufacturing.....	261,076	124,320	136,755	27,748	120,568
Machinery manufacturing.....	907,985	829,376	78,609	410,844	282,645
Computer and electronic product manufacturing.....	6,958,632	5,732,374	1,226,258	5,221,153	1,789,489
Electric equipment, appliance, and component manufacturing.....	172,574	145,087	27,486	56,253	167,166
Transportation equipment manufacturing.....	2,690,393	1,444,379	1,246,014	1,252,936	1,013,471
Motor vehicles and parts manufacturing.....	2,639,963	1,407,866	1,232,097	1,222,205	994,263
Other transportation equipment manufacturing.....	50,429	36,512	13,917	30,730	19,208
Furniture and related product manufacturing.....	33,219	10,708	22,511	10,457	36,964
Miscellaneous manufacturing.....	1,565,255	1,263,029	302,226	488,978	258,723

Footnotes at end of table.

Controlled Foreign Corporations, 2000

Table 1.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected industrial sector of 7,500 largest Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued				
	Distributions out of earnings and profits			Dividends paid to controlling U.S. corporation	Total Subpart F income
	Total	Not previously taxed earnings and profits	Previously taxed earnings and profits		
(12)	(13)	(14)	(15)	(16)	
Distribution and transportation of goods.....	8,899,016	4,054,230	4,844,786	2,604,333	3,744,631
Wholesale and retail trade.....	8,642,874	3,915,709	4,727,165	2,571,002	3,505,025
Wholesale trade.....	8,014,778	3,595,770	4,419,008	2,445,007	3,036,874
Machinery, equipment, and supplies wholesalers.....	1,768,828	348,208	1,420,619	143,482	662,971
Drugs and druggists' sundries wholesalers.....	1,183,537	504,620	678,917	419,642	490,047
Grocery and related product wholesalers.....	123,087	107,284	15,803	93,089	41,876
Petroleum and petroleum products wholesalers.....	816,626	738,030	78,596	625,541	181,756
Other wholesale trade.....	4,122,701	1,897,627	2,225,073	1,163,252	1,660,225
Retail trade.....	628,096	319,939	308,157	125,995	468,151
Motor vehicle dealers and parts dealers.....	--	--	--	--	--
Building materials and garden equipment and supplies dealers.....	15,058	15,058	--	--	--
Food and beverage stores.....	--	--	--	--	--
Clothing and clothing accessories stores.....	251,548	49,185	202,363	48,661	185,569
General merchandise stores.....	183,841	141,664	42,177	27,330	81,824
Other retailers.....	177,649	114,032	63,617	50,004	200,759
Transportation and warehousing.....	256,142	138,521	117,620	33,331	239,606
Transportation.....	228,773	118,304	110,469	33,331	232,350
Warehousing and storage.....	27,369	20,218	7,151	--	7,256
Information.....	2,036,185	1,739,240	296,945	547,306	412,567
Publishing industries.....	580,776	578,282	2,494	68,841	15,334
Broadcasting and telecommunications.....	934,839	854,918	79,921	280,853	58,857
Other information industries.....	520,570	306,041	214,530	197,611	338,375
Finance, insurance, real estate, and rental and leasing.....	14,663,822	6,455,118	8,208,703	2,391,254	8,319,134
Depository credit intermediation.....	2,988,273	1,599,506	1,388,767	100,471	1,013,423
Nondepository credit intermediation.....	3,055,061	1,266,976	1,788,085	962,406	879,149
Security, commodity contracts and other financial investments and related products.....	4,545,989	1,972,110	2,573,879	862,341	3,416,636
Insurance carriers and related activities.....	1,628,687	477,775	1,150,912	74,991	1,379,425
Funds, trusts, and other financial activities.....	1,543,174	424,981	1,118,193	206,282	1,401,631
Real estate and rental and leasing.....	902,638	713,771	188,867	184,762	228,869
Services.....	24,486,595	13,806,615	10,679,980	7,059,131	8,047,648
Professional and business services.....	23,838,985	13,446,989	10,391,996	6,893,248	7,982,112
Education, health, and social assistance.....	34,017	34,017	--	--	22,595
Leisure, accommodation, and food services.....	301,486	224,725	76,761	137,643	13,099
Other services.....	312,107	100,884	211,223	28,240	29,841
Nature of business not allocable.....	5,440	--	5,440	--	12,444

Footnotes at end of table.

Controlled Foreign Corporations, 2000

Table 1.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected industrial sector of 7,500 largest Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued						
	Receipts by foreign corporations from						
	All sources	All related parties	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(17)	(18)	(19)	(20)	(21)	(22)	(23)
All industries.....	2,157,736,289	627,117,862	139,080,084	102,508,905	385,222,353	306,520	1,541,835,149
Raw materials and energy production.....	109,464,006	16,010,318	304,578	4,371,169	11,334,571	--	93,488,917
Agriculture, forestry, fishing, and hunting.....	4,025,386	640,792	37,327	69,504	533,961	--	3,388,063
Mining.....	56,670,339	12,084,529	267,251	3,381,362	8,435,916	--	44,606,648
Oil and gas extraction.....	49,221,824	11,298,133	42,593	3,118,930	8,136,610	--	37,937,724
Coal mining.....	202,275	1,242	--	--	1,242	--	201,033
Metal ore mining.....	3,790,541	419,419	153,281	201,364	64,774	--	3,371,122
Other mining.....	3,455,699	365,735	71,377	61,069	233,289	--	3,096,769
Utilities.....	48,768,282	3,284,997	--	920,303	2,364,694	--	45,494,206
Goods production.....	1,002,032,315	372,000,317	109,799,902	60,066,906	202,072,414	61,095	632,114,132
Construction.....	8,861,969	557,135	951	31,001	525,182	--	8,304,834
Building, developing, and general contracting.....	686,702	2,072	--	62	2,011	--	684,630
Heavy construction.....	2,570,333	4,371	--	--	4,371	--	2,565,962
Special trade contractors.....	5,604,934	550,691	951	30,940	518,801	--	5,054,242
Manufacturing.....	993,170,346	371,443,182	109,798,951	60,035,905	201,547,231	61,095	623,809,298
Food manufacturing.....	52,907,902	6,863,092	717,330	713,644	5,432,118	--	46,219,763
Beverage and tobacco product manufacturing.....	45,733,149	7,419,641	1,890	728,337	6,689,414	--	38,626,875
Textile mills and textile product mills.....	843,155	283,729	25,048	159,192	99,489	--	559,425
Apparel manufacturing.....	4,624,405	2,559,638	341,251	1,205,931	1,012,456	--	2,064,767
Wood product manufacturing.....	1,546,129	256,886	133,314	11,508	112,064	--	1,289,243
Paper manufacturing.....	20,589,018	3,815,322	1,405,772	826,622	1,582,929	--	16,777,715
Petroleum and coal products manufacturing.....	74,210,582	21,143,068	1,771	3,987,935	17,153,363	--	53,137,780
Chemical manufacturing.....	162,429,897	57,400,149	12,370,932	5,574,655	39,393,466	61,095	105,896,148
Pharmaceutical and medicine manufacturing.....	79,220,248	34,423,799	8,240,999	2,660,976	23,521,824	--	45,140,217
Other chemical manufacturing.....	83,209,649	22,976,350	4,129,933	2,913,679	15,871,642	61,095	60,755,931
Plastics and rubber products manufacturing.....	21,758,684	8,180,742	2,515,702	271,659	5,393,382	--	13,583,110
Nonmetallic mineral product manufacturing.....	9,185,264	1,372,204	390,985	274,199	707,021	--	7,813,227
Primary metal manufacturing.....	9,358,335	2,596,128	139,608	1,228,913	1,227,608	--	6,762,207
Fabricated metal product manufacturing.....	13,206,911	3,354,616	771,877	426,113	2,156,626	--	9,854,659
Machinery manufacturing.....	34,860,488	12,462,596	3,135,385	1,195,660	8,131,551	--	22,398,471
Computer and electronic product manufacturing.....	232,616,876	93,101,035	38,744,230	13,922,348	40,434,457	--	139,849,538
Electric equipment, appliance, and component manufacturing.....	28,263,878	8,538,290	2,182,687	2,021,579	4,334,023	--	19,744,302
Transportation equipment manufacturing.....	236,487,526	128,263,351	45,804,136	25,194,020	57,265,195	--	108,438,919
Motor vehicles and parts manufacturing.....	230,403,619	126,447,843	45,122,001	24,823,613	56,502,230	--	104,170,519
Other transportation equipment manufacturing.....	6,083,908	1,815,508	682,135	370,408	762,965	--	4,268,400
Furniture and related product manufacturing.....	1,413,435	363,959	140,589	185,076	38,294	--	1,049,475
Miscellaneous manufacturing.....	43,134,713	13,468,735	976,443	2,108,515	10,383,777	--	29,743,675

Footnotes at end of table.

Controlled Foreign Corporations, 2000

Table 1.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected industrial sector of 7,500 largest Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued						
	Receipts by foreign corporations from						
	All sources	All related parties	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(17)	(18)	(19)	(20)	(21)	(22)	(23)
Distribution and transportation of goods.....	475,399,981	96,547,234	12,917,208	13,518,651	69,958,893	152,482	379,806,095
Wholesale and retail trade.....	465,542,971	94,774,394	12,901,341	12,441,644	69,278,927	152,482	371,720,466
Wholesale trade.....	366,808,400	83,711,686	11,537,666	10,829,027	61,192,511	152,482	283,972,911
Machinery, equipment, and supplies wholesalers...	63,730,075	19,571,708	6,704,211	361,337	12,358,938	147,222	44,538,777
Drugs and druggists' sundries wholesalers.....	21,967,953	7,404,417	49,955	932,507	6,421,956	--	14,563,535
Grocery and related product wholesalers.....	5,301,536	1,095,180	7,985	722,621	364,574	--	4,206,357
Petroleum and petroleum products wholesalers.....	71,746,897	14,693,383	52	3,586,332	11,106,999	--	57,107,077
Other wholesale trade.....	204,061,939	40,946,998	4,775,464	5,226,230	30,940,045	5,260	163,557,165
Retail trade.....	98,734,571	11,062,708	1,363,675	1,612,617	8,086,415	--	87,747,555
Motor vehicle dealers and parts dealers.....	3,786,341	1,134,228	--	418,783	715,445	--	2,652,316
Building materials and garden equipment and supplies dealers.....	2,581,198	41,984	26	--	41,957	--	2,539,215
Food and beverage stores.....	7,919,384	16,167	15,851	--	316	--	7,903,217
Clothing and clothing accessories stores.....	3,601,672	564,535	102,753	127,107	334,676	--	3,037,137
General merchandise stores.....	37,222,306	3,322,703	49,308	3,370	3,270,026	--	33,899,603
Other retailers.....	43,623,669	5,983,091	1,195,737	1,063,358	3,723,995	--	37,716,067
Transportation and warehousing.....	9,857,010	1,772,840	15,867	1,077,007	679,966	--	8,085,629
Transportation.....	8,580,928	1,642,281	10,788	1,054,377	577,117	--	6,938,646
Warehousing and storage.....	1,276,082	130,559	5,079	22,630	102,849	--	1,146,982
Information.....	49,818,018	5,118,161	398,488	1,435,319	3,284,353	--	44,777,384
Publishing industries.....	6,633,442	851,321	116,292	25,299	709,731	--	5,833,627
Broadcasting and telecommunications.....	31,064,751	2,833,935	223,621	989,221	1,621,092	--	28,253,941
Other information industries.....	12,119,825	1,432,905	58,575	420,799	953,531	--	10,689,817
Finance, insurance, real estate, and rental and leasing.....	212,915,499	43,056,384	3,512,293	12,616,985	26,885,350	41,755	172,884,365
Depository credit intermediation.....	18,599,199	3,820,941	1,576,011	1,635,103	609,827	--	14,780,115
Nondepository credit intermediation.....	30,852,167	6,268,882	268,873	432,718	5,567,291	--	24,656,554
Security, commodity contracts and other financial investments and related products.....	79,808,635	20,744,426	901,107	7,728,264	12,073,300	41,755	60,196,661
Insurance carriers and related activities.....	54,060,934	2,287,641	95,590	1,109,318	1,082,732	--	51,887,672
Funds, trusts, and other financial activities.....	16,298,792	6,549,233	612,110	757,908	5,179,215	--	10,012,365
Real estate and rental and leasing.....	13,295,772	3,385,261	58,602	953,675	2,372,984	--	11,350,998
Services.....	307,993,046	94,369,557	12,147,614	10,499,875	71,670,881	51,187	218,666,723
Professional and business services.....	286,015,044	90,626,493	11,892,016	10,350,055	68,333,235	51,187	200,181,299
Education, health, and social assistance.....	548,780	59,534	17,642	7,998	33,894	--	507,794
Leisure, accommodation, and food services.....	15,285,042	659,156	48	68,352	590,755	--	14,625,886
Other services.....	6,144,181	3,024,375	237,908	73,470	2,712,997	--	3,351,744
Nature of business not allocable.....	113,424	15,891	--	--	15,891	--	97,532

Footnotes at end of table.

Controlled Foreign Corporations, 2000

Table 1.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected industrial sector of 7,500 largest Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued						
	Payments by foreign corporations to						
	All recipients	All related parties	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(24)	(25)	(26)	(27)	(28)	(29)	(30)
All industries.....	2,055,270,187	643,966,908	165,345,312	141,739,758	336,334,984	546,853	1,419,326,973
Raw materials and energy production.....	96,478,196	17,860,339	2,904,488	5,365,302	9,583,688	6,861	78,962,064
Agriculture, forestry, fishing, and hunting.....	3,944,102	311,538	62,308	81,572	167,658	--	3,643,324
Mining.....	45,506,627	14,229,192	2,814,715	5,071,133	6,343,345	--	31,552,639
Oil and gas extraction.....	38,277,228	13,635,327	2,710,324	4,795,371	6,129,632	--	24,917,106
Coal mining.....	243,752	27,073	--	--	27,073	--	216,679
Metal ore mining.....	3,749,726	187,566	14,012	126,735	46,818	--	3,562,161
Other mining.....	3,235,921	379,227	90,380	149,027	139,821	--	2,856,694
Utilities.....	47,027,468	3,319,609	27,464	212,597	3,072,686	6,861	43,766,101
Goods production.....	954,114,940	327,521,853	92,789,646	72,868,039	161,851,705	12,463	627,505,026
Construction.....	8,233,440	803,021	54,645	92,820	654,442	1,114	7,430,419
Building, developing, and general contracting.....	610,406	6,570	2,687	1,249	2,633	--	603,836
Heavy construction.....	2,553,903	135,501	4,554	--	129,833	1,114	2,418,401
Special trade contractors.....	5,069,132	660,950	47,404	91,570	521,976	--	4,408,182
Manufacturing.....	945,881,500	326,718,833	92,735,001	72,775,220	161,197,263	11,349	620,074,606
Food manufacturing.....	52,009,864	9,359,002	1,720,506	1,505,552	6,132,944	--	42,650,862
Beverage and tobacco product manufacturing.....	43,158,344	10,611,256	704,329	3,256,756	6,650,171	--	32,547,088
Textile mills and textile product mills.....	778,362	258,686	65,456	168,878	24,352	--	519,676
Apparel manufacturing.....	4,504,773	1,049,568	346,615	289,983	412,970	--	3,479,805
Wood product manufacturing.....	1,504,401	60,457	3,700	33,396	23,360	--	1,443,944
Paper manufacturing.....	19,118,344	2,501,994	707,028	380,931	1,414,034	--	16,616,350
Petroleum and coal products manufacturing.....	72,840,310	30,549,362	215,768	7,942,293	22,391,301	--	42,291,228
Chemical manufacturing.....	143,880,119	52,754,487	12,422,403	12,347,014	27,985,069	(²)	91,481,322
Pharmaceutical and medicine manufacturing.....	64,676,323	27,106,290	5,434,177	7,675,374	13,996,739	--	37,635,568
Other chemical manufacturing.....	79,203,796	25,648,197	6,988,227	4,671,640	13,988,329	(²)	53,845,754
Plastics and rubber products manufacturing.....	21,012,007	6,118,531	1,458,629	661,906	3,997,997	--	14,898,638
Nonmetallic mineral product manufacturing.....	7,776,135	1,736,565	728,707	316,137	691,721	--	6,039,570
Primary metal manufacturing.....	8,376,027	2,257,713	181,560	909,252	1,166,902	--	6,118,314
Fabricated metal product manufacturing.....	12,567,540	1,913,465	560,607	299,151	1,053,708	--	10,659,866
Machinery manufacturing.....	34,620,805	9,061,779	3,575,770	916,977	4,569,032	--	25,559,026
Computer and electronic product manufacturing.....	220,608,600	95,083,232	37,294,452	21,907,834	35,880,946	--	125,778,470
Electric equipment, appliance, and component manufacturing.....	26,303,016	6,611,695	2,235,663	1,371,055	3,004,977	--	19,691,321
Transportation equipment manufacturing.....	233,815,193	84,397,681	27,577,007	18,427,739	38,381,586	11,349	149,499,765
Motor vehicles and parts manufacturing.....	228,283,090	83,141,902	27,419,793	17,705,932	38,004,829	11,349	145,208,706
Other transportation equipment manufacturing.....	5,532,103	1,255,778	157,215	721,806	376,757	--	4,291,059
Furniture and related product manufacturing.....	1,331,162	191,057	133,567	45,317	12,173	--	1,140,105
Miscellaneous manufacturing.....	41,676,499	12,202,304	2,803,235	1,995,049	7,404,020	--	29,659,256

Footnotes at end of table.

Controlled Foreign Corporations, 2000

Table 1.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected industrial sector of 7,500 largest Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued						
	Payments by foreign corporations to						
	All recipients	All related parties	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(24)	(25)	(26)	(27)	(28)	(29)	(30)
Distribution and transportation of goods.....	465,958,014	139,843,358	40,665,295	22,477,030	76,258,131	442,903	330,745,778
Wholesale and retail trade.....	456,270,466	137,431,714	40,568,188	21,036,476	75,384,147	442,903	323,468,778
Wholesale trade.....	360,489,868	126,941,660	38,880,682	18,318,020	69,300,055	442,903	237,516,846
Machinery, equipment, and supplies wholesalers.....	61,648,789	34,184,987	13,105,005	1,822,948	19,220,488	36,546	30,839,890
Drugs and druggists' sundries wholesalers.....	20,763,586	7,418,906	346,568	1,869,027	5,203,311	--	13,344,680
Grocery and related product wholesalers.....	5,153,059	1,801,956	259,743	24,217	1,517,996	--	3,407,775
Petroleum and petroleum products wholesalers.....	72,673,819	11,861,551	52,278	3,235,847	8,573,426	--	60,824,405
Other wholesale trade.....	200,250,616	71,674,260	25,117,089	11,365,981	34,784,834	406,357	129,100,096
Retail trade.....	95,780,597	10,490,054	1,687,506	2,718,457	6,084,091	--	85,951,931
Motor vehicle dealers and parts dealers.....	3,825,143	1,597,838	--	496,374	1,101,464	--	2,227,500
Building materials and garden equipment and supplies dealers.....	2,523,837	272,415	44,624	41,298	186,493	--	2,273,011
Food and beverage stores.....	7,691,550	206,382	177,346	16,699	12,336	--	7,485,168
Clothing and clothing accessories stores.....	3,484,711	1,025,046	254,182	118,524	652,339	--	2,459,665
General merchandise stores.....	36,216,797	798,748	188,764	364,016	245,968	--	35,418,049
Other retailers.....	42,038,560	6,589,625	1,022,590	1,681,544	3,885,491	--	36,088,538
Transportation and warehousing.....	9,687,548	2,411,644	97,106	1,440,554	873,984	--	7,277,000
Transportation.....	8,398,218	1,808,809	55,386	1,430,893	322,530	--	6,590,087
Warehousing and storage.....	1,289,330	602,835	41,721	9,660	551,455	--	686,913
Information.....	54,979,103	9,688,334	1,455,955	2,329,048	5,891,055	12,276	45,375,582
Publishing industries.....	4,957,352	1,587,803	633,230	112,436	842,137	--	3,398,936
Broadcasting and telecommunications.....	38,571,382	4,141,146	521,642	634,708	2,972,520	12,276	34,484,424
Other information industries.....	11,450,369	3,959,385	301,083	1,581,904	2,076,398	--	7,492,222
Finance, insurance, real estate, and rental and leasing.....	195,172,646	51,622,620	5,519,835	18,335,048	27,760,010	7,726	145,039,895
Depository credit intermediation.....	15,924,774	6,566,611	1,092,540	2,254,439	3,219,633	--	9,358,333
Nondepository credit intermediation.....	28,690,803	9,443,107	745,344	4,011,113	4,686,627	23	19,491,280
Security, commodity contracts and other financial investments and related products.....	72,392,936	22,878,440	1,864,474	9,711,724	11,294,539	7,703	50,581,988
Insurance carriers and related activities.....	51,387,535	3,384,367	693,901	588,177	2,102,289	--	48,080,046
Funds, trusts, and other financial activities.....	13,210,801	7,162,773	947,602	1,259,848	4,955,322	--	6,116,964
Real estate and rental and leasing.....	13,565,796	2,187,322	175,975	509,747	1,501,600	--	11,411,285
Services.....	288,477,154	97,422,890	22,010,094	20,365,291	54,982,881	64,624	191,616,007
Professional and business services.....	267,903,657	95,043,494	21,510,413	19,591,314	53,879,125	62,642	173,415,840
Education, health, and social assistance.....	560,154	65,299	1,773	10,368	53,158	--	494,855
Leisure, accommodation, and food services.....	14,261,212	1,675,737	465,945	495,554	712,255	1,982	12,585,475
Other services.....	5,752,131	638,361	31,962	268,055	338,343	--	5,119,837
Nature of business not allocable.....	90,134	7,513	--	--	7,513	--	82,622

¹ Number of returns is not additive because some U.S. corporations had Controlled Foreign Corporations in more than one industrial sector. The industrial activity of the parent corporation filing the return often differs from that of the Controlled Foreign Corporations.

² Value is less than \$500.

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

Controlled Foreign Corporations, 2000

Table 2.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation of Controlled Foreign Corporation

[Money amounts are in thousands of dollars]

Selected country of incorporation of 7,500 Controlled Foreign Corporations	Number of U.S. corporation returns ¹	7,500 largest Controlled Foreign Corporations			
		Number of foreign corporations	Total assets		Total receipts
			Beginning of year	End of year	
	(1)	(2)	(3)	(4)	(5)
All geographic areas.....	1,087	7,500	3,563,713,908	4,367,374,661	2,157,736,289
Canada.....	391	708	347,157,144	406,902,052	279,853,599
Latin America, total.....	373	1,241	403,977,414	524,277,861	235,463,494
Mexico.....	147	271	76,193,947	88,868,862	85,408,949
Central America, total.....	36	64	11,109,733	11,130,060	5,909,724
Costa Rica.....	6	7	901,658	1,035,958	767,829
El Salvador.....	6	10	1,188,863	1,452,525	513,554
Guatemala.....	4	6	1,417,851	1,482,529	717,340
Panama (including Canal Zone).....	25	37	7,189,513	6,664,803	3,514,288
Caribbean countries, total.....	149	313	131,857,102	206,769,643	42,298,984
Cayman Islands (British).....	134	283	123,317,018	198,085,399	39,442,977
Trinidad and Tobago.....	3	4	982,695	892,830	232,900
Other Caribbean countries.....	20	26	7,557,389	7,791,414	2,623,107
South America, total.....	199	593	184,816,632	217,509,296	101,845,837
Argentina.....	83	148	33,290,386	35,853,426	20,655,196
Bolivia.....	4	5	1,231,599	1,251,095	264,183
Brazil.....	136	252	103,312,972	117,011,257	57,718,249
Chile.....	48	70	15,894,714	22,155,359	5,732,513
Colombia.....	19	30	6,629,723	8,664,602	3,359,154
Ecuador.....	4	4	436,165	395,544	297,331
Peru.....	13	19	4,978,936	4,862,514	1,498,669
Uruguay.....	11	11	1,453,681	1,889,273	598,591
Venezuela.....	36	52	17,499,215	25,224,057	11,360,157
Other Western Hemisphere, total.....	166	321	177,218,335	221,184,861	77,657,550
Bahamas.....	32	63	27,124,699	29,601,683	14,437,486
Bermuda.....	106	181	101,547,573	133,882,368	44,997,344
Netherlands Antilles.....	21	27	14,938,728	15,852,505	930,950
Other British West Indies.....	30	46	30,809,879	38,836,058	10,097,268
Europe, total.....	744	3,951	2,144,066,645	2,672,215,602	1,171,739,748
European Union, total.....	721	3,636	2,000,966,498	2,477,496,892	1,061,729,977
Austria.....	23	26	13,922,037	14,415,913	9,236,857
Belgium.....	86	141	54,614,926	55,946,753	28,826,424
Denmark.....	40	48	7,394,206	12,816,427	5,546,914
Finland.....	16	20	4,342,572	4,508,809	3,850,430
France (including Andorra).....	202	410	140,130,365	155,128,243	91,434,808
Germany.....	212	431	191,446,863	230,933,119	144,302,277
Greece.....	6	6	604,063	477,715	704,523
Ireland.....	105	176	81,756,051	108,761,619	49,367,500
Italy (including San Marino).....	124	197	52,290,161	48,535,848	46,972,615
Luxembourg.....	54	73	53,878,441	109,066,139	19,018,387
Netherlands.....	289	554	359,830,040	415,860,501	219,551,136
Portugal.....	22	29	6,564,437	7,766,472	4,981,501
Spain.....	110	151	49,457,183	56,365,239	36,404,143
Sweden.....	49	83	29,375,786	40,724,559	28,823,313
United Kingdom.....	455	1,291	955,359,368	1,216,189,536	372,709,148
Other West European countries, total.....	129	225	121,191,797	168,502,357	98,189,905
Norway.....	24	30	10,758,216	11,400,985	12,375,564
Switzerland.....	107	173	105,924,701	152,934,150	80,220,936
Turkey.....	16	18	3,717,561	2,794,168	5,207,615
Other West European countries.....	4	4	791,319	1,373,054	385,790
East European countries, total.....	43	90	21,908,351	26,216,353	11,819,866
Czech Republic.....	16	19	4,085,948	5,292,443	1,874,436
Poland.....	22	33	11,065,202	11,941,623	4,270,591
Romania.....	3	3	603,317	853,355	177,633
Russia.....	7	10	1,202,100	1,719,804	1,559,660
Other East European countries.....	16	25	4,951,784	6,409,128	3,937,546

Footnotes at end of table.

Controlled Foreign Corporations, 2000

Table 2.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation of 7,500 Controlled Foreign Corporations	Number of U.S. corporation returns ¹	7,500 largest Controlled Foreign Corporations--Continued			
		Number of foreign corporations	Total assets		Total receipts
			Beginning of year	End of year	
	(1)	(2)	(3)	(4)	(5)
Africa, total	46	74	15,079,424	15,996,338	10,469,366
North Africa, total.....	5	7	822,388	971,192	1,781,917
Egypt.....	4	4	464,766	671,157	1,384,192
Morocco.....	3	3	357,622	300,035	397,725
East Africa, total.....	12	14	1,277,516	1,574,299	819,618
West and Central Africa, total.....	18	28	9,016,570	9,074,529	3,434,016
Liberia.....	12	16	7,363,054	7,405,817	2,194,133
Nigeria.....	6	9	1,265,257	1,193,879	874,531
Other West and Central African countries.....	3	3	388,259	474,833	365,353
Southern Africa, total.....	21	25	3,962,950	4,376,319	4,433,815
South Africa (including Namibia).....	20	24	3,902,213	4,300,996	4,423,672
Asia, total	278	835	338,923,849	392,139,993	324,647,805
Middle East, total.....	28	45	12,075,394	14,587,901	8,519,812
Israel.....	18	33	9,201,992	11,734,786	7,021,487
Other Middle East countries.....	10	12	2,873,402	2,853,115	1,498,325
Southern and Southeastern Asia, total.....	125	266	89,996,830	101,475,439	82,923,595
India.....	27	32	4,594,818	4,934,616	3,382,255
Indonesia.....	7	8	1,364,979	3,634,518	965,459
Malaysia.....	29	40	14,090,472	16,158,198	10,369,202
Philippines.....	22	35	9,769,630	11,133,548	5,151,148
Singapore.....	75	109	50,814,899	56,639,124	54,784,422
Thailand.....	28	37	8,300,449	7,860,411	8,026,489
Other Southern and Southeastern Asian countries.....	5	5	1,061,582	1,115,024	244,621
Eastern Asia, total.....	211	524	236,851,626	276,076,653	233,204,398
China.....	36	60	9,887,333	12,972,556	14,046,153
Hong Kong.....	70	111	45,433,221	50,962,453	31,532,804
Japan (including Okinawa and Ryukyu Islands).....	142	248	151,797,625	176,228,422	157,628,528
South Korea, Republic of.....	51	62	12,441,902	15,446,883	14,947,544
Taiwan.....	33	43	17,291,545	20,466,338	15,049,370
Oceania, total	138	324	117,582,920	113,557,166	48,614,020
Australia.....	130	273	100,157,050	93,298,119	43,734,765
New Zealand.....	22	38	14,878,159	17,841,670	3,869,409
Other countries of Oceania.....	6	13	2,547,711	2,417,377	1,009,846
Puerto Rico and U.S. Possessions, total	31	46	19,708,176	21,100,789	9,290,706
Puerto Rico.....	29	42	18,198,861	19,744,125	8,910,494
U.S. Possessions, total.....	4	4	1,509,315	1,356,663	380,212
OPEC countries, total (countries included above)	49	74	22,098,758	32,068,536	14,531,589

Footnotes at end of table.

Controlled Foreign Corporations, 2000

Table 2.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation of 7,500 Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued					
	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes		
				Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes
	(6)	(7)	(8)	(9)	(10)	(11)
All geographic areas.....	207,576,012	43,143,111	164,432,900	243,215,063	42,159,723	201,055,340
Canada.....	24,761,314	5,889,372	18,871,942	27,750,320	5,815,128	21,935,192
Latin America, total.....	22,986,094	4,477,748	18,508,345	28,897,417	4,376,862	24,520,554
Mexico.....	6,106,019	1,551,218	4,554,801	6,973,791	1,508,267	5,465,525
Central America, total.....	623,369	103,108	520,261	730,617	109,586	621,031
Costa Rica	146,199	12,468	133,731	151,232	12,468	138,764
El Salvador.....	67,649	27,374	40,276	67,649	27,374	40,276
Guatemala.....	5,360	5,537	-178	20,708	4,915	15,793
Panama (including Canal Zone).....	359,732	50,483	309,249	440,814	57,584	383,230
Caribbean countries, total.....	9,618,720	870,617	8,748,103	10,612,189	839,607	9,772,581
Cayman Islands (British).....	8,865,214	793,659	8,071,555	9,836,075	762,655	9,073,420
Trinidad and Tobago.....	23,199	5,583	17,616	25,075	5,583	19,492
Other Caribbean countries.....	730,306	71,375	658,932	751,039	71,370	679,669
South America, total.....	6,637,986	1,952,805	4,685,180	10,580,819	1,919,402	8,661,417
Argentina.....	684,724	472,193	212,531	1,734,255	436,080	1,298,174
Bolivia.....	98,304	3,931	94,374	98,304	3,931	94,374
Brazil.....	3,373,519	868,333	2,505,186	5,007,825	886,651	4,121,174
Chile.....	496,892	215,920	280,971	920,077	217,929	702,148
Colombia.....	-254,117	30,244	-284,361	212,010	38,770	173,240
Ecuador.....	-4,527	1,600	-6,127	32,813	1,406	31,407
Peru.....	104,105	24,366	79,739	243,944	24,680	219,264
Uruguay.....	35,770	11,915	23,855	46,514	11,366	35,148
Venezuela.....	2,093,079	321,831	1,771,248	2,274,841	296,117	1,978,724
Other Western Hemisphere, total.....	12,491,725	1,540,149	10,951,575	13,949,090	1,573,676	12,375,413
Bahamas.....	1,095,202	241,135	854,068	1,710,747	230,354	1,480,393
Bermuda.....	8,680,895	1,130,853	7,550,042	9,324,074	1,160,980	8,163,094
Netherlands Antilles.....	323,314	47,185	276,129	324,417	47,185	277,232
Other British West Indies.....	2,391,576	120,977	2,270,599	2,559,767	135,158	2,424,609
Europe, total.....	115,100,551	23,537,872	91,562,679	135,404,608	22,803,867	112,600,740
European Union, total	99,284,001	20,364,575	78,919,426	118,523,772	19,679,566	98,844,206
Austria.....	972,387	183,777	788,610	1,107,198	179,365	927,833
Belgium.....	2,240,993	460,376	1,780,618	2,472,521	435,954	2,036,567
Denmark.....	1,011,503	135,186	876,317	1,068,530	129,823	938,707
Finland.....	414,440	75,903	338,537	434,234	75,903	358,331
France (including Andorra).....	5,446,384	1,679,111	3,767,273	7,100,490	1,541,148	5,559,343
Germany.....	8,818,477	2,267,320	6,551,157	10,829,408	2,217,838	8,611,571
Greece.....	47,009	25,022	21,986	48,346	22,072	26,274
Ireland.....	11,769,381	1,103,071	10,666,309	12,147,896	1,083,546	11,064,350
Italy (including San Marino).....	3,029,528	1,169,261	1,860,267	3,640,155	1,129,745	2,510,410
Luxembourg.....	3,071,699	336,886	2,734,813	3,658,433	332,195	3,326,238
Netherlands.....	26,949,429	4,381,520	22,567,909	29,386,800	4,271,120	25,115,680
Portugal.....	381,909	98,686	283,223	405,538	95,955	309,583
Spain.....	3,692,504	1,298,161	2,394,343	4,155,207	1,273,493	2,881,714
Sweden.....	1,742,179	232,509	1,509,670	2,151,309	230,510	1,920,799
United Kingdom.....	29,696,179	6,917,785	22,778,394	39,917,707	6,660,900	33,256,807
Other West European countries, total.....	14,345,311	2,951,196	11,394,115	15,131,866	2,907,013	12,224,852
Norway.....	3,134,866	1,927,123	1,207,743	3,222,604	1,914,254	1,308,350
Switzerland.....	10,980,675	939,668	10,041,007	11,606,444	910,917	10,695,527
Turkey.....	198,989	83,507	115,482	263,848	79,981	183,867
Other West European countries.....	30,781	898	29,883	38,970	1,862	37,108
East European countries, total.....	1,471,239	222,101	1,249,139	1,748,970	217,288	1,531,682
Czech Republic.....	139,050	57,403	81,647	193,807	57,403	136,404
Poland.....	876,651	81,669	794,982	1,034,559	80,795	953,764
Romania.....	16,847	3,862	12,985	16,847	3,862	12,985
Russia.....	121,901	50,756	71,145	141,963	46,667	95,296
Other East European countries.....	316,791	28,411	288,380	361,794	28,562	333,232

Footnotes at end of table.

Controlled Foreign Corporations, 2000

Table 2.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation of 7,500 Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued					
	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes		
				Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes
	(6)	(7)	(8)	(9)	(10)	(11)
Africa, total.....	679,045	199,071	479,974	869,526	199,631	669,895
North Africa, total.....	8,815	8,026	789	17,520	7,210	10,310
Egypt.....	6,788	4,346	2,442	12,077	4,346	7,731
Morocco.....	2,027	3,680	-1,653	5,443	2,863	2,580
East Africa, total.....	92,867	15,006	77,861	97,343	15,006	82,337
West and Central Africa, total.....	355,468	104,058	251,410	480,921	105,857	375,064
Liberia.....	237,358	37,803	199,555	263,446	36,545	226,901
Nigeria.....	58,663	62,392	-3,729	158,028	65,450	92,578
Other West and Central African countries.....	59,447	3,863	55,584	59,447	3,863	55,584
Southern Africa, total.....	221,895	71,982	149,914	273,742	71,558	202,184
South Africa (including Namibia).....	218,359	68,367	149,992	270,206	67,944	202,263
Asia, total.....	26,777,492	6,405,049	20,372,443	29,973,207	6,239,546	23,733,662
Middle East, total.....	1,549,749	180,239	1,369,510	1,781,104	176,736	1,604,368
Israel.....	1,293,038	177,768	1,115,270	1,508,168	174,265	1,333,903
Other Middle East countries.....	256,711	2,471	254,240	272,936	2,471	270,465
Southern and Southeastern Asia, total.....	7,122,893	753,649	6,369,244	8,227,550	744,036	7,483,514
India.....	7,895	50,613	-42,718	218,673	50,421	168,251
Indonesia.....	-148,172	40,576	-188,748	115,155	40,576	74,579
Malaysia.....	1,154,619	133,471	1,021,148	1,190,229	130,769	1,059,460
Philippines.....	466,580	39,479	427,101	628,773	37,760	591,014
Singapore.....	5,269,168	440,705	4,828,464	5,489,644	435,725	5,053,919
Thailand.....	323,816	42,368	281,449	517,358	42,348	475,010
Other Southern and Southeastern Asian countries.....	48,986	6,437	42,549	67,718	6,437	61,281
Eastern Asia, total.....	18,104,850	5,471,161	12,633,688	19,964,553	5,318,774	14,645,779
China.....	1,354,290	122,327	1,231,963	1,508,196	120,972	1,387,224
Hong Kong.....	3,776,290	455,681	3,320,609	3,926,536	441,133	3,485,452
Japan (including Okinawa and Ryukyu Islands).....	10,245,840	4,358,306	5,887,534	11,524,466	4,225,109	7,299,357
South Korea, Republic of.....	1,526,480	349,503	1,176,977	1,752,695	347,018	1,405,677
Taiwan.....	1,201,949	185,344	1,016,605	1,252,661	184,542	1,068,119
Oceania, total.....	3,141,200	978,383	2,162,817	4,543,419	1,039,672	3,503,747
Australia.....	2,753,538	865,364	1,888,174	3,977,438	940,297	3,037,141
New Zealand.....	214,343	43,422	170,921	389,334	37,382	351,952
Other countries of Oceania.....	173,319	69,598	103,721	176,647	61,993	114,654
Puerto Rico and U.S. Possessions, total.....	1,638,591	115,466	1,523,126	1,827,476	111,339	1,716,137
Puerto Rico.....	1,558,066	113,626	1,444,440	1,744,993	110,253	1,634,740
U.S. Possessions, total.....	80,525	1,840	78,685	82,483	1,086	81,397
OPEC countries, total (countries included above).....	2,234,528	424,671	1,809,856	2,778,981	402,015	2,376,966

Footnotes at end of table.

Controlled Foreign Corporations, 2000

Table 2.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation of 7,500 Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued				
	Distributions out of earnings and profits			Dividends paid to controlling U.S. corporation	Total Subpart F income
	Total	Not previously taxed earnings and profits	Previously taxed earnings and profits		
(12)	(13)	(14)	(15)	(16)	
All geographic areas.....	94,882,197	62,037,300	32,844,897	31,917,740	29,372,318
Canada.....	8,444,142	6,953,280	1,490,861	3,148,177	1,694,095
Latin America, total.....	10,514,841	6,702,130	3,812,711	3,600,773	3,573,487
Mexico.....	1,569,144	1,230,731	338,412	619,620	269,624
Central America, total.....	506,223	270,901	235,323	167,467	129,749
Costa Rica	--	--	--	--	4,904
El Salvador.....	31,490	30,456	1,034	1,510	306
Guatemala.....	--	--	--	--	--
Panama (including Canal Zone).....	474,733	240,445	234,288	165,957	124,538
Caribbean countries, total.....	4,670,877	2,275,509	2,395,368	1,747,478	2,246,300
Cayman Islands (British).....	4,308,883	2,003,228	2,305,656	1,479,207	2,170,110
Trinidad and Tobago.....	803	161	643	129	1,122
Other Caribbean countries.....	361,191	272,121	89,070	268,143	75,069
South America, total.....	3,768,597	2,924,989	843,608	1,066,208	927,814
Argentina.....	828,129	751,419	76,711	220,225	43,404
Bolivia.....	22,912	7,003	15,909	--	9,786
Brazil.....	1,899,443	1,370,287	529,156	632,539	560,508
Chile.....	290,953	125,488	165,466	67,105	231,409
Colombia.....	55,273	48,301	6,972	38,736	17,583
Ecuador.....	699	--	699	--	1,214
Peru.....	151,069	143,446	7,623	4,377	6,311
Uruguay.....	--	--	--	--	11,543
Venezuela.....	520,114	479,045	41,070	103,226	46,056
Other Western Hemisphere, total.....	6,550,413	3,597,900	2,952,514	2,903,930	3,509,550
Bahamas.....	1,100,768	324,096	776,672	311,724	441,705
Bermuda.....	4,428,756	2,843,350	1,585,406	2,163,249	2,530,923
Netherlands Antilles.....	204,737	6,718	198,019	5,341	154,502
Other British West Indies.....	816,153	423,736	392,418	423,616	381,539
Europe, total.....	54,268,681	33,740,289	20,528,392	14,537,765	17,379,317
European Union, total	50,051,294	31,792,420	18,258,873	13,088,869	14,197,579
Austria.....	450,620	361,567	89,053	5,493	29,567
Belgium.....	1,491,405	999,595	491,810	840,288	686,613
Denmark.....	642,097	308,900	333,197	83,922	317,438
Finland.....	49,528	38,365	11,163	11,187	11,541
France (including Andorra).....	3,001,201	2,007,686	993,515	977,377	802,157
Germany.....	8,849,513	5,221,111	3,628,402	3,138,030	568,428
Greece.....	18,634	18,634	--	16,201	--
Ireland.....	1,709,672	386,124	1,323,548	283,866	2,229,578
Italy (including San Marino).....	1,362,497	804,524	557,973	425,968	347,990
Luxembourg.....	1,643,994	155,351	1,488,642	151,271	632,124
Netherlands.....	10,687,320	4,885,921	5,801,399	1,477,287	4,596,741
Portugal.....	303,959	241,914	62,045	208,636	179,564
Spain.....	1,212,494	1,059,431	153,064	712,169	174,749
Sweden.....	949,923	451,543	498,380	369,266	272,300
United Kingdom.....	17,678,437	14,851,754	2,826,683	4,387,910	3,348,790
Other West European countries, total.....	4,010,810	1,825,827	2,184,983	1,424,816	3,132,301
Norway.....	1,035,740	1,008,074	27,666	971,357	41,951
Switzerland.....	2,899,002	741,694	2,157,308	448,458	3,077,340
Turkey.....	76,060	76,060	--	5,001	12,285
Other West European countries.....	9	--	9	--	725
East European countries, total.....	206,577	122,042	84,535	24,079	49,437
Czech Republic.....	63,743	63,743	--	--	12,378
Poland.....	8,794	7,298	1,495	--	13,945
Romania.....	5,885	5,885	--	5,885	602
Russia.....	--	--	--	--	101
Other East European countries.....	128,155	45,115	83,040	18,194	22,412

Footnotes at end of table.

Controlled Foreign Corporations, 2000

Table 2.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation of 7,500 Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued				
	Distributions out of earnings and profits			Dividends paid to controlling U.S. corporation	Total Subpart F income
	Total	Not previously taxed earnings and profits	Previously taxed earnings and profits		
	(12)	(13)	(14)	(15)	(16)
Africa, total.....	447,040	419,972	27,068	165,781	129,632
North Africa, total.....	53,029	50,582	2,447	46,855	--
Egypt.....	49,563	49,563	--	45,873	--
Morocco.....	3,466	1,019	2,447	983	--
East Africa, total.....	181,261	173,006	8,255	3,201	4,204
West and Central Africa, total.....	168,499	160,904	7,595	99,133	98,130
Liberia.....	51,821	46,509	5,312	46,509	80,828
Nigeria.....	69,551	67,268	2,283	52,624	2,119
Other West and Central African countries.....	47,127	47,127	--	--	15,183
Southern Africa, total.....	44,250	35,480	8,770	16,592	27,298
South Africa (including Namibia).....	44,250	35,480	8,770	16,592	27,298
Asia, total.....	12,635,172	9,080,132	3,555,040	6,769,404	2,642,950
Middle East, total.....	104,072	62,672	41,399	19,967	33,933
Israel.....	59,528	32,263	27,265	17,264	13,978
Other Middle East countries.....	44,544	30,410	14,134	2,703	19,955
Southern and Southeastern Asia, total.....	1,509,489	439,812	1,069,677	307,097	1,225,383
India.....	34,023	31,825	2,198	22,000	1,170
Indonesia.....	17,826	17,826	--	3,387	--
Malaysia.....	282,304	114,762	167,542	106,144	76,551
Philippines.....	146,931	103,213	43,718	93,366	55,349
Singapore.....	1,007,024	157,186	849,838	71,394	1,087,805
Thailand.....	19,154	15,000	4,155	10,805	3,923
Other Southern and Southeastern Asian countries.....	2,226	--	2,226	--	586
Eastern Asia, total.....	11,021,611	8,577,648	2,443,963	6,442,340	1,383,634
China.....	506,354	393,767	112,587	84,943	34,363
Hong Kong.....	2,408,293	1,337,579	1,070,714	762,012	781,017
Japan (including Okinawa and Ryukyu Islands).....	7,501,342	6,386,129	1,115,212	5,239,223	442,448
South Korea, Republic of.....	354,909	252,380	102,529	226,436	83,812
Taiwan.....	250,714	207,793	42,921	129,726	41,993
Oceania, total.....	1,979,764	1,505,383	474,381	753,697	375,722
Australia.....	1,638,035	1,230,998	407,037	635,101	264,280
New Zealand.....	292,302	239,385	52,917	118,596	79,930
Other countries of Oceania.....	49,427	35,000	14,427	--	31,512
Puerto Rico and U.S. Possessions, total.....	42,145	38,213	3,931	38,213	67,564
Puerto Rico.....	21,636	18,603	3,033	18,603	67,564
U.S. Possessions, total.....	20,509	19,610	898	19,610	--
OPEC countries, total (countries included above).....	633,246	589,142	44,103	159,237	50,218

Footnotes at end of table.

Controlled Foreign Corporations, 2000

Table 2.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation of 7,500 Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued						
	Receipts by foreign corporations from						
	All sources	All related parties	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(17)	(18)	(19)	(20)	(21)	(22)	(23)
All geographic areas.....	2,157,736,289	627,117,862	139,080,084	102,508,905	385,222,353	306,520	1,541,835,149
Canada.....	279,853,599	81,231,639	39,565,898	22,959,913	18,696,918	8,910	198,777,980
Latin America, total.....	235,463,494	57,010,886	17,592,554	13,062,812	26,351,945	3,574	179,963,651
Mexico.....	85,408,949	27,437,218	7,182,055	8,433,944	11,821,219	--	58,083,274
Central America, total.....	5,909,724	2,463,849	544,590	598,231	1,321,028	--	3,449,669
Costa Rica.....	767,829	594,447	434,197	92,672	67,578	--	173,382
El Salvador.....	513,554	28,149	--	1,241	26,908	--	485,405
Guatemala.....	717,340	132,829	--	6,005	126,824	--	584,511
Panama (including Canal Zone).....	3,514,288	1,504,375	4,936	443,784	1,055,655	--	2,013,707
Caribbean countries, total.....	42,298,984	15,466,449	8,484,861	2,495,601	4,482,412	3,574	28,121,952
Cayman Islands (British).....	39,442,977	14,267,614	8,296,346	1,975,567	3,992,126	3,574	26,451,844
Trinidad and Tobago.....	232,900	9,060	--	1,073	7,987	--	223,840
Other Caribbean countries.....	2,623,107	1,189,775	188,515	518,961	482,299	--	1,446,268
South America, total.....	101,845,837	11,643,370	1,381,048	1,535,036	8,727,286	--	90,308,756
Argentina.....	20,655,196	2,657,918	76,955	196,943	2,384,019	--	18,013,291
Bolivia.....	264,183	3,080	--	--	3,080	--	261,104
Brazil.....	57,718,249	6,934,566	1,038,719	898,236	4,997,611	--	50,854,203
Chile.....	5,732,513	795,149	186,959	209,864	398,326	--	4,946,758
Colombia.....	3,359,154	311,459	39,448	45,585	226,426	--	3,047,696
Ecuador.....	297,331	70,877	--	1,619	69,258	--	226,454
Peru.....	1,498,669	185,609	5,187	100,114	80,308	--	1,320,399
Uruguay.....	598,591	29,527	--	16,292	13,235	--	569,064
Venezuela.....	11,360,157	506,437	33,780	65,699	406,957	--	10,856,740
Other Western Hemisphere, total.....	77,657,550	33,011,751	13,081,878	11,035,986	8,855,707	38,181	44,964,824
Bahamas.....	14,437,486	4,108,103	3,888	2,001,306	2,102,909	--	10,331,357
Bermuda.....	44,997,344	17,114,338	8,267,619	4,471,233	4,337,305	38,181	28,193,624
Netherlands Antilles.....	930,950	284,495	17,064	52,000	215,430	--	651,516
Other British West Indies.....	10,097,268	6,051,839	4,793,307	625,086	633,446	--	4,046,803
Europe, total.....	1,171,739,748	344,280,778	39,910,982	40,807,630	263,502,488	59,678	835,682,080
European Union, total.....	1,061,729,977	304,455,785	34,797,046	38,522,831	231,076,231	59,678	764,527,542
Austria.....	9,236,857	4,423,464	7,655	1,443,630	2,972,179	--	4,824,045
Belgium.....	28,826,424	13,816,389	606,587	1,101,594	12,108,209	--	15,591,220
Denmark.....	5,546,914	1,125,523	36,456	156,563	932,504	--	4,427,636
Finland.....	3,850,430	184,775	3,051	74,289	107,435	--	3,665,655
France (including Andorra).....	91,434,808	26,512,960	2,523,628	1,017,352	22,971,970	--	65,334,978
Germany.....	144,302,277	41,189,478	4,665,426	3,452,036	33,067,750	4,266	103,491,547
Greece.....	704,523	37,327	--	1,016	36,311	--	667,196
Ireland.....	49,367,500	14,949,727	4,113,591	1,173,797	9,662,339	--	34,480,113
Italy (including San Marino).....	46,972,615	6,900,969	759,724	479,635	5,658,380	3,231	40,228,460
Luxembourg.....	19,018,387	4,983,303	402,112	687,293	3,893,897	--	14,134,204
Netherlands.....	219,551,136	75,223,520	11,248,049	6,246,852	57,681,699	46,920	145,265,288
Portugal.....	4,981,501	822,022	15,981	158,985	647,056	--	4,159,479
Spain.....	36,404,143	10,669,423	644,685	289,132	9,735,606	--	25,748,098
Sweden.....	28,823,313	16,288,942	924,686	4,210,249	11,154,007	--	12,645,602
United Kingdom.....	372,709,148	87,327,962	8,845,416	18,030,407	60,446,879	5,260	289,864,023
Other West European countries, total.....	98,189,905	37,475,898	4,981,393	2,158,302	30,336,202	1	61,680,896
Norway.....	12,375,564	4,749,872	62,857	568,827	4,118,188	--	7,625,692
Switzerland.....	80,220,936	32,523,567	4,885,294	1,571,480	26,066,791	1	48,664,258
Turkey.....	5,207,615	196,895	33,242	17,994	145,659	--	5,010,720
Other West European countries.....	385,790	5,564	--	--	5,564	--	380,227
East European countries, total.....	11,819,866	2,349,096	132,543	126,497	2,090,055	--	9,473,642
Czech Republic.....	1,874,436	401,042	52,905	30,417	317,720	--	1,476,265
Poland.....	4,270,591	603,302	74,552	71,345	457,405	--	3,667,289
Romania.....	177,633	69,704	--	935	68,768	--	107,929
Russia.....	1,559,660	446,890	--	--	446,890	--	1,112,770
Other East European countries.....	3,937,546	828,157	5,087	23,799	799,271	--	3,109,389

Footnotes at end of table.

Controlled Foreign Corporations, 2000

Table 2.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation of Controlled Foreign Corporation--Continued

(Money amounts are in thousands of dollars)

Selected country of incorporation of 7,500 Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued						
	Receipts by foreign corporations from						
	All sources	All related parties	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(17)	(18)	(19)	(20)	(21)	(22)	(23)
Africa, total.....	10,469,366	1,815,439	31,068	819,486	964,884	--	8,659,433
North Africa, total.....	1,781,917	84,274	--	74,311	9,963	--	1,697,642
Egypt.....	1,384,192	82,661	--	73,779	8,881	--	1,301,532
Morocco.....	397,725	1,614	--	532	1,082	--	396,111
East Africa, total.....	819,618	118,453	4,809	9,394	104,250	--	701,165
West and Central Africa, total.....	3,434,016	1,078,130	9,260	723,570	345,301	--	2,355,886
Liberia.....	2,194,133	853,663	9,260	552,058	292,345	--	1,340,470
Nigeria.....	874,531	4,590	--	4,590	--	--	869,941
Other West and Central African countries.....	365,353	219,878	--	166,922	52,956	--	145,475
Southern Africa, total.....	4,433,815	534,581	17,000	12,211	505,370	--	3,904,740
South Africa (including Namibia).....	4,423,672	533,428	17,000	11,060	505,368	--	3,895,750
Asia, total.....	324,647,805	99,320,992	27,137,900	11,778,932	60,207,984	196,177	226,079,188
Middle East, total.....	8,519,812	3,952,578	2,726,117	328,807	897,654	--	4,647,040
Israel.....	7,021,487	3,931,299	2,721,534	328,714	881,051	--	3,169,994
Other Middle East countries.....	1,498,325	21,279	4,583	93	16,602	--	1,477,046
Southern and Southeastern Asia, total.....	82,923,595	44,172,962	16,749,867	6,489,503	20,739,117	194,474	39,360,545
India.....	3,382,255	427,217	82,896	90,417	253,904	--	2,955,037
Indonesia.....	965,459	--	--	--	--	--	965,459
Malaysia.....	10,369,202	6,740,719	4,035,578	675,161	2,029,980	--	3,676,721
Philippines.....	5,151,148	2,693,749	1,984,781	11,994	696,974	--	2,605,668
Singapore.....	54,784,422	31,899,002	10,276,157	5,667,152	15,822,314	133,379	23,297,585
Thailand.....	8,026,489	2,390,406	370,455	27,469	1,931,386	61,095	5,637,325
Other Southern and Southeastern Asian countries.....	244,621	21,871	--	17,311	4,560	--	222,750
Eastern Asia, total.....	233,204,398	51,195,453	7,661,916	4,960,622	38,571,212	1,703	182,071,603
China.....	14,046,153	4,252,853	749,174	290,890	3,212,788	--	9,793,879
Hong Kong.....	31,532,804	10,441,667	2,239,571	1,527,452	6,674,604	40	21,138,027
Japan (including Okinawa and Ryukyu Islands).....	157,628,528	30,726,559	3,095,518	1,599,061	26,031,980	--	126,917,157
South Korea, Republic of.....	14,947,544	2,258,957	641,985	170,462	1,446,510	--	12,688,587
Taiwan.....	15,049,370	3,515,416	935,666	1,372,757	1,205,330	1,663	11,533,953
Oceania, total.....	48,614,020	7,432,563	529,327	1,470,339	5,432,897	--	41,230,722
Australia.....	43,734,765	6,720,118	476,276	1,420,750	4,823,093	--	37,058,158
New Zealand.....	3,869,409	685,887	53,051	25,379	607,457	--	3,189,275
Other countries of Oceania.....	1,009,846	26,557	--	24,210	2,346	--	983,289
Puerto Rico and U.S. Possessions, total.....	9,290,706	3,013,814	1,230,477	573,807	1,209,530	--	6,477,270
Puerto Rico.....	8,910,494	2,975,034	1,230,477	571,778	1,172,779	--	6,135,838
U.S. Possessions, total.....	380,212	38,780	--	2,029	36,751	--	341,432
OPEC countries, total (countries included above).....	14,531,589	532,212	38,364	70,289	423,560	--	14,002,397

Footnotes at end of table.

Controlled Foreign Corporations, 2000

Table 2.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation of 7,500 Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued						
	Payments by foreign corporations to						
	All recipients	All related parties	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(24)	(25)	(26)	(27)	(28)	(29)	(30)
All geographic areas.....	2,055,270,187	643,966,908	165,345,312	141,739,758	336,334,984	546,853	1,419,326,973
Canada.....	263,989,106	69,570,202	31,390,216	23,359,885	14,815,604	4,496	194,514,487
Latin America, total.....	224,876,314	58,331,063	21,840,739	16,956,940	19,494,213	39,171	167,016,381
Mexico.....	81,798,426	23,644,925	8,264,849	9,569,599	5,809,364	1,114	58,307,654
Central America, total.....	5,898,802	2,490,969	644,308	363,152	1,483,510	--	3,454,733
Costa Rica.....	622,965	196,545	160,933	26,525	9,087	--	426,420
El Salvador.....	457,024	62,661	--	15,053	47,608	--	394,447
Guatemala.....	699,503	178,036	--	161,349	16,687	--	521,467
Panama (including Canal Zone).....	3,767,027	1,826,448	358,649	160,225	1,307,574	--	1,952,035
Caribbean countries, total.....	38,230,218	16,907,215	9,104,900	3,023,730	4,770,882	7,703	21,474,376
Cayman Islands (British).....	35,816,257	15,996,082	8,698,708	2,620,590	4,669,081	7,703	19,971,547
Trinidad and Tobago.....	210,707	18,167	--	10,595	7,572	--	192,540
Other Caribbean countries.....	2,203,255	892,966	406,191	392,545	94,229	--	1,310,289
South America, total.....	98,948,867	15,287,953	3,826,683	4,000,459	7,430,457	30,354	83,779,618
Argentina.....	21,372,457	3,317,658	681,211	751,570	1,878,016	6,861	18,056,736
Bolivia.....	206,102	21,294	--	22	21,273	--	184,808
Brazil.....	55,827,465	9,110,788	2,620,357	2,515,919	3,963,163	11,349	46,809,021
Chile.....	5,494,709	893,134	116,098	257,427	519,609	--	4,625,998
Colombia.....	3,819,832	319,013	78,736	111,811	128,465	--	3,500,819
Ecuador.....	303,846	23,018	280	9,036	13,702	--	280,827
Peru.....	1,595,085	267,624	47,151	88,769	131,704	--	1,327,460
Uruguay.....	546,064	30,412	2,237	2,349	13,681	12,144	515,652
Venezuela.....	9,430,078	1,301,521	280,613	263,460	757,449	--	8,128,557
Other Western Hemisphere, total.....	70,490,869	27,061,773	5,595,543	6,904,596	14,561,634	--	43,495,139
Bahamas.....	14,409,087	6,245,771	1,846,589	2,524,962	1,874,220	--	8,165,977
Bermuda.....	39,634,518	16,171,260	3,233,735	2,597,813	10,339,712	--	23,526,642
Netherlands Antilles.....	778,820	660,768	129,791	326,718	204,258	--	118,052
Other British West Indies.....	8,532,177	2,084,051	385,428	1,176,007	522,615	--	6,448,126
Europe, total.....	1,119,014,467	357,322,671	69,085,745	68,505,209	219,649,543	82,174	768,619,854
European Union, total.....	1,019,676,821	318,665,532	57,662,126	61,634,192	199,322,618	46,596	704,292,833
Austria.....	9,031,944	3,372,621	105,305	1,000,751	2,266,565	--	5,683,102
Belgium.....	28,453,223	7,545,470	1,153,911	1,477,594	4,913,964	--	20,962,909
Denmark.....	5,484,103	1,852,869	129,627	543,421	1,179,822	--	3,636,397
Finland.....	3,540,511	856,037	30,237	190,786	635,014	--	2,684,473
France (including Andorra).....	89,571,745	25,749,370	3,439,820	2,947,934	19,361,616	--	63,891,714
Germany.....	145,870,485	40,582,393	5,337,370	7,571,235	27,650,122	23,666	105,414,576
Greece.....	686,326	43,094	1,420	27,132	14,542	--	643,232
Ireland.....	40,116,157	18,596,512	7,125,396	3,958,871	7,512,245	--	21,658,947
Italy (including San Marino).....	45,462,147	12,856,435	1,012,474	1,867,401	9,975,193	1,367	33,278,515
Luxembourg.....	17,033,586	6,951,676	520,294	1,870,011	4,561,371	--	10,082,543
Netherlands.....	204,775,730	84,523,466	23,566,981	12,346,810	48,608,414	1,261	121,052,631
Portugal.....	4,980,881	1,355,762	48,194	386,647	920,920	--	3,625,119
Spain.....	34,294,968	12,902,609	1,121,026	1,419,191	10,362,392	--	21,393,001
Sweden.....	28,424,988	5,980,571	331,019	1,545,137	4,104,415	--	22,579,462
United Kingdom.....	361,950,026	95,496,645	13,739,050	24,481,271	57,256,023	20,302	267,706,211
Other West European countries, total.....	88,084,177	35,107,011	11,109,080	6,141,227	17,821,126	35,579	56,600,661
Norway.....	10,107,472	2,221,619	14,529	1,114,479	1,092,612	--	8,079,607
Switzerland.....	72,521,625	31,530,462	11,025,857	4,063,447	16,405,580	35,579	44,353,952
Turkey.....	5,183,473	1,311,662	68,694	954,512	288,456	--	3,938,761
Other West European countries.....	271,608	43,268	--	8,789	34,479	--	228,340
East European countries, total.....	11,253,469	3,550,128	314,539	729,789	2,505,800	--	7,726,360
Czech Republic.....	1,749,588	300,389	5,253	95,338	199,797	--	1,452,648
Poland.....	4,131,817	1,365,980	244,166	479,776	642,038	--	2,785,408
Romania.....	171,066	6,749	--	6,749	--	--	164,316
Russia.....	155,875	814,864	--	22,802	792,063	--	741,011
Other East European countries.....	3,645,123	1,062,146	652,120	125,123	871,903	--	2,582,977

Footnotes at end of table.

Controlled Foreign Corporations, 2000

Table 2.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation of 7,500 Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued						
	Payments by foreign corporations to						
	All recipients	All related parties	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(24)	(25)	(26)	(27)	(28)	(29)	(30)
Africa, total.....	10,073,985	2,269,330	199,452	295,894	1,773,984	--	7,804,655
North Africa, total.....	1,826,325	140,924	4,563	117,388	18,973	--	1,685,401
Egypt.....	1,426,405	91,193	4,563	75,715	10,915	--	1,335,212
Morocco.....	399,920	49,732	--	41,673	8,059	--	350,189
East Africa, total.....	886,912	358,884	32,717	10,308	315,859	--	528,027
West and Central Africa, total.....	3,132,168	924,237	117,731	114,423	692,083	--	2,207,931
Liberia.....	1,920,374	717,619	73,399	5,903	638,317	--	1,202,755
Nigeria.....	841,929	89,169	44,332	39,434	5,403	--	752,760
Other West and Central African countries.....	369,864	117,449	--	69,086	48,363	--	252,415
Southern Africa, total.....	4,228,580	845,284	44,440	53,775	747,069	--	3,383,296
South Africa (including Namibia).....	4,221,413	845,066	44,440	53,556	747,069	--	3,376,347
Asia, total.....	311,782,545	116,122,656	33,992,212	23,012,751	58,696,681	421,012	196,062,650
Middle East, total.....	7,169,057	1,259,139	416,203	84,662	758,274	--	5,912,666
Israel.....	5,962,047	1,194,469	415,550	73,348	705,572	--	4,770,326
Other Middle East countries.....	1,207,010	64,670	653	11,315	52,701	--	1,142,340
Southern and Southeastern Asia, total.....	77,694,340	30,673,628	12,209,284	6,134,478	12,319,686	10,181	47,129,371
India.....	3,498,224	650,939	155,185	169,646	326,109	--	2,847,285
Indonesia.....	1,088,690	54,225	4,941	27,718	21,566	--	1,034,464
Malaysia.....	9,547,604	4,234,852	2,101,939	1,027,713	1,105,200	--	5,384,808
Philippines.....	5,025,796	2,639,720	1,437,364	107,173	1,092,915	2,268	2,422,260
Singapore.....	50,373,080	20,795,708	8,074,151	4,431,929	8,281,716	7,912	29,577,790
Thailand.....	7,954,555	2,269,979	435,497	353,118	1,481,364	(²)	5,684,576
Other Southern and Southeastern Asian countries.....	206,391	28,204	206	17,183	10,816	--	178,187
Eastern Asia, total.....	226,919,148	84,189,889	21,366,726	16,793,611	45,618,721	410,831	143,020,613
China.....	13,179,680	4,083,611	703,257	451,287	2,929,068	--	9,100,301
Hong Kong.....	30,182,833	13,013,125	4,198,069	2,103,913	6,711,118	25	17,221,145
Japan (including Okinawa and Ryukyu Islands).....	155,384,412	57,668,793	13,231,877	13,117,980	31,318,936	--	97,725,469
South Korea, Republic of.....	13,863,452	4,214,705	1,553,294	575,785	2,085,626	--	9,648,747
Taiwan.....	14,308,771	5,209,655	1,680,228	544,647	2,573,974	410,806	9,324,951
Oceania, total.....	47,540,357	11,027,758	2,679,019	1,709,525	6,639,214	--	36,572,717
Australia.....	42,611,267	9,592,161	2,421,920	1,600,211	5,570,030	--	33,072,505
New Zealand.....	4,003,216	1,353,845	247,973	105,970	999,901	--	2,655,411
Other countries of Oceania.....	925,874	81,752	9,126	3,343	69,282	--	844,800
Puerto Rico and U.S. Possessions, total.....	7,502,544	2,261,454	562,385	994,959	704,110	--	5,241,090
Puerto Rico.....	7,200,503	2,046,339	512,016	970,242	564,081	--	5,154,164
U.S. Possessions, total.....	302,041	215,115	50,369	24,717	140,029	--	86,926
OPEC countries, total (countries included above).....	12,406,635	1,482,517	330,279	336,203	816,035	--	10,924,118

¹ Number of returns is not additive because some U.S. corporations had Controlled Foreign Corporations in more than one country of incorporation.

² Value is less than \$500.

NOTE: Detail may not add to totals because of rounding and because data are shown for selected countries only.

Controlled Foreign Corporations, 2000

Table 3.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation

[Money amounts are in thousands of dollars]

Selected country of incorporation and NAICS industrial sector of 7,500 largest Controlled Foreign Corporations	Number of U.S. corporation returns ¹	7,500 largest Controlled Foreign Corporations			
		Number of foreign corporations	Total assets		Total receipts
			Beginning of year	End of year	
	(1)	(2)	(3)	(4)	(5)
All geographic areas ²					
All industries.....	1,087	7,500	3,563,713,908	4,367,374,661	2,157,736,289
Raw materials and energy production.....	107	435	210,629,058	249,030,747	109,464,006
Goods production.....	496	2,197	861,568,486	930,057,315	1,002,032,315
Distribution and transportation of goods.....	290	915	235,698,565	263,081,889	475,399,981
Information.....	85	298	114,288,514	165,895,788	49,818,018
Finance, insurance, real estate, and rental and leasing.....	360	1,713	1,418,627,626	1,825,708,854	212,915,499
Services.....	568	1,939	722,822,958	932,952,141	307,993,046
Argentina					
All industries.....	83	148	33,290,386	35,853,426	20,655,196
Raw materials and energy production.....	15	35	8,173,180	7,790,703	3,221,237
Goods production.....	35	43	9,057,679	9,511,248	7,962,374
Distribution and transportation of goods.....	11	11	3,933,282	3,869,876	5,405,324
Information.....	8	10	3,421,838	4,517,138	1,968,017
Finance, insurance, real estate, and rental and leasing.....	13	21	4,134,848	4,295,757	1,420,438
Services.....	19	28	4,569,559	5,868,704	677,806
Australia					
All industries.....	130	273	100,157,050	93,298,119	43,734,765
Raw materials and energy production.....	16	32	11,230,416	9,326,713	2,221,673
Goods production.....	44	59	19,330,861	17,413,938	20,706,565
Distribution and transportation of goods.....	30	32	6,656,090	4,516,642	9,095,137
Information.....	8	14	2,088,584	1,807,200	1,690,317
Finance, insurance, real estate, and rental and leasing.....	42	72	34,191,514	35,172,415	4,882,760
Services.....	38	64	26,659,584	25,061,210	5,138,315
Belgium					
All industries.....	86	141	54,614,926	55,946,753	28,826,424
Raw materials and energy production.....	--	--	--	--	--
Goods production.....	45	52	18,428,411	21,777,182	18,009,737
Distribution and transportation of goods.....	20	22	4,049,208	4,324,958	6,826,067
Information.....	7	7	1,323,263	798,292	141,677
Finance, insurance, real estate, and rental and leasing.....	25	30	20,538,072	21,270,860	2,286,267
Services.....	25	30	10,275,973	7,775,461	1,562,676
Bermuda					
All industries.....	106	181	101,547,573	133,882,368	44,997,344
Raw materials and energy production.....	10	27	11,900,863	11,453,759	7,996,116
Goods production.....	10	14	12,766,183	15,051,305	12,355,034
Distribution and transportation of goods.....	12	15	7,690,531	8,420,941	10,932,182
Information.....	4	4	1,244,735	2,295,281	93,868
Finance, insurance, real estate, and rental and leasing.....	59	91	59,794,840	83,439,806	10,334,178
Services.....	26	30	8,150,421	13,221,275	3,285,966
Brazil					
All industries.....	136	252	103,312,972	117,011,257	57,718,249
Raw materials and energy production.....	13	24	11,757,255	17,040,485	8,124,452
Goods production.....	76	103	29,191,771	32,656,988	25,044,787
Distribution and transportation of goods.....	14	17	4,628,973	5,555,736	8,730,706
Information.....	9	13	14,988,423	15,174,199	6,233,432
Finance, insurance, real estate, and rental and leasing.....	23	40	27,090,497	28,371,972	6,167,764
Services.....	36	55	15,656,054	18,211,878	3,417,108

Footnotes at end of table.

Controlled Foreign Corporations, 2000

Table 3.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation and NAICS industrial sector of 7,500 largest Controlled Foreign Corporations	Number of U.S. corporation returns ¹	7,500 largest Controlled Foreign Corporations			
		Number of foreign corporations	Total assets		Total receipts
			Beginning of year	End of year	
	(1)	(2)	(3)	(4)	(5)
Canada					
All industries.....	391	708	347,157,144	406,902,052	279,853,599
Raw materials and energy production.....	45	69	36,920,364	54,003,359	27,281,075
Goods production.....	179	221	96,412,108	105,340,569	153,070,356
Distribution and transportation of goods.....	84	93	27,662,604	33,561,681	62,286,538
Information.....	12	19	7,261,221	9,696,667	4,104,041
Finance, insurance, real estate, and rental and leasing.....	98	174	131,038,480	146,718,500	18,853,676
Services.....	97	132	47,862,367	57,581,275	14,257,913
Cayman Islands (British) ²					
All industries.....	134	283	123,317,018	198,085,399	39,442,977
Raw materials and energy production.....	17	28	10,894,963	12,396,371	3,196,050
Goods production.....	23	27	13,534,557	13,640,001	15,497,079
Distribution and transportation of goods.....	5	5	1,083,070	1,096,792	583,414
Information.....	4	4	3,144,495	3,477,464	654,713
Finance, insurance, real estate, and rental and leasing.....	52	120	67,455,318	98,103,337	5,424,632
Services.....	50	98	27,125,913	69,293,137	14,087,090
Chile					
All industries.....	48	70	15,894,714	22,155,359	5,732,513
Raw materials and energy production.....	5	10	3,809,101	6,562,429	1,635,594
Goods production.....	6	6	1,021,709	1,012,860	463,853
Distribution and transportation of goods.....	10	10	1,082,223	1,323,108	1,127,302
Information.....	4	7	1,929,293	2,166,960	657,593
Finance, insurance, real estate, and rental and leasing.....	16	20	4,630,210	7,129,562	1,249,297
Services.....	15	17	3,422,178	3,960,440	598,873
France (including Andorra)					
All industries.....	202	410	140,130,365	155,128,243	91,434,808
Raw materials and energy production.....	4	5	755,890	647,038	339,166
Goods production.....	104	142	39,354,822	40,539,969	46,857,691
Distribution and transportation of goods.....	43	52	11,992,211	11,718,051	24,558,584
Information.....	8	11	1,426,454	2,471,420	904,310
Finance, insurance, real estate, and rental and leasing.....	45	74	52,949,401	64,878,437	5,289,406
Services.....	80	126	33,651,588	34,873,329	13,485,652
Germany					
All industries.....	212	431	191,446,863	230,933,119	144,302,277
Raw materials and energy production.....	--	--	--	--	--
Goods production.....	106	159	70,173,779	62,590,254	86,676,651
Distribution and transportation of goods.....	42	55	14,492,538	18,092,877	28,982,897
Information.....	10	14	2,552,249	22,874,532	1,811,071
Finance, insurance, real estate, and rental and leasing.....	41	61	67,726,979	68,875,569	11,945,125
Services.....	107	142	36,501,318	58,499,887	14,886,533
Hong Kong					
All industries.....	70	111	45,433,221	50,962,453	31,532,804
Raw materials and energy production.....	**	**	**	**	**
Goods production.....	17	17	2,976,766	3,224,945	6,967,618
Distribution and transportation of goods.....	28	32	5,486,200	6,418,807	12,721,661
Information.....	**	**	**	**	**
Finance, insurance, real estate, and rental and leasing.....	17	33	27,460,528	31,215,776	6,504,321
Services.....	20	25	4,427,009	5,769,745	3,251,224
Ireland					
All industries.....	105	176	81,756,051	108,761,619	49,367,500
Raw materials and energy production.....	**	**	**	**	**
Goods production.....	40	49	21,354,111	28,112,545	22,785,221
Distribution and transportation of goods.....	12	14	1,757,730	2,793,920	5,757,261
Information.....	**	**	**	**	**
Finance, insurance, real estate, and rental and leasing.....	34	56	33,417,840	41,221,281	3,266,909
Services.....	39	50	24,022,920	35,231,074	17,316,101

Controlled Foreign Corporations, 2000

Table 3.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation and NAICS industrial sector of 7,500 largest Controlled Foreign Corporations	Number of U.S. corporation returns ¹	7,500 largest Controlled Foreign Corporations			
		Number of foreign corporations	Total assets		Total receipts
			Beginning of year	End of year	
	(1)	(2)	(3)	(4)	(5)
Italy (including San Marino)					
All industries.....	124	197	52,290,161	48,535,848	46,972,615
Raw materials and energy production.....	**	**	**	**	**
Goods production.....	72	107	26,294,464	23,320,222	26,602,461
Distribution and transportation of goods.....	30	34	9,140,692	9,205,664	13,677,820
Information.....	**	**	**	**	**
Finance, insurance, real estate, and rental and leasing.....	17	21	8,078,770	7,634,220	1,049,330
Services.....	26	31	8,231,768	7,840,555	5,513,910
Japan (including Okinawa and Ryukyu Islands)					
All industries.....	142	248	151,797,625	176,228,422	157,628,528
Raw materials and energy production.....	--	--	--	--	--
Goods production.....	72	106	60,173,012	59,015,764	87,866,542
Distribution and transportation of goods.....	55	67	18,900,914	20,515,373	42,191,172
Information.....	6	8	756,045	833,981	957,843
Finance, insurance, real estate, and rental and leasing.....	17	36	53,425,161	75,013,010	11,111,869
Services.....	22	31	18,542,492	20,850,295	15,501,102
Malaysia					
All industries.....	29	40	14,090,472	16,158,198	10,369,202
Raw materials and energy production.....	--	--	--	--	--
Goods production.....	17	21	6,120,056	7,244,368	8,005,500
Distribution and transportation of goods.....	4	5	693,655	629,012	1,191,755
Information.....	--	--	--	--	--
Finance, insurance, real estate, and rental and leasing.....	7	9	6,619,671	7,472,740	565,449
Services.....	5	5	657,090	812,077	606,498
Mexico					
All industries.....	147	271	76,193,947	88,868,862	85,408,949
Raw materials and energy production.....	7	10	3,566,945	4,032,461	2,492,655
Goods production.....	76	108	25,240,178	27,974,776	42,864,000
Distribution and transportation of goods.....	25	27	8,059,813	9,801,049	16,027,929
Information.....	5	13	2,190,226	2,595,420	1,991,329
Finance, insurance, real estate, and rental and leasing.....	33	47	11,767,946	18,100,622	3,790,937
Services.....	50	66	25,368,838	26,364,534	18,242,098
Netherlands					
All industries.....	289	554	359,830,040	415,860,501	219,551,136
Raw materials and energy production.....	11	14	12,135,588	11,082,839	6,310,996
Goods production.....	97	120	125,288,227	151,039,929	99,965,998
Distribution and transportation of goods.....	50	54	21,558,576	25,135,391	51,194,366
Information.....	16	28	17,698,207	27,299,894	6,064,268
Finance, insurance, real estate, and rental and leasing.....	60	90	66,478,197	68,226,251	11,091,834
Services.....	167	248	116,671,246	133,076,197	44,923,674
New Zealand					
All industries.....	22	38	14,878,159	17,841,670	3,869,409
Raw materials and energy production.....	**	**	**	**	**
Goods production.....	5	8	7,779,567	9,125,443	1,847,507
Distribution and transportation of goods.....	4	5	595,201	860,450	997,126
Information.....	**	**	**	**	**
Finance, insurance, real estate, and rental and leasing.....	6	11	4,003,247	5,649,522	276,999
Services.....	8	10	1,669,145	1,357,448	473,217
Norway					
All industries.....	24	30	10,758,216	11,400,985	12,375,564
Raw materials and energy production.....	7	7	6,706,256	7,197,823	4,728,252
Goods production.....	7	7	1,119,606	948,509	1,298,329
Distribution and transportation of goods.....	8	9	1,747,695	1,905,820	5,582,370
Information.....	**	**	**	**	**
Finance, insurance, real estate, and rental and leasing.....	**	**	**	**	**
Services.....	3	4	898,224	743,705	665,409

Footnotes at end of table.

Controlled Foreign Corporations, 2000

Table 3.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation and NAICS industrial sector of 7,500 largest Controlled Foreign Corporations	Number of U.S. corporation returns ¹	7,500 largest Controlled Foreign Corporations			
		Number of foreign corporations	Total assets		Total receipts
			Beginning of year	End of year	
	(1)	(2)	(3)	(4)	(5)
Panama (including Canal Zone)					
All industries.....	25	37	7,189,513	6,664,803	3,514,288
Raw materials and energy production.....	6	10	1,662,239	1,784,653	620,500
Goods production.....	6	6	1,293,476	1,133,661	1,172,743
Distribution and transportation of goods.....	5	6	2,002,897	1,277,678	1,167,356
Information.....	**	**	**	**	**
Finance, insurance, real estate, and rental and leasing.....	**	**	**	**	**
Services.....	11	12	1,939,382	2,068,893	425,004
Singapore					
All industries.....	75	109	50,814,899	56,639,124	54,784,422
Raw materials and energy production.....	--	--	--	--	--
Goods production.....	33	42	22,347,012	23,622,609	26,743,564
Distribution and transportation of goods.....	22	26	7,084,627	8,088,600	21,055,753
Information.....	--	--	--	--	--
Finance, insurance, real estate, and rental and leasing.....	16	21	16,223,217	17,685,605	1,715,406
Services.....	17	20	5,160,044	7,242,310	5,269,699
South Africa (including Namibia)					
All industries.....	20	24	3,902,213	4,300,996	4,423,672
Raw materials and energy production.....	--	--	--	--	--
Goods production.....	12	12	2,453,127	2,327,792	3,121,662
Distribution and transportation of goods.....	4	4	379,357	350,815	559,626
Information.....	--	--	--	--	--
Finance, insurance, real estate, and rental and leasing.....	4	4	750,273	748,299	373,630
Services.....	4	4	319,455	874,089	368,754
Spain					
All industries.....	110	151	49,457,183	56,365,239	36,404,143
Raw materials and energy production.....	3	3	6,106,081	1,315,967	139,070
Goods production.....	60	77	16,737,301	16,967,393	26,125,944
Distribution and transportation of goods.....	19	21	2,672,466	2,597,974	3,299,989
Information.....	4	4	881,652	860,523	149,297
Finance, insurance, real estate, and rental and leasing.....	18	22	11,545,938	13,145,549	2,533,203
Services.....	24	24	11,513,746	21,477,832	4,156,640
Sweden					
All industries.....	49	83	29,375,786	40,724,559	28,823,313
Raw materials and energy production.....	**	**	**	**	**
Goods production.....	18	21	13,306,897	12,263,576	18,166,469
Distribution and transportation of goods.....	12	19	4,287,065	5,860,630	7,147,683
Information.....	**	**	**	**	**
Finance, insurance, real estate, and rental and leasing.....	9	12	5,256,545	9,643,245	901,122
Services.....	19	25	5,612,345	11,805,244	1,450,348
Switzerland					
All industries.....	107	173	105,924,701	152,934,150	80,220,936
Raw materials and energy production.....	--	--	--	--	--
Goods production.....	35	41	32,386,781	40,413,407	23,337,626
Distribution and transportation of goods.....	35	37	14,444,587	14,618,492	30,887,719
Information.....	5	12	737,797	7,622,393	479,030
Finance, insurance, real estate, and rental and leasing.....	28	38	41,126,442	57,129,300	5,034,371
Services.....	34	45	17,229,095	33,150,560	20,482,190
United Kingdom ²					
All industries.....	455	1,291	955,359,368	1,216,189,536	372,709,148
Raw materials and energy production.....	25	54	51,282,509	60,986,010	29,246,132
Goods production.....	188	274	109,906,605	110,258,954	132,880,802
Distribution and transportation of goods.....	84	103	32,369,703	35,404,841	60,790,133
Information.....	31	71	31,700,846	36,880,696	9,505,218
Finance, insurance, real estate, and rental and leasing.....	137	363	535,712,449	768,491,305	75,068,587
Services.....	223	424	194,387,256	203,598,099	65,104,853

Controlled Foreign Corporations, 2000

Table 3.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation and NAICS industrial sector of 7,500 largest Controlled Foreign Corporations	Number of U.S. corporation returns ¹	7,500 largest Controlled Foreign Corporations			
		Number of foreign corporations	Total assets		Total receipts
			Beginning of year	End of year	
	(1)	(2)	(3)	(4)	(5)
Venezuela					
All industries.....	36	52	17,499,215	25,224,057	11,360,157
Raw materials and energy production.....	5	8	1,209,472	4,429,634	908,315
Goods production.....	13	14	3,829,995	4,212,225	1,985,454
Distribution and transportation of goods.....	5	5	1,043,416	1,847,302	1,716,505
Information.....	**	**	**	**	**
Finance, insurance, real estate, and rental and leasing.....	**	**	**	**	**
Services.....	11	15	2,726,330	4,315,725	1,225,423
European Union, total ²					
All industries.....	721	3,636	2,000,966,498	2,477,496,892	1,061,729,977
Raw materials and energy production.....	38	82	71,254,665	74,978,987	36,890,486
Goods production.....	328	1,059	457,063,015	489,177,851	491,181,970
Distribution and transportation of goods.....	179	406	107,182,964	120,387,787	212,137,401
Information.....	55	153	59,520,961	95,784,182	20,871,396
Finance, insurance, real estate, and rental and leasing.....	216	772	831,208,126	1,099,988,059	116,650,293
Services.....	428	1,162	474,736,766	596,610,395	183,885,007
European Monetary Union, total					
All industries.....	525	2,214	1,008,837,139	1,207,766,370	654,650,601
Raw materials and energy production.....	18	26	19,373,999	13,338,967	6,906,372
Goods production.....	259	748	332,212,003	362,721,008	338,644,799
Distribution and transportation of goods.....	133	276	69,387,618	78,093,556	142,358,932
Information.....	32	76	26,985,315	57,941,873	10,641,290
Finance, insurance, real estate, and rental and leasing.....	134	389	287,821,000	318,336,673	39,813,095
Services.....	314	699	273,057,204	377,334,293	116,286,113
OPEC countries, total					
All industries.....	49	74	22,098,758	32,068,536	14,531,589
Raw materials and energy production.....	12	18	2,834,673	7,929,046	2,188,194
Goods production.....	16	18	5,681,842	6,265,261	2,826,355
Distribution and transportation of goods.....	8	8	1,321,739	2,162,075	2,486,827
Information.....	**	**	**	**	**
Finance, insurance, real estate, and rental and leasing.....	**	**	**	**	**
Services.....	12	16	3,012,533	4,315,725	1,290,072

Footnotes at end of table.

Controlled Foreign Corporations, 2000

Table 3.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation and NAICS industrial sector of 7,500 largest Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued					
	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes	Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation	Total Subpart F income
	(6)	(7)	(8)	(9)	(10)	(11)
All geographic areas ²						
All industries.....	207,576,012	43,143,111	164,432,900	94,882,197	31,917,740	29,372,318
Raw materials and energy production.....	25,618,867	7,903,885	17,714,982	12,635,223	5,019,537	843,985
Goods production.....	80,911,319	17,212,236	63,699,083	32,155,917	14,296,179	7,991,909
Distribution and transportation of goods.....	16,919,764	4,447,881	12,471,883	8,899,016	2,604,333	3,744,631
Information.....	1,001,517	1,021,597	-20,081	2,036,185	547,306	412,567
Finance, insurance, real estate, and rental and leasing.....	35,858,768	6,541,456	29,317,313	14,663,822	2,391,254	8,319,134
Services.....	47,229,104	6,015,238	41,213,866	24,486,595	7,059,131	8,047,648
Argentina						
All industries.....	684,724	472,193	212,531	828,129	220,225	43,404
Raw materials and energy production.....	616,955	191,853	425,103	323,253	10,973	10,857
Goods production.....	28,667	136,129	-107,462	313,471	159,861	13,531
Distribution and transportation of goods.....	-77,336	42,379	-119,715	129,815	20,000	15,318
Information.....	-101,492	36,529	-138,021	--	--	--
Finance, insurance, real estate, and rental and leasing.....	190,714	48,982	141,732	26,300	25,805	3,530
Services.....	27,214	16,321	10,894	35,291	3,586	167
Australia						
All industries.....	2,753,538	865,364	1,888,174	1,638,035	635,101	264,280
Raw materials and energy production.....	-101,141	35,196	-136,337	38,157	--	17,701
Goods production.....	1,640,651	621,422	1,019,229	776,171	354,074	24,116
Distribution and transportation of goods.....	126,396	78,680	47,716	120,086	48,148	16,092
Information.....	-91,439	22,018	-113,457	48,089	36,020	--
Finance, insurance, real estate, and rental and leasing.....	703,902	161,290	542,612	323,226	36,783	144,416
Services.....	475,169	-53,243	528,411	332,307	160,076	61,956
Belgium						
All industries.....	2,240,993	460,376	1,780,618	1,491,405	840,288	686,613
Raw materials and energy production.....	--	--	--	--	--	--
Goods production.....	1,429,913	301,523	1,128,390	1,077,384	780,441	340,153
Distribution and transportation of goods.....	188,499	60,030	128,468	178,782	51,999	11,239
Information.....	10,411	261	10,150	29,329	--	7,416
Finance, insurance, real estate, and rental and leasing.....	338,594	68,901	269,694	124,766	2,422	253,572
Services.....	273,576	29,660	243,916	81,143	5,426	74,233
Bermuda						
All industries.....	8,680,895	1,130,853	7,550,042	4,428,756	2,163,249	2,530,923
Raw materials and energy production.....	3,045,214	966,450	2,078,764	2,072,966	1,709,355	177,985
Goods production.....	2,628,389	57,469	2,570,920	742,321	386,964	737,941
Distribution and transportation of goods.....	499,430	34,562	464,869	101,967	35,136	135,230
Information.....	-27,059	70	-27,129	--	--	561
Finance, insurance, real estate, and rental and leasing.....	2,190,338	51,059	2,139,279	1,347,091	31,794	1,340,155
Services.....	344,583	21,244	323,339	164,411	--	139,050
Brazil						
All industries.....	3,373,519	868,333	2,505,186	1,899,443	632,539	560,508
Raw materials and energy production.....	803,747	67,139	736,608	418,008	32,230	17,081
Goods production.....	1,603,557	401,023	1,202,534	835,605	506,040	252,036
Distribution and transportation of goods.....	-70,984	19,968	-90,953	48,523	41,696	--
Information.....	5,255	118,467	-113,212	156,697	--	30,144
Finance, insurance, real estate, and rental and leasing.....	703,746	227,435	476,311	220,940	2,861	139,945
Services.....	328,198	34,300	293,898	219,672	49,712	121,301

Footnotes at end of table.

Controlled Foreign Corporations, 2000

Table 3.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation and NAICS industrial sector of 7,500 largest Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued					
	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes	Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation	Total Subpart F income
	(6)	(7)	(8)	(9)	(10)	(11)
Canada						
All industries.....	24,761,314	5,889,372	18,871,942	8,444,142	3,148,177	1,694,095
Raw materials and energy production.....	4,668,366	871,171	3,797,195	2,414,692	375,939	58,099
Goods production.....	9,397,708	3,178,568	6,219,140	2,432,817	1,328,752	1,078,716
Distribution and transportation of goods.....	1,947,317	725,709	1,221,609	676,541	238,808	136,346
Information.....	1,804,293	13,052	1,791,240	503,599	9,492	28,985
Finance, insurance, real estate, and rental and leasing.....	1,856,698	567,188	1,289,510	503,634	188,534	163,366
Services.....	5,086,933	533,685	4,553,248	1,912,858	1,006,653	228,583
Cayman Islands (British) ²						
All industries.....	8,865,214	793,659	8,071,555	4,308,883	1,479,207	2,170,110
Raw materials and energy production.....	1,295,722	260,179	1,035,543	347,854	22,824	179,219
Goods production.....	1,521,721	119,477	1,402,243	1,644,414	1,429,566	210,241
Distribution and transportation of goods.....	93,340	4,761	88,579	52,292	--	48,927
Information.....	-14,410	15,067	-29,477	297	--	3,318
Finance, insurance, real estate, and rental and leasing.....	2,085,611	139,099	1,946,512	873,253	19,482	1,226,238
Services.....	3,883,635	255,075	3,628,560	1,390,773	7,334	502,166
Chile						
All industries.....	496,892	215,920	280,971	290,953	67,105	231,409
Raw materials and energy production.....	58,449	5,792	52,657	26,965	7,894	1,622
Goods production.....	97,086	4,165	92,922	30,451	26,265	6,900
Distribution and transportation of goods.....	-6,528	4,922	-11,450	--	--	3,281
Information.....	-215,823	2,388	-218,210	11,543	10,817	--
Finance, insurance, real estate, and rental and leasing.....	244,377	20,238	224,139	209,114	16,106	19,707
Services.....	319,329	178,416	140,914	12,881	6,023	199,898
France (including Andorra)						
All industries.....	5,446,384	1,679,111	3,767,273	3,001,201	977,377	802,157
Raw materials and energy production.....	78,594	5,992	72,603	38,132	--	827
Goods production.....	2,415,332	773,587	1,641,745	1,359,845	444,261	357,847
Distribution and transportation of goods.....	675,926	343,393	332,533	448,727	276,024	123,181
Information.....	182,318	6,909	175,409	19,466	--	122,246
Finance, insurance, real estate, and rental and leasing.....	898,492	212,112	686,380	332,262	54,980	54,205
Services.....	1,195,721	337,116	858,604	802,768	202,113	143,852
Germany						
All industries.....	8,818,477	2,267,320	6,551,157	8,849,513	3,138,030	568,428
Raw materials and energy production.....	--	--	--	--	--	--
Goods production.....	4,304,017	1,178,707	3,125,309	4,886,762	2,285,292	175,193
Distribution and transportation of goods.....	556,393	227,208	329,185	637,995	258,983	75,539
Information.....	-216,853	119,450	-336,302	167,175	34,063	10,076
Finance, insurance, real estate, and rental and leasing.....	1,375,258	426,611	948,647	843,508	202,664	167,248
Services.....	2,799,662	315,344	2,484,318	2,314,073	357,027	140,372
Hong Kong						
All industries.....	3,776,290	455,681	3,320,609	2,408,293	762,012	781,017
Raw materials and energy production.....	**	**	**	**	**	**
Goods production.....	436,115	58,230	377,885	109,385	35,039	124,123
Distribution and transportation of goods.....	754,832	74,016	680,816	491,463	37,518	378,587
Information.....	**	**	**	**	**	**
Finance, insurance, real estate, and rental and leasing.....	1,224,099	209,033	1,015,066	533,221	179,155	149,042
Services.....	675,216	27,098	648,117	887,998	510,300	24,191
Ireland						
All industries.....	11,769,381	1,103,071	10,666,309	1,709,672	283,866	2,229,578
Raw materials and energy production.....	**	**	**	**	**	**
Goods production.....	5,100,269	489,631	4,610,638	578,283	247,028	405,007
Distribution and transportation of goods.....	716,644	32,418	684,226	27,476	182	57,485
Information.....	**	**	**	**	**	**
Finance, insurance, real estate, and rental and leasing.....	1,100,479	170,107	930,372	237,127	--	542,511
Services.....	4,733,529	391,854	4,341,675	810,785	36,655	1,173,723

Footnotes at end of table.

Controlled Foreign Corporations, 2000

Table 3.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation and NAICS industrial sector of 7,500 largest Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued					
	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes	Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation	Total Subpart F income
	(6)	(7)	(8)	(9)	(10)	(11)
Italy (including San Marino)						
All industries.....	3,029,528	1,169,261	1,860,267	1,362,497	425,968	347,990
Raw materials and energy production.....	**	**	**	**	**	**
Goods production.....	2,312,324	767,872	1,544,452	698,469	164,665	75,861
Distribution and transportation of goods.....	636,862	269,405	367,457	151,359	2,833	175,024
Information.....	**	**	**	**	**	**
Finance, insurance, real estate, and rental and leasing.....	70,421	39,695	30,726	79,785	43,131	34,134
Services.....	-11,743	92,212	-103,955	432,886	215,339	62,972
Japan (including Okinawa and Ryukyu Islands)						
All industries.....	10,245,840	4,358,306	5,887,534	7,501,342	5,239,223	442,448
Raw materials and energy production.....	--	--	--	--	--	--
Goods production.....	5,461,070	2,536,885	2,924,185	4,971,866	3,936,198	292,742
Distribution and transportation of goods.....	1,792,163	826,094	966,070	699,681	361,078	133,311
Information.....	-4,121	23,228	-27,349	27,597	19,043	--
Finance, insurance, real estate, and rental and leasing.....	1,849,780	532,968	1,316,812	1,252,421	796,698	5,750
Services.....	1,146,948	439,131	707,817	549,777	126,206	10,645
Malaysia						
All industries.....	1,154,619	133,471	1,021,148	282,304	106,144	76,551
Raw materials and energy production.....	--	--	--	--	--	--
Goods production.....	864,410	52,827	811,583	183,314	104,315	70,270
Distribution and transportation of goods.....	2,611	6,547	-3,936	--	--	592
Information.....	--	--	--	--	--	--
Finance, insurance, real estate, and rental and leasing.....	201,259	67,465	133,794	98,990	1,829	5,004
Services.....	86,340	6,632	79,708	--	--	684
Mexico						
All industries.....	6,106,019	1,551,218	4,554,801	1,569,144	619,620	269,624
Raw materials and energy production.....	237,502	25,439	212,063	3,173	--	1,503
Goods production.....	3,227,770	804,835	2,422,935	759,917	421,050	124,252
Distribution and transportation of goods.....	1,064,352	326,554	737,798	156,352	40,920	58,698
Information.....	-156,432	4,442	-160,874	--	--	--
Finance, insurance, real estate, and rental and leasing.....	766,711	154,060	612,650	146,147	28,077	47,060
Services.....	966,116	235,888	730,228	503,556	129,573	38,110
Netherlands						
All industries.....	26,949,429	4,381,520	22,567,909	10,687,320	1,477,287	4,596,741
Raw materials and energy production.....	2,485,509	931,392	1,554,116	1,226,047	272,071	93,785
Goods production.....	14,548,482	2,094,390	12,454,091	3,302,960	286,962	1,260,963
Distribution and transportation of goods.....	2,357,829	117,642	2,240,186	1,840,750	96,046	932,813
Information.....	-249,490	224,499	-473,989	46,044	--	18,985
Finance, insurance, real estate, and rental and leasing.....	2,515,833	433,515	2,082,318	849,705	26,274	731,180
Services.....	5,291,267	580,080	4,711,187	3,421,813	795,933	1,559,014
New Zealand						
All industries.....	214,343	43,422	170,921	292,302	118,596	79,930
Raw materials and energy production.....	**	**	**	**	**	**
Goods production.....	116,661	13,943	102,718	162,735	23,104	6,601
Distribution and transportation of goods.....	-48,953	8,364	-57,317	6,561	6,554	12,797
Information.....	**	**	**	**	**	**
Finance, insurance, real estate, and rental and leasing.....	88,754	19,290	69,464	35,272	--	54,622
Services.....	109,989	1,825	108,165	87,734	88,938	5,909
Norway						
All industries.....	3,134,866	1,927,123	1,207,743	1,035,740	971,357	41,951
Raw materials and energy production.....	2,964,621	1,857,531	1,107,090	1,019,616	967,618	15,786
Goods production.....	16,919	14,530	2,389	--	--	384
Distribution and transportation of goods.....	120,383	43,048	77,335	9,678	3,739	15,989
Information.....	**	**	**	**	**	**
Finance, insurance, real estate, and rental and leasing.....	**	**	**	**	**	**
Services.....	70,549	11,816	58,734	6,446	--	3,411

Footnotes at end of table.

Controlled Foreign Corporations, 2000

Table 3.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation and NAICS industrial sector of 7,500 largest Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued					
	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes	Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation	Total Subpart F income
	(6)	(7)	(8)	(9)	(10)	(11)
Panama (including Canal Zone)						
All industries.....	359,732	50,483	309,249	474,733	165,957	124,538
Raw materials and energy production.....	127,419	18,260	109,160	75,971	--	3,741
Goods production.....	-20,466	1,814	-22,280	13,457	--	6,399
Distribution and transportation of goods.....	150,213	12,616	137,597	371,256	165,957	81,053
Information.....	**	**	**	**	**	**
Finance, insurance, real estate, and rental and leasing.....	**	**	**	**	**	**
Services.....	48,130	4,365	43,766	11,049	--	28,136
Singapore						
All industries.....	5,269,168	440,705	4,828,464	1,007,024	71,394	1,087,805
Raw materials and energy production.....	--	--	--	--	--	--
Goods production.....	3,347,056	197,394	3,149,662	498,556	59,551	534,855
Distribution and transportation of goods.....	278,089	45,218	232,871	82,667	11,432	86,041
Information.....	--	--	--	--	--	--
Finance, insurance, real estate, and rental and leasing.....	416,694	74,412	342,282	331,335	411	36,683
Services.....	1,227,329	123,680	1,103,649	94,467	--	430,226
South Africa (including Namibia)						
All industries.....	218,359	68,367	149,992	44,250	16,592	27,298
Raw materials and energy production.....	--	--	--	--	--	--
Goods production.....	149,968	40,655	109,313	24,768	6,802	26,408
Distribution and transportation of goods.....	10,486	8,013	2,472	9,848	4,018	--
Information.....	--	--	--	--	--	--
Finance, insurance, real estate, and rental and leasing.....	67,594	19,535	48,060	3,817	--	890
Services.....	-9,689	164	-9,853	5,817	5,773	--
Spain						
All industries.....	3,692,504	1,298,161	2,394,343	1,212,494	712,169	174,749
Raw materials and energy production.....	-8,693	--	-8,693	--	--	--
Goods production.....	1,107,419	320,044	787,375	514,760	129,496	124,408
Distribution and transportation of goods.....	131,713	12,567	119,146	150,079	115,512	8,267
Information.....	-41,343	2,049	-43,392	--	--	--
Finance, insurance, real estate, and rental and leasing.....	297,662	41,215	256,447	1,434	--	405
Services.....	2,205,747	922,286	1,283,461	546,222	467,161	41,668
Sweden						
All industries.....	1,742,179	232,509	1,509,670	949,923	369,266	272,300
Raw materials and energy production.....	**	**	**	**	**	**
Goods production.....	296,438	82,283	214,156	87,542	561	4,317
Distribution and transportation of goods.....	804,508	102,175	702,333	555,597	166,914	253,300
Information.....	**	**	**	**	**	**
Finance, insurance, real estate, and rental and leasing.....	180,174	24,119	156,055	3,136	42	10,781
Services.....	294,476	15,783	278,693	278,447	201,749	3,901
Switzerland						
All industries.....	10,980,675	939,668	10,041,007	2,899,002	448,458	3,077,340
Raw materials and energy production.....	--	--	--	--	--	--
Goods production.....	5,228,226	368,678	4,859,548	971,627	36,515	710,061
Distribution and transportation of goods.....	1,026,515	132,321	894,193	796,169	110,037	445,728
Information.....	-41,419	21	-41,440	--	--	2,176
Finance, insurance, real estate, and rental and leasing.....	1,207,991	245,696	962,295	157,990	95,195	207,671
Services.....	3,559,362	192,952	3,366,411	973,216	206,712	1,711,704
United Kingdom ²						
All industries.....	29,696,179	6,917,785	22,778,394	17,678,437	4,387,910	3,348,790
Raw materials and energy production.....	7,453,626	2,210,102	5,243,524	3,655,143	1,287,195	131,766
Goods production.....	3,722,586	1,356,043	2,366,543	2,720,294	302,336	509,484
Distribution and transportation of goods.....	1,367,487	509,636	857,851	271,121	50,788	128,169
Information.....	-1,136,142	127,143	-1,263,285	209,830	68,841	13,645
Finance, insurance, real estate, and rental and leasing.....	9,958,134	1,923,783	8,034,352	4,441,328	455,985	1,977,552
Services.....	8,293,411	790,261	7,503,151	6,375,281	2,222,764	575,730

Footnotes at end of table.

Controlled Foreign Corporations, 2000

Table 3.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation and NAICS industrial sector of 7,500 largest Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued					
	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes	Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation	Total Subpart F income
	(6)	(7)	(8)	(9)	(10)	(11)
Venezuela						
All industries.....	2,093,079	321,831	1,771,248	520,114	103,226	46,056
Raw materials and energy production.....	-34,961	23,029	-57,990	473	--	3,098
Goods production.....	354,580	12,887	341,693	34,181	31,600	2,798
Distribution and transportation of goods.....	98,197	23,395	74,802	29,528	27,843	1,686
Information.....	**	**	**	**	**	**
Finance, insurance, real estate, and rental and leasing.....	**	**	**	**	**	**
Services.....	302,196	25,796	276,401	82,149	36,009	10,503
European Union, total ²						
All industries.....	99,284,001	20,364,575	78,919,426	50,051,294	13,088,869	14,197,579
Raw materials and energy production.....	10,215,521	3,159,246	7,056,275	4,919,606	1,559,550	226,378
Goods production.....	36,846,086	7,683,771	29,162,315	15,857,974	4,658,099	3,461,349
Distribution and transportation of goods.....	8,016,100	1,748,975	6,267,125	4,782,624	1,244,089	1,905,953
Information.....	-1,237,157	545,489	-1,782,645	553,046	102,904	223,219
Finance, insurance, real estate, and rental and leasing.....	17,383,341	3,422,432	13,960,909	7,153,681	869,867	3,961,117
Services.....	28,023,032	3,803,844	24,219,189	16,778,922	4,654,361	4,407,120
European Monetary Union, total						
All industries.....	66,834,140	13,079,095	53,755,045	30,780,836	8,247,772	10,259,052
Raw materials and energy production.....	2,557,419	940,994	1,616,424	1,264,179	272,071	94,612
Goods production.....	32,500,332	6,156,318	26,344,014	12,987,306	4,346,506	2,913,212
Distribution and transportation of goods.....	5,778,682	1,131,642	4,647,040	3,777,463	1,026,387	1,522,642
Information.....	-245,538	416,802	-662,340	318,014	34,063	209,574
Finance, insurance, real estate, and rental and leasing.....	7,082,419	1,451,211	5,631,207	2,529,951	338,897	1,849,510
Services.....	19,160,827	2,982,128	16,178,700	9,903,923	2,229,847	3,669,502
OPEC countries, total						
All industries.....	2,234,528	424,671	1,809,856	633,246	159,237	50,218
Raw materials and energy production.....	-241,097	85,177	-326,274	43,100	35,800	4,391
Goods production.....	569,205	12,887	556,318	59,934	31,600	3,548
Distribution and transportation of goods.....	126,544	29,992	96,552	49,397	34,255	3,804
Information.....	**	**	**	**	**	**
Finance, insurance, real estate, and rental and leasing.....	**	**	**	**	**	**
Services.....	334,411	43,267	291,143	82,149	36,009	10,503

** Not shown to avoid disclosure of information on specific corporations. However, the data are included in the appropriate totals.

¹ Number of returns is not additive because some U.S. corporations had Controlled Foreign Corporations in more than one industrial sector. The industrial activity of the parent corporation filing the return often differs from that of the Controlled Foreign Corporations.

² Includes "Nature of business not allocable," not shown separately.

NOTE: Detail may not add to totals because of rounding and because data are shown for selected countries only.