

Controlled Foreign Corporations, 1980

By Arthur Gianelos and William Sutton*

For 1980, the total assets of 35,471 Controlled Foreign Corporations passed the half trillion dollar mark, reaching \$508 billion [1]. From these investments in foreign subsidiary corporations, \$699 billion of business receipts and \$47.6 billion of pre-tax earnings and profits were generated. Taxes paid to foreign countries by these foreign subsidiaries totaled \$16.4 billion. Nearly 45 percent (\$13.6 billion) of the \$31.2 billion of after-tax earnings and profits were paid to stockholders as dividends. U.S. corporations, as majority stockholders, received most (\$10.7 billion) of these dividend payments.

The relatively few domestic corporations (4,799) controlling these foreign subsidiaries tended to be large companies. Although representing less than two-tenths of one percent of all domestic corporations, they accounted for 45 percent of the total assets, 43 percent of the business receipts, and 58 percent of the net income of all the 2.7 million domestic corporations, as shown in Figure A.

EVOLUTION OF CONTROLLED FOREIGN CORPORATIONS

After World War II, corporations were encouraged to invest overseas for both economic and political reasons. The Marshall Plan, for instance, was a program which extended economic aid to European countries (and increased exports by U.S. companies) in order to accelerate their economic recovery. Additionally, as a means of developing their economies, Western European nations and developing countries lured foreign investments through various kinds of commercial and industrial concessions. Most of the U.S. products exported and most foreign investments came from large American corporations. The selling of products overseas was frequently a prelude to foreign investment. Once the foreign market was explored and penetrated via exports the next step was to set up a branch or a subsidiary. The former required establishing a place of business in a foreign country while the latter required establishing legal residence through incorporation in the country.

Figure A.--Domestic Corporation Returns and Controlled Foreign Corporations (CFC's), Selected Items, 1980

[Money amounts are in millions of dollars]

Selected items	Domestic corporation returns		
	All	With Controlled Foreign Corporations	Controlled Foreign Corporations
Number of returns/CFC's	2,710,538	4,799	35,471
Total assets	7,617,238	3,430,444	508,032
Business receipts	5,731,616	2,437,191	699,003
Net income (less deficit)	239,007	137,638	N/A
Current earnings and profits (less losses), before taxes of CFC's	N/A	N/A	47,622
Foreign income taxes of CFC's, net	N/A	N/A	16,440
Dividends received from all foreign corporations	14,563	14,173	N/A
Dividends paid to domestic parent corporations by CFC's on stock, directly or indirectly held	N/A	N/A	10,652

N/A = Not Applicable

*Foreign Returns Analysis Section. Prepared under the direction of Jim Hobbs, Chief.

Foreign operations began to expand overseas in various countries for many reasons [2]. Lower labor and transportation costs, market accessibility and sources of supply, the political and economic climate, stability of the currency, modern transportation and communication facilities were surely some of the reasons.

Prior to 1960, U.S. corporations were not required to file information on foreign corporations. They were also able to defer payment of U.S. tax on all foreign profits because the income earned by foreign corporations was not taxed by the U.S. Government until repatriated to the U.S. parents, usually in the form of dividends. This postponement of tax added further impetus to the economic reasons for establishing foreign subsidiaries.

Public Law 86-780 was passed in 1960 to obtain information on these foreign holdings. It required a domestic corporation to furnish, as part of its tax return, information on any foreign subsidiaries it directly controlled (i.e., tier-one subsidiaries) and any foreign subsidiaries controlled by these directly-controlled foreign corporations (i.e., tier-two subsidiaries) [3]. Control was defined as direct or indirect ownership of stock having more than 50 percent of the combined voting power of all classes of stock. These foreign corporations became known as Controlled Foreign Corporations (CFC's). In 1961, there were slightly more than 7,000 foreign corporations which were CFC's, owned by nearly 1,700 U.S. parent corporations [4].

The retention of earnings and profits by foreign subsidiaries made it possible to defer U.S. income taxation indefinitely. More and more, foreign subsidiaries were organized abroad, aided by arrangements between parent and subsidiary corporations to maximize accumulation of profits in certain countries for the purpose of reducing overall tax liability. Also, through an ordinary taxable liquidation, sale, or exchange of assets of a foreign subsidiary, it was possible to bring the accumulated earnings of the subsidiary back to the United States by paying a capital gains tax rather than the higher tax based on dividend income.

The Revenue Act of 1962 placed some restrictions on certain types of income previously eligible for tax deferral. It allowed for the U.S. taxation of specific types of undistributed earnings and profits [5]. Owners of foreign corporations were required to report, for tax purposes, the undistributed earnings of foreign corporations to the extent they represented income from insuring U.S. risks, passive types of income in general, and income derived from certain types of sales and service. These

types of income were referred to as "Subpart F income" and were no longer tax deferred. Also, the conversion of tax-deferred accumulated earnings and profits into capital gains was restricted.

The 1962 Act also redefined the term Controlled Foreign Corporation. Foreign corporations were considered Controlled Foreign Corporations (whose undistributed earnings and profits could be subject to U.S. taxation through their U.S. parents or other shareholders), if more than 50 percent of the voting stock of the foreign corporation was owned by U.S. shareholders, each having at least a 10 percent or more interest. The 1962 Act also expanded the filing requirements for Controlled Foreign Corporations to include all lower tiers of foreign corporations controlled by the U.S. corporation [6].

The Tax Reduction Act of 1975 expanded the definition of Subpart F income. An exception permitting tax deferral for a portion of Subpart F income reinvested in tax-defined "less-developed countries" was repealed for accounting periods beginning in 1976. Also, prior to the Act, no income was treated as Subpart F income if it was 30 percent or less of the gross income. This percentage was reduced to 10, thus limiting the amount of income that could avoid treatment as Subpart F income. Finally, some types of shipping income received by foreign subsidiaries of U.S. corporations, which were previously excluded from Subpart F income, were now included. As a result of these and other actions, the tax deferral privileges of CFC's in certain countries were reduced, but not entirely eliminated.

RELATIVE PROFIT MARGINS OF CONTROLLED FOREIGN CORPORATIONS AND ALL U.S. CORPORATIONS

The profit margins of CFC's compared to all U.S. corporations has traditionally been relatively high. As shown in Figure B, while the percentage of current earnings and profits to business receipts for CFC's has declined from nearly 9 percent in 1972 to 6.8 percent in 1980, this measure of profitability remained relatively high compared to domestic corporations [7]. During the same period of time, net income, a similar measure of profitability, for all U.S. corporations ranged between 4.2 and 5.5 percent of business receipts. It appears that for the past several years, the profit margins of CFC's were higher than domestic corporations.

TRANSACTIONS OF CONTROLLED FOREIGN CORPORATIONS

The U.S. parent corporations through their control of the foreign corporations can direct the industrial activity and the business dealings of these foreign corporations. Information

Figure B.--Relative Profit Margins of Controlled Foreign Corporations and All U.S. Corporations, 1972-1980

[Money amounts are in millions of dollars]

Selected years	Controlled Foreign Corporations				Profit margin of U.S. corporations ²
	Number	Business receipts	Current E&P ¹ less deficit before taxes	Profit margin	
1972	29,221	\$172,407	\$15,356	8.91	4.82
1974	19,142	281,271	20,938	7.44	5.11
1976	21,071	342,777	23,478	6.85	5.50
1980	35,471	699,003	47,622	6.81	4.17

¹Earnings and profits.²Based on net income as a percent of business receipts.

on all transactions of the foreign corporations is not usually available. However, transactions between the foreign corporations and the U.S. parent corporations as well as other subsidiaries of the parent corporations were identified on the return.

The transactions shown in Figure C, between Controlled Foreign Corporations and their U.S. parent corporations, were substantially greater in dollar amounts than transactions between the CFC's and other related domestic and foreign corporations controlled by the same parents. CFC's received \$65.5 billion from their U.S. parents and \$50.3 billion from other related persons in 1980, while they in turn made \$92.7 billion in payments to their U.S. parents and \$65.2 billion to other related persons.

Figure D illustrates the major flow of receipts and payments between CFC's and their related corporations. The purchases of stock in trade (i.e., purchases of merchandise in the ordinary course of a trade or business) by CFC's from all related companies, foreign and domestic, accounted for the majority of payments by CFC's, comprising more than the combined total of dividends, funds loaned, interest, commissions, rents, royalties, compensation for services, and other payments. The merchandise purchased by CFC's from both parent and other related domestic corporations was \$87.7 billion in 1980, while only \$10.7 billion was purchased from related foreign companies.

The importance of the purchases from related domestic corporations can be especially appreciated when their dollar value is compared to the dollar value of all U.S. exports [8]. For 1980, the \$87.7 billion in purchases of stock in trade by CFC's from their related

domestic corporations accounted for nearly 40 percent of the \$220.8 billion of total U.S. exports. Previous studies indicate that CFC purchases of stock in trade from related domestic corporations have consistently accounted for approximately 40 percent of the U.S. exports for the previous 7 years.

The sales of stock in trade by CFC's dominated the receipts that they received from related corporate members. These sales totaled \$75.1 billion, of which \$62.8 billion were to related U.S. corporations. This latter amount was nearly 26 percent of the total U.S. imports (\$244.0 billion) for 1980 [8]. Thus, it can be seen that while the United States was in an overall deficit trade position for 1980 (with \$244.0 billion of imports to only \$220.8 billion of exports), transactions involving CFC's resulted in a net surplus of almost \$25 billion to the U.S. balance of trade.

Approximately equal amounts of funds (\$21 billion) were borrowed from, and loaned to, CFC's and their related domestic and foreign corporations. These were the second largest type of transaction, accounting for 18 percent of CFC receipts and 13 percent of the payments they made. Foreign subsidiaries provided \$2.4 billion more in loans to U.S. parent corporations than loans they obtained from them.

Dividends paid by CFC's to related domestic and foreign corporations amounted to \$13.2 billion. Most of these dividends, as expected, were remitted to U.S. parent corporations. The amount of dividends paid was partly dictated by the dividend policy prescribed by the U.S. parent corporations. The decision for CFC's to pay dividends was significantly affected by the U.S. corporation's foreign tax credit position [9].

Figure C

Transactions of Controlled Foreign Corporations with Selected Related Member Corporations, 1980

(Millions of Dollars)

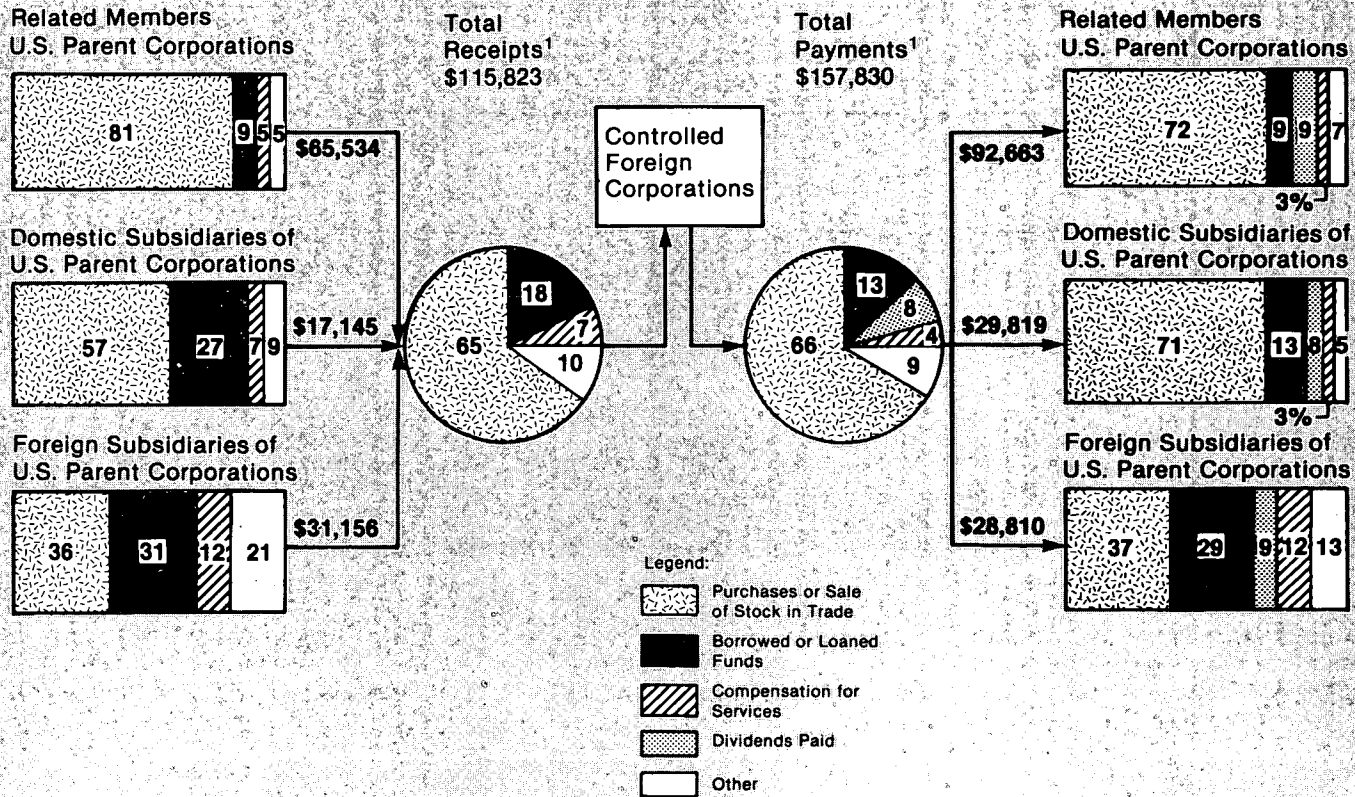
Transactions	Receipts of CFC				Payments by CFC			
	Total ¹	U.S. parent	Domestic subsidiary of U.S. parent	Foreign subsidiary of U.S. parent	Total ¹	U.S. parent	Domestic subsidiary of U.S. parent	Foreign subsidiary of U.S. parent
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Total	115,823	65,534	17,146	31,156	157,830	92,663	29,819	28,810
Sales or purchases of stock in trade	75,078	53,033	9,749	11,103	103,909	66,630	21,035	10,682
Purchases of tangible property	n.a.	n.a.	n.a.	n.a.	1,891	1,864	216	—
Sales or purchases of property rights	506	323	146	37	185	129	34	22
Compensation for services	8,059	3,151	1,176	3,678	6,916	2,516	796	3,553
Commissions	1,915	846	284	746	1,058	233	141	682
Rents and royalties	1,298	264	181	802	4,510	3,336	245	880
Amounts borrowed or loaned	20,552	5,880	4,620	9,878	20,875	8,275	3,958	8,226
Dividends	2,974	373	83	2,513	13,235	8,358	2,294	2,559
Interest	4,368	1,243	663	2,195	5,140	1,507	1,082	2,151
Insurance premiums received	1,046	414	235	390	n.a.	n.a.	n.a.	n.a.
Not allocable	28	7	7	14	111	16	19	78

n.a. — Not applicable.

¹Totals include receipts and payments of 10% or more U.S. shareholders of CFC (other than controlling shareholder) and 10% or more U.S. shareholders of domestic corporation filing return, which are not shown separately.

NOTE: Detail may not add to total due to rounding.

Figure D.
Flow of Receipts and Payments Between Controlled Foreign Corporations and Their Related Member Corporations (Percent of Total and Millions of Dollars)



¹ Total includes receipts and payments of 10% or more U.S. shareholder of CFC (other than controlling shareholder) and 10% or more U.S. shareholder of domestic corporation filing return.

Note: Receipts and payments of CFC's from sources other than related member corporations are not available.

INDUSTRIAL ACTIVITY OF CONTROLLED FOREIGN CORPORATIONS

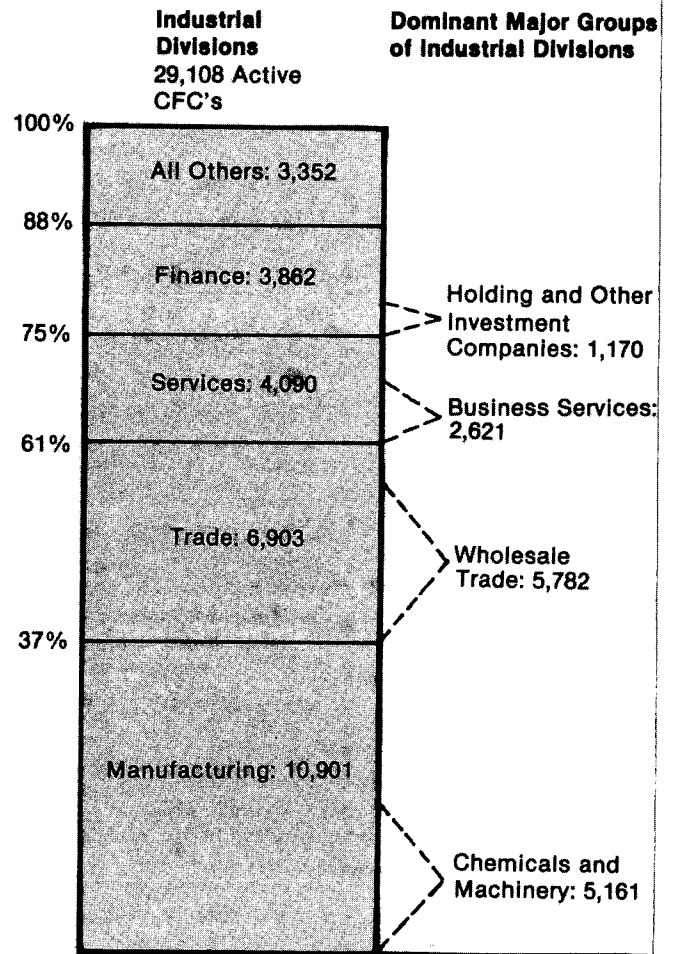
There were 29,108 CFC's actively involved in business operations during Tax Year 1980. Four broad activities accounted for nearly 90 percent of these CFC's. As shown in Figure E, manufacturing (with 10,901 CFC's), trade (6,903), services (4,090), and finance (3,862) were the four principal industrial activities in which most CFC's were chiefly involved. These particular foreign subsidiaries accounted for 90 percent of all foreign taxes paid by CFC's and almost 90 percent of the total distributions made to stockholders. For instance, of the \$16.4 billion of foreign taxes paid by CFC's, manufacturing subsidiaries paid \$9.7 billion, while trade, services, and finance subsidiaries paid \$3.5, \$0.7, and \$0.8 billion, respectively.

Historically, CFC's have been involved in manufacturing activities to a greater degree than in any other activity. Many nations, in fact, encourage the manufacture of goods for export (through tax exemptions) to bolster their economies and to help pay for imports.

However, the domination of manufacturing CFC's, although still important, diminished somewhat during the period of 1968 through 1980. For instance, in 1968, approximately 44 percent of all active CFC's were primarily engaged in manufacturing operations. By 1980, this percentage had decreased to 37 percent. During this same period, the percentage of total assets reported by manufacturers fell from 82 percent to 45 percent. While the number of manufacturing CFC's grew during this period, foreign subsidiaries involved in services and finance expanded at a faster rate. Manufacturing assets of CFC's rose from \$79.7 billion in 1968 to \$226.1 billion in 1980, while the assets of CFC's principally involved in services and finance grew more rapidly, beginning at only \$7.2 billion and expanding to \$149.3 billion during the same period.

An analysis of more specific principal industrial activities shows that CFC's were most frequently engaged in the manufacture of machinery and chemicals, accounting for 5,161 subsidiaries (nearly 18 percent) with assets of \$88.6 billion. Looking at the trade industry we find that wholesaling was the dominant activity for nearly 5,800 CFC's, while other trade activities accounted for only 1,100 CFC's. Foreign subsidiaries performing business services (2,621 CFC's) accounted for most service companies. Finally, holding and investment CFC's, while accounting for only 30 percent of all financial subsidiaries, appear to have played an important role. Investment companies generally manage a portfolio of security investments (with little participation in the management of the companies), while

**Figure E.
Dominant Industries, By Number and Percent of Active Controlled Foreign Corporations, 1980**



holding companies do manage the companies they control and act as conduits for the financial transactions between these companies and other corporations. As such, these CFC's distributed \$1.1 billion of the \$1.7 billion in dividends paid by all financial CFC's during 1980.

INDUSTRIAL DISTRIBUTION OF U.S. CORPORATIONS AND THEIR CFC'S

Controlled Foreign Corporations were commonly engaged in the same principal industrial activity as their parent companies. Figure F

Controlled Foreign Corporations, 1980

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Figure F

Business Receipts and Current Earnings and Profits for Active Controlled Foreign Corporations in the Same Industry as Their U.S. Corporation Parent, 1980

[Money amounts are in millions of dollars]

Industries of U.S. corporations and CFC's	Number of U.S. corporation returns	Number of CFC's	Percent of CFC's in same industry as parent	CFC business receipts	Percent of business receipts when CFC is in the same industry as parent	CFC's current earnings and profits before taxes	Percent of current earnings and profits when CFC is in same industry as parent
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All Industries, U.S.							
All CFC's ¹	4,430	29,108		699,003		47,822	
CFC's in same industry ²	3,388	15,900	54.6	448,754	64.2	30,140	63.3
Agriculture, forestry and fishing, U.S.							
All CFC's	20	105		1,312		34	
CFC's in same industry	7	28	26.7	139	10.1	10	29.4
Mining, U.S.							
All CFC's	172	554		5,551		1,143	
CFC's in same industry	86	274	49.5	2,889	53.8	856	74.9
Construction, U.S.							
All CFC's	133	495		6,990		387	
CFC's in same industry	94	297	60.0	6,371	91.1	366	94.6
Manufacturing, U.S.							
All CFC's	2,452	19,689		554,534		40,015	
CFC's in same industry	1,849	10,038	51.0	336,721	61.1	24,884	62.2
Transportation and public utilities, U.S.							
All CFC's	242	1,373		14,976		1,034	
CFC's in same industry	161	563	41.0	5,079	33.9	321	31.0
Wholesale and retail trade, U.S.							
All CFC's	768	2,303		88,805		2,881	
CFC's in same industry	472	1,391	60.4	77,977	87.8	2,103	79.0
Finance, insurance, and real estate, U.S.							
All CFC's	481	2,336		20,472		1,843	
CFC's in same industry	313	1,516	64.9	12,339	60.3	1,224	66.4
Services, U.S.							
All CFC's	531	2,251		6,362		505	
CFC's in same industry	405	1,793	79.7	5,145	80.8	376	74.5

¹Represents all active CFC's controlled by U.S. corporations which were classified in the indicated industry.²Represents only those active CFC's classified in the same industry as their U.S. corporation parents.

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

shows that CFC's which were engaged in the same principal industrial activity as their parent corporation accounted for 64.2 percent of the business receipts and 63.3 percent of the earnings and profits of all CFC's. Business receipts and earnings and profits were selected as the most positive measures of relative activity. For all industries there were 15,900 CFC's (54.6 percent) of 29,108 active CFC's classified in the same industry as the parent corporation filing the return.

Parent manufacturing corporations owned the majority (19,689 out of 29,108) of active CFC's. Slightly over half (10,038) of these CFC's were also primarily engaged in manufacturing activities. The CFC's which were engaged in the same activity as their parents tended to be larger in size than other CFC's. For instance, while manufacturing CFC's accounted for half of all CFC's owned by manufacturing parents, these same CFC's accounted for over 60 percent of the business receipts and earnings and profits, respectively, for all CFC's owned by these parents.

Of the remaining 8,788 non-manufacturing CFC's owned by manufacturing parents, most were involved primarily in wholesale and retail trade. These CFC's were also an extension of their parents and most likely were engaged in the distribution of products produced by their

U.S. parent corporations. Like manufacturing CFC's, trade CFC's were also large as measured by business receipts. While they comprised 25 percent of all CFC's owned by manufacturing parents, they produced one third of the business receipts of these same CFC's.

The remaining CFC's whose major activities were not directly related to their parents' manufacturing activity conversely tended to be of a smaller size. Although they were almost a fourth of the CFC's of these parent corporations, they produced only 5 percent of the business profits. Thus, it can be seen that while U.S. manufacturing parent corporations diversified into other enterprises through CFC's, this was done at a relatively slow pace. They often ventured into foreign countries conducting the types of businesses they had previously performed in the United States either by manufacturing the same products or by selling their U.S. manufactured products.

SUMMARY

Controlled Foreign Corporations play a significant role in U.S. international trade through their transactions with related U.S. corporations. These transactions accounted for 40 percent of the total U.S. exports and 26 percent of the total U.S. imports in 1980.

Most CFC's were generally controlled by large U.S. corporations. They were also primarily engaged in the same business activities as their parent corporations. Additionally, manufacturing continued to be the dominant activity of CFC's, although services and financial activities have grown more rapidly than manufacturing activities in recent years.

DATA SOURCES AND LIMITATIONS

Sample Selection and Variability

The statistics for the 1980 Tax Year were estimated by using as a basis the stratified probability sample of about 85,000 corporation income tax returns selected after revenue processing but before audit. A description of the sample selection procedures for corporate returns is presented in the Appendix.

From the general corporate sample described above, all returns containing Forms 2952 were used for the 1980 statistics presented in this article. The weighting factor used for each return was the same factor used for the U.S. parent corporation.

Sampling variability (i.e., the degree to which statistics based on a sample differ from similar data based on a complete count or census) occurs only in strata in which returns were selected at a rate of less than 100 percent. For this article, returns selected at the 100 percent rate accounted for the largest part of the estimated amounts. For instance, for 1980, CFC's owned by U.S. corporations with \$250 million or more in total assets (and selected at a 100 percent rate) accounted for the major portion of total assets (94.1 percent), business receipts (93.3 percent), and current earnings and profits (93.4 percent) of CFC's owned by all corporations. Because of the predominance of large companies, sampling variability is not considered a major limitation of the statistics. It is also felt that historical analysis can be performed using studies based on all corporate returns with CFC's (1972 and 1980) and studies based on only "large" corporate returns with CFC's (1974 and 1976).

Limitations

Controlled Foreign Corporations were classified by the principal business activity of the corporation as reported on Form 2952. Certain amounts of receipts, profits, and other items may have been generated by other activities in addition to the principal business activity. It is not possible to measure the extent of these secondary operations.

About 50 U.S. corporations filed consolidated Controlled Foreign Corporation schedules, with the data aggregated for several companies.

Follow-up requests were made in an attempt to get the individual CFC information. About 75 percent of these requests were successful. A part of the remaining data fell into the correct classification by industry because all of the CFC's reported on that particular return were in the same industry. The few remaining unresolved consolidated CFC's were left in the same industry classification as the CFC showing the consolidated data.

Nearly 7 percent of the CFC's had inadequate or no information shown to identify by whom they were controlled (i.e., domestic or foreign corporations). These CFC's were separately identified, checked, and corrected using their transactions with related corporations, if any, or the name of their parent corporation on the Form 2952, if different from the name of the domestic corporation filing the return. If this information was not helpful the actual return was checked, if available, or a previous-year record of the CFC was used to check ownership at that time.

Because Form 2952 was designed to report transactions between Controlled Foreign Corporations and their related persons, specific data are not available for the transactions between CFC's and non-related persons. For instance, it is known that total CFC business receipts were \$699 billion, of which \$116 billion were receipts from related persons. The difference, \$583 billion, was received from non-related persons, about which detailed data could not be tabulated.

Time Period Covered

The 1980 estimates are based on data filed by U.S. corporations with accounting periods that were for full years ending any time between July 1980 through June 1981. In addition to these returns filed for 12-month accounting periods, the statistics also include data from part-year returns (filed for accounting periods ending during the same time period by corporations which were new, merging, liquidating or simply changing their accounting periods). Because Forms 2952 were filed for the accounting periods of CFC's ending with, or within the accounting periods of the U.S. parent corporations, the CFC accounting periods covered by the statistics may have ended any time during the period August 1978 through June 1981; however, most of the activity was deemed to have occurred during 1980.

EXPLANATION OF SELECTED TERMS

Business receipts of Controlled Foreign Corporations.--Business receipts were, in general, gross receipts or gross sales less returns and allowances reported for CFC's on Forms 2952. In the finance, insurance, and real estate industries, business receipts were

generally the total income or receipts of the CFC and may have included other types of income such as interest, royalties, rents, and other investment income. This definition differs from that used for business receipts statistics for domestic corporations, in that investment income is normally excluded.

Current earnings and profits of Controlled Foreign Corporations.--This item represents the difference between the accumulated beginning and ending year balances of earnings and profits available for distribution to the stockholders. In this report, pre-tax current earnings and profits are shown. The earnings and profits of a foreign corporation must be calculated under U.S. accounting standards, as required by IRS regulations.

Distributions of Controlled Foreign Corporations.--The distributions of CFC's consisted of dividends paid to shareholders of the CFC's, capital gains distributions, and distributions paid out of capital (including capital stock, paid-in capital, and capital surplus). Liquidating dividends may also have been included.

Foreign income taxes paid by Controlled Foreign Corporations.--These were foreign income, war profits, and excess profits taxes paid or accrued by CFC's to foreign countries or U.S. possessions (including Puerto Rico). Also included were taxes imposed by other countries (including the United States) in cases where CFC's had business operations in countries other than the one in which they were incorporated.

Inactive Controlled Foreign Corporations.--Inactive CFC's were those which showed no income, deductions, or foreign income taxes paid, but may have shown only transactions regarded as indicative of passive investment, such as dividends paid out of prior-year earnings. Total assets for these CFC's were accumulated for the statistics.

Includable Income of Controlled Foreign Corporations.--This income represents Subpart F income (described below), plus other types of income defined in Internal Revenue Code Section 951. Subpart F income was the largest portion of includable income received by U.S. shareholders. A more complete definition of this term can be found in the *Supplemental Report, Statistics of Income--1976-1979, International Income and Taxes, Foreign Income and Taxes Reported on U.S. Income Tax Returns*, page 381.

Related persons of Controlled Foreign Corporations.--Five categories of related persons of CFC's were shown on Form 2952 for the purpose of reporting transactions. They were (1) the U.S. corporation filing the return; (2) a domestic corporation controlled by the corporation filing the return; (3) a foreign corporation controlled by the corporation filing the

return; (4) 10-percent or more U.S. shareholder of the CFC (other than the controlling shareholder); and (5) 10-percent or more U.S. shareholders of the U.S. corporation filing the return.

Sales and Purchases of Stock in Trade.--These were sales and purchases of merchandise in the ordinary course of trade or business. These items were reported as transactions for the five categories of related persons described above.

Subpart F Income.--Subpart F provisions of the Internal Revenue Code (section 952) allow the United States to tax U.S. shareholders on certain types of income which, although undistributed to them, were deemed to be constructively distributed and thereby taxable, generally at the same rate(s) as dividends. Subpart F income included income from the insurance and reinsurance of U.S. risks, "foreign base company income," boycott participation income, and illegal bribes and kickbacks.

Transactions of Controlled Foreign Corporations.--Controlled Foreign Corporation transactions were reported on Form 2952 for five categories of related persons (described above) who dealt with the CFC's. The transactions shown include receipts and payments for such items as property rights, stock in trade, services rendered, commissions, rents and royalties, dividends, interest, insurance premiums and amounts borrowed and loaned.

NOTES AND REFERENCES

- [1] Although all U.S. persons (individuals, partnerships, corporations, estates or trusts) could control a foreign corporation, this article is based only on a sample of foreign corporations controlled by U.S. corporations.
- [2] There will be an article in the Fall 1984 issue of the *Statistics of Income Bulletin* covering 1980 country data for Controlled Foreign Corporations.
- [3] This information was filed on Forms 2952, Information Returns by a Domestic Corporation with Respect to Controlled Foreign Corporations. The data contained on these forms are the bases for the statistics shown in this article.
- [4] These data were based on an unpublished Statistics of Income study of 1961 corporation income tax returns with Forms 2952 attached.
- [5] Book earnings of CFC's were required to be adjusted to comply with the U.S. tax concept of earnings and profits as specified by Internal Revenue regulations. An early

study concluded that although substantial differences in accounting practices existed among countries, there were even greater variations among countries in the types of taxes and methods of taxation used. Harmon, Murl D., "Calculating Earnings and Profits for Foreign Subsidiaries: Background and Some Actual Results Showing Differences Among Countries," *Taxes--The Tax Magazine*, July 1973.

[6] Control by the U.S. corporation was extended to lower-tier foreign corporations through a chain of control, viz., the U.S. corporation owned more than 50 percent of a foreign corporation (first-tier) which, in turn, owned more than 50 percent of a second-tier foreign corporation which, in turn, owned more than 50 percent of a third-tier foreign corporation, and so forth. Forms 2952 had to be filed for each of these foreign corporations.

[7] Although the 1974 and 1976 data were based only on CFC's owned by U.S. corporations with total assets of \$250 million or more, the profit ratio was not materially affected because the vast majority of CFC's belong in this category.

[8] U.S. Department of Commerce, Bureau of the Census, *Highlights of U.S. Export and Import Trade*. Data from this source are based on calendar year periods, while CFC data are based on accounting periods ended July through June for each year of the domestic parent corporations.

[9] There will be an article in the Summer 1984 *Statistics of Income Bulletin* concerning foreign tax credits claimed by U.S. corporations for 1980.

Controlled Foreign Corporations, 1980

Table 1.—Number of Returns, Total Assets, Income, Deductions, Tax and Credits, of U.S. Corporations and Number, Total Assets, Receipts, Earnings, Taxes, Distributions, and Selected Transactions of Controlled Foreign Corporations, by Selected Industry and Size of Total Assets of U.S. Corporation Filing the Return—Continued

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

Selected industry and size of total assets of U.S. corporations filing return	Controlled Foreign Corporations										
	Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign income taxes (net)	Distributions		Receipts by foreign corporations from —			
						Total	Out of current earnings and profits	U.S. corporation filing return		Any domestic corporations controlled by the U.S. corporation filing return	
								Total	Sales of stock in trade	Total	Sales of stock in trade
(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)	
Manufacturing—Continued											
Motor vehicles and equipment	1,171	47,384,443	64,560,553	887,292	684,163	362,801	232,797	9,186,269	7,810,213	230,825	184,022
Zero under \$50,000,000	32	375,618	205,086	-18,913	733	1,242	551	32,549	30,796	4,979	4,979
\$50,000,000 under \$250,000,000	103	404,168	482,805	45,641	19,539	30,020	14,332	17,834	14,350	14,564	7,610
\$250,000,000 or more, total	1,036	46,604,657	63,872,662	860,564	663,891	331,539	217,913	9,135,886	7,765,067	211,282	171,432
\$250,000,000 under \$500,000,000	47	225,258	314,094	706	5,807	8,716	1,294	41,835	39,712	1,177	1,040
\$500,000,000 under \$1,000,000,000	87	570,043	587,635	71,454	22,734	17,123	8,642	21,889	8,344	271	(1)
\$1,000,000,000 or more	902	45,809,356	62,970,933	788,404	635,351	305,700	207,976	9,072,162	7,717,010	209,834	170,392
Transportation and public utilities	1,759	19,031,100	14,976,283	1,033,718	324,495	500,890	273,123	517,090	156,006	680,038	444,766
Zero under \$50,000,000	380	387,244	510,123	34,693	7,861	2,850	2,138	49,534	11,330	21,836	—
\$50,000,000 under \$250,000,000	106	344,432	351,453	26,930	6,257	4,057	1,978	9,761	739	10,673	—
\$250,000,000 or more, total	1,274	18,299,425	14,114,707	972,094	310,376	493,982	269,005	457,793	143,937	647,529	444,766
\$250,000,000 under \$500,000,000	86	1,009,889	186,658	49,473	2,432	4,371	3,918	579	—	124	—
\$500,000,000 under \$1,000,000,000	114	735,123	354,238	36,799	11,559	5,744	5,513	9,123	—	30,887	38
\$1,000,000,000 or more	1,074	16,554,413	13,573,811	885,822	296,386	483,868	259,574	448,092	143,937	616,518	444,728
Wholesale and retail trade	2,863	31,926,928	88,804,810	2,661,007	689,283	482,022	335,260	1,730,723	1,528,562	436,438	306,222
Zero under \$50,000,000	1,051	1,735,818	2,605,090	113,114	32,911	18,889	12,522	183,128	149,147	69,155	65,120
\$50,000,000 under \$250,000,000	464	2,188,827	7,496,924	265,825	63,283	44,591	42,018	158,255	132,918	50,798	26,487
\$250,000,000 or more, total	1,349	28,002,284	78,702,796	2,282,067	593,089	418,541	280,720	1,389,340	1,246,498	316,486	214,614
\$250,000,000 under \$500,000,000	179	1,316,921	4,804,573	107,022	21,399	18,526	12,091	37,269	22,842	52,877	48,110
\$500,000,000 under \$1,000,000,000	147	950,459	650,546	72,696	22,913	43,781	23,907	206,965	195,061	52,149	51,952
\$1,000,000,000 or more	1,023	25,734,903	73,247,677	2,102,348	548,777	356,234	244,723	1,145,107	1,028,595	211,459	114,552
Wholesale trade	2,327	22,928,740	74,431,299	1,912,230	472,660	367,360	238,560	1,622,375	1,494,032	371,110	293,156
Zero under \$50,000,000	971	1,643,860	2,506,412	105,562	32,123	17,256	10,925	168,021	140,201	68,682	64,888
\$50,000,000 under \$250,000,000	375	2,108,151	7,323,517	240,765	58,351	44,456	42,013	132,548	110,680	47,318	26,487
\$250,000,000 or more, total	982	19,176,729	64,601,370	1,565,903	382,187	305,646	185,622	1,321,806	1,243,151	255,109	201,781
\$250,000,000 under \$500,000,000	136	1,194,067	4,629,450	100,249	19,346	16,312	10,294	29,383	20,118	51,718	48,110
\$500,000,000 under \$1,000,000,000	107	812,825	453,557	47,788	15,437	39,794	22,450	206,820	195,061	52,042	51,952
\$1,000,000,000 or more	739	17,169,838	59,518,363	1,417,866	347,404	249,539	152,877	1,085,602	1,027,973	151,350	101,718
Retail trade	535	8,998,188	14,370,162	748,512	216,622	114,662	96,700	108,063	34,530	65,328	13,066
Zero under \$50,000,000	79	91,958	95,330	7,288	788	1,633	1,596	14,823	8,945	472	232
\$50,000,000 under \$250,000,000	89	80,676	173,407	25,061	4,934	134	5	25,707	22,238	3,479	—
\$250,000,000 or more, total	367	8,825,555	14,101,426	716,164	210,901	112,895	95,099	67,534	3,347	61,377	12,834
\$250,000,000 under \$500,000,000	43	122,854	175,122	6,773	2,053	1,796	7,885	2,724	1,159	—	—
\$500,000,000 under \$1,000,000,000	40	137,635	196,989	24,909	7,476	3,986	1,457	144	—	108	—
\$1,000,000,000 or more	284	8,565,066	13,729,315	684,482	201,373	106,695	91,846	59,504	623	60,110	12,834
Finance, insurance and real estate	2,980	79,517,280	20,472,199	1,842,647	506,460	480,666	318,006	2,514,124	6,187	3,226,525	296,547
Zero under \$50,000,000	635	1,960,257	1,485,670	37,652	24,230	25,899	14,840	5,862	—	302,537	283,280
\$50,000,000 under \$250,000,000	202	984,920	754,326	115,123	24,508	36,911	20,773	8,043	319	9,132	—
\$250,000,000 or more, total	2,143	76,572,104	18,232,203	1,689,874	457,723	417,857	282,392	2,500,218	5,868	2,914,855	3,267
\$250,000,000 under \$500,000,000	185	2,339,018	4,496,247	245,666	74,705	124,169	87,758	79	—	3,267	3,267
\$500,000,000 under \$1,000,000,000	418	3,610,296	725,705	138,195	37,210	54,241	41,113	58,558	2,885	165	—
\$1,000,000,000 or more	1,540	70,622,790	13,010,250	1,306,013	345,807	239,446	153,521	2,441,581	2,983	2,911,423	—
Banking	715	53,063,718	6,647,607	745,471	212,832	120,049	78,712	2,169,669	1,681	2,717,368	—
Zero under \$50,000,000	**	**	**	**	**	**	**	**	**	**	—
\$50,000,000 under \$250,000,000	**	**	**	**	**	**	**	**	**	**	—
\$250,000,000 or more, total	708	52,934,016	6,628,952	743,011	212,413	120,049	78,712	2,169,669	1,681	2,716,168	—
\$250,000,000 under \$500,000,000	**	**	**	**	**	**	**	**	**	**	—
\$500,000,000 under \$1,000,000,000	**	**	**	**	**	**	**	**	**	**	—
\$1,000,000,000 or more	708	52,934,016	6,628,952	743,011	212,413	120,049	78,712	2,169,669	1,681	2,716,168	—
Insurance carriers	718	14,203,293	5,610,895	446,325	91,173	69,332	49,916	86,926	4,187	126,919	—
Zero under \$50,000,000	*17	*373,034	*40,228	*2,270	*548	—	—	*4,586	—	—	—
\$50,000,000 under \$250,000,000	13	103,528	48,399	20,717	1,893	1,824	1,824	—	—	—	—
\$250,000,000 or more, total	689	13,726,730	5,522,268	423,337	88,733	66,758	47,092	82,340	4,187	126,919	—
\$250,000,000 under \$500,000,000	24	111,161	59,332	256	626	893	340	—	—	—	—
\$500,000,000 under \$1,000,000,000	77	638,577	108,170	15,612	4,140	2,768	1,579	10,631	2,885	64	—
\$1,000,000,000 or more	586	12,976,993	5,354,767	407,982	83,966	63,097	45,173	71,710	1,302	126,855	—
Services	2,660	5,833,160	6,362,369	505,065	196,476	148,465	87,273	168,935	48,227	55,409	4,521
Zero under \$50,000,000	997	967,160	1,362,893	66,937	36,048	13,660	10,384	36,297	11,791	5,342	—
\$50,000,000 under \$250,000,000	786	1,686,601	2,142,278	174,364	64,203	42,032	28,278	37,850	3,720	28,857	4,521
\$250,000,000 or more, total	877	3,179,400	2,857,399	263,764	96,224	92,773	48,630	94,788	32,716	21,211	—
\$250,000,000 under \$500,000,000	388	966,485	1,039,172	107,816	49,097	34,083	21,120	59,948	32,263	2,677	—
\$500,000,000 under \$1,000,000,000	183	469,332	407,429	34,615	12,235	5,575	4,774	2,089	238	207	—
\$1,000,000,000 or more	296	1,743,583	1,410,798	121,333	34,893	53,115	22,735	32,751	215	18,127	—

Footnotes at end of table.

Controlled Foreign Corporations, 1980

Table 1.—Number of Returns, Total Assets, Income, Deductions, Tax and Credits, of U.S. Corporations and Number, Total Assets, Receipts, Earnings, Taxes, Distributions, and Selected Transactions of Controlled Foreign Corporations, by Selected Industry and Size of Total Assets of U.S. Corporation Filing the Return — Continued

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

Table with 12 columns: Selected industry and size of total assets of U.S. corporations filing return; Receipts by foreign corporations; U.S. corporation filing return; Payments by foreign corporations to U.S. corporation filing return; Any domestic corporations controlled by the U.S. corporation filing the return; Any foreign corporations controlled by the U.S. corporation filing return. Sub-columns include Total, Sales of stock in trade, Purchases of stock in trade, Dividends paid. Rows include industries like All Industries, Agriculture, Mining, etc., and asset size brackets.

Footnotes at end of table.

Controlled Foreign Corporations, 1980

Table 1.—Number of Returns, Total Assets, Income, Deductions, Tax and Credits, of U.S. Corporations and Number, Total Assets, Receipts, Earnings, Taxes, Distributions, and Selected Transactions of Controlled Foreign Corporations, by Selected Industry and Size of Total Assets of U.S. Corporation Filing the Return—Continued

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

Selected industry and size of total assets of U.S. corporations filing return	Controlled Foreign Corporations—Continued										
	Receipts by foreign corporations—Continued		Payments by foreign corporations to—								
	Any foreign corporation controlled by U.S. corporation filing return		U.S. corporation filing return			Any domestic corporations controlled by the U.S. corporation filing the return			Any foreign corporations controlled by the U.S. corporation filing return		
	Total	Sales of stock in trade	Total	Purchases of stock in trade	Dividends paid	Total	Purchases of stock in trade	Dividends paid	Total	Purchase of stock in trade	Dividends paid
(23)	(24)	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)	(33)	
Manufacturing—Continued											
Motor vehicles and equipment	1,636,261	476,869	12,575,593	10,329,792	196,465	697,509	352,980	65,501	1,906,542	305,004	80,544
Zero under \$50,000,000	1,216	763	54,252	43,553	820	13,283	12,791	—	1,361	763	—
\$50,000,000 under \$250,000,000	39,347	32,200	51,983	17,589	26,145	23,705	22,332	25	19,906	12,565	3,334
\$250,000,000 or more, total	1,595,698	443,905	12,469,359	10,268,651	169,499	660,520	317,857	65,477	1,885,276	291,675	77,210
\$250,000,000 under \$500,000,000	2,137	2,055	25,127	17,699	1,143	7,644	575	7,069	3,762	3,310	362
\$500,000,000 under \$1,000,000,000	60,649	29,966	56,111	43,972	7,413	12,874	5,059	7,334	45,884	17,632	1,907
\$1,000,000,000 or more	1,532,912	411,884	12,388,121	10,206,980	160,943	640,003	312,223	51,074	1,835,630	270,733	74,942
Transportation and public utilities	958,270	81,021	969,570	76,464	112,267	663,412	105,338	111,504	1,029,659	54,509	133,660
Zero under \$50,000,000	20,283	—	13,817	156	2,742	22,848	94	39	41,707	—	—
\$50,000,000 under \$250,000,000	6,608	—	20,847	498	1,672	5,470	—	895	3,833	—	—
\$250,000,000 or more, total	931,379	81,021	954,905	75,809	107,653	635,095	105,244	110,569	984,120	54,509	133,660
\$250,000,000 under \$500,000,000	108,476	—	14,653	—	3,760	—	—	—	96,340	—	300
\$500,000,000 under \$1,000,000,000	8,593	2,396	7,894	118	5,014	2,460	659	593	5,485	118	—
\$1,000,000,000 or more	814,310	78,624	932,358	75,692	98,879	632,635	104,585	109,977	882,295	54,391	133,360
Wholesale and retail trade	1,253,513	494,342	10,225,888	9,262,668	293,860	515,018	291,995	58,746	1,378,980	814,927	95,395
Zero under \$50,000,000	53,911	37,913	202,639	165,619	9,701	86,482	67,478	7,324	84,634	66,105	2,663
\$50,000,000 under \$250,000,000	27,455	2,541	265,055	192,769	27,156	57,986	21,435	10,565	33,430	3,596	6,606
\$250,000,000 or more, total	1,172,147	453,887	9,758,000	8,904,280	258,005	370,550	203,082	40,854	1,258,917	745,226	86,126
\$250,000,000 under \$500,000,000	78,799	68,387	107,436	49,960	10,923	17,555	1,711	2,261	134,219	110,897	5,157
\$500,000,000 under \$1,000,000,000	15,683	—	143,022	103,997	34,156	40,223	25,617	2,139	11,853	—	7,080
\$1,000,000,000 or more	1,077,666	385,501	9,507,542	8,753,323	212,926	312,772	177,294	36,454	1,112,845	634,329	73,890
Wholesale trade	1,112,187	493,391	9,742,999	9,187,668	253,988	359,984	275,814	24,654	1,238,488	814,927	80,113
Zero under \$50,000,000	51,557	37,913	187,187	163,997	9,701	83,870	68,515	5,731	82,281	66,105	2,663
\$50,000,000 under \$250,000,000	27,222	2,541	233,176	173,393	27,045	56,746	20,661	10,565	33,321	3,596	6,606
\$250,000,000 or more, total	1,033,388	452,937	9,312,635	8,860,279	218,243	219,369	186,638	8,358	1,122,898	745,226	70,845
\$250,000,000 under \$500,000,000	78,741	68,387	44,375	21,569	8,532	2,733	1,711	1,439	134,199	110,897	5,157
\$500,000,000 under \$1,000,000,000	15,060	—	128,144	93,738	30,674	28,272	25,617	2,020	11,853	—	7,080
\$1,000,000,000 or more	939,587	384,550	9,140,116	8,744,882	178,037	188,364	162,851	4,899	976,847	634,329	58,608
Retail trade	141,345	951	482,844	65,000	39,873	155,034	16,180	34,092	138,481	—	15,282
Zero under \$50,000,000	2,354	—	5,401	1,822	—	2,612	962	1,596	2,354	—	—
\$50,000,000 under \$250,000,000	232	—	31,679	19,377	1,111	1,240	774	—	109	—	—
\$250,000,000 or more, total	138,760	951	445,365	44,001	39,762	151,181	14,444	32,496	136,619	—	15,282
\$250,000,000 under \$500,000,000	58	—	63,061	25,300	1,392	14,822	822	20	—	—	—
\$500,000,000 under \$1,000,000,000	823	—	14,878	10,259	3,482	11,951	—	119	—	—	—
\$1,000,000,000 or more	138,079	951	367,426	8,442	34,888	124,408	14,444	31,554	135,999	—	15,282
Finance, insurance and real estate	3,247,676	41,196	3,999,406	42,982	144,112	3,555,168	216,902	161,283	2,453,860	41,778	127,313
Zero under \$50,000,000	58,567	29,754	53,563	—	22,780	30,701	16,987	1,254	47,132	29,805	1,098
\$50,000,000 under \$250,000,000	20,439	4,763	15,471	2,109	9,494	216,314	199,915	11,855	18,560	5,373	11,942
\$250,000,000 or more, total	3,168,670	6,680	3,930,374	40,872	111,837	3,308,153	3,087,111	148,174	2,388,167	6,600	114,274
\$250,000,000 under \$500,000,000	54,673	(1)	83,448	—	64,792	5,069	—	1,907	60,807	—	23,878
\$500,000,000 under \$1,000,000,000	79,484	80	39,214	28,816	1,638	4,626	—	1,697	104,392	—	50,451
\$1,000,000,000 or more	3,034,533	6,600	3,807,712	12,056	45,408	3,298,458	—	144,570	2,222,969	6,600	39,944
Banking	2,629,373	6,600	3,548,731	6,574	12,803	2,936,722	—	104,438	1,964,789	6,600	1,818
Zero under \$50,000,000	78	—	158	—	—	—	—	—	78	—	—
\$50,000,000 under \$250,000,000	—	—	—	—	—	90	—	—	—	—	—
\$250,000,000 or more, total	2,629,295	6,600	3,548,573	6,574	12,803	2,936,632	—	104,438	1,964,711	6,600	1,818
\$250,000,000 under \$500,000,000	—	—	—	—	—	837	—	—	—	—	—
\$500,000,000 under \$1,000,000,000	—	—	4,712	—	—	—	—	—	—	—	—
\$1,000,000,000 or more	2,629,295	6,600	3,543,862	6,574	11,965	2,936,632	—	104,438	1,964,711	6,600	1,818
Insurance carriers	237,537	80	193,896	14,678	28,501	102,802	—	15,919	116,618	—	21,915
Zero under \$50,000,000	41	—	18	—	—	—	—	—	41	—	—
\$50,000,000 under \$250,000,000	264	—	40	—	40	—	—	—	—	—	—
\$250,000,000 or more, total	237,232	80	193,838	14,678	28,461	102,802	—	15,919	116,577	—	21,015
\$250,000,000 under \$500,000,000	—	—	687	—	687	3	—	—	36	—	36
\$500,000,000 under \$1,000,000,000	48,472	80	10,045	9,217	237	2,506	—	—	47,045	—	2,531
\$1,000,000,000 or more	188,760	—	183,106	5,461	27,537	100,292	—	15,919	69,496	—	18,449
Services	172,025	13,193	520,014	114,826	69,150	48,265	3,152	26,236	212,410	13,993	21,802
Zero under \$50,000,000	49,272	1,740	67,109	17,074	10,388	10,591	279	334	51,857	3,079	2,285
\$50,000,000 under \$250,000,000	81,648	11,353	71,255	11,669	24,948	4,459	2,774	285	109,829	10,910	13,850
\$250,000,000 or more, total	41,105	101	381,652	86,083	33,812	33,215	99	25,616	50,725	4	5,567
\$250,000,000 under \$500,000,000	13,197	73	60,616	4,553	27,499	4,362	—	174	12,056	—	4,919
\$500,000,000 under \$1,000,000,000	11,110	—	62,784	1,859	4,928	642	—	—	14,238	—	648
\$1,000,000,000 or more	16,798	28	258,252	79,672	1,386	28,211	99	25,442	24,431	4	—

* Estimate should be used with caution because of the small number of sample returns on which it was based.

** Deleted or combined to avoid disclosure of information for specific corporations.

† Less than \$500.

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

Controlled Foreign Corporations, 1980

Table 2.—Number of U.S. Corporation Returns and Number, Total Assets, Receipts, Earnings, Taxes and Distributions of Controlled Foreign Corporations, by Selected Industry of U.S. Corporation Filing the Return and by Selected Industry of Controlled Foreign Corporation

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

Selected industry of U.S. corporation filing return and selected industry of Controlled Foreign Corporation	Number of U.S. corporation returns	Controlled Foreign Corporations								
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)	Distributions	
						Current earnings and profits before taxes	Foreign income taxes (net)		Total	Out of current earnings and profits
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	
All Industries (U.S. Parent)	4,799	35,471	508,031,994	699,003,002	47,621,582	55,794,508	16,736,730	16,440,451	14,115,642	9,643,638
CFC Industries										
Agriculture, forestry and fishing.....	73	224	4,167,349	1,618,046	-1,195,895	115,907	37,832	36,801	19,651	15,955
Mining.....	273	969	15,017,247	11,392,971	3,430,646	3,820,565	1,273,353	1,272,931	975,082	446,771
Construction.....	172	558	7,028,446	11,244,627	798,147	907,458	199,234	183,706	343,556	154,801
Manufacturing.....	2,052	10,901	226,062,259	354,511,342	25,832,360	29,871,292	9,895,433	9,666,940	7,238,667	5,409,843
Transportation and public utilities.....	336	1,145	21,412,678	18,442,328	980,649	1,426,419	242,569	259,358	571,348	239,379
Wholesale and retail trade.....	1,507	6,903	82,234,324	256,779,170	11,108,818	12,176,380	3,518,158	3,496,022	2,542,746	1,862,034
Finance, insurance, and real estate.....	1,048	3,862	129,263,466	24,921,436	4,821,672	5,240,696	851,207	806,194	1,674,186	1,041,042
Services.....	1,081	4,090	20,359,450	19,911,917	1,841,033	2,221,868	716,536	706,075	730,411	473,095
Nature of business not allocable.....	195	456	276,175	181,164	4,153	11,923	2,409	2,426	4,166	718
Inactive.....	1,538	6,363	2,210,599	—	—	—	—	—	15,827	—
Agriculture, forestry and fishing (U.S. Parent)	20	142	878,019	1,312,264	34,278	46,747	16,963	15,695	1,971	871
CFC Industries										
Agriculture, forestry and fishing.....	7	28	186,851	132,898	10,061	14,845	4,421	4,380	802	492
Mining.....	—	—	—	—	—	—	—	—	—	—
Construction.....	—	—	—	—	—	—	—	—	—	—
Manufacturing.....	3	26	96,976	111,220	8,507	9,695	3,829	3,575	70	70
Transportation and public utilities.....	**	**	**	**	**	**	**	**	**	**
Wholesale and retail trade.....	11	27	373,530	992,797	9,389	13,165	7,480	6,538	391	304
Finance, insurance, and real estate.....	4	6	29,886	1,405	103	613	83	83	—	—
Services.....	4	8	38,801	33,020	952	1,853	304	273	694	—
Nature of business not allocable.....	**	**	**	**	**	**	**	**	**	**
Inactive.....	4	37	7,482	—	—	—	—	—	—	—
Mining (U.S. Parent)	172	793	7,383,484	5,551,063	1,142,818	1,211,077	253,386	253,545	369,138	239,408
CFC Industries										
Agriculture, forestry and fishing.....	—	—	—	—	—	—	—	—	—	—
Mining.....	86	274	4,263,998	2,989,371	855,937	903,006	173,519	174,150	195,779	184,605
Construction.....	3	6	74,524	32,857	11,972	13,698	3,054	3,054	778	—
Manufacturing.....	10	69	1,197,545	1,345,806	126,946	143,033	46,927	46,481	47,489	32,252
Transportation and public utilities.....	8	16	100,010	126,009	16,385	17,871	4,485	4,494	38	38
Wholesale and retail trade.....	11	57	287,452	791,862	49,720	50,291	9,606	9,570	9,878	3,162
Finance, insurance, and real estate.....	24	63	1,274,699	199,151	65,644	66,408	11,054	11,054	108,340	17,737
Services.....	15	33	65,406	55,163	14,495	14,985	4,138	4,139	1,669	1,609
Nature of business not allocable.....	5	14	11,185	9,043	1,721	1,784	603	603	5	5
Inactive.....	95	239	108,687	—	—	—	—	—	5,162	—
Oil and gas extraction (U.S. Parent)	143	609	5,931,264	4,443,410	988,939	1,049,350	209,866	210,159	328,502	214,977
CFC Industries										
Agriculture, forestry and fishing.....	—	—	—	—	—	—	—	—	—	—
Mining.....	71	244	3,706,062	2,604,253	779,895	825,069	153,898	154,537	187,002	177,105
Construction.....	**	**	**	**	**	**	**	**	**	**
Manufacturing.....	7	58	702,591	815,656	84,076	96,426	31,191	30,814	31,502	24,260
Transportation and public utilities.....	3	4	57,971	65,390	3,436	4,815	—	31	—	—
Wholesale and retail trade.....	6	31	226,412	724,352	42,544	42,634	8,183	8,183	4,324	510
Finance, insurance, and real estate.....	16	40	1,020,967	151,692	53,589	54,277	9,574	9,574	99,414	11,580
Services.....	8	23	60,533	49,234	12,044	12,431	3,966	3,967	1,580	1,522
Nature of business not allocable.....	3	5	272	-25	-60	—	—	—	—	—
Inactive.....	86	199	87,271	—	—	—	—	—	4,680	—

Footnotes at end of table.

Controlled Foreign Corporations, 1980

Table 2.—Number of U.S. Corporation Returns and Number, Total Assets, Receipts, Earnings, Taxes and Distributions of Controlled Foreign Corporations, by Selected Industry of U.S. Corporation Filing the Return and by Selected Industry of Controlled Foreign Corporation — Continued

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

Selected industry of U.S. corporation filing return and selected industry of Controlled Foreign Corporation	Number of U.S. corporation returns	Controlled Foreign Corporations								Distributions	
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)	Total	Out of current earnings and profits	
						Current earnings and profits before taxes	Foreign income taxes (net)				
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)		
Construction (U.S. Parent)	133	607	3,056,588	6,990,052	387,060	475,685	74,356	68,601	177,755	57,841	
CFC Industries											
Agriculture, forestry and fishing.....	—	—	—	—	—	—	—	—	—	—	
Mining.....	*12	*69	*31,321	*20,832	*-1,512	*2,703	*14	*12	—	—	
Construction.....	94	297	2,593,870	6,371,216	366,298	436,590	79,034	74,929	177,075	57,174	
Manufacturing.....	14	21	62,110	98,914	5,270	8,057	2,566	2,628	563	563	
Transportation and public utilities.....	3	7	7,005	1,750	-348	237	-77	-103	—	—	
Wholesale and retail trade.....	*15	*22	*42,840	*75,570	*2,583	*3,154	*1,365	*1,104	—	—	
Finance, insurance, and real estate.....	20	28	82,763	58,724	4,014	8,787	742	216	50	19	
Services.....	22	46	196,610	361,840	10,290	15,689	-9,309	-10,184	85	85	
Nature of business not allocable.....	4	6	4,165	1,206	465	488	—	—	—	—	
Inactive.....	31	112	35,903	—	—	—	—	—	—	—	
Manufacturing (U.S. Parent)	2,452	23,685	360,405,427	554,533,962	40,014,988	46,915,595	14,615,711	14,385,897	11,954,735	8,331,857	
CFC Industries											
Agriculture, forestry and fishing.....	41	152	3,817,407	694,877	-1,190,725	87,206	30,755	29,680	18,508	15,192	
Mining.....	85	416	9,182,339	7,093,135	2,467,151	2,744,040	1,074,022	1,073,241	770,783	255,669	
Construction.....	49	195	4,059,061	4,442,932	392,393	426,963	106,205	105,012	163,772	96,218	
Manufacturing.....	1,849	10,038	215,023,493	338,721,423	24,884,125	28,729,562	9,535,582	9,314,830	6,940,230	5,205,550	
Transportation and public utilities.....	106	344	11,852,387	12,116,234	547,563	852,039	115,057	131,208	445,599	147,938	
Wholesale and retail trade.....	890	4,995	58,919,385	171,897,291	8,766,231	9,563,880	2,912,010	2,898,021	2,001,871	1,546,356	
Finance, insurance, and real estate.....	473	1,726	45,771,883	8,259,968	3,086,192	3,240,036	404,011	401,500	1,160,540	762,177	
Services.....	366	1,486	10,377,565	11,374,635	1,061,482	1,264,086	436,517	430,759	440,691	302,133	
Nature of business not allocable.....	142	359	202,860	133,468	575	7,784	1,553	1,646	2,767	623	
Inactive.....	741	3,976	1,199,046	—	—	—	—	—	9,994	—	
Chemicals and allied products (U.S. Parent)	250	4,590	51,139,085	65,250,212	5,912,217	6,619,986	2,122,074	2,090,707	1,663,696	1,187,632	
CFC Industries											
Agriculture, forestry and fishing.....	10	42	141,248	152,723	2,894	14,160	4,776	4,886	3,817	1,897	
Mining.....	9	32	429,342	141,966	38,518	38,535	8,197	8,196	5,743	5,510	
Construction.....	4	6	156,256	140,318	11,452	11,715	2,902	2,773	—	—	
Manufacturing.....	207	2,345	38,529,169	51,943,251	4,667,285	5,255,716	1,743,977	1,711,216	1,253,214	909,239	
Transportation and public utilities.....	15	35	589,072	596,950	102,227	103,460	25,029	25,010	11,043	8,259	
Wholesale and retail trade.....	104	853	6,037,658	10,666,791	689,711	776,065	285,926	285,428	218,115	129,341	
Finance, insurance, and real estate.....	67	259	4,705,327	870,549	367,137	383,617	40,939	42,584	162,477	128,620	
Services.....	43	133	414,463	733,958	32,261	35,399	10,147	10,469	8,141	4,624	
Nature of business not allocable.....	25	55	25,485	3,705	731	1,319	181	146	577	141	
Inactive.....	113	830	111,064	—	—	—	—	—	568	—	
Petroleum (including integrated) and coal products (U.S. Parent)	77	1,749	84,258,330	202,490,759	13,234,911	13,951,428	4,256,245	4,272,051	3,485,298	2,458,523	
CFC Industries											
Agriculture, forestry and fishing.....	**	**	**	**	**	**	**	**	**	**	
Mining.....	25	171	5,390,086	5,106,495	2,040,094	2,286,601	936,313	936,209	625,299	163,298	
Construction.....	3	7	243,822	488,649	42,180	48,350	6	6	—	—	
Manufacturing.....	45	279	32,967,165	73,731,311	5,209,680	5,260,548	1,754,618	1,760,493	1,252,347	1,198,228	
Transportation and public utilities.....	17	98	8,404,320	8,658,339	151,450	405,874	35,240	37,012	354,458	76,912	
Wholesale and retail trade.....	25	518	26,260,233	112,973,192	4,828,483	4,975,779	1,465,956	1,474,099	995,395	829,997	
Finance, insurance, and real estate.....	29	148	8,241,740	1,133,921	917,714	924,869	58,720	58,734	241,049	173,919	
Services.....	14	71	441,628	394,104	47,363	49,141	5,323	5,429	16,619	16,169	
Nature of business not allocable.....	**	**	**	**	**	**	**	**	**	**	
Inactive.....	39	435	230,342	—	—	—	—	—	12	—	

Footnotes at end of table.

Controlled Foreign Corporations, 1980

Table 2.—Number of U.S. Corporation Returns and Number, Total Assets, Receipts, Earnings, Taxes and Distributions of Controlled Foreign Corporations, by Selected Industry of U.S. Corporation Filing the Return and by Selected Industry of Controlled Foreign Corporation—Continued

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

Selected industry of U.S. corporation filing return and selected industry of Controlled Foreign Corporation	Number of U.S. corporation returns	Controlled Foreign Corporations								
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)	Distributions	
						Current earnings and profits before taxes	Foreign income taxes (net)		Total	Out of current earnings and profits
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	
Manufacturing—Continued										
Machinery, except electrical (U.S. Parent).....	408	3,058	45,398,879	53,549,953	6,491,998	7,036,632	2,336,022	2,288,551	2,434,722	1,545,905
CFC Industries										
Agriculture, forestry and fishing.....	**	**	**	**	**	**	**	**	**	**
Mining.....	6	60	269,892	338,721	60,444	62,615	22,859	22,859	9,534	8,996
Construction.....	5	15	334,578	119,291	53,476	54,174	10,398	10,147	1,659,853	1,030,011
Manufacturing.....	308	1,305	29,194,196	35,837,546	4,478,443	4,823,683	1,745,330	1,714,756	—	—
Transportation and public utilities.....	3	3	8,517	3,070	256	726	249	249	—	—
Wholesale and retail trade.....	147	742	6,640,541	10,896,549	708,110	859,075	256,558	244,366	152,962	112,656
Finance, insurance, and real estate.....	59	201	4,242,436	979,098	543,101	559,705	36,451	35,040	328,972	192,575
Services.....	58	276	4,646,459	5,371,512	650,755	676,015	264,066	261,022	282,931	201,455
Nature of business not allocable.....	**	**	**	**	**	**	**	**	**	**
Inactive.....	108	416	53,242	—	—	—	—	—	258	—
Electrical and electronic equipment (U.S. Parent).....	410	2,827	31,596,966	40,836,137	3,017,077	3,597,553	1,034,043	1,002,957	793,992	533,204
CFC Industries										
Agriculture, forestry and fishing.....	—	—	—	—	—	—	—	—	—	—
Mining.....	5	28	369,164	153,082	39,345	40,431	9,000	9,000	1,200	684
Construction.....	7	44	2,114,723	1,966,405	98,740	119,185	46,087	45,352	25,916	25,718
Manufacturing.....	299	1,332	18,517,082	28,545,597	1,946,835	2,345,306	698,494	653,618	440,614	341,177
Transportation and public utilities.....	8	38	1,062,366	1,214,834	64,111	81,044	17,888	32,358	30,882	29,719
Wholesale and retail trade.....	147	564	3,529,358	6,501,579	584,422	609,740	189,106	189,159	122,366	59,470
Finance, insurance, and real estate.....	52	176	4,488,663	588,456	219,355	246,745	33,513	32,618	142,539	58,846
Services.....	39	259	1,403,950	1,861,605	84,913	144,985	39,827	40,782	27,890	17,555
Nature of business not allocable.....	14	20	8,700	4,579	—	136	78	64	358	35
Inactive.....	87	366	102,940	—	—	—	—	—	2,126	—
Transportation and public utilities (U.S. Parent).....	242	1,759	19,031,100	14,976,283	1,033,718	1,389,411	328,870	324,495	500,890	273,123
CFC Industries										
Agriculture, forestry and fishing.....	**	**	**	**	**	**	**	**	**	**
Mining.....	13	47	1,121,974	1,104,682	116,786	124,508	19,964	19,706	5,298	4,725
Construction.....	7	15	54,097	135,177	5,775	6,750	3,434	3,434	1,443	903
Manufacturing.....	22	221	2,868,310	4,220,285	181,880	309,071	100,322	98,226	73,818	48,901
Transportation and public utilities.....	161	563	7,385,776	5,079,039	320,840	421,424	108,049	107,058	109,272	81,122
Wholesale and retail trade.....	21	171	1,592,436	2,780,641	27,113	125,021	33,572	30,231	136,710	29,481
Finance, insurance, and real estate.....	61	170	4,792,735	781,513	255,143	266,767	18,382	18,300	130,961	79,149
Services.....	45	177	945,136	865,924	125,940	135,608	47,137	47,522	43,277	28,840
Nature of business not allocable.....	**	**	**	**	**	**	**	**	**	**
Inactive.....	100	386	264,623	—	—	—	—	—	88	—
Wholesale and retail trade (U.S. Parent).....	768	2,883	31,926,926	88,804,810	2,661,007	2,968,414	700,690	689,283	482,022	335,260
CFC Industries										
Agriculture, forestry and fishing.....	11	29	150,507	785,357	6,589	13,695	2,657	2,732	320	271
Mining.....	10	35	203,681	131,605	—4,612	29,828	5,116	5,108	2,405	934
Construction.....	12	13	11,919	4,691	—23	138	22	22	—	—
Manufacturing.....	92	249	4,282,767	5,531,393	318,951	346,776	118,873	117,210	48,230	32,358
Transportation and public utilities.....	29	112	1,031,825	723,055	73,367	99,340	8,211	8,166	16,243	—10,115
Wholesale and retail trade.....	472	1,391	20,172,917	77,976,880	2,103,034	2,250,226	512,306	512,303	362,640	261,716
Finance, insurance, and real estate.....	84	225	4,980,646	3,185,662	139,974	194,311	47,808	38,126	43,783	26,245
Services.....	152	221	608,223	463,551	21,619	33,694	5,550	5,515	6,726	3,542
Nature of business not allocable.....	14	28	9,088	2,618	108	407	147	81	1,310	78
Inactive.....	249	580	475,355	—	—	—	—	—	365	—

Footnotes at end of table.

Controlled Foreign Corporations, 1980

Table 2.—Number of U.S. Corporation Returns and Number, Total Assets, Receipts, Earnings, Taxes and Distributions of Controlled Foreign Corporations, by Selected Industry of U.S. Corporation Filing the Return and by Selected Industry of Controlled Foreign Corporation—Continued

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

Selected industry of U.S. corporation filing return and selected industry of Controlled Foreign Corporation	Number of U.S. corporation returns	Controlled Foreign Corporations								
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)	Distributions	
						Current earnings and profits before taxes	Foreign income taxes (net)		Total	Out of current earnings and profits
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	
Wholesale and retail trade—Continued										
Wholesale trade (U.S. Parent)	658	2,327	22,928,740	74,431,299	1,912,230	2,197,353	483,545	472,660	367,360	238,560
CFC Industries										
Agriculture, forestry and fishing	8	26	146,150	780,041	6,822	11,929	1,948	2,024	54	4
Mining	9	26	158,279	71,708	-21,900	12,014	-194	-202	—	—
Construction	12	13	11,919	4,891	-23	138	22	22	—	—
Manufacturing	73	208	3,932,814	4,864,854	240,364	268,157	95,403	93,740	46,003	32,204
Transportation and public utilities	24	104	1,010,813	713,996	70,029	95,679	8,211	8,186	14,610	8,519
Wholesale and retail trade	409	1,184	14,849,915	65,208,658	1,556,241	1,690,773	352,596	353,154	272,458	182,158
Finance, insurance, and real estate	58	148	2,132,474	2,385,508	53,354	99,349	21,298	11,585	29,206	14,109
Services	190	186	215,053	403,189	7,386	19,129	4,212	4,170	4,664	1,565
Nature of business not allocable	8	14	2,449	656	-42	185	49	-18	—	—
Inactive	217	418	468,774	—	—	—	—	—	365	—
Finance, insurance, and real estate (U.S. Parent)	481	2,980	79,517,280	20,472,199	1,842,647	2,112,712	543,719	506,460	480,666	318,006
CFC Industries										
Agriculture, forestry and fishing	3	4	3,451	—	-23,478	—	—	—	—	—
Mining	64	122	208,506	49,770	-3,395	15,766	719	720	837	837
Construction	**	**	**	**	**	**	**	**	**	**
Manufacturing	29	120	2,087,883	3,968,903	255,777	266,726	78,291	75,898	117,622	81,077
Transportation and public utilities	18	55	598,693	124,274	8,314	10,148	1,039	1,170	—	—
Wholesale and retail trade	31	144	771,965	2,354,321	148,827	160,779	40,965	39,349	30,339	20,476
Finance, insurance, and real estate	313	1,516	71,763,175	12,338,533	1,223,869	1,408,427	365,238	333,334	219,638	147,555
Services	74	348	3,979,775	1,612,432	230,441	248,230	57,174	55,703	112,172	68,061
Nature of business not allocable	**	**	**	**	**	**	**	**	**	**
Inactive	179	644	55,461	—	—	—	—	—	58	—
Services (U.S. Parent)	531	2,660	5,833,160	6,362,369	505,065	674,867	263,035	196,476	148,465	87,273
CFC Industries										
Agriculture, forestry and fishing	9	9	8,183	3,380	-501	**	**	**	**	**
Mining	**	**	**	**	**	**	**	**	**	**
Construction	5	28	225,216	248,085	20,383	21,836	7,239	7,008	506	506
Manufacturing	33	136	443,176	513,398	50,904	58,373	9,023	8,093	10,645	9,071
Transportation and public utilities	10	38	295,782	240,269	9,450	20,973	7,003	6,544	196	166
Wholesale and retail trade	55	95	73,799	110,009	2,122	9,864	853	-1,094	916	539
Finance, insurance, and real estate	68	128	567,579	96,479	46,734	55,346	3,889	3,582	10,874	8,159
Services	405	1,793	4,147,931	5,145,352	375,816	507,722	175,025	172,348	125,096	68,825
Nature of business not allocable	**	**	**	**	**	**	**	**	**	**
Inactive	139	409	64,034	—	—	—	—	—	161	—
Business services (U.S. Parent)	306	1,616	3,330,109	3,862,670	259,527	359,554	116,290	114,902	104,181	54,020
CFC Industries										
Agriculture, forestry and fishing	—	—	—	—	—	—	—	—	—	—
Mining	—	—	—	—	—	—	—	—	—	—
Construction	3	17	193,893	226,848	17,818	17,974	6,712	6,485	506	506
Manufacturing	22	32	95,604	130,363	599	3,291	56	-310	—	—
Transportation and public utilities	4	20	164,988	158,547	13,851	17,754	6,122	5,978	214	214
Wholesale and retail trade	17	32	37,499	50,556	3,393	5,669	-11	-11	6,064	4,045
Finance, insurance, and real estate	41	64	217,187	37,906	23,210	27,448	1,809	1,608	97,219	49,247
Services	259	1,230	2,576,076	3,256,632	200,758	287,387	101,798	101,151	70	7
Nature of business not allocable	5	8	2,001	1,819	-103	31	4	(¹)	107	—
Inactive	60	212	42,861	—	—	—	—	—	—	—

¹ Estimate should be used with caution because of the small number of sample returns on which it was based.

** Data deleted to avoid disclosure of information to specific corporations.

¹ Less than \$500.

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

Controlled Foreign Corporations, 1980

Table 3—Number of U.S. Corporations Returns and Number, Total Assets, Receipts, Earnings, Taxes, Distributions and Selected Transactions of Controlled Foreign Corporations, by Major Industry of Controlled Foreign Corporation

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

Major industry of Controlled Foreign Corporations	Number of U.S. corporation returns	Controlled Foreign Corporations							
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign income taxes (net)	Distributions		Selected receipts by foreign corporations from:
							Total	Out of current earnings and profits	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	
All Industries, total	4,799	35,471	508,031,994	699,003,002	47,621,582	16,440,451	14,115,642	9,643,638	115,823,113
Agriculture, forestry and fishing	73	224	4,167,349	1,618,046	- 1,195,895	36,801	19,651	15,955	1,081,050
Mining	273	969	15,017,247	11,392,971	3,430,646	1,272,931	975,082	446,771	2,374,991
Oil and gas extraction	210	753	10,735,684	9,179,334	3,034,911	1,154,664	824,751	349,987	2,093,431
Construction	172	558	7,028,446	11,244,627	798,147	193,706	343,556	154,801	870,030
Manufacturing	2,052	10,901	226,062,259	354,511,342	25,832,360	9,666,940	7,238,667	5,409,843	47,664,187
Food and kindred products	136	788	13,466,353	26,357,350	1,479,715	520,772	355,129	273,630	1,327,549
Chemicals and allied products	290	2,417	40,450,536	56,287,396	4,987,665	1,923,308	1,319,657	964,886	4,605,916
Petroleum (including integrated) and coal products	53	149	32,683,871	71,175,546	5,053,419	1,679,034	1,226,036	1,161,867	11,461,832
Machinery except electrical	409	1,253	15,817,952	20,872,998	1,436,800	524,225	340,345	253,727	3,806,561
Electrical and electronic equipment	309	1,491	32,282,019	44,601,989	4,797,484	1,816,831	1,761,443	1,126,228	8,628,934
Transportation and public utilities	336	1,145	21,412,678	18,442,326	980,649	259,358	571,348	239,379	6,988,863
Transportation	304	1,004	13,790,138	12,230,980	55,886	112,571	389,311	87,545	5,779,321
Wholesale and retail trade	1,507	6,903	82,234,324	256,779,170	11,108,818	3,496,022	2,542,746	1,862,034	38,215,104
Wholesale trade	1,308	5,782	72,053,590	232,838,975	9,889,956	3,114,646	2,338,275	1,706,315	37,144,563
Retail trade	240	942	9,264,414	22,476,053	1,028,202	324,398	176,222	132,443	979,879
Finance, insurance and real estate	1,048	3,862	129,263,466	24,921,436	4,821,672	806,194	1,674,186	1,041,042	15,244,552
Credit agencies other than banks	182	673	39,661,444	5,262,895	838,743	239,712	220,835	99,187	5,340,335
Insurance carriers	359	593	16,940,222	6,202,612	1,054,382	71,496	166,599	131,855	1,271,367
Holding and other investment companies, except bank holding companies	479	1,170	27,795,528	4,257,834	2,076,270	236,334	1,096,794	683,384	3,395,561
Services	1,081	4,090	20,359,450	19,911,917	1,841,033	706,075	730,412	473,095	4,125,274
Business services	742	2,621	12,315,008	12,701,126	1,256,697	478,775	529,318	348,474	2,905,042
Nature of business not allocable	195	456	276,175	181,164	4,153	2,426	4,166	718	58,491
Inactive	1,538	6,363	2,210,599	—	- 2	- 2	15,827	—	570

Controlled Foreign Corporations—Continued

Selected receipts by foreign corporations from—Continued

Major industry of Controlled Foreign Corporations	U.S. corporation filing return				Any domestic corporation controlled by U.S. corporation filing return				Any foreign corporation controlled by U.S. corporation filing return	
	Total	Sales of stock in trade	Compensation received for certain services	Amounts borrowed	Total	Sales of stock in trade	Compensation received for certain services	Amounts borrowed		Total
All Industries, total	65,533,573	53,032,955	3,151,286	5,880,474	17,145,614	9,748,793	1,176,345	4,620,438	31,155,589	
Agriculture, forestry and fishing	971,347	959,076	2,006	9,590	39,730	36,985	348	1,592	69,973	
Mining	1,063,241	670,416	9,673	364,546	591,372	565,287	9,782	5,718	558,949	
Oil and gas extraction	929,613	555,645	8,422	349,323	536,712	514,897	9,766	2,362	467,218	
Construction	120,094	12,474	53,336	42,229	201,448	37,609	145,782	11,499	647,540	
Manufacturing	26,694,700	22,450,168	1,351,532	2,043,615	6,815,766	4,547,632	304,078	1,688,014	13,402,651	
Food and kindred products	344,231	200,082	3,494	122,660	120,236	101,528	298	6,131	742,733	
Chemicals and allied products	1,829,416	955,514	62,070	432,664	369,921	240,113	23,781	55,414	2,403,628	
Petroleum (including integrated) and coal products	6,690,697	6,417,461	37,767	209,802	3,733,206	1,925,552	139,512	1,525,017	970,963	
Machinery except electrical	1,444,734	1,253,318	68,271	65,833	80,553	68,281	910	5,234	2,194,737	
Electrical and electronic equipment	4,609,797	3,786,489	679,505	74,908	1,514,830	1,458,636	17,064	15,782	2,482,870	
Transportation and public utilities	1,813,016	487,488	904,657	134,977	970,918	27,194	553,150	153,095	2,843,351	
Transportation	1,779,014	478,541	898,820	122,188	956,673	18,692	553,133	153,095	2,582,056	
Wholesale and retail trade	29,318,887	28,007,272	204,603	507,510	4,324,239	3,972,878	70,656	138,411	4,515,031	
Wholesale trade	29,042,903	27,796,001	190,925	486,950	4,056,633	3,751,877	63,809	111,551	4,004,558	
Retail trade	245,437	198,066	1,753	18,975	255,808	212,954	3,895	26,860	462,282	
Finance, insurance and real estate	4,036,992	291,256	8,574	2,425,060	3,237,948	18,031	13,171	2,377,227	7,437,679	
Credit agencies other than banks	1,224,630	1,930	2,026	747,934	1,424,059	10	433	1,214,553	3,112,934	
Insurance carriers	428,276	—	827	40,652	222,261	—	33	21,121	615,713	
Holding and other investment companies, except bank holding companies	597,811	5,593	2,335	336,812	196,720	15,349	5,463	26,450	2,587,316	
Services	1,496,612	151,633	616,256	339,317	935,681	543,172	79,373	219,882	1,668,581	
Business services	910,652	83,530	366,280	118,477	793,809	537,355	47,176	165,801	1,180,325	
Nature of business not allocable	18,684	3,170	650	13,629	26,511	4	6	25,000	11,265	
Inactive	—	—	—	—	—	—	—	—	570	

Footnote at end of table.

Controlled Foreign Corporations, 1980

Table 3—Number of U.S. Corporations Returns and Number, Total Assets, Receipts, Earnings, Taxes, Distributions and Selected Transactions of Controlled Foreign Corporations, by Major Industry of Controlled Foreign Corporation — Continued

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

Major industry of Controlled Foreign Corporations	Controlled Foreign Corporations — Continued								
	Receipts by — Continued			All related persons	Selected payments by foreign corporations to:				
	Any foreign corporation controlled by U.S. corporation filing return — Continued				U.S. corporation filing return				
	Sales of stock in trade	Compensation received for certain services:	Amounts borrowed		Total	Purchases of stock in trade	Compensation paid for certain services	Amounts loaned	Dividends paid
(19)	(20)	(21)	(22)	(23)	(24)	(25)	(26)	(27)	
All industries, total	11,102,657	3,678,383	9,677,736	157,829,919	92,663,469	66,629,803	2,516,036	8,275,021	8,358,199
Agriculture, forestry and fishing	22,629	4,250	33,856	1,564,240	1,506,608	294,984	21,549	1,000,000	13,873
Mining	47,076	31,879	242,429	1,867,748	1,010,657	72,985	61,162	29,791	615,962
Oil and gas extraction	40,680	30,493	218,892	1,635,517	925,348	60,529	59,513	29,783	554,252
Construction	89,633	145,743	210,363	1,318,429	244,869	25,072	82,730	6,959	85,162
Manufacturing	8,212,868	1,473,805	2,027,379	72,418,801	45,651,743	33,916,099	1,798,280	821,720	4,844,092
Food and kindred products	303,401	52,787	277,029	1,773,046	1,058,441	636,069	34,473	43,860	212,997
Chemicals and allied products	1,099,386	272,453	621,289	8,940,769	4,225,313	2,319,653	221,233	39,663	845,972
Petroleum (including integrated) and coal products	210,735	230,554	262,566	20,781,668	10,666,594	9,612,808	25,087	21,316	937,828
Machinery except electrical	1,909,468	52,377	166,543	4,338,473	3,043,496	530,337	54,537	16,787	233,896
Electrical and electronic equipment	1,708,631	299,106	248,095	11,125,461	7,926,514	2,422,886	139,818	64,154	125,618
Transportation and public utilities	152,083	206,134	2,029,733	4,832,161	732,692	34,590	58,548	232,103	338,320
Transportation	119,152	186,471	1,919,080	4,487,955	666,462	22,620	38,231	222,779	317,379
Wholesale and retail trade	2,016,910	373,271	1,275,647	50,641,511	32,752,750	30,126,910	222,861	232,685	1,334,157
Wholesale trade	1,713,968	347,022	1,156,757	48,459,398	31,607,119	29,271,030	191,570	203,266	1,250,264
Retail trade	280,301	15,164	111,161	1,632,197	727,237	545,295	28,441	29,419	63,232
Finance, insurance and real estate	391,434	659,896	3,511,663	20,046,810	8,229,530	1,341,522	42,124	5,474,766	742,319
Credit agencies other than banks	7,642	558,696	1,926,111	8,558,217	4,653,013	2,261	14,855	4,387,864	81,300
Insurance carriers	—	2,415	191,088	663,635	352,374	6,100	7,826	284,966	49,964
Holding and other investment companies, except bank holding companies	29,730	59,152	863,638	5,024,414	1,225,199	36,308	13,300	444,596	566,967
Services	168,863	782,626	344,115	5,098,014	2,518,240	806,049	227,735	476,558	381,924
Business services	137,813	636,158	184,390	3,653,643	1,927,385	699,162	124,868	407,700	288,143
Nature of business not allocable	1,161	779	2,551	32,178	15,788	11,592	1,046	439	1,799
Inactive	—	—	—	10,027	591	—	—	—	591

Major industry of Controlled Foreign Corporations	Controlled Foreign Corporations — Continued									
	Selected payments by foreign corporations to — Continued									
	Any domestic corporation controlled by U.S. corporation filing return					Any foreign corporation controlled by U.S. corporation filing return				
	Total	Purchases of stock in trade	Compensation paid for certain services	Amounts loaned	Dividends paid	Total	Purchases of stock in trade	Compensation paid for certain services	Amounts loaned	Dividends paid
(28)	(29)	(30)	(31)	(32)	(33)	(34)	(35)	(36)	(37)	
All industries, total	29,818,562	21,034,521	795,922	3,957,670	2,293,695	28,810,106	10,681,671	3,552,769	8,225,756	2,558,863
Agriculture, forestry and fishing	28,400	23,407	33	1,707	2,460	29,231	2,228	871	12,102	3,094
Mining	307,594	49,170	9,981	4,790	213,194	546,879	11,032	28,355	307,591	112,246
Oil and gas extraction	198,288	10,920	9,059	4,220	147,185	509,263	11,032	24,779	293,634	98,045
Construction	383,913	226,181	87,366	12,122	52,108	675,317	186,173	87,795	181,039	190,740
Manufacturing	11,499,373	9,486,208	434,066	129,173	721,469	11,675,948	5,026,721	2,177,995	1,610,720	1,314,493
Food and kindred products	204,984	93,030	24,220	23,741	42,077	505,895	139,683	90,189	54,614	91,798
Chemicals and allied products	1,962,085	1,611,197	131,863	10,347	115,995	2,716,252	1,005,617	446,024	522,426	312,547
Petroleum (including integrated) and coal products	6,161,568	5,556,833	112,691	75,803	114,796	734,589	76,797	186,702	274,746	68,221
Machinery except electrical	226,409	145,252	9,222	1,472	58,950	965,249	546,763	64,572	154,673	43,105
Electrical and electronic equipment	304,768	206,245	62,437	7,072	96,912	2,370,552	1,268,551	380,569	137,586	399,159
Transportation and public utilities	2,694,969	2,509,352	79,860	1,574	78,846	1,349,517	225,927	91,346	358,591	104,126
Transportation	2,629,198	2,493,960	70,360	1,574	38,073	1,137,313	161,235	66,448	358,156	25,198
Wholesale and retail trade	8,856,137	7,942,905	102,513	167,544	535,758	6,932,568	4,369,043	602,922	978,124	448,134
Wholesale trade	8,646,286	7,858,423	98,220	108,707	488,375	6,140,225	3,825,373	553,949	892,031	409,346
Retail trade	189,975	65,833	4,218	58,837	46,360	680,710	466,665	32,555	84,775	32,783
Finance, insurance and real estate	4,858,523	46,058	30,252	3,578,231	501,718	6,213,650	638,754	116,439	4,331,724	301,355
Credit agencies other than banks	1,826,848	416	8,809	1,495,778	76,486	1,946,636	35,990	70,374	1,427,577	54,689
Insurance carriers	73,697	—	1,905	14	53,763	234,931	—	10,142	142,680	57,041
Holding and other investment companies, except bank holding companies	1,129,577	22,966	3,122	752,404	287,117	2,663,264	466,665	20,628	2,294,360	135,728
Services	1,178,572	748,850	51,852	62,418	183,239	1,372,251	219,108	448,823	444,617	78,779
Business services	915,995	717,572	20,237	36,008	109,858	797,323	90,153	385,839	144,518	51,643
Nature of business not allocable	6,197	2,590	—	110	19	10,192	4,685	224	1,249	1,344
Inactive	4,884	—	—	—	4,884	4,552	—	—	—	4,552

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