Domestic International Sales Corporation Returns, 1980

By Jeffrey Hartzok*

For Income Year 1980, export gross receipts of Domestic International Sales Corporations (DISC's) exceeded \$154 billion. DISC earnings and profits derived from these export receipts amounted to nearly \$9.8 billion. By utilizing the provisions of U.S. income tax law pertaining to this special type of corporation, it was possible for stockholders of DISC's to defer, indefinitely, taxes on \$3.6 billion of the \$9.8 billion earned in 1980. The estimated cost of these provisions has been reported to be nearly \$1.7 billion in lost U.S. tax revenues for 1980 [1].

Large U.S. corporations with DISC subsidiaries were the primary beneficiaries of the DISC provisions. Nearly 70 percent of all tax deferred profits in 1980 were retained by DISC's owned by U.S. corporations with total assets of \$250 million or more.

DISC LEGISLATION

A DISC is a special type of corporation established by the Revenue Act of 1971 (for taxable years beginning in 1972) to promote exports through sheltering a portion of export profits from U.S. income taxation. The profits of a DISC are not taxed to the DISC itself, but instead are taxed to the stockholders when distributed or deemed distributed. Stockholders of DISC's (typically other operating U.S. corporations) are deemed to receive annually, a portion of the DISC's earnings and profits. This deemed distribution is fully taxable to the stockholders even if the earnings are not actually distributed. U.S. income taxation is deferred indefinitely, for the most part, on the remainder of the DISC's earnings and profits.

To qualify as a DISC, a corporation has to meet very strict formal requirements, such as satisfying the tests that 95 percent of both its gross receipts and assets are "qualified." These requirements are designed to limit the DISC to export related activities. A DISC is allowed to export products that qualified as export property which are manufactured, produced, grown, or extracted in the United States by someone other than the DISC. Property manufactured, produced, grown, or extracted by a DISC and later sold or leased does not qualify as export property.

A DISC usually acquires export property from its parent corporation or an affiliated corporation (a "related supplier") and then sells the property abroad. However, it can act simply as a commission merchant on export sales of related suppliers and, thus, not have any substance (i.e., no employees or real business activity). The allocation of income between the DISC and its related supplier is achieved through the use of special intercompany pricing rules discussed later in this article.

DISC Legislative Changes

The DISC legislation has undergone three major modifications since 1972. Each law change reduced the tax benefits allowed to the stockholders of DISC's. The Tax Reduction Act of 1975 eliminated DISC benefits for profits arising from exports of depletable energy products such as oil and natural gas. The Tax Reform Act of 1976 limited DISC benefits to taxable income attributable to export gross receipts in excess of 67 percent of the average export gross receipts in a four-year base period. DISC's with adjusted taxable income of \$100,000 or less were exempted from these provisions. The Tax Equity and Fiscal Responsibility Act of 1982 increased the portion of DISC income considered deemed distributed to the DISC's corporate stockholders from 50 percent to 57.5 percent for taxable years beginning in 1983.

Objectives and Effects of the DISC Legislation

The principal objective of the original DISC provisions was to increase U.S. exports and thereby improve U.S. balance of trade by making U.S. exports more profitable for exporting companies and more competitive, in price, with foreign products.

Exports through DISC's have increased rapidly since their enactment, growing from \$21.7 billion in export receipts in 1972 to \$154.1 billion in 1980. A recent Treasury report [2] estimates that the DISC provisions directly increased U.S. exports in 1980 in the range of \$7.2 billion to \$11.0 billion. This range represents approximately 5 to 7 percent of the total of \$154.1 billion of exports through DISC's.

A comparison of exports through DISC's to total U.S. exports and imports of merchandise for 1973 through 1980 is shown below [3].

DISC Exports vs. Total U.S. Exports and Imports (Billions of Dollars)

Year	DISC Exports	Total U.S. Exports	Total U.S. Imports	U.S. Merchandise Trade Balance
1973	\$44.8	\$70.8	\$69.5	\$1.3
1974	66.8	97.9	101.0	-3.1
1975	73.2	107.1	96.9	10.2
1976	82.7	114.8	120.7	-5.9
1977	85.9	121.2	147.7	-26.5
1978	99.6	143.6	172.0	-28.4
1979	132.0	181.7	206.3	-24.6
1980	154.1	220.6	244.9	-24.3

Although total U.S. exports of merchandise (including exports through DISC's) have risen steadily since 1973, U.S. imports of foreign merchandise have increased

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rapidly as well. Contributing to this increase in U.S. imports has been the growth of imports of petroleum products, machinery, and transportation equipment [4].

As noted before, large U.S. corporations with DISC subsidiaries have been the primary beneficiaries of the DISC provisions. Shown below is a historical comparison of the tax deferred income for all DISC's and those owned by corporations with total assets of \$250 million or more ("large" majority corporate stockholders). Although a majority corporate stockholder of a DISC is defined as a corporation owning 50 percent or more of the DISC's capital stock, more than 99 percent of the DISC's owned by "large" corporations are wholly owned subsidiaries.

Tax Deferred Income (Millions of Dollars)

_		DISC's with "Large" Majority Corporate Stockholde					
Income Year	Total Deferred Amount	Total Amount	Percent of All DISC's				
1975	\$2,351	\$1,498	63.7				
1976	1,572	942	60.0				
1977	1,519	959	63.1				
1978	2,071	1,376	66.4				
1979	3,065	2,148	70.1				
1980	3,606	2,520	69.9				

Assuming an income tax rate structure of 48 percent for Income Years 1975 through 1978 and 46 percent for Income Years 1979 and 1980, it was possible for these large corporations to defer indefinitely over \$4.4 billion in U.S. income taxes since 1975 [5].

EXPORT ACTIVITIES, 1979 VS 1980

The number of DISC's actively engaged in exporting U.S. goods and services abroad for 1979 and 1980 was 7,933 and 8,665, respectively (see Figure A). The number of active DISC's continued to grow in nearly all major product and service groups, increasing nearly 9 percent from 1979. DISC's primarily engaged in exporting U.S. manufactured products continued to dominate DISC activity, representing 88 percent of the total number of DISC's. During this same period the cumulative number of elections to be treated as a DISC increased nearly 10 percent from 10,978 in February 1979 to 12,192 in February 1980 [6]. The data on elections were not adjusted for DISC's that were inactive, were liquidated, withdrew their election, or had their election revoked. The increase in the number of DISC elections during 1980 provides evidence of the continued use of the DISC provisions for export sales.

Balance Sheets

In 1980, DISC total assets amounted to \$28.7 billion, an 18.9 percent increase over the previous year (Figure B). This increase compares to a net increase of only 13 percent in total assets for corporations in general [7], and it is more than double the 9.0 percent inflation rate for 1980, as measured by the Implicit Price Deflator for Gross National Product [8]. The fastest growing asset item for the second year in a row was export property which increased 42.1 percent in 1980 after increasing 76.2 percent the previous year.

Figure A -- Number of DISC's by Selected Major Product or Service Group, 1979 - 1980

Selected Major Product	Numb		Percent		
or Service Group	1979	1980	Change		
Total	7,933	8,665	9.0		
Nonmanufactured					
products and services	953	1,052	10.4		
Grains	119	110	-7.6		
Other agriculture	183	222	21.3		
Manufactured products Food and kindred	6,980	7,613	9.1		
products	273	336	2.3		
Textile mill products Apparel and other	247	284	15.0		
fabric products Lumber and wood	151	180	19.2		
productsPaper and allied	197	198	0.5		
products	141	160	13.5		
and allied products	96	126	32.0		
products	521	621	19.9		
plastic products	136	162	19.1		
Primary metal products Fabricated metal	244	281	15.2		
products	701	773	10.3		
electrical	1,465	1,448	1.2_		
Electrical machinery and equipment	1,248	1,354	8.5		
Transportation equipment	401	441	10.0		
Professional, scientific, and photographic					
equipment	420	439	4.5		

Figure B -- Balance Sheets, 1979-1980 (Millions of Dollars)

Selected Items	1979	1980
Total assets, total	\$24,161	\$28,729
Qualified assets, total	24,105	28,674
Working capital Export-Import Bank	475	628
obligations	1,211	1,587
Trade receivables	14,897	17,522
Export property	1,588	2,256
Producer's loans	3,484	4,367
Nonqualified assets	56	56
Total liabilities	3,902	4,389
Net worth, total	20,259	24,340
Capital stock and paid-in		
or capital surplus	277	238
Previously taxed income	5,860	6,783
Accumulated DISC income	14,146	17,308

Producer's loans increased 25.3 percent to \$4.4 billion in 1980. In most cases, producer's loans were loans made by DISC's to their stockholders out of the DISC's accumulated, undistributed, untaxed profits. The practical effect to a stockholder of a DISC of borrowing these tax deferred profits was an interest-free loan. This occurred because the interest earned by the DISC from these producer's loans was not taxed to the DISC and the distributions out of this interest which were taxed to the stockholder were offset by the interest deduction taken by the stockholder.

In the aggregate, DISC net worth increased by over 20 percent in 1980. The largest single item was accumulated DISC income which amounted to \$17.3 billion. This amount represents the aggregate tax deferred profits retained by DISC's since 1972.

Income Statements

Income statement statistics for all DISC's are presented in Figure C. For 1980, total receipts [9] continued to increase rising by 21.1 percent from 1979 to \$52.8 billion. Qualified export receipts from the sale of export property accounted for over 96 percent of total DISC receipts. Most of these receipts were from direct foreign sales (either on a commission basis or noncommission basis) of U.S. merchandise to related and unrelated purchasers. Of the \$1.7 billion of other qualified receipts, over 64 percent consisted of, qualified interest other than that earned on producer's loans, an increase of 44.2 percent over 1979. This increase in qualified interest receipts reflects the favorable tax treatment of interest earned on trade receivables (the largest qualified export asset item) and other investments such as Export-Import Bank obligations and Private Export Funding Corporation notes.

While domestic profits for all corporations declined as a result of the downturn in the economy during 1980 [10], exports channeled through DISC's continued be a profitable business. DISC net income in 1980 increased 17.1 percent compared to a 16.2 percent decline in profits for corporations in general. There were several possible reasons for this phenomenon. One is a corporation with excessive net operating losses (or excessive tax credits) which may have elected not to export goods and services through a DISC. In a similar manner another corporation which had overall profits (both domestic and foreign) may have chosen to channel only profitable exports through a DISC and directly absorb the losses on unprofitable exports. Finally, the special intercompany pricing rules applicable to DISC's allowed DISC's to maximize their own profits on export sales and minimize the profits allocated to their parent company.

PRODUCT HIGHLIGHTS

DISC's engaged primarily in the export of grain and selected manufactured products such as chemicals, machinery, and transportation equipment received most of the DISC tax benefits [11]. Those primarily exporting grain generated over 60 percent of the profits from all nonmanufactured products and services. DISC's primarily exporting chemicals, machinery and transportation equipment accounted for nearly 73 percent of the earnings and profits from all manufactured products.

Figures D and E show the percentage of total export gross receipts and net income accounted for by these significant major product groups. Although DISC's primarily exporting manufactured products accounted for 72.4 percent of all DISC export gross receipts, they derived 91.8 percent of all DISC net income.

Figure C -- Income Statements, 1979-1980 (Millions of Dollars)

Selected Items	1979	1980
Total receipts	\$43,601	\$52,799
Qualified export receipts		
from the sale of export		
property	42,180	50,811
receipts, total	1,228	1,719
Leasing of export	-,	-,
property	49	84
Engineering and architectural		
services	100	129
Interest on producer's	100	123
loans	245	342
Other qualified interest	730	1,053
Nonqualified receipts	193	268
Total deductions	35,175	42,929
Cost of sales and operations.	32,920	40,248
Export promotion expenses	1,238	1,506
import promotion expenses	1,200	1,500
Net income (less deficit)	8,426	9,870

A comparison, for 1980, of DISC exports to total U.S. exports [12] for agricultural and nonagricultural products is shown below.

DISC Exports vs U.S. Exports, 1980 (Billions of Dollars)

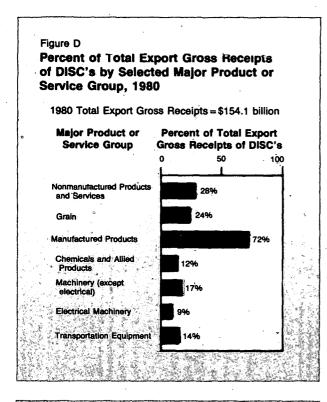
Product/Services	DISC Exports	U.S. Exports
Total	\$154.1	\$216.6
Agricultural products and services	40.4	41.3
Nonagricultural products and services	113.7	175.3

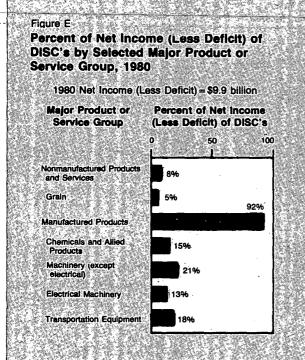
DISC exports in 1980 accounted for approximately 65 percent of all nonagricultural exports [13] of U.S. goods and services abroad. The remaining (non-DISC) exports generally included: (1) exports by corporations with excessive net operating losses or tax credits, (2) exports of products ultimately used in the United States, (3) exports of certain products (such as oil and natural gas) which were denied DISC benefits by law, and (4) exports of unprofitable product lines.

DISTRIBUTIONS TO STOCKHOLDERS

Over 64 percent of DISC earnings and profits were considered to be taxable to their stockholders in 1980 compared to only 51 percent in 1975. This was a direct result of the Tax Reform Act of 1976 which allowed DISC tax benefits to be accrued only on profits arising from increases in exports over a base period amount.

Under the 1976 provisions, DISC benefits have been limited to earnings and profits attributable to export gross receipts in excess of 67 percent of the average export gross receipts of the DISC in a four-year base period. For taxable years beginning in 1976 through 1979 the base period years were 1972 through 1975. Starting with taxable years beginning in 1980, the





base period advanced each year. For DISC's which were members of the same controlled group (i.e., owned by one stockholder) the export gross receipts for both the current and base period years were aggregated. Small DISC's with adjusted taxable income of \$100,000 or less were exempted from these provisions.

The total amounts of DISC taxable income and amounts deemed distributed for Income Years 1975 through 1980 are compared in Figure F. The difference shown between the amount of DISC taxable income and the amounts deemed distributed represents the amount of the DISC's

income that can be deferred indefinitely from U.S. income taxation. As noted before, the amounts deemed to be distributed and fully taxable to DISC stockholders amounted to 50.7 percent of the total DISC taxable income in 1975. While the ratio of deemed distributions to DISC taxable income increased to approximately 70 percent for 1976 and 1977, it decreased slightly in the following two years. For 1980, however, the ratio (63.5 percent) remained constant to the previous year, reflecting the shift of the base period year for those DISC's with taxable years beginning in 1980.

INTERCOMPANY PRICING PRACTICES

A series of special intercompany pricing methods (the "4 percent gross receipts method" and the "50-50 combined taxable income method") have been provided for in cases where the DISC either purchases its inventory of export property from a related supplier or acts as a commission agent for a related supplier. A related supplier is the DISC's parent corporation or any other related person that controls the DISC.

Regardless of the actual price charged, the selling price is considered to be the smallest of the following:

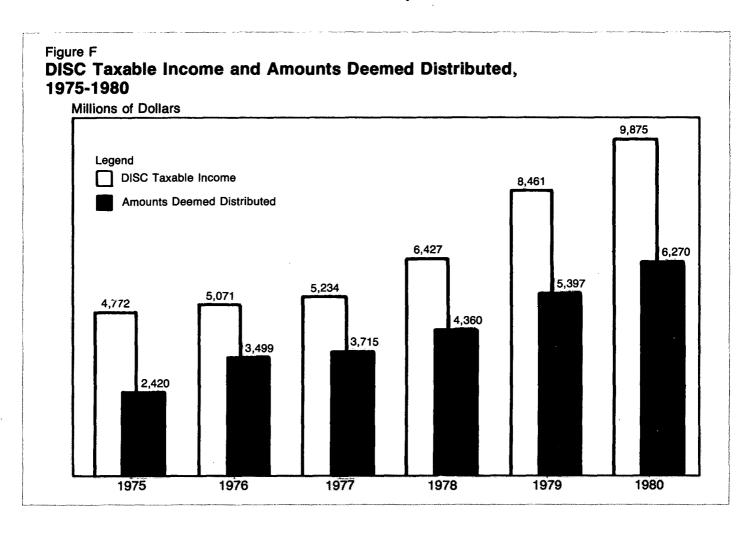
- (1) A price that will result in the DISC having taxable income of 4 percent of the qualified export receipts derived from the sale of export property plus 10 percent of the export promotion expenses allocable to those receipts.
- (2) A price that will result in the DISC having taxable income of 50 percent of the combined taxable income derived by both the DISC and its related supplier from the sales of export property which is attributable to the qualified export receipts plus 10 percent of the export promotion expenses allocable to those receipts, or
- (3) the competitive market price subject to the "arms length" pricing rules of the Internal Revenue Code.

If the 4 percent gross receipts method or the 50-50 combined taxable income method are used, the transfer price from the related supplier to the DISC is computed only after the DISC sold the goods to a customer. The DISC and its supplier can make adjustments following the close of the taxable year in which the DISC sold the goods in order to maximize the DISC's allocation of earnings and profits [14]. However, neither of these methods permits the related supplier to allocate income to the DISC to the extent that it results in a loss to the supplier.

The importance of these special intercompany pricing rules is presented in Figure G. Over 35 percent of DISC export gross receipts were subject to the 50-50 combined taxable income method, nearly 34 percent to the 4 percent gross receipts method, and almost 20 percent to a combination of both the 50-50 method and the 4 percent method. Only 4 percent of DISC export gross receipts were subject to the arms length, or fair market price, method. The ratio of net income to export gross receipts indicates that DISC's and related suppliers with high profit margins tend to use the 50-50 combined taxable income method while DISC's and related suppliers with a combined profit margin of less than 8 percent tend to use the 4 percent gross receipts method [15].

SUMMARY

Exports of U.S. goods and services through DISC's have increased steadily since 1972. The use of the



DISC provisions have increased the profitability of exporting, by lowering the effective U.S. tax rate on export profits. Large U.S. corporations with DISC subsidiaries are the primary beneficiaries of the DISC provisions accounting for nearly 70 percent of all tax deferred profits in 1980. Most DISC's and their parent companies take advantage of the special intercompany pricing rules in order to maximize the DISC's profits on exports sales and minimize the profits allocated to the parent company.

'The DISC provisions have been a point of contention between the United States and other signatory countries of the General Agreement on Tariffs and Trade (GATT) for the last several years. GATT rules generally accept territorial systems of taxation in which income earned within a given country is taxed while income earned outside the home country is tax exempt. As a result, legislation has been introduced to replace the DISC provisions with a tax alternative. This proposal would require U.S. companies to establish foreign sales corporations through which export sales of U.S. goods would be made. A portion of the earnings and profits of these corporations which are attributable to foreign economic processes would be exempt from U.S. income taxation [16].

DATA SOURCES AND LIMITATIONS

The statistics in this article were estimated from a stratified probability sample of Domestic International Sales Corporation returns selected after revenue

processing but before audit. All returns were manually designated and selected on the basis of randomly selected digits using the eighth position of the Employer Identification Number. The sample was stratified based upon size of net income or deficit of the DISC and total assets of DISC majority stockholders that were corporations, and selected at three rates ranging from 20 percent to 100 percent. There were 3,265 returns in the sample for 1980 drawn from a population of 9,782.

The estimates are intended to represent Form 1120-DISC returns with accounting periods ended July 1980 through June 1981. However, returns for prior years processed by the Internal Revenue Service during the same period as current year returns were included, in the statistics to compensate for current year returns filed after the cutoff date for 1980 sampling. This exception was for prior year returns of large DISC's. Inclusion of returns for large DISC's was manually verified insofar as possible on a name basis because of their impact on the statistics. Therefore, prior year returns of large DISC's were excluded from the statistics, because the 1980 returns for the same DISC's were included.

Because the data presented in this article are estimates based upon a sample, they are subject to sampling error. To use the data properly, the magnitude of the sampling error should be known. Coefficients of variation (CV's) are used to measure that magnitude.

Figure G.--RETURNS OF ACTIVE DISC's: Export Gross Receipts, Export Promotion Expenses, Net Income (Less Deficit), and Tax Deferred Income by Major Product and Service Division and by Intercompany Pricing Method

[All figures are estimates--money amounts are in millions]

Major product and service division	Number	Total export	Export		income deficit)	Tax
and intercompany pricing method	of returns	gross receipts of the DISC	promotion expenses	Amount	Percent of export gross receipts	deferred income
	(1)	(2)	(3)	(4)	(5)	(6)
All Products and Services						
All returns	8,665	154.078	1,506	9.870	6.4	3,606
Returns reporting pricing method	7,202	143,896	1,244	9,554	6.6	3,484
50-50 method only	3,579	54,372	680	5,766	10.6	2,153
4 percent method only	2,053	48,436	149	1,133	2.3	410
Arm's-length method only	1,137	6,787	310	483	7.1	181
50-50 and 4 percent methods	409	30,562	88	1,994	6.5	674
All other combinations	. 25	3,739	17	178	4.7	66
Pricing method not determinable	1,463	10,182	24	316	3.1	122
Nonmanufactured Products and Services				,		
All returns	1,052	42,517	75	805	1.9	285
Returns reporting pricing method	673	38,191	58	736	1.9	261
50-50 method only	233	1,251	25	149	11.9	56
4 percent method only	258	28,279	17	370	1.3	125
Arm's-length method only	157	1,748	12	50	2.8	20
50-50 and 4 percent methods	22	4,297	(¹)	86	2.0	28
All other combinations	3	2,616	, 4	81	3.1	32
Pricing method not determinable	379	4,326	16	. 69	1.6	24
Manufactured Products	٠.					
All returns	7,613	111,561	1,431	9,065	8.1	3,321
Returns reporting pricing method	6,529	105,705	1,186	8,818	8.3	3,223
50-50 method only	3,345	53,122	655	5,617	10.6	2,097
4 percent method only	1,795	20,156	132	763	3.8	285
Arm's-length method only	980	5,040	298	433	8.6	161
50-50 and 4 percent methods	386	26,264	88	1,908	7.3	646
All other combinations	23	1,123	13	97	8.7	34
Pricing method not determinable	1,084	5,856	245	257	4.4	98

¹Less than \$500,000.

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

The table below presents approximated coefficients of variation for frequency estimates. The approximate CV's shown here are intended only as a general indication of the reliability of the data. For a number other than those shown below, the corresponding CV's can be estimated by interpolation. The reliability of estimates based on samples and the use of coefficients of variation for evaluating the precision of sample estimates are discussed in the Appendix.

Estimated Number of Returns	Approximated Coefficient of Variation	Estimated Number of Returns	Approximated Coefficient of Variation
200	. 21	1,400	.08
300	.17	1,800	.07
400	.15	2,500	.06
600	.12	4,000	.05
800	.10	7,000	.04
1,000	.09	10,000	.03

DEFINITIONS

Brief definitions of the terms used throughout this article are shown below.

Accumulated DISC Income -- This balance sheet amount represented the portion of the DISC's earnings and profits, derived during taxable years for which the

corporation qualified as a DISC, that was deferred from U.S. income taxation.

Amounts Deemed Distributed -- This amount represented that portion of the DISC's earnings and profits which were fully taxable as dividends to the DISC's stockholders. For taxable years beginning before January 1, 1976, amounts deemed distributed were the sum of: (1) gross interest on producer's loans; (2) certain gains from the sale or exchange of assets; (3) one-half of the excess DISC taxable income over the sum of (1) and (2); and (4) the foreign investment attributable to producer's loans for the taxable year. For taxable years beginning after December 31, 1975, amounts deemed distributed were the sum of: (1) gross interest on producer's loans; (2) certain gains from the sale or exchange of assets; (3) one-half of DISC taxable income attributable to military property; (4) DISC taxable income attributable to base period export gross receipts; (5) one-half of the excess DISC taxable income over the sum of (1), (2), (3), and (4); (6) international boycott income; (7) the amount of illegal bribes and kickbacks paid to foreign governillegal bribes and kickbacks paid to foreign governments; and (8) the foreign investment attributable to producer's loans for the taxable year. The sum of the amounts described in (1) through (3) for taxable years beginning before January 1, 1976, and the sum of the amounts described in (1) through (7) for taxable years beginning, after December 31, 1975 were limited to the DISC's earnings and profits for the current taxable

year. Amounts deemed distributed from foreign investment attributable to producer's loans were limited to the lower of either the accumulated DISC income or the DISC's accumulated earnings and profits for the current and all preceding years.

DISC Taxable Income -- This amount represented the DISC's net income minus the statutory special deductions (net operating loss deduction and dividends-received deduction). This sum of the DISC's tax deferred income and income taxable to stockholders was used in determining the amount of the DISC's earnings and profits that was considered to be deemed distributed to the stockholder of the DISC for the current taxable year.

Export Gross Receipts -- Export gross receipts of the DISC included qualified export receipts from: (1) the sale, lease, or rental of export property; (2) services related and subsidiary to any qualified sale, lease, or rental of export property; (3) engineering or architectural services for construction projects located outside the United States; and (4) export management services provided unrelated DISC's to aid them in deriving qualified export receipts. For DISC's that acted as commission agents, export gross receipts included the total receipts on which the commission was earned.

Export Promotion Expenses -- These were expenses (excluding income taxes) incurred by a DISC to advance the sale, lease, or other distribution of export property for use, consumption, or distribution outside the United States. A DISC was allowed to increase its profit by an amount equal to 10 percent of the export promotion expenses attributable to sales of export property through use of the special DISC intercompany pricing rules.

Export Property -- This amount represented the DISC's inventory and property held for sale or lease which: (1) had been manufactured, produced, grown, or extracted in the United States by a person other than a DISC; (2) was held primarily for sale or lease in the ordinary course of business for direct use, consumption, or disposition outside the United States; and (3) had at the time of sale or lease by the DISC, not more than 50 percent of its fair market value attributable to imported articles.

Previously Taxed Income -- This balance sheet amount represented the portion of the DISC's earnings and profits derived during taxable years for which the corporation qualified as a DISC that was fully taxable as dividends to the DISC's stockholders. Excluded from this amount were amounts actually distributed to DISC's stockholders during each taxable year.

Producer's Loans -- This qualified asset generally consisted of loans made out of the DISC's tax deferred accumulated DISC income to its parent company or any other U.S. person engaged in manufacturing, producing, growing, or extracting export property. A producer's loan must have been designated as such, have been evidenced by a note, have had a stated maturity not to exceed 5 years and have been attributed to assets used in export production. If a producer's loan was renewed, it had to requalify at the time of renewal. A producer's loan did not have to be traced to a specific investment by the domestic borrower, but was subject to certain limitations to assure that it did not exceed the investment in assets which could have been attributable to production for export.

Related U.S. Persons -- Related U.S. persons were: (1) individuals who were citizens or residents of the

United States and who controlled the DISC; (2) domestic partnerships, estates or trusts that controlled the DISC; (3) domestic corporations that controlled the DISC; and (4) domestic corporations that were controlled by the same person or persons that controlled the DISC. Control meant direct or indirect ownership of more than 50 percent of the voting power of the stock entitled to vote in a DISC or other domestic corporation.

NOTES AND REFERENCES

- [1] See U.S. Department of the Treasury, The Operation and Effect of the Domestic International Sales Corporation Legislation, 1981
 Annual Report, page 17.
- [2] <u>Ibid.</u>, pages 8-16. A more detailed analysis of the effect of the DISC provisions on the level and structure of U.S. trade is presented there.
- [3] The U.S. export and import totals are based upon foreign trade statistics for merchandise for calendar years 1973 through 1980 as shown in U.S. Department of Commerce, Bureau of the Census, Statistical Abstract of the United States, 1982-83, page 833. The amounts for U.S. exports exclude U.S. Department Defense Military Assistance Program Grant-Aid Shipments.
- [4] <u>Ibid.</u>, page 842.
- The \$4.4 billion deferral of U.S. income taxes by corporations with total assets of \$250 million or more since 1975 is based upon the assumption that DISC income would be taxed to the parent corporation in the year earned by the DISC. This estimate understates the deferral of income taxes in cases where the DISC's accounting period ends one month later than its parent corporation's accounting period. This, in effect, postponed by one year the inclusion of the DISC deemed distribution as a taxable dividend in its parent corporation's gross income because the timing of the taxability of DISC income to its parent corporation was based on DISC accounting periods that end with or within the parent's accounting period. It can be roughly estimated that approximately 60 percent of all DISC's owned by U.S. corporations have accounting periods lagging slightly behind their parents's accounting period. The \$4.4 billion estimate overstates the deferral of income taxes in cases where the DISC has made actual distributions out of its accumulated tax deferred profits (accumulated DISC income).
- [6] U.S. Department of the Treasury, op. cit., page 24.
- [7] Hobbs James R., 'Corporation Returns, 1980,"

 Statistics of Income Bulletin, Volume 2. Number

 3, page 12.
- [8] U.S. Department of Commerce, Bureau of Economic Analysis, Survey of Current Business, June 1981, Volume 61, Number 6, page 15.
- [9] For DISC's which operated on a commission basis, receipts figures included only the commissions earned and not the gross receipts on which the commissions arose.
- [10] For a more detailed discussion on the decline in profits for U.S. corporations in 1980, see Hobbs. op. cit., pp. 11-16.

- [11] Since most DISC's, by their very nature, would have been classified in the 'wholesale trade' industry (selling export property aboard) and to a much lesser extent, in the "services" industry, the statistics presented in this article are classified by the major product sold, leased, or rented, or the qualified service provided abroad. The most significant difference between the classification by major product or service and the classification by industry (which is used for the presentation of statistical data for corporations in general) was that the industrial classification made distinctions based upon type of business activity while the major product or service classification was based on the kind of property being sold, leased, or rented, or the service being provided. Both classification systems were derived from the Enterprise Standard Industrial Classification authorized by the Office of Information and Regulatory Affairs in the Office of Management and Budget.
- [12] U.S. Department of Commerce, Bureau of the Census, <u>Highlights of U.S. Export and Import Trade</u>, Report F1990, December 1981, page 31.
- [13] A comparison of DISC exports to total U.S. exports for agricultural products and services is

- not meaningful because of inter-DISC sales. Sales of export property between unrelated DISC's are qualified export receipts as long as the property sold is ultimately for direct use, consumption, or sale outside the United States. Inter-DISC sales also occur to a much lesser extent for sales of nonagricultural products. However, these sales are not considered to be a limitation of the comparison shown.
- [14] The intercompany pricing methods allowed DISC's are not mutually exclusive. Any one may be applied to a particular product or product line or group of transactions without exclusion of other methods for other products, product lines or transactions in the same taxable year.
- [15] This information can be used to estimate the combined profit margins of DISC's and their related suppliers. See U.S. Department of the Treasury, The Operation and Effect of the Domestic International Sales Corporation Legislation, 1976 Annual Report; pp. 35-36.
- [16] U.S. Department of the Treasury, op.cit., pp. 6-7.

Table 1 — Assets, Receipts, Deductions, Income, and Distributions of DISC, and Total Export Gross Receipts of DISC and Related U.S. Persons for Current and First-Preceding Years, by Major Product and Service Division and by Type of Majority Stockholder and Size of Total Assets of Majority Corporate Stockholder

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

Major product and service division, type of stockholder and size of assets of majority corporate stockholder	Number of returns	Net income (less deficit)	Net income	Deficit	DISC taxable income	Taxable income attributable to base period export	Adjusted DISC income subject to deferral computation	Total amount deemed distributed	Tax deferred income
	(4)	/8)	12)			gross receipts			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
All Products and Services									
All returns	8,665	9,870,247	9,888,125	17,878	9,875,286	2,191,919	7,213,891	6,269,797	3,606,064
Returns with majority stockholder, total	8,270	9,824,497	9,841,993	17,496	9,829,297	2,186,824	7,173,842	6,243,832	3,586,041
Corporate stockholders, total Assets zero or not available	7,194 529	9,747,320 132,354	9,755,596 133,123	8,276 769	9,743,314 132,040	2,180,111 26,478	7,095,978	6,196,773	3,547,110
\$1 under \$100,000	134	14,173	14,313	140	14,313	20,478	100,305 12,167	81,882 8,226	50,158 6,087
\$100,000 under \$1,000,000 \$1,000,000 under \$5,000,000	801	62,526	63,465	940	60,515	6,057	53,940	33,545	26,969
\$5,000,000 under \$10,000,000	2,018 873	237,256 208,614	240,170 211,414	2,914 2,800	239,999 211,411	23,940 29,271	210,033 174,125	135,396 123,650	104,777 87,761
\$10,000,000 under \$50,000,000	1,491	839,601	839,917	317	839,878	145,175	670,746	504,765	335,116
\$50,000,000 under \$100,000,000 \$100,000,000 under \$250,000,000	390	409,555	409,604	48	409,604	85,738	307,736	255,808	153,865
\$250,000,000 or more, total	303 654	705,206 7,138,035	705,211 7,138,379	4 344	701,021 7,134,533	159,947 1,701,454	526,023 5,040,905	438,178 4,615,323	262,843 2,519,535
\$250,000,000 under \$500,000,000	187	610,288	610,289	1	610,289	151,139	438.627	391,086	2,519,535
\$500,000,000 under \$1,000,000,000	188	995,044	995,044	(')	995,044	256,557	713,313	638,817	356,552
\$1,000,000,000 or more	279	5,532,703	5,533,046	343	5,529,199	1,293,758	3,888,964	3,585,419	1,943,780
Noncorporate stockholders	1,047 *30	73,657 *3,520	82,808 *3,589	9,151 *69	82,395 *3,589	6,713	74,275 *3,589	45,264	37,136
Returns with no majority stockholder	394	45,750	46,132	382	45,989	5,095	40,049	*1,794 25,965	*1,794 20,023
Nonmanufactured Products and Services	•	.5,.55	10,702	332	45,505	3,033	40,043	25,905	20,023
All returns	1,052	805,195	809,127	3,933	804,090	191,239	569,944	519,520	. 284,900
Returns with majority stockholder, total	950	800,937	804,852	3,915	799.898	190,557	566,584	517,007	283,220
Corporate stockholders, total	819	791,969	795,316	3,347	790,361	189,966	557,848	511,834	278,852
Assets zero or not available	91	12,337 164	12,453	116 *25	11,457 *190	2,373	9,084	6,915	4,542
\$100,000 under \$1,000,000	139	5,699	6,030	331	6.030	292	*190 5,673	*95 3,194	*95 2,836
\$1,000,000 under \$5,000,000 \$5,000,000 under \$10,00,,000	234 78	23,580	23,603	23	23,491	3,122	19,293	13,844	9,647
\$10,000,000 under \$50,000,000	119	11,768 57,250	14,568 57,253	2,799	14,567	1,874	11,998	8,568	5,999
\$50,000,000 under \$100,000,000	34	55,532	57,253 55,580	47	57,253 55,580	11,605 10,374	43,362 44,066	35,572 33,547	21,681 22,033
\$100,000,000 under \$250,000,000	15	179,539	179,539	(¹)	179,539	51,172	127,085	116,009	63,530
\$250,000,000 or more, total	75	446,099	446,100		442,254	109,155	297,096	294,089	148,490
\$250,000,000 under \$500,000,000 \$500,000,000 under \$1,000,000,000	18 23	27,884 141,410	27,884 141,410	_1	27,884 141,410	4,179 56.162	23,511 78,954	16,129 102,317	11,755 39,418
\$1,000,000,000 or more	34	276,806	276,806	(1)	272,959	48,813	194,632	175,644	97,316
Noncorporate stockholders	125	8,968	9,537	568	9,537	591	8,736	5,174	4,368
Type of stockholder not known	*5	*(¹)		*(¹)	-	-	_		_
Returns with no majority stockholder	102	4,258	4,275	17	4,192	682	3,360	2,512	1,680
Manufactured Products								- 1	
All returns	7,613	9,065,052	9,078,998	13,946	9,071,196	2,000,680	6,643,947	5,750,277	3,321,164
Returns with majority stockholder, total	7,321 6,375	9,023,560 8,955,351	9,037,141 8,960,280	13,581 4,929	9,029,400 8,952,953	1,996,267 1,990,145	6,607,257 6,538,129	5,726,824 5,684,940	3,302,821 3,268,258
Assets zero or not available	437	120,017	120,669	653	120,583	24,105	91,220	74,967	3,266,256 45,616
\$1 under \$100,000	102 662	14,009	14,123	114	14,123	2,050	11,977	8,131	5,992
\$1,000,000 under \$5,000,000	1,784	56,827 213,676	57,435 216,567	608 2,891	54,484 216,508	5,765 20,818	48,267 190,739	30,351 121,551	24,133 95,130
\$5,000,000 under \$10,000,000	795	196,846	196,846	1	196,844	27,398	162,127	115,082	81,762
\$10,000,000 under \$50,000,000	1,371	782,351	782,664	313	782,625	133,570	627,384	469,193	313,435
\$50,000,000 under \$100,000,000 \$100,000,000 under \$250,000,000	356 288	354,023 525,668	354,024 525,672	1	354,024 521,482	75,364 108,775	263,669 398,937	222,262	131,831
\$250,000,000 or more, total	579	6,691,936	6,692,279	344	6,692,279	1,592,299	4,743,809	322,169 4,321,234	199,314 2,371,045
\$250,000,000 under \$500,000,000	169	582,405	582,405	(b)	582,405	146,959	415,116	374,957	207,448
\$500,000,000 under \$1,000,000,000 \$1,000,000,000 or more	165 245	853,634 5,255,897	853,634 5,256,240	(¹) (¹) 343	853,634	200,394	634,359	536,501	317,133
Noncorporate stockholders	922	64,689	73,272	8,582	5,256,240 72,858	1,244,945	3,694,333	3,409,776	1,846,464
Type of stockholder not known	*24	*3,520	*3,589	*69	*3,589	6,123	65,539 *3,589	40,090 *1,794	32,768 *1,794
Returns with no majority stockholder	292	41,492	41.857	365	41,796	4,413	36,690	23,453	18,343

Footnotes at end of table

Domestic International Sales Corporation Returns, 1980

ALL RETURNS OF ACTIVE DOMESTIC INTERNATIONAL SALES CORPORATIONS

Table 1 — Assets, Receipts, Deductions, Income, and Distributions of DISC, and Total Export Gross Receipts of DISC and Related U.S. Persons for Current and First-Preceding Years, by Major Product and Service Division and by Type of Majority Stockholder and Size of Total Assets of Majority Corporate Stockholder — Continued

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

•		Currer	nt year total exp DISC and relate	port gross rece ed U.S. persons	ipts of	Full-year export gross	returns with full receipts of DIS	-year first-prece C and related	ding year U.S. persons
Major product and service division, type of stockholder and size of assets of majority corporate stockholder	Total amount actually distributed	Number of returns	Total amount	DISC's	Related U.S. persons (except DISC's)	Number of returns	Current year receipts	First- preceding year receipts	Percent increase (decrease) in current over first-preceding year receipts
	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)
		· ' '			` ′	` ,			
All Products and Services	٠ .								
All returns	5,221,216	8,022	163,973,528	154,078,475	9,895,053	6,150	151,710,540	140,036,919	8.34
Returns with majority stockholder, total	5,199,875	7,687	163,060,017	153,164,964	9,895,053	5,900	150,918,637	134,322,483	12.36
Corporate stockholders, total	5,163,061 69,772	6,701 481	161,116,916 2,875,447	151,223,948 2,863,014	9,892,968 12,433	5,151 353	149,513,319 2,435,134	133,088,616 2,205,575	12.34 10.41
\$1 under \$100.000	3,065	124	196,606	196,606	· - 1	63	125,614	76,009	65.26
\$100,000 under \$1,000,000	22,238 113,453	721 1.901	1,159,619 4,085,225	1,119,904 4,052,786	39,714 32,440	430 1,364	747,927 3,242,785	641,102 2,976,871	16.66 8.93
\$1,000,000 under \$5,000,000 \$5,000,000 under \$10,000,000	110,560	833	4,005,225	4,041,205	37,418	621	3,564,819	3,584,431	55
\$10,000,000 under \$50,000,000		1,377	14,364,501	14,314,266	50,234	1,164	11,291,919	10,169,634	11.04
\$50,000,000 under \$100,000,000	193,807	362	6,988,119	6,923,973	64,146	324	5,916,435	5,859,137	.98
\$100,000,000 under \$250,000,000	323,412	300 603	17,356,164	16,560,063	796,101 8,860,480	259 572	15,192,091 106,996,594	13,179,860 94,395,998	15.27 13.35
\$250,000,000 or more, total	3,997,826		110,012,611	101,152,131	l				
\$250,000,000 under \$500,000,000 \$500,000,000 under \$1,000,000,000	305,937 461,820	. 171 175	9,229,525 18,101,338	9,127,452 17,054,224	102,073 1,047,114	151 166	8,526,250 17,753,307	7,048,398 18,246,442	20.97 - 2.70
\$1,000,000,000 or more	3,230,068	257	82,681,748	74,970,454	7,711,293	255	80,717,037	69,101,158	16.81
Noncorporate stockholders	36,495	961	1,885,842	1,883,757	2,085	741	1,386,326	1,223,924	13.27
Type of stockholder not known	*319	*24	*57,258	*57,258	_	*8	*18,992	*9,943	. *91.01
Returns with no majority stockholder	21,341	335	913,512	913,512	_	249	791,903	5,714,436	~ 86.14
Nonmanufactured Products and Services									
All returns	346,565	589	45,393,860	42,517,079	2,876,781	492	38,167,766	36,471,932	4.65
Returns with majority stockholder, total	342,988	524	45,185,548	42,308,767	2,876,781	444	37,988,869	36,224,220	4.87
Corporate stockholders, total	336,516	458	44,699,207	41,823,057	2,876,150	387	37,835,943	36,046,217	4.97
Assets zero or not available\$1 under \$100,000		. 54 . *21	1,254,137 2,709	1,248,944 *2,709	5,193	41 *11	1,088,833 1,866	899,420 *1,461	21.06 *27.68
\$100,000 under \$1,000,000 \$1,000,000 under \$5,000,000	2,025	75	281,263	254,726	26,537	*40	*95,461	*58,158	*64.14
\$1,000,000 under \$5,000,000	16,949	138	531,964	521,935	10,029	125	420,058	572,573	-26.64
\$5,000,000_under_\$10,000,000		43	3.851.482			. 69	1,743,199	. *489,805 1,900,180	- 8.26
\$10,000,000 under \$50,000,000 \$50,000,000 under \$100,000,000	27,378 26,535	19	1,756,199	3,851,482 1,756,199] =	` 21	1,139,951	1,194,245	- 4.55
\$100,000,000 under \$250,000,000	74,343	*12	*10,502,546	*9,872,449	*630,098	5	8,764,350	7,990,961	9.68
\$250,000,000 or more, total	173,131	40	25,985,748	23,781,455	2,204,293	49	24,146,182	22;939,413	• 5.26
\$250,000,000 under \$500,000,000	10,525	9 14	1,490,373 7,152,954	1,490,373 7,095,725	57,229	.9	1,258,743 7,152,954	9,751,653	55.30 - 26.65
\$500,000,000 under \$1,000,000,000 \$1,000,000,000 or more		17	17,342,421	15,195,357	2,147,063	22	15,734,485	12,377,229	27.12
Noncorporate stockholders	6,472	66	486,341	485,710	631	57	152,927	178,003	- 14.09
Type of stockholder not known	-			_	-	_	_	_	-
Returns with no majority stockholder	3,576	. 64	208,312	208,312	· -	48	178,897	247,712	- 27.78
Manufactured Products	1								
All returns	4,874,651	7,433	118,579,669	111,561,397	7,018,272	5,658	113,542,774	103,564,987	9.63
Returns with majority stockholder, total	4,856,887	7,163	117,874,469	110,856,197	7,018,272	5,456	112,929,768	98,098,263	15.12
Corporate stockholders, total	4,826,545	6,243	116,417,710	109,400,891	7,016,818	4.764	111,677,377	97,042,399 1,306,155	15.08 3.07
Assets zero or not available	64,127 2,678	427 102	1,621,310 193,898	1,614,070 - 193,898	7,240	313 52	1,346,302 123,748	74,548	66.00
\$100,000 under \$1,000,000	20 214	646	878,356	865,179	13,177	390	652,466	582,943	11.93
\$1,000,000 under \$5,000,000 \$5,000,000 under \$10,000,000	96,503 100,439	1,763 790	3,553,261 3,545,465	3,530,850 3,508,047	22,411 37,418	1,239 595	2,822,727 3,128,777	2,404,297 3,094,626	17.40 1.10
			10,513,019	10,462,784	50,234	1.095	9,548,721	8,269,453	15:47
\$10,000,000 under \$50,000,000 \$50,000,000 under \$100,000,000	167,272	1,323 343	5,231,920	5,167,774	64,146	303	4,776,484	4,664,892	2.39
\$100,000,000 under \$250,000,000	249,068	288	6,853,618	6,687,614	166,004	254	6,427,741	5,188,899	23.87
\$250,000,000 or more, total		563	84,026,863	77,370,676	6,656,188	523	82,850,412	71,456,585	15.95
\$250,000,000 under \$500,000,000 \$500,000,000 under \$1,000,000,000	295,412 416,116	162 161	7,739,152 10,948,384	7,637,079 9,958,499	102,073 989,885	142 148	7,267,507 10,600,353	· 6,237,867 8,494,789	16.51 24.79
\$1,000,000,000 under \$1,000,000,000 \$1,000,000,000 or more		240	65,339,327	59,775,097	5,564,230	233	64,982,552	56,723,929	14.56
Noncorporate stockholders	1 ' '	895	1,399,501	1,398,047	1,454	684	1,233,399	1,045,921	17.92
Type of stockholder not known		*24	*57,258	*57,258	-	- 8	*18,992	*9,943	*91.01
Returns with no majority stockholder	17,764	271	705,200	705,200		201	613,006	5,466,724	- 88.79
		· · · · · · · · · · · · · · · · · · ·							

^{*}Estimate should be used with caution because of the small number of sample returns on which it was based. 'Less than \$500.

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

Table 2 — Assets, Receipts, Deductions, Income, and Distributions of the DISC, and Total Export Gross Receipts of the DISC, and Related U.S. Persons for Current and First-Preceding Years, by Major Product or Service

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

Major product or service	Number of returns	Total assets	Qualified assets	Export property	Total liabilities	Total qualified and nonqualified receipts	Qualified export receipts from the sale of export property	Other qualified export receipts	Cost of sales and operations
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
All products and services	8,665	28,728,913	28,674,344	2,255,910	4,389,232	52,798,631	50,811,478	1,718,553	40,247,932
Nonmanufactured products and services	1,052	2,922,186	2,918,579	407,748	574,534	15,038,106	14,619,925	383,510	13,992,173
Grains	110 *26	1,680,007 *81,212	1,679,260 *80,050	340,805	391,132 *8,573	12,336,079 *184,264	12,176,439 176,050	136,656 *6,578	11,731,895 *156,803
Crops, except cotton and grains	119 63	142,665 65,327	142,645 65,310	11,104 8,230	41,151 13,077	572,035 388,663	561,235 382,019	6,629 2,514	482,739 357,690
Agriculture services	*14	*3,957	*3,912	*265	*1,291	*127,481	127,049	*432	*123,524
Fishery products and services	*15	*29,349	*28,923	-	*2,562	*106,105	*104,637	*1,464	*87,330
services	53 *5	133,665	133,665	42,890	60,083	1,025,624	1,020,334	5,214	976,819
Chemical and fertilizer mineral	*8	*4,709 *2,262	*4,709 *2,262	*103	*111 *464	*3,299 *5,085	*2,923 *5,061	*376 *23	*2,513 *3,284
Transportation electric, gas, and sanitary services	*4	*5,480	*5,135	*113	*4,556	*2,846	*2,358	*428	*1,360
Financial services	146 *35	486,013 *8,655	485,976 *8,653	*2,685	15,954 *2,390	66,428 *4,756	229	66,193 *4,756	21
Motion picture distribution	*15 66	*149,949 101,537	*149,252	•77	1,218	*82,480	*23,654	*57,494	*1,759
Miscellaneous nonmanufactured products and		i	101,533	-	28,873	101,229	7,339	93,885	43,674
services	371	27,402	27,296	1,476	3,097	31,732	30,597	867	22,574
Manufactured products	7,613 23 *3	25,806,726 65,314	25,755,765 65,314	1, 848,162 *22	3,814,698 9,515	37,760,525 46,810	36,191,554 42,682	1,335,043 4,128	26,255,759 20,592
Ammunition, except for small arms	*3 *3	*1,141 *1,195	*1,141 *1,195	*22	*594	*838 *4,554	*804 *4,554	*34	*3,271
Small arms	•7 •11	*53,311	*53,311	==	*3,941	*29,853	*25,863	*3,989	*8,631
Ordnance and accessories, not elsewhere classified Food and kindred products	336	*9,668 576,956	*9,668 576,555	73,832	*4,980 118,272	*11,566 2,093,565	*11,461 2,068,901	*105 18,262	*8,690 1,777,941
Meat products	102	133,450	133,428	13,358	34,345	484,643	475,820	4,961	409,316
Dairy products	*9 71	*8,519 122,921	*8,519 122,556	*571 8,743	*86 14,798	*2,682 355,465	*2,178 350,872	*92 3,844	*263 307,417
Grain mill products	40	95,290	95,290	7,638	3,287	292,891	288,233	3,863	220,255
Sugar	*6 *12	*1,460 *3,990	*1,460 *3,990	_	*(¹) *6	*2,194 *1,678	*2,194 *1,466	*213	=
Beverages	*14 80	*41,995 169,330	*41,995	*6,137	*(¹) *6,382 59,367	*70,838	*69,265	*1,267	*40,947
Tobacco manufactures		204,221	169,317 204,221	37,385 14,198	59,367 2,711	883,173 116,090	878,874 109,928	4,021 4,962	799,742 4,587
Cigarettes	12 5	179,973	179,973	74,130	1,366	100,283	95,141	3,941	4,367
Tobacco	*3 4	*914 23,334	*914 23,334	14,198	*16 1,329	*398 15,410	*356 14,431	*42 979	*4,587
Textile mill products	284	426,440	424,624	55,922	178,483	556,488	543,069	10,992	394,372
Broad woven fabric mills, cotton	26 15	233,599 *36,729	233,599 *36,729	46,655 *1,194	135,470 *1,641	229,444 *22,078	224,893 *21,496	4,541 *581	183,735 *8,117
Narrow fabrics and smallwares mills	*16 *12	*13,303 *5,455	13,303 5,455	*15	*3,236 *529	*11,708 *11,180	*10,715 *11,107	*993 *72	*7,370 *7,190
Floor covering mills	52	26,176	26,172	. =	6,081	30,659	29,707	859	20,159
Yarn and thread mills	*23 140	*18,360 92,820	*18,352 91,014	1,557 6,501	*11,791 19,734	*56,020 195,401	*53,903 191,248	3,945	*48,503 119,297
Apparel and other finished products made from fabrics									
and similar materials	180	121,033 *2,950	120,958 *2,950	7,192	48,473 —	307,053 *1,577	302,962 *1,577	2,823	240,934
Male furnishings and work clothing Female and infant undergarments	*12 *13	*22,683 *5,776	*2,950 *22,683 *5,776	*15 *542	*6,123 *2,465	*26,064 *9,603	*24,477 *9,680	*1,587 *- 77	*12,880 *6,792
Hats, caps, and millinery	*5	*177	*177	-	*24	*1,007	*1 006	- //	*838
Girls, childrens and infants wear Fur goods	*5 *11	*3,264 *3,445	*3,264 *3,445	_	*187 *1,352	*1,324 *3,006	*1,324 *2,554	*452	*1,863
Miscellaneous apparel and accessories	79 50	56,969 25,770	56,945 25,719	5,288 1,346	28,831 9,492	198,218 66,253	196,551 65,792	399 460	164,191 54,371
Lumber, wood products, except furniture	198	291,029	290,723	17,388	61,266	1,105,987	1.097,780	6.360	942,740
Logging camps, logging contractors	*19 46	*60,417 39,949	*60,406 39,919	*893 639	*2,621 4,325	*111,667 94,670	*110,956 93,016	*420 1,573	*71,058 73,467
Millwork, veneer, and plywood products	50	40,678	40,676	3,944	13,497	155,128	153,484	651	138,697
Miscellaneous wood products	82 42	149,985	149,723	11,912 982	40,822	744,522	740,323	3,717	659,517
Furniture and fixtures	*13	13,479 *1,954	13,479 *1,954	962	1,457 *382	15,245 *5,557	15,020 *5,557	225 —	7,380 *3,776
Office and public building related furniture	*10 *19	*5,952 *5,573	*5,952 *5,573	*982	*20 *1,055	*2,824 *6,864	*2,721 *6,742	*103 *122	*3,603
Paper and allied products	160	495,530	493,747	30,428	70,963	935,875	911,784	20,349	643,524
Pulp mills	14 •17	171,064 *32,681	170,998 *32,681	10,642	11,234 *3,709	187,861 115,031	175,998 114,675	9,865 *335	89,230 *83,213
Paperboard mills	•14	112,470	*112,470	*3,567	16,243	*232,705	1226,044	*6,009	°164,436
Converted paper products except containers and boxes	99	112,615	110,901	16,216	30,631	212,434	209,538	1,870	158,089
Paperboard containers, boxes and building paper	*17	*66,700	*66,697	*2	*9,146	*187,845	*185,530	*2,271	*148,555
Printing, publishing and allied products	126 *16	206,210 *17,164	206,084 *17,163	761	113,776 *2,896	110,536 *13,133	107,274 *12,897	3,024	66,816 *3,448
Books Miscellaneous publishing	64 *21	175,249 *1,595	175,139 *1,595	761	106,252 *707	75,917 *3,355	73,091 *3,351	2,589	50,457 *1,956
Commercial printing	*13	*2,114	*2,099	-	*26	*2,346	*2,208	139	1,332
Miscellaneous service industries for print trade	*11	10,089	*10,089		*3,895	15,784	15,728	*56	*9,622

Footnotes at end of table

Table 2 — Assets, Receipts, Deductions, Income, and Distributions of the DISC, and Total Export Gross Receipts of the DISC, and Related U.S. Persons for Current and First-Preceding Years, by Major Product or Service.

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

Major product or service	Total export promotion and other expenses	Export promotion expenses	Net income (less deficit)	Net income	Deficit	DISC taxable income	Taxable income attributable to base period export gross receipt	Adjusted DISC income subject to deferral computation	Total amount deemed distributed
	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)
All products and services	2,680,453	1,505,666	9,870,247	9,888,125	17,878	9,875,286	2,191,919	7,213,891	6,269,797
ionmanufactured products and services	240,739	74,578	805,195	809,127	3,933	804,090	191,239	569,944	519,520
Grains	117,223 *1,710	24,987 *1,667	486,962 *25,751	486,964 *25,751	2	483,006 *25,751	131,482 *5,289	333,695 *17,896	316,503 *16,809
Crops, except cotton and grains	45,132	6,448	44,163	44,259	96	44,259 23,372	10,946 *4,193	30,487 18,301	29,016
Livestock and livestock products	7,768 *2,183	6,402 *2,062	23,205 *1,775	23,372 1,778	167 *3	*1,778	4,193	*1,778	*889
Fishery products and services	*6,604	•247	*12,171	*12,171	-1	*12,171	*2,363	*8,999	*7,672
Metal mining, iron ores, coal mining products and services	19,987	6,958	28.817	29.005	187	28,009	1,662	25,809	15,104
Chemical and fertilizer mineral	*254	*204	*532	*532	_	*532 *1,066	Ξ	*532 *1,066	*266 *533
Other nonmetalic minerals products and services	*735 *224	*177	*1,066 *1,261	*1,066 *1,261		*1,261		*1,261	*631
Transportation electric, gas, and sanitary services	2,212	187	64,005	64,062	56	63,984	11,610	39,964	44,053
Export management services	*2,369 *18,207	1,115 18,023	*2,387 *62,514	*2,470 *62,514	*82 —	*2,470 *62,514	*499 12,445	*1,649 *45,425	*1,646 *39,80
Engineering and architectural services	11,963	3,093	45,591	48,378	2,787	48,378	10,045	38,261	29,248
Miscellaneous nonmanufactured products and services	4,166	3,009	4,992	5,545	552	5,539	704	4,822	3,128
Manufactured products	2,439,714	1,431,088	9,065,052	9,078,998	13,946	9,071,196	2,000,680	6,643,947 12,014	5,750,27 7
Ordnance and accessories	2,802	1,758	23,416 *838	23,418 *838	_	23,418 838	4,736	*441	*618
Sighting and fire control equipment	*686 *1,194	*663 *1,048	*597 *20.028	*597 *20,028	=	*597 *20,028	*4,602	*597 *10,158	*298 *14,948
Small armsOrdnance and accessories, not elsewhere classified	*922	*47	*1,953	*1,956	•2	*1,956	133	*818	1,547
Food and kindred products	117,648	60,242	197,975	198,705	729	198,658	40,401 8,813	150,416 35,377	122,790 27,672
Meat products	29,609 49	16,972	45,718 *2,370	46,102 *2,370	384	46,058 *2,370	*1,440	• 930	*1,908
Canned fruits, vegetables, seafoods	15,717	10,147	32,331	32,652	321	32,652	5,636	25,519	19.893
Grain mill products	29,693	4,618	42,943 *2,193	42,943 *2,194	(')	42,943 *2,194	9,135	31,386 *2,194	27,284 *1,091
Confectionery and related products	! " 5	4	*1,674	*1,674	-	*1,674 *16,645	*293	*1,295 *12,771	1,026
Beverages	*13,246 29,328	12,279	16,645 54,103	*16,645 54,125	23	54,123	11.695	40,945	33,65
Tobacco manufactures	2,147	1,440	109,357	109,357	_	109,357	24,260	84,163	67.345
Cigarettes	1,440	1,440	98,843 *398	98,843 *398	_	98,843 *398	21,403 107	76,612 *291	60,537
Tobacco stemming and redrying	• • 706	-	10,117	10,117	-	10,117	2,749	7,261	6,556
Textile mill products	71,287 21,820	25,299 10,427	90,830 23,889	92,669 25,640	1,840 1,751	92,669 25,640	19,223 7,243	71,609 17,914	56,869 16,683
Broad woven fabric mills, cotton	*869	*531	*13,092	13,092	1.75	13,092	*4,053	*8,985	8.59
Narrow fabrics and smallwares mills	*530 474	*518 261	*3,808 3,516	*3,808 3,516	-=1	*3,808 3,516	*1,025 188	*2,757 3,256	*2.43 1.88
Floor covering mills	722	621 *2,276	9,777 *4,578	9,777 *4,632	- 154	9,777 *4,632	799 *45	8,299 *4,587	5,62 . *2,33
Yarn and thread mills Miscellaneous textile goods	*2,939 43,932	10,665	32,170	32,204	34	32,204	5,870	25,812	19,29
Apparel and other finished products made from fabrics				00.704	5.45	26.274	. 7.700	20.256	22.00
and similar materials	29,900	19,866	36,219 1,577	36,764 *1,577	545 —	36,271 *1,577	7.703 74	28,356 *1,504	22,090
Male furnishings and work clothing	*4,936	*4,494 *1,504	*8,248 *1,180	*8,248 *1,180	_	*8,248 *1,180	*2,916 *290	*5,325 *890	*5.58 . *73
Female and infant undergarments Hats, caps, and millinery	*30	*29	140	*140	_	*140	_	*140	•76 •76
Girls, childrens and infants wear	*192	_	*1,324 *951	*1,324 *951		*1,324 *951	*215	*1,109 *951	*47
Fur goods	20,128	12,235 1,604	13,899 8,899	14,366 8,978	466 79	14,366 8,485	2,557 1,651	11,603 6,835	8,56 5,06
Miscellaneous fabricated textile products Lumber, wood products, except furniture	1	19,983	131,916	1	204	132,062	Į.	107,348	78,38
Logging camps, logging contractors	1991	*353	*39,617	*39,617	- 1	*39,617 18,434		*38,537	*20.34 11.46
Sawmills and planing mills] 3,725	1,785 2,468	18,434 12,706	18,434 12,706		12,706	4,123	8,028	8,69
Miscellaneous wood products	23,846	15,377	61,158	61,363	204	61,305		46,835	37,88
Furniture and fixtures		167 *165	6,934 *1,311	6,941 1,319	* 8	6.941 1,319	522	6,321 1,319	3,78 *65
Office and public building related furniture	(')	-2	*2,824 2,799	*2,824 *2,799	_	*2.824 *2.799	*209 *313	*2,615 *2,388	*1,516 *1,60
Miscellaneous furniture, and fixtures		18,177	2,799 219,823	219,823	_	219,823	1	146,790	146,42
Paper and allied products	13,868	995	84,762	84,762	_	84,762	28,251	51,758	58.88 *8.99
Paper mills, except building paper mills	*18,358 *26,297	*4,997 *5,376	*13,460 *41,971	*13,460 *41,971	_	*13,460 *41,971	*4,324 *12,756	*8,931 *27,489	*28,22
Converted paper products except containers and	40.500			43,813		43,813		34,119	26,75
boxes Paperboard containers, boxes and building paper	10,533 *3,472	5,589 1,220	43,813 *35,818	35,818		*35,818		*24,493	*23,57
Printing, publishing and allied products	6,458	4,367	37,262	37,334	•73	37,334		27,661	23,50
Periodicals: publishing, and printing Books	*431	149 2,814	*9,254 21,305	*9,326 21,305	•73 —	*9,326 21,305	7,513	13,751	*5,41 14,42
Miscellaneous publishing	. 83	_	1,316	1,316	-	*1,316 *914	1 –	11,311	166 149
Commercial printing	1,690	*72 *1,331	*914 *4,473		_	*4,473		13,926	*2.51

Footnotes at end of table.

Table 2 — Assets, Receipts, Deductions, Income, and Distributions of the DISC, and Total Export Gross Receipts of the DISC, and Related U.S. Persons for Current and First-Preceding Years, by Major Product or Service.

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

Major product or service	Tax deferred income	Tatel	Current year total export gross receipts of DISC and related U.S. persons			Full-year returns with first-preceding year export gross receipts of DISC and related U.S. persons			
		Total amount actually distributed	Total amount	DISC's	All related U.S. persons except DISC's	Number of returns	Current year receipts	First- preceding year receipts	Percent increase (decrease) current ove first-precedir year receip
	(19)	(20)	(21)	(22)	(23)	(24)	(25)	(26)	(27)
All products and services	3,606,064	5,221,216	163,973,528	154,078,475	9,895,053	6,150	151,710,540	140,036,919	8.
Nonmanufactured products and services	284,900 166,827	346,565 192,928	45,393,860	42,517,079 37,165,866	2,876,781 2,747,866	492	38,167,766 33,404,169	36,471,932	4.
Cotton	*8,948	*16,075	39,913,732 *1,268,246	1,263,243	*5,003	67 •20	*1,115,584	31,602,001 *1,073,039	5. *3.
Crops, except cotton and grains	15,243 9,150	22,043 14,062	1,132,628 740,391	1,106,860 740,391	25,768	99 35	930,265 542,539	942,454 750,904	- 1 - 27
Agriculture services	*889	*752	*151,174	*151,174	-	•9	*151,174	*218,184	*- 30
Fishery products and services	*4,499	*9,855	*151,601	*151,601	-	•9	*145,316	*135,500	•7
services	12,905	25,639	1,069,050	1,069,050		*13	*995,808	*794,640	*25
Chemical and fertilizer mineral	*266 *533	*266 *520	*2,923 *6,961	*2,923 *6,961		*8	*2,923 *6,961	*4,344 *4,701	*- 32 *48
Transportation electric, gas, and sanitary services	*631	*631	*8,478	*8,478	_ [109	*83	31
Financial services	19,931 *824	21,327 1,559	1,124 *34,599	1,124 *34,599	-	58 *24	1,109 *16,385	260,716 *44,453	- 99 *- 63
Motion picture distribution	*22,713	*21,609	*357,747	*295,115	*62,633	*15	*357,747	*312,976	*14
Engineering and architectural services	19,130	16,510	491,874	466,392	25,482	*44	*442,143	*251,540	*75
services	2,411	2,790	63,333	53,304	10,029	*82	*55,535	*76,397	'- 27
anufactured products	3,321,164 6.007	4,874,651 17,676	118,579,669 196,543	111,561,397 196,543	7,018,272	5,658 23	113,542,774 196,543	103,564,987 165,363	9 18
Ammunition, except for small arms	*220	*472	*8,895	*8,895	_	*3	*8,895	*6,258	•42
Sighting and fire control equipment	*298 *5.079	*499 *15,546	*4,554 *166,603	*4,554 *166,603		*3	*4,554 *166,603	*3,273 *141,712	*39 *17
Ordnance and accessories, not elsewhere classified	*409	*1,159	16,491	*16,491	_	*11	16,491	14,120	*1é
Food and kindred products	75,869	106,966	4,251,809	4,204,101	47,708	245	3,810,361	3,723,981	. 2
Meat products	18,386 *461	27,017 *1,250	952,514 *35,499	950,071 *30,661	2,443 *4.838	80 *9	920,689 *35,499	802,089 *45,679	14 *- 22
Canned fruits, vegetables, seafoods	12,759	16,663	632,690	631,771	919	62	580,075	584,753	-
Grain mill products	15,659 *1,097	27,370 *758	797,388 *20,904	797,388 *20,904	_	26	667,755	556,005	20
Confectionery and related products	*648	*722	*20,209	*19,791	*417	*6	*19,576	15,456	*26
Beverages	*6,385 20,472	*10,071 23,117	147,885 1,644,720	*141,684 1,611,829	*6,201 32,891	*10 51	*112,368 1,474,400	*100,574 1,619,425	*11 -8
Tobacco manufactures	42,082	40,495	1,355,571	1,110,066	245,506	12	1,355,571	1,216,250	11
Cigarettes Tobacco	38,306 *145	37,670 212	996,346 *6,478	750,840 *6,478	245,506	5 *3	996,346 *6,478	926,195	7
Tobacco stemming and redrying	3,630	2,614	352,747	352,747		4	352,747	*5,688 284,367	*13 24
Textile mill products	35,805	55,971	1,843,501	1,829,029	14,472	205	1,647,897	1,531,815	
Broad woven fabric mills, cotton	8,957 4,493	*23,813 *6,785	*562,318 *315,217	*561,913 *315,217	*405 —	*26 *15	*562,318 *315,217	*627,554 *273,348	*- 10 *15
Narrow fabrics and smallwares mills	*1,378 *1,628	*981 *1,106	*44,838 *37,932	*44,838 *37,932	_	*15 *5 *5	*38,909 *18,309	*28,360 *15,393	*37 *18
Floor covering mills	4,149	5,303	181,051	175,231	_	28	116,603	103,337	12
Yarn and thread mills	*2,294 *12,905	*2,205 *15,778	*159,698 *542,446	*159,698 *534,199	*14,067	*14 *111	*81,576 *514,964	*59,970 *423,853	*36 *12
Apparel and other finished products made from fabrics		,					31.1,001	120,000	,-
and similar materials	14,178 *752	13,000 *565	611,175 *39,681	581,968 *39,430	29,207 *251	116	487,251 *38,544	379,514 *28,261	28 *36
Male furnishings and work clothing	*2,663	*2,827	83,292	*83,292	-	*12	*83,292	*45,966	*81
Female and infant undergaments Hats, caps, and millinery	*445 *70	*621	*30,163 *1,006	*30,163 *1,006	=	*8	*29,288	*23,992	*22
Girls, childrens and infants wear	*554 *476	*653 *51	*33,092	*33,092 *2,554	-	•5	*23,760	*21,708	•9
Fur goods	5,801	5,307	*2,554 283,406	268,130	15,276	48	*2,449 174,151	*2,240 149,009	*9 16
Miscellaneous fabricated textile products	3,417	2,977	137,982	124,302	13,680	37	135,768	108,338	25
Lumber, wood products, except furniture	53,674 *19,268	55,536 *6,207	2,934,877 *1,158,956	2,883,720 *1,158,956	51,158	127 16	2,780,481 *1,151,040	3,069,233 *1,059,555	- 9 *8
Sawmills and planing mills	6,974	10,453	148,784	148,784		25	124,052	105,174	17
Millwork, veneer, and plywood products	4,014 23,418	5,297 33,580	285,522 1,341,614	240,405 1,335,573	45,117 6,041	34 51	281,763 1,223,626	217,580 1,686,925	29 - 27
Furniture and fixtures	3,161	2,019	81,492	81,492	-1	37	48,594	36,311	33
Household furnitureOffice and public building related furniture	*659 *1,307	*378 *567	*11,097 *27,404	*11,097 *27,404	=1	*11 *10	*4,754 *27,404	*4,021 *19,120	*18. *43.
Miscellaneous furniture, and fixtures	*1,194	*1,074	*42,990	*42,990	=1	*16	16,435	*13,171	*24
Paper and allied products	73,395	159,584	3,163,598	3,114,530	49,068	121	2,966,576	2,130,540	39
Pulp mills Paper mills, except building paper mills	25,879 *4,465	82,059 *8,508	1,349,892 276,939	1,349,892 *276,939	=	14 *13	1,349,892 *251,810	964,300 *178,150	39 *41
Paperboard mills	*13,744	*20,798	*477,525	*477,525	-	•9	*474,202	*303,007	*56
Converted paper products except containers and boxes	17,059	16,220	781,351	732,877	48,474	74	658,460	523,651	25
Paperboard containers, boxes and building paper	*12,247	*32,001	1277,892	*277,297	*594	*11	*232,213	*161,431	•43
Printing, publishing and allied products	13,831 *3,915	25,360 *4,892	393,624 *65,262	391,604 *65,262	*2,020	89 *10	324,075 *49,437	327,133 *53,793	8 8
Books	6,875	17,475	256,540	256,540	_ i	52	236,590	244,012	- 3
Miscellaneous publishing Commercial printing	*656 *421	*865 *433	*11,050 *13,378	*11,050 *13,378		*16 *8	*2.634 *8,209	*1,917 *7,182	*37 *14
Miscellaneous service industries for print trade	1,963	1,695	*47,392	*45,372	*2,020	3	27,206	20,229	34

Footnotes at end of table

Domestic International Sales Corporation Returns, 1980

ALL RETURNS OF ACTIVE DOMESTIC INTERNATIONAL SALES CORPORATIONS

Table 2 — Assets, Receipts, Deductions, Income, and Distributions of the DISC, and Total Export Gross Receipts of the DISC, and Related U.S. Persons for Current and First-Preceding Years, by Major Product or Service.

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

Major product or service	Number of returns	Total assets	Qualified assets	Export property	Total liabilities	Total qualified and nonqualified receipts	Qualified export receipts from the sale of export property	Other qualified export receipts	Cost of sales and operations
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Ranufactured products — Continued							-		
Chemicals and allied products	621 101	4,955,001 2,282,842	4,952,819 2,282,790	189,352 99,722	600,728 233,536	7,422,022 3,364,639	7,133,933 3,262,626	273,888 97,644	5,427,084 2,372,489
Plastics materials and manmade fibers	95 43	1,282,315 356,946	1,282,258 356,231	28,388 17	141,518 46,050	1,525,952 272,742	1,410,995 251,431	114,159 19,643	1,102,771 143,384
Soap, detergents and cleaning preparations	81 53	74,609 61,653	74,595 61,637	2,319 10,612	6,212 10,939	61,906 128,437	59,646	2,260	25,112
Gum and wood chemicals	3	98,790	98,790	1	1,775	36,751	126,309 25,737	1,756 10,980	95,086 12,261
Agricultural chemicals	54 191	415,633 382,215	414,831 381,686	25,208 23,086	100,818 59,879	1,458,890 572,706	1,444,415 552,774	9,048 18,398	1,285,657 390,323
Petroleum refining and related products	*32 *8	*84,878 *4,908	*84,851 *4,908	*136	*3,941 *1,786	*50,448 *10,620	*49,202 *10,444	*1,246 *176	*13,713 *5,043
Miscellaneous products of petroleum and coal	*24	*79,970	*79,943	*136	*2,156	*39,828	*38,758	*1,070	*8,670
Rubber and miscellaneous plastics products	162 *15	179,891 *66,846	178,771 *66,843	7,306	23,872 *793	242,715 *30,479	238,252 *27,188	4,378 *3,291	135,960 *2,997
Fabricated rubber products, not elsewhere classified Miscellaneous plastics products	29 118	26,986 86,059	26,986 84,942	7,306	3,837 19,242	57,421 154,815	57,166 153,897	254 834	33,213 99,751
Leather and leather products	79	158,284	158,113	4,583	110,600	705,599	704,509	833	672,941
Leather tanning and finishing	47 *6	60,075 *13,484	60,074 13,484	2,703	42,120 *6,213	111,262 *25,137	110,717 *25,118	336 *19	96,157 *19,862
Leather gloves and mittensLuggage	•5 •7	*691 *8,666	*691 *8,666	=1	*604 *79	*25,137 *908 *4,501	*908 *4,501	=1	*832
Leather goods, not elsewhere classified	*13	*75,369	*75,199	*1,879	*61,585	*563,791	*563,266	*478	*556,091
Stone, clay, glass and concrete products	78 *4	241,300 *95,387	241,005 *95,092	1,451 *1,373	14,917 *8,963	198,312 *82,073	179,513 *73,936	17,583 *8,136	78,170 *42,949
Glass products, made or purchased glass	3 *5	64,947 *3,764	64,947 *3,764		1,220 240	43,655 *2,948	38,760 *2,681	3,911 *267	*1,763
Structural clay products	9	*3,628 *3,775	*3,628 *3,775	-	*311 *162	*4,699	*4,629	*70	*1,377
Cut stone and stone products	*3 *5	*2,562	2,562	=	*27	*11,523 *574	*11,442 *322	*81 *252	*9,000
Abrasive, asbestos, miscellaneous mineral products Primary metal products	48 281	67,238 473,235	67,238 472,513	78 29,164	3,994 76,180	52,840 932,390	47,743 906,664	4,866 19,531	23,082 652,244
Blast furnaces, steel works and finishing mills	19 *25	95,212 *45,255	94,635 *45,255	•737	1,828 *781	40,796	35,688	4,780	· —
Primary smelting and retining of nonterrous metals	•13	*58,632	*58,632		*3,602	*20,603 *44,081	*15,254 *39,836	*5, <u>192</u> *4,246	*7,891 *6,157
 Secondary-smelting-and-refining-of-nonferrous-metals Rolling, drawing and extruding of nonferrous metals 	*32	*31,207	*31,204 *30,487	*34	15,408 8,412	*79,473 *20,523	*79,135 *19,764	*476	*66,280 *3,669
Miscellaneous primary metal products	166	212,381	212,301	. 24,326	46,150	726,913	716,987	4,524	568,249
and transportation equipment	773	994,072	990,381	72,972	138,078	1,695,472	1,623,180	34,810	1,181,108
Cottory, Harier tools and general Hardware	3 89	13,677 57,739	13,672 56,807	2,499	545 8,417	6,352 98,062	5,153 95,986	1,042 2,028	59,338
Heating apparatus and plumbing fixtures Fabricated structural metal products	- 125	48,881 112,500	48,804 112,337	2,289 3,325	8,974 11,237	72,871 209,108	70,955 204,579	1,299 4,046	46,992 143,786
Screw machine products	*29 40	*20,845 16,426	*20,845	*1,810	*7,023	*46,010	45,519	*490	*31,916
Coating, engraving and allied services	*13	*21,357	16,426 *21,357		3,306 754	15,988 8,095	15,098 *7,022	889 1,072	8,627 *1,499
Miscellaneous fabricated wire products	· *23 367	*18,802 683,845	*18,802 681,331	*595 62,455	*3,350 94,473	, *54,367 £1,184,620	*53,885 1,124,981	23,797	*45,187 843,762
Machinery except electrical	1,448 35	5,985,491 1,420,684	5,975,549 1,420,684	248,896 63,724	988,503 119,644	5,776,234	5,363,153	366,676	3,281,170
Farm machinery and equipment	130	241,179	240,878	1,717	63,362	1,403,411 257,048	1,311,120 244,054	92,123 12,685	832,383 169,060
Construction and mining machinery Metalworking machinery and equipment	254 129	1,679,727 194,025	1,675,254 193,853	85,248 31,394	421,938 53,517	1,879,751 121,251	1,730,518 114,411	109,055 6,738	1,258,203 53,448
Special industry machinery, except metalwork	397	778,788	776,946 359,714	21,428 9,841	144,782 90,495	837,154 358,835	800,627 338,070	35,026 20,460	454,999 184,134
Office, computing and accounting machines	69 *11	824,919 *13,130	822,362 *13,128	*186	10,588 2,169	350,806 *37,267	277,947	70,121	26,261
Miscellaneous machinery, except electrical	308	472,963	472,729	35,358	82,007	530,712	*36,761 509,643	*263 20,205	*27,533 275,149
Electrical machinery, equipment and supplies	1,354 45	3,329,776 529,794	3,323,272 528,838	100,164 329	425,148 8,295	4,216,327 309,251	3,986,339 236,304	220,614 72,624	2,569,733 69,489
Electrical industrial apparatus Household appliances	115 50	139,208 260,271	138,460 260,270	3,894 4,844	21,697 30,788	221,950 295,990	219,110 282,134	1,488	151,677
Electric lighting and wiring equipment	*27 *18	13,695 53,341	*13,603	*1,258	*3,306	*34,146	*33,354	11,880 *783	188,350 *27,047
Communication equipment	153	377,315	*53,099 375,854	*1,034 2,078	*11,606 27,676	*58,205 377,584	*57,339 345,698	*483 31,443	*30,760 200,950
Electronic components and accessories	529	1,224,342	1,222,740	19,300	150,234	1,537,630	1,463,310	73,277	928,460
supplies	418	731,810	730,407	67,427	171,547	1,381,570	1,349,090	28,636	973,000
Motor vehicles and motor vehicle equipment	441 219	4,563,759 1,837,354	4,559,396 1,836,590	950,797 32,073	637,804 143,920	7,921,997 962,015	7,631,940 846,688	217,321 82,152	5,857,857 441,702
Aircraft and parts	171 *18	2,592,364 *76,523	2,591,165 *74,123	917,876 —	473,415 *1,795	6,778,688 *70,115	6,609,983 65,510	133,502 *308	5,329,076 *1.575
Railroad equipment	.9	*10,528 *665	*10,528 *665	=1	*559 *11	*16,504 *647	*16,102 *647	*342	*8,916
Miscellaneous transportation equipment	*20	*46,325	*46,325	*848	*18,105	*94,027	*93,010	*1,017	*76,589
Professional, scientific, controlling instruments; photographic and optical goods; watches and clocks	439	1,955,681	1,947,298	12,218	96,744	2,428,462	2,311,577	91,955	1,654,834
Engineering, laboratory and scientific equipment	123 127	367,816 242,879	367,805 240,326	1,848 2,866	27,573 32,401	226,446 218,437	220,124 206,913	6,306 10,690	52,949 95,150
Optical instruments and lenses	*19 117	17,268 190,285	*17,268 190,285	*185	*1,746	*22,537	*21,789	*748	*13,946
Ophthalmic goods	*12	*26,157	*26,150	5,571	23,746 *2,719	217,550 *34,447	208,463 *33,858	9,035 *588	119,723 *17,833
Photographic equipment and supplies	41	1,111,274	1,105,463	1,747	8,560	1,709,045	1,620,431	64,587	1,355,233
products not allocable	545 *25	485,146	476,093	30,399	93,266	882,898	863,890	15,084	632,058
Musical instruments	*25 *28	*9,874 *13,424	*9,874 *13,424	*1,386 *628	*795 *2,803	*15,705 *17,151	*15,610 *16,943	*95 *205	*9,070 *9,936
Toys, amusement, sporting and athletic goods Pens, pencils, and office materials	70 *22	122,273 *21,009	122,273	3,696 *643	21,368 *3,074	274,046 *57,937	270,197 57,118	3,252 *265	221,840 *43,004
Costume jewelry, novelties and buttons	*13	*5,904	*5,904	*170	*2,106	*17,428	*17,283	*106	*14,114

Table 2 — Assets, Receipts, Deductions, Income, and Distributions of the DISC, and Total Export Gross Receipts of the DISC, and Related U.S. Persons for Current and First-Preceding Years, by Major Product or Service.

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

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Major product or service	Total export promotion and other expenses	Export promotion expenses	Net income (less deficit)	Net income	Deficit	DISC taxable income	Taxable income attributable to base period export gross receipts	Adjusted DISC income subject to deferral computation	Total amount deemed distributed
	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)
Manufactured products — Continued									
Chemicals and allied products	508,105	219,224	1,486,833	1,488,334	1,501	1,488,284	339,624	1,091,010	943,192
Plastics materials and manmade fibers	282,488 89,566	112,089 35,578	709,662 333,615	709,662 333,615	(') _[709,662 333,615	159,564 80,295	507,452	455,992
Drugs	14,507	5,654	114,850	115,030	180	115,030	29,600	251,647 77,878	208,153 76,091
Soap, detergents and cleaning preparations	7,454 13,267	5,549 8,407	29,340 20,084	29,340 20,132	48	29,296 20,126	5,723 4,370	23,473 15,530	17,559
Gum and wood chemicals	559	549	23,930	23,930	_	23,930	8,522	15,204	12,361 16,328
Miscellaneous chemical products	42,156 58,108	22,195 29,203	131,076 124,275	131,419 125,206	343 931	131,419 125,206	24,900 26,649	102,765 97,061	80,037 76,670
Petroleum refining and related products	*5,497	*5,129	*31,238	*31,239	*(¹)	*31,239	*5,496	*25.616	*18,431
Paving and roofing materials	*3,301 *2,196	*3,086 *2,044	*2,276 *28,962	*2,276 *28,962	·(¹) -	*2,276 *28,962	*67 *5,428	*2,209 *23,407	1,172
Rubber and miscellaneous plastics products	33,015	15,926	73,739	73,739		69,881	11,897	57,157	*17,259 41,357
Tires and inner tubes	424 6,682	*10 4,206	*27,058 17,526	*27,058 17,526	_	*27,058	*6,625	*19,977	17,123
Miscellaneous plastics products	25,909	11,710	29,155	29,155		13,668 29,155	3,107 2,165	10,398 26,782	8,469 15,764
Leather and leather products Leather tanning and finishing	16,797 7,336	8,316 3,293	15,861 7,769	16,416	555	16,416	2,719	13,392	9,720
Footwear, except rubber	2,110	*745	*3,166	7,770 *3,166	_1	7,770 *3,166	967 *494	6,518 *2,652	4,512 *1,840
Leather gloves and mittens	*17 *13	*17	*59 *4,488	*59	_	*59	-1	*59	*29
Leather goods, not elsewhere classified	*7,321	*4,261	*380	*4,488 *934	*554	*4,488 *934	*1,102 *155	*3,385 *778	*2,795 *545
Stone, clay, glass and concrete products	35,113 *9,988	18,078 *3,450	85,028 *29,135	85,028	=	85,028	18,697	65,554	52,251
Glass products, made or purchased glass	17,536	9,601	26,119	*29,135 26,119	=	*29,135 26,119	*6,396 5,118	*22,740 21,001	*17,765 15,619
Cement, hydraulic	*152 *432	*79 *147	*1,033 *2,890	1,033 2,890	-	*1,033	-	*1,033	*516
Pottery and related products	*1,002	*921	1,520	*1,520	=	*2,890 *1,520	*232	*2,843 *1,260	*1,469 *890
Cut stone and stone products	5,947 5,947	3,881	*519 23,812	*519	-	*519		*267	*385
Primary metal products	91,861	25,579	188,284	23,812 188,418	134	23,812 188,417	6,951 34,571	16,412 148,836	15,606 113,999
Blast furnaces, steel works and finishing mills	2,384 *1,927	2,350	38,412	38,412	_	38,412	10,793	27,285	24,769
Primary smelting and refining of nonferrous metals	*52	*1,879 *52	*10,785 *37,873	*10,785 *37,873	_	*10,785 *37,873	*2,300 *3,087	*5,583 *34,777	*7,994 *20,484
Secondary smelting and refining of nonferrous metals Rolling, drawing and extruding of nonferrous metals	*6,484 *1,408	*3,061 *1,115	*6,710 *15,446	*6,710	-	*6,710	*1,742	*4,861	*4,280
Miscellaneous primary metal products	79,607	17,122	79,058	*15,446 79,191	134	*15,446 79,191	*1,064 15,585	*14,083 62,247	*8,405 48,067
Fabricated metal products, except ordnance, machinery and transportation equipment	139,961	99.747	074 400	075 400					10,001
Metal cans	(1)	88,747	374,402 6,352	375,483 6,352	1,081	375,151 6,352	77,207 1,604	290,526 4,748	230,241 3,978
Cuttery, hand tools and general hardware Heating apparatus and plumbing fixtures	18,946 5,936	16,817 4,410	19,778 19,943	19,784	6	19,784	3,397	15,464	12,053
Fabricated structural metal products	11,352	7,692	53,970	19,943 54,090	120	19,943 54,090	3,867 8,950	15,762 43,164	12,062 32,650
Screw machine products	*2,916 1,310	*2,540 1,056	*11,177 6,050	*11,177 6,050	-1	*11,177	1,941	*9,172	*6,396
Coating, engraving and allied services	*137	*(¹)	6,458	*6,458	=	6,050 *6,458	1,449 *1,418	4,235 *4,910	3,933 *4.003
Miscellaneous fabricated wire products	*4,175 95,188	*2,725 53,507	*5,005 245,669	*5,005 246,624	954	*5,005 246,292	*1,668 52,913	*3,264	*3,373
Machinery except electrical	432,226	291,664	2,062,838	2,065,952	3,114	2,065,888	533,092	189,808 1,465,636	151,793 1,333,027
Engines and turnines	20,391 22,031	7,750 15,032	550,637 65,957	550,637 66,499	 541	550,600	147,311	374,165	363,518
Construction and mining machinery	130,315	97,492	491,234	493,611	2,377	66,499 493,611	16,639 144,269	48,612 337,329	42,193 324.946
Metalworking machinery and equipment	11,047 81,391	10,259 43,545	56,756 300,764	56,756 300,838		56,756 300,822	16,962 66,984	38,566 229,564	37,408
General industry machinery and equipment Office, computing and accounting machines	56,590	26,884	118,111	118,115	, s	118,115	29,703	86,616	186,040 74,828
Service industry machines	7,337 *3,637	2,199 *2,924	317,207 *6,098	317,207 *6,098	=1	317,207 6,098	74,194 *732	242,020 *5,366	196,197 *3,415
Miscellaneous machinery, except electrical	99,488	85,578	156,074	156,191	117	156,180	36,299	103,398	104,482
Electric transmission and distribution equipment	364,511 23,672	235,293 14,702	1,282,082 216,090	1,282,311 216,090	229	1,281,970 216,003	248,158 51,517	961,111 140,492	802,169 145,925
Electrical industrial apparatus Household appliances	18,363 31,609	15,727	51,910	52,009	99	52,009	10,332	40,713	31,652
Electric lighting and wiring equipment	*2,019	14,219 *1,987	76,031 *5,080	76,032 *5,080	_1	76,032 *5,080	23,266	52,552 *4,171	49,756 *2,994
Radio and television sets, except communication Communication equipment	*13,402 28,959	12,898 16,102	*14,043 147,675	*14,043 147,692	_ 17	*14,043 147,631	*5,018	*9,025	*9,531
Electronic components and accessories	105,681	62,138	503,489	503,490	ტ ''	503,295	32,970 78,590	105,647 397,090	94,810 304,729
Miscellaneous electrical machinery, equipment and supplies	140,806	97,520	267,764	267,876	112	267,876	45,556	· ·	
Transportation equipment	292,643	260,931	1,771,496	1,772,117	621	1,769,561	368,437	211,421 1,255,058	162,772 1,142,150
Motor vehicles and motor vehicle equipment	69,443 217,343	52,149 203,875	450,870 1,232,269	451,386 1,232,373	516 105	449,141 1,232,063	144,821	286,188	306,204
Ship and boat building and repairing	*74	-1	*68,466	*68,466		*68,466	214,574 13,785	891,341 *63,429	786,353 *36,752
Railroad equipment	*2,467	*2,443	*5,121 *647	*5,121 *647	=1	*5,121 *647	*1,468	*3,490 647	*3,376 *323
Miscellaneous transportation equipment	*3,315	*2,463	*14,123	*14,123		14,123	*3,788	*9,963	*9,142
Professional, scientific, controlling instruments; photographic and optical goods; watches and clocks	83,098	61,977	690,529	690,529	(')	690,527	139,689	510.000	400 440
Engineering, laboratory and scientific equipment	14,685	10,450	158,812	158,812	-1	158,812	21,414	516,236 135,969	432,410 90,828
Optical instruments and lenses	33,517 *3,135	22,046 *1,617	89,770 *5,456	89,770 *5,456	(') _	89,768 *5,456	16,015 *841	68,579 3,906	55,478 *3,503
Surgical, medical, dental instruments and supplies Ophthalmic goods	24,578 *4,736	21,779 *4,239	73,250	73,250	-	73,250	12,303	59,976	43,263
Photographic equipment and supplies	2,447	1,847	*11,878 351,364	11,878 351,364	=1	*11,878 351,364	*2,707 86,409	*9,169 238,639	*7,293 232,045
Miscellaneous manufactured products and manufactured products not allocable	101.054		· ·						
Jewelry, silverware, and plated ware	101,851	48,926 *251	148,989 *4.825	152,299 *4,825	3,310	152,299 *4,825	30,141 *396	119,137 *4,344	92,727
Musical instruments	*3,648	*1,950	*3,566	*3,566		*3,566	*539	*3,023	*2,653 *2,051
Pens, pencils, and office materials	11,218 *8,044	3,245 *4,305	40,988 *6,889	40,988 *6,889	(') _	40,988 *6,889	9,511 *2,703	31,429 *4,187	25,273 4,796
Costume jewelry, novelties and buttons	*1,828 75,302	*1,570 37,606	1,486 91,235	1,592	*107	*1,592	*105	*1,382	902
Footnotes at end of table.	73,302	37,000	81,233	94,438	3,203	94,438	16,887	74,7,2	57,052

Footnotes at end of table.

Table 2 — Assets, Receipts, Deductions, Income, and Distributions of the DISC, and Total Export Gross Receipts of the DISC, and Related U.S. Persons for Current and First-Preceding Years, by Major Product or Service.

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

Major product or service	Tax deferred income	·	Current year total export gross receipts of DISC and related U.S. persons			Full-year returns with first-preceding year export gross receipts of DISC and related U.S. persons			
		Total amount actually distributed	Total amount	DISC's	All related U.S. persons except DISC's	Number of returns	Current year receipts	First- preceding year receipts	Percent increase (decrease) current over first-preceding year receipts
	(19)	(20)	(21)	(22)	(23)	(24)	(25)	(26)	(27)
Manufactured products — Continued									
Chemicals and allied products	545,266 253,670	801,789 436,699	18,029,472 6,862,304	16,727,710 6,781,892	1,301,761 80,412	468 78	17,608,171 6,793,126	15,664,763 6,360,553	12.4 6.8
Plastics materials and manmade fibers	125,635 38,939	168,695 48,877	4,521,066 995,026	4,179,402 835,715	341,664 159,311	65 31	4,406,733 984,810	3,771,763 697,657	16.8 41.1
Drugs	11 736	13,160 11,610	273,781 173,023	273,781 173,023	_	51 53	205,190 173,023	202,490 150,893	1.3 14.6
Paints and allied products Gum and wood chemicals Agricultural chemicals	7,765 7,602	1,209	224,524	224,524	 57,900	3 43	224,524 2,495,107	209,331 2,024,587	7.2 23.2
Agricultural chemicals	51,382 48,536	73,019 48,520	2,533,783 2,445,965	2,475,883 1,783,490	662,475	144	2.325,659	2,247,489	3.4
Petroleum refining and related products	*12.808 *1,104	*8,301 *1,310	*343,958 *10,444	*318,833 *10,444	` *25,125	*21 *3	*338,527 *6,825	*305,743 *4,961	*10.7 *37.6
Paving and roofing materials	*11,703	*6,991	*333,514	*308,389	*25,125	*18	*331,701 910,872	*300,782	*10.2 24.2
Rubber and miscellaneous plastics products	28,525 *9,935	25,735 *8,492	1,085,173 *512,779	1,084,719 *512,779	453	123 *15	*512,779	733,413 *405,246	*26.5
Fabricated rubber products, not elsewhere classified	5,199 13,391	6,902 10,341	165,213 407,181	165,213 406,728	453	*21 86	*132,128 265,966	*97,978 230,190	*34.l 15.
Miscellaneous plastics products Leather and leather products	6,696	7,928	843,307	837.126	6.181	66 41	839,873 205,401	1,023,647 188,483	- 17.9 8.9
Leather tanning and finishing	3,259 *1,326 *29	3,294 1,057	205,401 *35,137 *908	199,220 *35,137 *908	6,181	••	*32,611	*25,111	*29.8
Leather gloves and mittens	1,693	*3,537	*38,594	*38,594			*38,594	*36,294	*6.3
Leather goods, not elsewhere classified	. 305	*39 36.971	*563,266 923,010	*563,266 881,896		*13 56	*563,266 856,668	*773,759 758,772	*- 27.2 12.9
Stone, clay, glass and concrete products	. -11,370	*10,682	*268,579	*268,579	-		*265,067 292,692	*266,896 214,515	*- 0.6 36.4
Glass products, made or purchased glass	516	11,273 *342	292,692 *2,681	2,681	=	:5	*2,681	*1,515 *4,357	*76.9 *- 49.6
Structural clay products	1,422	1,605	11,442	*35,001 *11,442		*3	*2,195 *11,442	*8,662	*32.0
Cut stone and stone products Abrasive, asbestos, miscellaneous mineral products	*133 8,206	13,070	*322 312,294	*322 271,180	·	*5 31	*322 282,270	*287 262,541	*12.4 7.5
Primary metal products	74,418	100,929	3,295,355	3,261,916	33,439	202	2,968,877 ——622,058	2,181,034 472,922	36. 31.
Blast furnaces, steel works and finishing mills	13,642	10,866	651,181 343,376 380,935	645,094 338,879	4497		*343,376 *378,600	297,975 214,686	*15.2
 Iron-and-steel-foundnes. Primary smelting and refining of nonferrous metals. Secondary smelting and refining of nonferrous metals. Rolling, drawing and extruding of nonferrous metals. Miscellaneous primary metal products. 	7,042	*12,974 *2,657 *6,405 34,405	*131,103 *221,931	131,103	*1,444	*16 *19 118	*89,522 *220,970 1,314,352	*112,775 *132,240 950,434	*~ 20.6
Fabricated metal products, except ordnance, machinery and transportation equipment	144,913		4,299,539	Į.	35,127	599	4,062,091	3,498,449	16.
Metal cans	2,374	2,640	133,771	133,771 212,061	3,196	3 ¹ 77	133,771 194,814	121,403 219,997	10. - 11.
Cutlery hand tools and general hardware	7,881	7,642	243,548	236,977 560,109	6,571	54 89	220,582 535,043	197,250 454,707	11.
Screw machine products	4./01	*3.269	82,183	*82,183	il —	*24	*71,878 *68,923	*48,124 *41,774	*49. *64.
Metal stampings	2,117	2,029 3,459	*69.986	*69,986	s	*13	69,986	*78,365	*- 10.
Miscellaneous fabricated wire products Miscellaneous fabricated metal products	*1,632 94,502	*2,745 114,728	*67,633 2,833,985	*67,633 2,823,864		*23 292	*67,633 2,699,462	*58,173 2,278,657	18.
Machinery except electrical	. 732,861	997,989	27,485,256	25.548.595	1,936,661	1,135 28	26,485,524 7,043,678	26,217,058 5,230,957	1. -34.
Engines and turbines	. 24,300	185,502 46,589	1,341,110	1.246.986	94,124	100	1,313,832	6,180,160 6,291,207	- 78. · 22.
Construction and mining machinery	. 168,665 19,348	242,516 33,030	752,426	7,573,894 729,178	3 23,248	192 109	7,706,451 695,941	559,593	24.
Special industry machinery, except metalwork	.[114,/01	150,180 66,058			108,827 3 4,590	337 70	3,328,357 1,431,240	2,735,194 1,109,808	28.
Office, computing and accounting machines	. 121,010	186,795	3,099,044	2,912,029	187.015	47 *11	3,047,476 *56,542	2,617,979	16 2
Service industry machines	*2,683 51,698	84,667	1,954,401	1,940,023	3 14,378	241	1,862,007 13.614.085	1,434,120	29.
Electrical machinery, equipment and supplies	479,801	534,360 114,110	14,452,869 1,791,766	1,791,668	3 98	36	1.758.452	1.273.931	38
Electric transmission and distribution equipment Electrical industrial apparatus	20,356	20,740	763,768	763,762	2 6	80 36	705,638 1,219,648	l 1.090.125	11.
Household appliances Electric lighting and wiring equipment	1 *2.086	*3,890	1,259,915 *54,976 *149,795	*54,976	3] —	*14	*40,317 *141,535	*38,498	*4.
Radio and television sets, except communication	.] 52,621	74,039	1,648,894	1,645,168	3.725 3.725	120	1,561,265	1,416,870	10.
Electronic components and accessories	. 198,567	180,039					1	Į.	
supplies							2,739,822 24,516,793		5.
Transportation equipment	142,938	549,846	12,222,642	11,140,614	1,082,029	141	12,078,685 11,787,564	13,071,233	- 7.
Aircraft and parts	"31,714	41,594	491,610	491,610	ol —	133	1 *453,774	*337,911	*34.
Railroad equipment	323	3	*7,497	*7,49	7] —	-		l	
Miscellaneous transportation equipment	*4,982	*7,432				"	*139,910	*93,571	*49
Professional, scientific, controlling instruments; photographic and optical goods; watches and clocks	258,117	281,93	6,051,285	6,026,600	24,679	310	5,822,210 1,559,576		
Engineering, laboratory and scientific equipment	. 34,289	35.296	1,603,084	906,710	0 730	93	803,376	642,769	24.
Optical instruments and lenses Surgical, medical, dental instruments and supplies	*1,953	3 °1,870) *41,173	3 41,173 770,58	3 — 1 14,294	*14 89	*39,758 749,746	619.201	. 1 21.
Onhthalmic goods	*4,584	1 *6,226	*141,127	141,12	7 -	12	*141,127 *2,528,628	'	°13.
Photographic equipment and supplies	119,318								
products not allocable	1 59.57°	79,360 1 *1,839	2,168,736	71 * 82.63	8 108,278 7 —	380 *25 *17	1,901,735 *82,637	*53,43	2. *54.
Jewelry, silverware, and plated ware	"1,51	1,74) *80.711	1 *80,71	1 -	177	*69,517	*59,079)
Toys, amusement, sporting and athletic goods	15,/14 *2,09	3 *3,88	82,592	67,59	7 *14,995		*82,210 *20,820	*84,342	2
Costume jewelry, novelties and buttons		1] *87-	1] "21,725	5 *21,72 5 1,328,34	5 — 2 13,983			1,155,02	

^{*}Estimate should be used with caution because of the small number of sample returns on which it was based.
*Coata deleted to avoid disclosure of information for specific corporations.

*Less than \$500.

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