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

	Domestic corporation returns							
Selected items	A11	With Controlled Foreign Corporations	Controlled Foreign Corporations					
Number of returns/CFC's Total assets Business receipts Net income (less deficit) Current earnings and profits (less losses),	7,617,238 5,731,616	4,799 3,430,444 2,437,191 137,638	35,471 508,032 699,003 N/A					
before taxes of CFC's Foreign income taxes of CFC's, net Dividends received from all foreign corporations	N/A 14,563	N/A N/A 14,173	47,622 16,440 N/A					
Dividends paid to domestic parent corporations by CFC's on stock, directly or indirectly held		N/A	10,652					

#### [Money amounts are in millions of dollars]

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 directlycontrolled 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

`		Controlled For		Profit margin	
Selected years	Number	Business receipts	Current E&P <sup>1</sup> less deficit before taxes	Profit margin	of U.S. corporations <sup>2</sup>
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

[Money amounts are in millions of dollars]

<sup>1</sup>Earnings and profits.

<sup>2</sup>Based 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

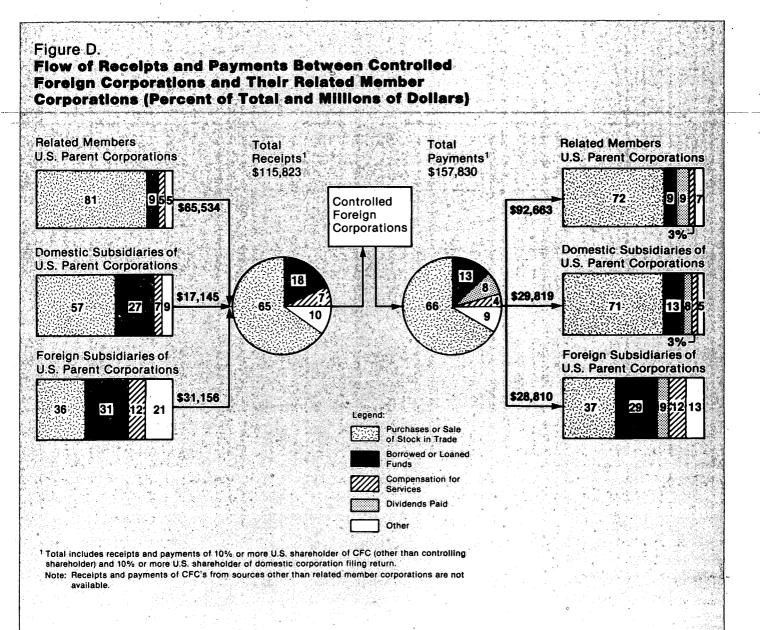
Transactions of Controlled Foreign Corporations with Selected Related Member Corporations, 1980

[Millions of Dollars]

	-	Receipts	of CFC		Payments by OFC						
Transactions	Total <sup>1</sup>	U.S. perent	Domestic subsidiary of U.S. parent	Foreign subeidiary of U.S. parent	Totai <sup>1</sup>	U.S. perent	Domestic eubeicliary of U.S. parent	Foreign subsidiery of U.S. perent			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(6)			
Total	115,823	65,534	17,146	31,156	157 <b>,830</b>	92,663	29,819	28,810			
Seles 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.e.	n.e.	n.e.	n.a.	1,891	1,664	216	. <del>.</del>			
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 royatties	1,298	264	181	802	4,510	3,336	245	860			
Amounts borrowed or loaned	20,552	5,880	4,620	9,678	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	76			

n.a. — Not ap <sup>1</sup>Totals include

CEC (other th and 10% or U.S. shareholders of domestic corporation filing return, which are not show NOTE: Detail may not add



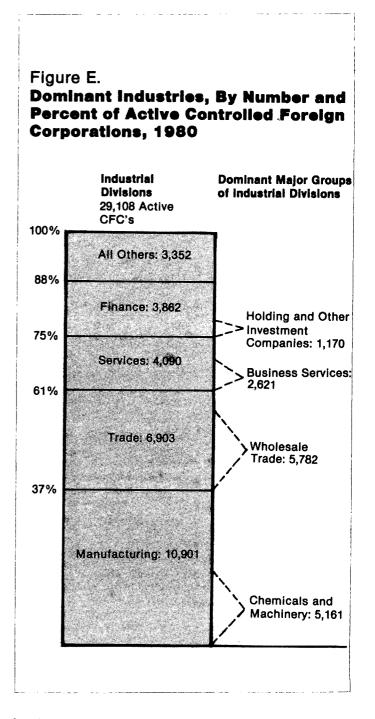
# INDUSTRIAL ACTIVITY OF CONTROLLED FOREIGN CORPORATIONS

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 corviace and finance 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 Foreign CFC's. 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



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

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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 earne industry as parent	CFC's current earnings and profits before taxes (net)	Percent of current earnings and pro- fits when CFC is in same industry as parent
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All Industries, U.S. All CFC's' CFC's in same industry <sup>2</sup>	4,430 3,388	29,108 15,900	54.6	699,003 448,754	64.2	47,622 30,140	
voriculture, forestry and fishing, U.S. All CFC's CFC's in same industry		105 28	26.7	1,312 133	10.1	34 10	29.
Alining, U.S. Ali CFC's	172	554 274	49.5	5,551 2,989	53.8	1,143 856	74.
Construction, U.S. All CFC's	133 94	495 297	60.0	6,990 6,371	91.1	387 366	94.
Aanufacturing, U.S. All CFC's		19,689 10,038	51.0	554,534 338,721	61.1	40,015 24,884	. 62
ranaporation and public utilities, U.S. All CFC's CFC's in same industry		1,373 563	41.0	14,976 5,079		1,034 321	- 31
Vholessle and retail trade, U.S. All CFC's		2,303 1,391	60.4	88,805 77,977	87.8	2,661 2,103	
Finance, insurance, and real estate, U.S. _All_CFC's	481	2,336	64.9	20,472	60.3	1,843	
CFC's in same industry	313	1,510	04.8	12,338			<b>~</b>
Services, U.S. All CFC's			. 79.7	6,362 5,145		505 376	

<sup>1</sup>Represents all active CFC's controlled by U.S. corporations which were classified in the indicated industry. <sup>2</sup>Represents 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. instance, manufacturing CFC's For while accounted for half of all CFC's owned by CFC's manufacturing parents, these same 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 They often ventured into foreign pace. 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.

#### SUMMAR Y

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 their accounting periods). simply changing 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.

<u>Related persons of Controlled Foreign Corpo-</u> rations.--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.

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

· · · · · · · · · · · · · · · · · · ·						S. Corporations					
Selected industry and size of total assets of U.S. corporations filling return	Number of returns	Total assets	Total receipts	Business receipts	U. Total dividends received from foreign corporations	Includable income of Controlled Foreign Corporations filing Form 2952 (Form	Total deductions	Net income (less deficit)	U.S. income tax before crodits	. Total credits	U.S. income tax after credits
	(1)	(2)	(3)	(4)	(5)	3646) (6)	(7)	(8)	(9)	(10)	(11)
All industries, total Zero under \$50,000,000 \$50,000,000 under \$250,000,000 \$250,000,000 or more, total \$250,000,000 under \$500,000,000 \$500,000,000 under \$1,000,000,000 \$1,000,000 or more	4 700	3,430,443,963 36,118,811 111,635,156 3,282,689,996 92,565,352 158,290,318	2,699,140,589 69,689,681 170,214,433 2,459,236,477 138,341,159 194,814,201	2,437,191,310 66,287,857 163,124,977 2,207,778,477	14,172,649 168,838 582,415 13,421,396 464,374 795,650	<b>2,579,186</b> 46,139 102,075 2,430,972 94,803 167,718	2,573,395,807 67,291,153 163,387,099 2,342,717,554 133,698,631	137,637,795 2,678,698 7,296,040 127,663,057 5,798,470 9,871,318	64,363,365 1,487,514	33,402,343	(11) <b>30,961,023</b> 1,168,783 2,732,152 27,060,087 ,2,093,908 3,012,323 21,953,855
Agriculture, forestry and fishing Zero under \$50,000,000 \$50,000,000 under \$250,000,000	- 20 17	2,480,396	5,655,289	5,511,396	10,817	1,414	5,451,162	208,913	87,164	11,723	75,441
\$250,000,000 under \$500,000,000 \$500,000,000 under \$1,000,000,000 \$1,000,000 under \$1,000,000,000	3 	501,936 1,978,460 	750,947 4,904,343 	684,105 4,827,290 	1,391 9,426 —		703,023 4,748,139 —	48,110 160,803 —	1,3,911 73,254	3,669 8,053 	10,241 65,201
Mining           Zero under \$50,000,000           \$50,000,000 under \$250,000,000           \$250,000,000 or more, total           \$250,000,000 under \$500,000,000           \$50,000,000 under \$1,000,000,000           \$1,000,000,000 under \$1,000,000	1 <b>72</b> 98	<b>65,309,992</b> 767,990 5,295,594 59,246,408 4,596,343 4,525,725 50,124,339	<b>42,474,54</b> 1 643,703 3,277,312 38,553,526 3,120,991 2,673,582 32,758,953	38,997,541 564,041 2,941,832 35,491,667 2,891,181 2,435,439 30,165,048	<b>282,241</b> 2,933 17,845 261,463 9,369 17,844 234,250	<b>58,188</b> 2,257 1,513 54,418 14,041 7,631 32,746	: 36,869,870 620,032 2,908,076 33,341,761 2,850,684 2,282,611 28,208,466	<b>5,748,280</b> 28,170 379,481 5,340,630 298,637 403,740 4,638,252	<b>2,546,714</b> 26,554 198,792 2,321,368 149,114 160,599 2,011,656	1,848,892 11,905 140,752 1,696,236 69,928 147,580 1,478,728	697,822 14,649 58,040 625,133 79,185 13,018 532,930
Construction           Zero under \$50,000,000           \$50,000,000 under \$250,000,000           \$250,000,000 or more, total           \$250,000,000 under \$500,000,000           \$500,000,000 under \$1,000,000,000           \$1,000,000,000 or more	133 90 28 15 7 5 3	15,815,317 1,368,927 3,302,079 11,144,312 2,141,979 3,672,423 5,329,910	25,626,626 2,994,950 4,828,874 17,802,802 4,806,652 5,360,591 7,635,559	24,637,305 2,875,306 4,615,602 17,146,398 4,585,110 5,148,309 7,412,980	85,712 923 7,416 77,372 40,678 308 36,387	108,444 153 5,349 102,942 2,337 1,206 99,399	25,163,905 2,900,565 4,825,211 17,438,128 4,688,011 5,185,710 7,564,407	672,192 94,437 8,679 569,077 136,247 176,333 256,497	<b>367,839</b> 47,128 35,203 285,507 59,431 79,227 146,850	180,601 11,077 8,401 161,123 31,183 23,863 106,078	<b>187,237</b> 36,051 26,802 124,384 28,248 55,364 40,772
Manufacturing	<b>2,452</b> 1,361	21,252,342	38,351,449	1,631,278,098 37,163,054	12,073,786 95,624	2,059,508 18,600	1,631,959,415 36,837,800	100,663,408 1,761,258	47,593,037 984,902	24,291,234 170,735	23,301,807 814,168
\$250,000,000_or_more, total. \$250,000,000_under \$500,000,000 \$500,000,000_under \$1,000,000,000 \$1,000,000,000_or_more	521 157 128 236		97,536,560 -1,583,981,349 80,902,804 121,417,941 1,381,660,605	93,753,087 1,500,361,957 78,676,265 115,912,242 1,305,773,449	444,145 	37,779	92,537,503 -1,502,584,114 77,817,978 115,088,828 1,309,677,307	5,350,773 	2,639,844 -43,968,291 2,008,889 3,337,271 38,622,131	634,858 23,485,638 511,024 1,119,144 21,855,471	2,004,986 20,482,653 1,497,867 2,218,127 16,766,659
Food and kindred products           Zero under \$50,000,000           \$50,000,000 under \$250,000,000           \$250,000,000 or more, total           \$250,000,000 under \$500,000,000           \$50,000,000 under \$1,000,000,000           \$1,000,000,000 under \$1,000,000	118 32 36 50 13 11 26	77,627,876 510,291 4,821,301 72,296,285 5,040,712 7,476,331 59,779,242	130,338,095 1,112,327 10,272,077 118,953,690 10,191,574 16,546,896 92,215,220	126,112,418 1,078,977 9,944,829 115,088,612 9,936,497 16,193,917 88,958,198	460,035 784 25,903 433,349 16,646 74,417 342,285	77,888 33 1,769 76,086 811 2,778 72,497	124,370,479 1,062,329 9,854,617 113,453,532 9,883,879 15,710,067 87,859,587	6,364,917 50,447 438,493 5,875,977 326,493 876,465 4,673,018	2,821,292 19,928 186,836 2,614,528 137,748 405,928 2,070,852	<b>762,870</b> 3,200 39,198 720,469 47,288 87,063 586,118	<b>2,058,422</b> 16,727 147,637 1,894,059 90,461 318,864 1,484,734
Chemicals and allied products           Zero under \$50,000,000           \$50,000,000 under \$250,000,000           \$250,000,000 or more, total           \$250,000,000 under \$500,000,000           \$50,000,000 under \$1,000,000,000           \$1,000,000,000 or more	<b>250</b> 125 49 76 18 18 39	129,887,430 2,001,050 5,318,524 122,567,856 6,340,106 12,386,948 103,840,802	154,039,661 3,458,246 7,049,703 143,531,712 8,316,957 15,586,246 119,628,509	146,980,787 3,318,607 6,735,050 136,927,131 7,992,893 14,782,706 114,151,531	1,254,486 27,913 50,572 1,176,002 42,324 141,825 991,853	<b>518,319</b> 1,132 9,645 507,542 31,859 65,069 410,614	145,410,267 3,195,130 6,535,149 135,679,988 7,686,797 14,753,490 113,239,701	10,250,463 290,899 566,020 9,393,544 699,059 1,027,448 7,667,037	4,786,787 144,353 258,562 4,383,871 331,814 495,527 3,556,530	2,363,449 33,858 67,809 2,261,783 92,113 181,824 1,987,846	2,423,337 110,496 190,753 2,122,088 239,702 313,704 1,568,683
Petroleum (including integrated) and coal products         products           Zero under \$50,000,000         \$250,000,000           \$250,000,000 under \$250,000,000         \$250,000,000           \$250,000,000 under \$500,000,000         \$500,000,000           \$50,000,000 under \$1,000,000,000         \$1,000,000,000	84	371,541,899 230,215 951,534 370,360,149 3,169,665 2,095,390 365,095,094	606,880,909 734,713 2,521,921 603,624,275 7,760,452 6,002,169 589,861,653	586,282,023 726,824 2,471,879 583,083,321 8,404,787 5,871,459 568,807,075	<b>4,320,149</b> 357 	<b>574,370</b> 56 845 573,469 6,097 531 566,841	565,032,605 723,879 2,495,691 561,813,035 8,241,386 5,770,342 547,801,306	47,761,082 11,523 27,076 47,722,485 269,224 263,164 47,190,097	20,796,534 12,358 17,804 20,766,371 121,939 110,665 20,533,767	12,780,364 1,848 2,446 12,776,069 18,924 65,803 12,691,344	8,016,171 10,511 15,358 7,990,301 103,016 44,862 7,842,424
Machinery.         except electrical           Zero under \$50,000,000         \$50,000,000           \$50,000,000 under \$250,000,000         \$250,000,000           \$250,000,000 under \$500,000,000         \$500,000,000 under \$1,000,000,000           \$1,000,000,000 under \$1,000,000,000         \$1,000,000,000		126,166,132 3,856,543 12,522,129 109,787,460 7,857,814 14,113,890 87,815,756	129,292,545 6,187,132 16,314,425 106,790,988 10,278,313 16,171,310 80,341,365	109,841,231 5,939,634 15,607,428 88,294,170 9,763,690 15,118,701 63,411,779	<b>2,117,473</b> 12,184 82,116 2,023,173 21,012 107,855 1,894,306		119,993,856 5,948,559 15,513,095 98,532,201 9,745,106 15,271,756 73,515,339	11,244,458 251,920 864,994 10,127,545 573,765 996,567 8,557,213	<b>5,302,135</b> 154,779 457,800 4,689,556 279,800 456,197 3,953,559	2,872,016 28,842 117,477 2,725,695 55,382 183,665 2,486,649	2,430,119 125,937 340,321 1,963,860 224,418 272,532 1,466,910
Electrical and electronic equipment Zero under \$50,000,000 \$250,000,000 under \$250,000,000 \$250,000,000 under \$500,000,000 \$500,000,000 under \$1,000,000,000 \$1,000,000 under \$1,000,000,000 \$1,000,000 under \$1,000,000,000	410 284 84 43 14 11 18	121,956,720 4,022,321 9,444,533 108,489,866 5,281,380 7,654,969 95,553,518	124,967,336 6,088,141 13,109,700 105,769,495 7,380,318 10,317,356 88,071,822	117,669,399 5,872,558 12,599,961 99,196,880 6,988,894 9,984,212 82,223,774	654,441 11,764 53,822 588,854 24,359 67,648 496,847	<b>184,776</b> 1,316 10,218 173,241 1,691 4,657 166,893	119,073,002 5,789,287 12,235,186 101,048,529 7,175,601 9,623,720 84,249,208	6,292,597 307,759 925,959 5,058,680 224,512 752,968 4,081,400	<b>2,894,904</b> 159,513 449,307 2,286,084 132,448 342,305 1,811,332	1,088,313 25,228 110,567 952,519 36,898 97,479 818,140	<b>1,806,591</b> 130,828 342,197 1,333,566 95,549 244,826 993,191

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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]

					ι	I.S. Corporation	s				
Selected industry and size of total assets of U.S. corporations filing return	Number of returns	Total assets	Total receipts	Business receipts	Total dividends received from foreign corporations	Includable income of Controlled Foreign Corporations filing Form 2952 (Form 3846)	Total deductions	Net income (less deficit)	U.S. income tax before credits	Total credits	U.S. income tax after credits
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
Manufacturing Continued           Motor vehicle and equipment	14	130,987,827 302,826 1,785,180 128,899,820 1,916,444 1,914,399 125,068,977	131,432,514 2,267,698 2,800,492 126,364,322 2,740,583 2,618,966 121,004,773	2,227,456 2,703,028 119,756,227 2,565,880 2,442,527	2,502 26,637 639,916 8,341 13,704	676 590 55,179 5,934	2,281,766 2,727,035 129,525,031 2,740,279 2,664,762	- 13,185 93,947 - 2,913,765 5,439 - 33,057	16,428 55,653 744,477 19,114 46,986	<b>540,928</b> 2,416 29,385 509,128 8,121 22,197 478,810	14,014 26,268 235,349 10,993
Transportation and public utilities           Zero under \$50,000,000           \$50,000,000 under \$250,000,000           \$250,000,000 or more, total           \$250,000,000 under \$500,000,000           \$500,000,000 under \$1,000,000,000           \$1,000,000,000 or more.	242 124 42	379,290,651 1,340,910 4,824,183 373,125,558 2,815,705 10,919,470 359,390,383	265,404,714 4,948,688 8,177,954 252,278,071 2,203,446 8,151,923 241,922,702	4,751,557 7,864,911 244,653,853 2,092,107	2,463 2,942 159,545 3,747 2,639	80,600 5,328	4,780,799 8,263,129 241,006,737 2,154,418 7,711,483 231,140,835	169,182 - 76,024 11,460,551 49,716 446,078 10,964,757	78,239 80,055 5,647,615 30,925 214,677 5,402,013	89,326 3,093,646	38,728 51,962 2,453,300 19,583 125,351 2,308,367
Wholesate         and         retail         trade           Zero         under         \$50,000,000         \$50,000,000         \$50,000,000         \$250,000,000         \$250,000,000         \$250,000,000         \$250,000,000         \$250,000,000         \$250,000,000         \$350,000,000         \$1,000,000,000         \$1,000,000,000         \$1,000,000,000         \$1,000,000,000         \$1,000,000<	543	<b>169,887,044</b> 5,560,121 15,359,471 148,967,452 13,430,959 15,944,698 119,591,796	358,652,046 13,203,338 41,786,668 303,662,041 39,274,288 41,723,113 222,664,639	12,793,891 40,701,534 294,808,435 38,536,832 40,802,037 215,469,566	14,721 45,341 980,113 18,600 24,330 937,184	16,593 11,244 103,600 5,793 8,302	13,007,697 40,961,755 298,785,738 38,823,547 41,028,465	214,380 847,861 7,113,919 467,905 726,665 5,919,349	143,441 398,851 3,196,810 268,568 350,502 2,577,741	19,423 78,522 1,784,072 33,388 61,105 1,689,579	124,018 320,329 1,412,738 235,180 289,396 888,162
Wholesale trade           Zero under \$50,000,000           \$50,000,000 under \$250,000,000           \$250,000,000 under \$250,000,000           \$550,000,000 under \$500,000,000           \$500,000,000 under \$1,000,000,000           \$1,000,000,000 or more.	658 502 102 55 26 14 15	74,458,073 4,833,802 11,434,809 58,189,461 9,121,355 9,988,320 39,079,786	209,521,410 11,569,675 31,486,329 166,465,405 30,657,540 29,664,965 106,142,900	11,272,337 30,725,119 163,103,873 30,305,097 29,006,211	14,144 45,205 801,325 13,587 11,684	15,292 11,244 67,715 5,298 8,283	11,391,597 30,882,063 164,412,915 30,466,123 29,526,204	195,530 637,815 4,159,444 204,621	127,101 309,063 1,956,794 172,237 97,176	17,505 55,424 1,433,415 18,162 33,848	109,594 253,639 523,379 154,075 63,330
Retail trade           Zero under \$50,000,000           \$50,000,000 under \$250,000,000           \$250,000,000 or more, total           \$250,000,000 under \$500,000,000           \$500,000,000 under \$1,000,000,000           \$1,000,000 under \$1,000,000,000	. 109	5,956,377	1,511,667 10,300,338 137,196,636 8,616,748 12,058,148	1,399,90 9,976,414 131,704,56 8,231,73 11,795,820	476 4 136 2 178,789 5 5,012 6 12,646	1,301 	1,495,025 10,079,693 134,372,823 8,357,423 11,502,262	17,931 210,045 2,954,475 263,284 2558,716	15,938 5 89,786 5 1,240,016 4 96,331 3 253,323	1,881 23,100 350,658 15,226 27,257	14,05 66,68 889,35 81,10 226,06
Finance insurance and real estate           Zero under \$50,000,000           \$50,000,000 under \$250,000,000           \$250,000,000 or more, total           \$250,000,000 under \$500,000,000           \$500,000,000 under \$500,000,000           \$1,000,000 or more.           \$1,000,000 or more.	491	1,395,817,797 1,855,529 7,174,546 1,386,787,721 7,772,954 21,975,106 1,357,039,662	2,226,344 2,648,223 229,402,293 2,418,236 7,918,673	1,287,77 1,877,61 84,812,24 1,631,31	4 21,797 2 25,961 1 348,491 5 115,373 1 9,789	2,593 35,131 59,082 3 117 3 1,831	2,100,522 2,464,465 217,436,934 2,129,43 7,129,44	2 115,767 5 210,578 4 8,127,666 7 314,436 5 714,465	7 58,839 8 82,147 6 2,985,326 6 133,497 5 214,065	20,987 15,410 1,557,688 66,923 5 29,177	37,85 66,73 1,427,64 66,57 184,88
Banking           Zero under \$50,000,000           \$50,000,000 under \$250,000,000           \$250,000,000 or more, total           \$250,000,000 under \$1,000,000           \$500,000,000 under \$1,000,000,000           \$1,000,000,000 or more.	65	1,003,198,993 7,237,780 1,002,729,784	112,830	70,05	3 304	- k	86,89	7 24,03	7 9,99	436	9,55
\$50,000,000 under \$1,000,000,000 \$1,000,000,000 or more	1	168,512 1,659,233 276,857,016 3,340,377 12,833,487	111,467,389 643,193 819,594 110,004,602 1,274,582 5,156,888	66,393,13 574,92 651,13 65,167,07 1,015,84 4,210,65	1 70,694 1 44 4 45 6 70,605 9 1,595 5 505	<b>8 28,01</b> 7 8 55 5 9,049 5 18,919 3 <u>-</u> 2 713	7 105,914,773 3 584,903 9 810,111 5 104,519,753 1,204,08 3 4,729,85	<b>3 3,501,40</b> 2 36,409 9 8,330 2 3,456,666 0 40,54 4 348,74	7 910,603 9 10,843 8 16,430 0 883,320 2 10,413 2 62,400	<b>230,27</b> 2 1,17 5 2,72 5 226,36 3 1,98 5 5,47	<b>680,32</b> 3 9,66 9 13,70 3 656,95 4 8,42 4 56,93
\$1,000,000,000 or more	<b>531</b> 411 79 41 17 12	<b>49,605,226</b> 3,757,609 8,879,322 36,968,294 5,709,830	<b>47,138,26</b> 4 6,937,762 11,548,450 28,652,052 5,021,102 7 568,370	<b>43,172,37</b> 6,508,00 10,987,73 25,676,63 4,508,62 6,882,54	7 118,71 7 28,98 4 38,76 6 50,96 0 28,35 1 10,76	<b>9 31,76</b> 6 2,643 6 3,33 8 25,78 8 1,17 0 3,94	<b>45,098,95</b> 6,690,47 111,032,48 727,376,00 44,788,18 7,191,58	<b>9 2,162,94</b> 5 265,21 1 558,70 3 1,339,03 6 254,22 1 389,67	9 1,097,28 5 141,16 1 266,92 3 689,19 8 155,68 5 177,17	7 331,87 3 42,39 5 69,32 7 220,15 3 53,61 9 51,00	7 765,41 5 98,76 2 197,60 9 469,03 3 102,07 2 126,17

Footnotes at end of table.

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## Controlled Foreign Corporations, 1980

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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]

1					Controlle	ed Foreign Cor	porations				
							puradions	Rece	sipts by foreign	corporations for	
Selected industry and size of total assets of U.S. corporations fiting return	Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign income taxes (net)	Total	Out of current earnings		ion filing return	Any domestic controlled	c corporations by the U.S. filling return
·							and profits	Total	stock in trade	Total	Sales of stock in trade
	(12)	(13)	(14)	(15)	(16)	(17)	(18)	. (19)	(20)	(21)	(22)
All industries, total Zero under \$50,000,000 \$50,000,000 under \$250,000,000 \$250,000,000 under \$250,000,000 \$250,000,000 under \$50,000,000 \$500,000,000 under \$1,000,000,000 \$1,000,000,000 or more.	<b>35,47</b> 1 6,230 5,103 24,138 2,822 3,976 17,340	508,031,994 10,414,027 19,789,994 477,827,975 18,527,251 31,120,796 428,179,928	13,367,497 33,145,676 652,489,827 32,330,313 35,686,762	799,937 2,319,880 44,501,764 2,054,186	16,440,451 290,785 833,719 15,315,946 703,897 1,247,915 13,364,134	14,115,642 148,006 546,747 13,420,890 455,277 1,015,601 11,950,012	99,897 380,545	750,189	542,432 830,055	17,145,614 481,247 237,595 16,426,771 265,999 670,986 15,489,786	419,348 119,257 9,210,188 163,133 525,326
Agriculture, forestry and fishing	142 42 100	878,019 120,205 757,814	1,312,264 97,542 1,214,722	34,278 11,357 22,921	15,695 3,882 11,812	1,971 1,643  328	871 639	<b>30,905</b> 813	487	<b>2,962</b> 2,855	. 443
\$250,000,000 under \$500,000,000 \$500,000,000 under \$1,000,000,000 \$1,000,000,000 or more	-		-		-	320 ** **	233	30,091	1,206	107 	443
Mining           Zero under \$50,000,000           \$50,000,000 under \$250,000,000           \$250,000,000 or more, total           \$250,000,000 under \$500,000,000           \$500,000,000 under \$500,000,000           \$500,000,000 under \$1,000,000,000           \$500,000,000 or more           \$1,000,000,000 or more	793 153 107 533 50 61 422	7,383,484 94,416 616,195 6,672,874 349,754 222,704 6,100,415	5,551,063 73,898 380,736 5,096,430 379,812 87,576 4,629,042	1,142,818 34,323 80,015 1,028,480 98,334 19,631 910,516	<b>253,545</b> 6,381 20,250 226,913 23,980 4,401 198,532	<b>369,138</b> 2,521 16,882 349,736 16,851 9,659 323,226	239,408 1,626 10,866 226,916 12,651 4,499 209,766	<b>305,098</b> 6,589 5,324 293,186 10,455 4,419 278,313	<b>251,571</b> 	- <b>289,475</b> 1,980 287,496 313 918 286,264	1 <b>98,126</b> 753 197,373  197,373
Construction	607 196 121 290 91 92 107	3,056,588 92,266 328,169 2,636,153 644,205 392,603 1,599,345	6,990,052 170,590 447,795 6,371,667 3,905,285 416,059 2,050,324	387,060 73,761 24,599 288,699 96,529 - 7,473 184,698	68,601 2,705 3,251 62,645 35,684 4,503 22,458	177,755 1,396 8,449 167,910 18,451 171 149,289	<b>57,841</b> 1,365 2,807 53,670 17,074 171 36,425	61,053 6,219 10,623 44,211 1,653 6,779 35,778	<b>2,762</b> 1,010 1,751 — — —	117,551 115 11,499 105,937 32,020 7,318 66,600	5,195 241 4,954 — —
Manufacturing           Zero, under \$50,000,000           \$50,000,000 under \$250,000,000           \$250,000,000 or more, total           \$250,000,000 under \$500,000,000           \$250,000,000 under \$1,000,000,000           \$1,000,000 under \$1,000,000,000	2,781 3,313 17,572 1,807 2,951	360,405,427 5,082,179 13,615,327 341,707,922 11,789,067 24,740,278 305,178,578	554,533,962 7,068,383 _21,565,676 525,899,903 17,462,471 33,045,209 475,392,223	400,149,988 428,298 37,953,864 1,348,968 3,518,779 33,086,117	14,385,897 176,843 651,890 13,557,164 494,757 1,155,094 11,907,312	11,954,735 	8,331,857 56,400 273,824 8,001,631 170,294 600,265 7,231,072	60,205,646 461,745 859,182 58,884,719 1,671,650 1,398,089 55,814,980	51,037,948 368,668 690,606 49,978,674 1,520,625 718,381 47,739,667	12,337,217 79,408 124,657 12,133,150 174,521 579,342 11,379,287	8,502,973 70,449 82,356 8,350,167 111,756 473,335 7,765,076
Food and kindred products           Zero under \$50,000,000           \$50,000,000 under \$250,000,000           \$250,000,000 under \$250,000,000           \$250,000,000 under \$500,000,000           \$250,000,000 under \$1,000,000,000           \$500,000,000 under \$1,000,000,000           \$1,000,000,000 or more.	<b>2,073</b> 60 132 1,881 78 173 1,630	23,100,603 83,870 523,067 22,493,665 574,561 1,741,012 20,178,092	32,098,019 201,668 851,314 31,045,037 893,178 4,341,854 25,810,005	725,552 9,378 82,290 633,884 51,356 305,111 277,416	717,714 4,491 33,616 679,607 17,538 92,672 569,397	445,165 788 20,666 423,711 4,888 60,848 357,975	<b>344,575</b> 575 14,061 329,939 4,888 56,052 268,999	1,638,563 19,740 31,876 1,586,947 24,460 52,529 1,509,958	1,138,914 16,041 25,528 1,097,345 18,893 5,554 1,072,898	<b>226,269</b> 132 1,225 224,912 1,626 1,440 221,846	70,511 33 1,225 69,253  69,253
Chemicals and allied products           Zero under \$\$0,000,000           \$\$0,000,000 under \$\$20,000,000           \$\$250,000,000 or more, total           \$\$250,000,000 under \$\$00,000,000           \$\$50,000,000 under \$\$1,000,000,000           \$\$1,000,000,000 under \$1,000,000,000	4,590 390 457 3,743 304 782 2,657	51,139,085 778,109 1,500,358 48,860,618 1,593,283 6,069,087 41,198,248	65,250,212 1,139,587 1,929,984 62,180,642 2,575,449 7,468,458 52,136,735	5,912,217 111,623 232,074 5,568,521 261,475 818,139 4,488,907	<b>2,090,707</b> 39,580 84,500 1,966,626 100,777 294,166 1,571,684	<b>1,663,696</b> 15,256 48,154 1,600,285 55,572 230,141 1,314,572	1,187,632 14,474 40,227 1,132,930 46,499 145,784 940,647	<b>2,678,783</b> 15,534 25,960 2,637,289 47,450 296,912 2,292,928	1,265,474 14,114 9,738 1,241,621 17,384 53,114 1,171,123	<b>518,709</b> 1,511 13,366 503,832 9,267 151,135	<b>332,223</b> 1,399 3,310 327,515 6,584 117,115
Petroleum (Including Integrated) and coal products.           Zero under \$50,000,000           \$50,000,000 under \$250,000,000           \$250,000,000 or more, total           \$250,000,000 under \$200,000,000	<b>1,749</b> 54 17 1,678 18	46,217 18,226 84,193,888 160,383	<b>202,490,759</b> 67,192 21,093 202,402,473 895,992	<b>13,234,911</b> 5,086 995 13,228,829 10,835	<b>4,272,051</b> 2,022 4,270,030 1,344	<b>3,485,298</b> 523 —	<b>2,458,523</b> 523 2,458,000	34,844,843 2,081 861 34,841,900 834,995	<b>32,735,910</b> 	343,430 <b>8,228,582</b> 	203,816 <b>5,377,39</b> 1  5,377,391
\$300,000,000 under \$1,000,000,000 \$1,000,000,000 or more Machinery, except electrical	4 1,656 <b>3,058</b>	74,514 83,958,992 <b>45,398,879</b>	1,482	616 13,217,379 <b>6,491,998</b>	23 4,268,663 <b>2,288,55</b> 1		2,458,000 1 <b>,545,905</b>	930 34,005,975	827,832 31,908,078	8,228 582	
Zero under \$50,000,000 \$250,000,000 under \$250,000,000 \$250,000,000 or more, total \$250,000,000 under \$500,000,000 \$500,000,000 under \$1,000,000,000 \$1,000,000 under \$1,000,000,000	438 582 2,038 236 500	891,982 2,496,712 42,010,186 2,154,326 5,285,148 34,570,712	1,233,735 3,127,498 49,168,721 2,607,947 6,289,784 40,290,990	68,879 252,482 6,150,636 237,495 729,734 5,183,407	2,150,304 106,894 2,150,952 81,175 244,473 1,825,304	2,434,722 14,467 77,455 2,342,799 30,376 131,308 2,181,115	1,343,905 10,630 54,151 1,481,124 24,846 85,025 1,371,253	3,535,881 76,070 174,776 3,285,035 115,006 321,183 2,848,846	2,164,584 53,689 133,909 1,976,985 88,331 233,820 1,654,834	310,789 10,233 10,075 290,482 1,467 91,850 197,164	141,690 6,508 7,054 128,128 633 56,557 70,937
Electrical and electronic equipment	525 470 1,833 238 181	31,596,966 778,483 1,700,175 29,118,308 2,214,617 1,431,261 25,472,430	40,836,137 1,183,800 3,131,416 36,520,923 3,454,156 2,090,414 30,976,353	3,017,077 54,017 232,169 2,730,891 250,494 251,027 2,229,370	1,002,957 20,156 92,019 890,782 78,046 97,513 715,223	<b>793,992</b> 8,981 51,243 733,767 22,858 87,636 623,273	533,204 6,029 32,404 494,770 16,476 59,796 418,498	3,739,102 103,044 367,601 3,268,457 480,221 216,311 2,571,926	2,753,040 83,624 330,553 2,338,862 462,525 180,307 1,696,030	1,979,049 15,103 22,509 1,941,437 119,775 134,171 1,687,491	1,862,407 13,948 14,171 1,834,287 90,630 132,612 1,611,044

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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]

	J				Controlle	ed Foreign Con					
		·				Distrit	outions	Recei	pts by foreign	corporations fro	- m
Selected industry and size of total assets of U.S. corporations filing return	Number of foreign	Totai assets	Business receipts	Current earnings and profits (less deficit)	Foreign income taxes	Total	Out of current	U.S. corporatio	on filing return	Any domestic controlled corporation	ov the U.S.
	corporations			before taxes	(net)		earnings and profits	Total	Sales of stock in trade	Total	Sales of stock in trade
lanufacturing Continued	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)
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	184.0
'ero under \$50,000,000	1 32	375,618	205,086	- 18,913	733	1,242 30,020	551	32,549	30,796	4,979	4,9
50,000,000 under \$250,000,000	1,036	404,168 46,604,657	482,805 63,872,662	45,641 860,564	19,539 663,891	30,020 331,539	14,332 217,913	17,834 9,135,886	14,350 7,765,067	14,564 211,282	7,6 171,4
250,000,000 or more, total \$250,000,000 under \$500,000,000 \$500,000,000 under \$1,000,000,000	47	225,258	314,094	706	5,807	8,716	1,294	41,835	39,712	1,177	1,0
\$1,000,000,000 or more	. 902	570,043 45,809,356	587,635 62,970,933	71,454 788,404	22,734 635,351	17,123 305,700	8,642 207,976		8,344 7,717,010	271 209,834	170,3
ransportation 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	444,7
aro under \$50,000,000 50,000,000 under \$250,000,000	106	387,244 344,432	510,123 351,453	34,693 26,930	7,861 6,257	2,850 4,057	2,138 1,978	49,534 9,761	11,330 739	21,836 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	444,7
250,000,000 or more, total \$250,000,000 under \$500,000,000 \$500,000,000 under \$1,000,000,000 \$1,000,000,000 or more	. 86 . 114	1,009,889 735,123	186,658 354,238	49,473 36,799	2,432 11,559	4,371 5,744	3,918 5,513	579 9,123		124 30.887	
\$1,000,000,000 or more	1,074	16,554,413	13,573,811	885,822	296,386	483,868	259,574		143,937	616,518	444,7
/holesale and retail trade ero under \$50,000,000	. 2,863 1,051	31,926,928 1,735,818	88,804,810 2,605,090	2,661,007 113,114	689,283 32,911	482,022 18,889	335,260 12,522	1,730,723 183,128	1,528,562 149,147	436,438 69,155	306,2 65,1
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	26,4
250,000,000 or more, total \$250,000,000 under \$500,000,000 \$500,000,000 under \$1,000,000,000 \$1,000,000,000 or more	. 1,349 . 179	28,002,284 1,316,921	78,702,796 4,804,573	2,282,067 107,022	593,089 21,399	418,541 18,526	280,720 12,091	1,389,340 37,269	1,246,498 22,842	316,486 52,877	214.0 48.1
\$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,
	1	25,734,903	73,247,677	2,102,348	548,777	356,234	244,723		1,028,595	211,459	114,5
Wholesale trade ero under \$50,000,000	. 971	22,928,740 1,643,860	74,431,299 2,506,412	1,912,230 105,562	472,660 32,123	367,360 17,256	238,560 10,925	1,622,375 168,021	1,494,032 140,201	371,110 68,682	<b>293,</b> 64,8
50.000.000 upder \$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,
\$250,000,000 or more, total \$250,000,000 under \$500,000,000	. 982 136 107	19,176,729 1,194,067	64,601,370 4,629,450	1,565,903 100,249	382,187 19,346	305,646 16,312	185,622 10,294	1,321,806 29,383	1,243,151 20,118	255,109 51,718	201,1 48,1
250,000,000 or more, total \$250,000,000 under \$500,000,000 \$1,000,000 under \$1,000,000,000 \$1,000,000,000 or more	107	812,825	453,557	47,788	15,437	39,794	22,450	206,820	195,061	52.042	51,9
		17,169,838	59,518,363	1,417,866	347,404	249,539	152,877		1,027,973	151,350	101,7
Retail trade aro under \$50,000,000	. 535 79	8,998,188 91,958	14,370,162 95,330	748,512 7,288	216,622 788	<b>114,662</b> 1,633 134	<b>96,700</b> 1,596	108,063 14,823	34,530 8,945	65,328 472	13,0
aro under \$50,000,000	. 89 367	80,676 8,825,555	173,407 14,101,426	25,061 716,164	4,934 210,901	134 112,895	5 95,099	25,707	22,238 3,347	3,479 61,377	12,8
\$250,000,000 under \$500,000,000	43	122,854	175,122	6,773	2,053	2 214	1,796	7,885	2,724	1,159	12,0
250,000,000 or more, total \$250,000,000 under \$500,000,000 \$500,000,000 under \$1,000,000,000 \$1,000,000,000 or more	40 284	137,635 8,565,066	196,989 13,729,315	24,909 684,482	7,476 201,373	3,986 106,695	1,457 91,846	144 59,504	623	108 60,110	12,8
inance, insurance and real estate		79,517,280	20,472,199	1,842,647	506,460	480,666	318,006		6,187	3,226,525	286,5
ero under \$50,000,000 50,000,000 under \$250,000,000	635 202	1,960,257	1 485 670	37,652	24,230	25,899	14,840	5.862	319	302,537	283,2
250,000,000 under \$250,000,000	2,143	984,920 76,572,104	754,326 18,232,203	115,123 1,689,874	24,508 457,723	36,911 417,857	20,773 282,392	8,043 2,500,218	5,868	9,132 2,914,855	3.2
\$250,000,000 under \$500,000,000	. 185 418	2,339,018 3,610,296	4,496,247 725,705	245,666 138,195	74,705 37,210	124,169 54,241	87,758 41,113	79 58,558	2.885	3,267 165	3,
250,000,000 or more, total \$250,000,000 under \$500,000,000 \$500,000,000 under \$1,000,000,000 \$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	
ero 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 or more, total \$250,000,000 under \$500,000,000 \$500,000,000 under \$1,000,000,000 \$1,000,000,000 or more			••	••	••		••		=	_	
\$1,000,000,000 or more		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 17	14,203,293 *373,034	5,610,895 *40,228	446,325 *2,270	91,173 *548	69,332	48,916 	86,926 *4,586	4,187	126,919	
50,000,000 under \$250,000,000	13	103,528	48,399	*2,270 20,717	1,893	2,574	1,824	-	=	-[	
\$250,000,000 or more, total \$250,000,000 under \$500,000,000	. 689 24	13,726,730 111,161	5,522,269 59,332	423,337 - 256	88,733 626	66,758 893	47,092 340	82,340	4,187	126,919	
Insurance Carners ero under \$50,000,000 50,000,000 under \$250,000,000 250,000,000 or more, total \$250,000,000 under \$500,000,000 \$1,000,000,000 or more.	24 77 588	638,577 12,976,993	108,170 5,354,767	15,612 407,982	4,140 83,966	2,768 63,097	1,579 45,173	10,631 71,710	2,885 1,302	64 126,855	
	0.000	5,833,160	6,362,369	505,065	196,476	148,465	87,273	168,935	48,227	55,409	4,5
ervices ero under \$50,000,000	997	967,160	1,362,693	66.937	36,048	13,660	10.364	36,297	11,791	5.342	-
50,000,000 under \$250,000,000	. 786 877	1,686,601 3,179,400	2,142,278 2,857,399	174,364 263,764	64,203 96,224	42,032 92,773	28,278 48,630	37,850 94,788	3,720 32,716	28,857 21,211	4,5
\$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	2,877	
\$500,000,000 under \$1,000,000,000	. 193 206										
Services         250,000,000           \$\$50,000,000         under \$250,000,000           \$\$250,000,000 or more, total         \$\$250,000,000           \$\$250,000,000 under \$1,000,000,000         \$\$30,000,000 under \$1,000,000,000           \$\$1,000,000,000 or more         \$\$1,000,000,000	388 193 296	900,485 469,332 1,743,583	407,429	34,615 121,333	49,097 12,235 34,893	5,575 53,115	21,120 4,774 22,735	59,948 2,089 32,751	32,263 238 215	2,877 207 18,127	

Footnotes at end of table.

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## **Controlled Foreign Corporations, 1980**

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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]

		Controlled Foreign Corporations — Continued										
	Receipts corporations	- Continued				Payments by	y foreign corpo	rations to -				
Selected industry and size of total assets of U.S. corporations filing return	Any foreign controlled corpo filing	ration	U.S. ¢	Orporation filing	return	controlled	lomestic corpor by the U.S. c filing the return	orporation i	Any foreig by the U.S	n corporations i. corporation f	controlled iling return	
<u></u>	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)	
All industries, total	421,175 1,280,770 29,453,645 1,006,532 2,035,740	11,102,657 280,486 949,612 9,872,560 499,089 1,209,282 8,164,188	3,032,353 88,306,268 3,438,561 3,523,968	66,629,803 904,586 2,112,668 63,612,548 2,431,614 2,204,587 58,976,346	<b>8,358,199</b> 101,107 355,652 7,901,440 302,702 531,529 7,067,210	287,784 770,620 28,760,158 594,976 911,636	191,985 580,956 20,261,579 317,563 645,897	<b>2,293,695</b> 19,084 93,167 2,181,444 51,637 155,479 1,974,329	28,810,106 515,315 1,229,869 27,064,922 1,041,855 1,811,245 24,211,822	10,681,671 358,191 851,454 9,472,025 580,076 927,682 7,964,267	<b>2,558,86</b> 3 11,216 81,454 2,466,193 58,079 295,346 2,112,768	
Agriculture, forestry and fishing ero under \$50,000,000	73,395 4,828	<b>56,332</b> 1,721	1 <b>8,570</b> 7,945	1 <b>1,859</b> 5,407	1 <b>,308</b> 1,308	<b>521</b> 254	207	47	1 <b>7,089</b> 2,032	<b>2,038</b> 1,724	616 288	
250,000,000 or more, total \$250,000,000 under \$500,000,000 \$500,000,000 under \$1,000,000,000		54,611 — —	10,625	6,452 —		267 	207 	47 	15,057	314	328	
\$1,000,000,000 or more	166,711	. 42,412	690,566	 234,669	74,893	825,964	123,156	228,740	166,321	12,144	16,127	
ero under \$50,000,000. 50,000,000 under \$250,000,000 250,000,000 or more, total \$250,000,000 under \$50,000,000 \$500,000,000 under \$1,000,000,000	8,016 156,684 25,980 5,120	42,412 2,358	4,975 61,248 624,342 81,271 7,169	10,733 223,936 15,192 —	2,521 9,195 63,177 6,108 1,322	14,326 811,638 12,911 7,380	5,397 117,759 190	7,424 221,316 6,500 7,380	2,011 4,196 160,114 25,915 2,364		16,127 3,941	
\$1,000,000,000 or more onstruction	361,838	40,053 <b>10,805</b>	535,902 106,283	208,744 <b>4,182</b>	55,747 <b>27,199</b>	791,347 <b>129,359</b>	117,569 2,751	207,436 16,030	131,835 <b>327,146</b>	12,144 10,814	12,186 129,695	
ero under \$50,000,000. \$50,000,000 under \$250,000,000. \$50,000,000 or more, total \$250,000,000 under \$500,000,000 \$5500,000,000 under \$1,000,000,000.	2,063 9,827 349,948 34,532 1,673	1,819 8,986 — — —	5,161 15,352 85,770 60,037 1,048	1,284 2,898 — — —	416 6,292 20,491 18,401	274 4,717 124,367 65,913 676	2,751 	135 1,219 14,675 —	2,048 11,579 313,519 33,975 	1,819 8,995 8,995	129,695	
_\$1,000,000,000 or more	313,742		24,685		2,090	57,778		14,675	278,567		129,524	
Ianufacturing ero under \$50,000,000 50,000,000 under \$250,000,000 250,000,000 or more, total \$250,000,000 under \$500,000,000 \$1,000,000,000 under \$1,000,000,000 \$1,000,000,000 or more.	24,922,161 230,241 1,126,776 23,565,144 690,717 1,914,097 20,960,329	10,363,357 207,540 921,969 9,233,848 430,630 1,204,448 7,598,770	76,113,373 970,499 2,582,275 72,560,600 3,022,863 3,262,838 66,274,899	56,882,152 715,046 1,891,571 54,275,536 2,358,879 2,069,798 49,846,859	7,635,411 52,251 276,695 7,306,465 171,219 484,471 6,650,775	24,080,855 136,634 467,351 23,476,871 489,166 855,628 22,132,077	20,291,020 106,940 348,685 19,835,395 317,202 619,522 18,898,671	1,691,110 9,946 60,924 1,620,239 40,794 143,671 1,435,775	23,226,640 283,896 1,048,441 21,894,303 678,072 1,671,936 19,544,295	9,731,468 255,660 822,580 8,653,228 468,865 927,564 7,256,799	2,034,255 4,885 48,956 1,980,415 19,727 236,997 1,723,692	
Food and kindred products           aro under \$50,000,000.           50,000,000 under \$250,000,000           250,000,000 or more, total           \$250,000,000 under \$500,000,000           \$500,000,000 under \$1,000,000,000           \$1,000,000,000 or more.	1,391,505 1,987 16,447 1,373,071 27,299 160,560 1,185,212	<b>501,671</b> 1,578 15,731 484,362 1,723 136,311 346,328	<b>2,119,834</b> 35,440 53,014 2,031,379 20,634 139,467 1,871,277	<b>392,530</b> 34,258 16,518 341,754 12,996 44,360 284,398	<b>259,132</b> 320 13,137 245,675 1,488 46,873 197,315	1,036,242 3,283 1,411 1,031,549 790 62,507 968,252	861,938 2,830 	69,942 115 1,347 68,480   68,480	1,127,395 2,532 24,675 1,100,189 21,487 137,671 941,031	476,767 1,578 18,128 457,061 639 111,391 345,031	101,469 353 6,157 94,960 3,400 11,699 79,860	
Chemicals and allied products           aro under \$50,000,000           50,000,000 under \$250,000,000           250,000,000 or more, total           \$250,000,000 under \$500,000,000           \$500,000,000 under \$1,000,000,000           \$1,000,000,000 or more           \$1,000,000,000 or more	3,296,474 42,254 142,071 3,112,150 82,722 363,346 2,666,081	1,227,296 37,277 118,254 1,071,765 33,812 144,099 893,854	5,897,741 76,999 190,198 5,630,543 154,176 511,107 4,965,261	3,699,638 49,192 128,833 3,521,613 65,561 202,198 3,253,855	1,004,563 11,552 27,990 965,021 43,255 120,103 801,663	<b>2,561,213</b> 7,910 51,757 2,501,547 48,588 344,636 2,108,323	2,124,851 6,055 25,622 2,093,174 25,502 261,585 1,806,087	184,819 1,673 3,642 179,503 6,593 28,462 144,448	3,365,973 55,562 144,636 3,165,775 62,374 365,348 2,738,053	<b>1,201,910</b> 44,109 107,956 1,049,846 21,635 140,185 888,026	<b>373,263</b> 1,931 16,300 355,033 3,288 64,891 286,854	
Petroleum (including integrated) and coal products ero under \$50,000,000	6,157,546	695,888	27,896,033 2,609	<b>24,684,992</b> 1,509	<b>2,416,832</b> 157	1 <b>4,657,718</b> 684	<b>13,537,988</b> 370	<b>466,62</b> 1 212	4,540,063 38	559,726	432,352 38	
50,000,000 under \$250,000,000 250,000,000 or more, total \$250,000,000 under \$500,000,000 \$500,000,000 under \$1,000,000,000	6,157,546 — —	695,888 	3 27,893,422 821,607 48,000	24,683,483 821,468	2,416,675 — —	 14,657,034 	13,537,618 — —	466,409 	4,540,025	559,726	432,314	
\$1,000,000,000 or more	6,157,546	695,888	27,023,815	23,862,014	2,416,675	14,657,034	13,537,618	466,409	4,540,025	559,726	432,314	
Machinery, except electrical	4,138,859 33,878 210,990 3,893,990 150,157 499,353 3,244,480	2,183,047 27,808 174,546 1,980,692 96,457 373,306 1,510,930	12,681,252 171,947 705,323 11,803,981 527,050 1,029,802 10,247,129	8,290,737 140,594 544,112 7,606,031 445,830 898,449 6,261,752	1,825,057 6,750 59,368 1,758,939 25,033 44,562 1,689,345	629,314 26,049 110,987 492,278 46,734 142,515 303,029	369,769 17,299 88,378 264,093 43,694 67,535 152,864	142,118 6,639 13,079 122,401 415 64,996 56,990	4,014,558 35,961 201,956 3,776,640 134,749 292,703 3,349,189	1,969,045 30,261 158,816 1,779,969 82,962 157,555 1,539,452	371,119 5 3,843 367,271 4,592 21,595 341,084	
Electrical and electronic equipment aro under \$50,000,000	3,661,497 33,116 169,858 3,458,523 109,011 102,490 3,247,022	2,460,826 30,930 129,982 2,299,914 49,000 65,330 2,185,584	5,003,744 192,463 620,647 4,190,635 737,123 276,082 3,177,430	<b>3,804,917</b> 162,960 511,186 3,130,772 525,709 178,183 2,426,680	<b>253,562</b> 8,318 32,134 213,110 17,968 51,402 143,740	1,652,282 41,162 126,516 1,484,603 235,967 25,902 1,222,734	1,055,104 29,646 103,862 921,596 143,019 11,135 767,443	<b>301,327</b> 210 12,539 288,578 1,802 13,898 272,878	<b>3,539,015</b> 48,529 197,124 3,293,362 118,204 101,982 3,073,177	2,492,331 46,024 159,187 2,287,120 85,369 64,658 2,137,094	<b>218,735</b> 393 3,145 215,197 2,006 22,185 191,006	

Footnotes at end of table.

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]

					Controlled Fore	ign Corporation	ns — Continued				
	Receipts corpo — Col	by foreign rations ntinued					y foreign corpor				
Selected industry and size of total assets of U.S. corporations filing return	Any foreign controlled corporation	corporation by U.S. filing return	U.S. 🗙	prporation filing	return	controlled	lomestic corpor by the U.S. c filing the return	orporation	Any foreig by the U.S	n corporations 5. corporation fi	controlled iling 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)
anufacturing — 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	305,004 763	<b>\$0,</b> 5
aro under \$50,000,000	1,216 39,347	763 32.200	54,252 51,983	43,553 17,589	820 26,145	13,283 23,705	12,791 22,332	25	1,361 19,906	12,565	3.3
0,000,000 under \$250,000,000 50,000,000 or more, total	1,595,698		12,469,359	10.268.651	169,499	660,520	317,857	65,477	1,885,276	291,675	77,
\$250 000.000 under \$500.000.000	2,137	2,055	25,127	17,699	1,143	7,644 12,874	575 5,059	7,069 7,334	3,762 45,884	3,310 17,632	1.
\$500,000,000 under \$1,000,000,000 \$1,000,000,000 or more	60,649 1,532,912	29,966 411,884	56,111 12,388,121	43,972 10,206,980	7,413 160,943	640,003	312,223	51,074	1,835,630	270,733	74,
								111,504	1,029,659	54,509	133,
ansportation and public utilities		81,021	989,570 13,817	76,464 156	112,267 2,742	663,412 22,848	94	39	41,707		100,
0.000,000 under \$250,000,000	6,608		20,847	498	1,872	5,470	_	895	3,833	<u> </u>	100
50,000,000 or more, total	931,379	81,021	954,905 14,653	75,809	107,653 3,760	635,095	105,244	110,569	984,120 96,340	54,509	133,
\$250,000,000 under \$500,000,000 \$500,000,000 under \$1,000,000,000	108,476		7.894	118	5,014	2,460	659	593	5,485	118	
\$1,000,000,000 or more			932,358	75,692		632,635	104,585	109, <del>9</del> 77	882,295	54,391	133,
holesale and retail trade	1,253,513	494.342	10,225,688	9,262,668	293,860	515,018	291,995	58,746	1,376,980	814,927	95,
ro under \$50,000,000	53,911	37,913	202,633	165,619	8,701	86,482	67,478	7,324	84,634	66,105	2,
0,000,000 under \$250,000,000			265,055 9,758,000	192,769 8,904,280		57,986 370,550		10,565 40,854	33,430 1.258,917	3,596 745,226	6. 86.
\$250,000,000 or more, total \$250,000,000 under \$500,000,000	1,172,147		107,436	46,960		17,555		2,261	134,219	110,897	5,
\$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
\$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
Wholesale trade	1,112,167	493,391	9,742,999	9,197,668		359,984	275,814	24,654	1,238,498	814,927	80
ero under \$50,000,000	51,557	37,913	197,187 233,176	163,997 173,393		83,870 56,746		5,731 10,565	82,281 33,321	66,105 3,596	2
50,000,000 under \$250,000,000		2,541 452,937	9,312,635	8,860,279	218,243	219,369		8,358	1,122,898	745,226	70,
\$250,000,000 under \$500,000,000	78,741	68,387	44,375	21,660	9,532	2,733		1,439	134,199	110,897	5,
\$500,000,000 under \$1,000,000,000	. 15,060		128,144 9,140,116	93,738 8,744,882	30,674 178,037	28,272 188,364		2,020 4,899	11,853 976,847	634,329	7; 58,
\$1,000,000,000 or more	939,587	384,550								00 1,020	-
Retail trade			482,644 5,401	65,000 1,622	39,873	155,034 2,612		34,092 1,596	138,481 2,354	_	15,
ero under \$50,000,000 50,000,000 under \$250,000,000	2,354	_	31,879	19,377	, 111	1,240	774		109	—	
250.000.000 or more, total	.[ 138,760	951	445,365	44,001	39,762	151,181		32,496 822	136,019 20	_	15
\$250,000,000 under \$500,000,000	623		63,061 14,878	25,300 10,259	1,392 3,482		1 =	119		_	
\$500,000,000 under \$1,000,000,000 \$1,000,000,000 or more			367,426	8,442		124,408	14,444	31,554	135,999	-	15
			3.999.406	42,982	144,112	3,555,168	216,902	161,283	2,453,860	41,778	127
inance, insurance and real estate ero under \$50,000,000			53,563		22,780	30,701	16,987	1,254	47,132	29,805	1
50,000,000 under \$250,000,000	. 20,439	4,763	15,471	2,109	9,494	216,314		11,855	18,560 2,388,167	5,373 6,600	11.
250,000,000 or more, total	. 3,168,670 . 54,673		3,930,374 83,448	40,872	111,837 64,792	3,308,153 5,069		148,174 1,907	2,366,167	0,000	23
\$250,000,000 under \$500,000,000 \$500,000,000 under \$1,000,000,000	79,464	i (/ 80	39,214	28,816	1,638	4,626		1,697	104,392		50
\$1,000,000,000 or more	. 3,034,533	6,600	3,807,712	12,056	45,408	3,298,458	9 –	144,570	2,222,969	6,600	39
Banking	2,629,373	6,600		6,574	12,803	2,936,722	4 –	104,438	1,964,789	6,600	1
ero under \$50,000,000	. 76		158	-	-			_	78	-	
50,000,000 under \$250,000,000	2,629,295	6,600	3,548,573	6,574	12,803	2,936,632		104,438	1,964,711	6,600	1
\$250,000,000 under \$500,000,000		]	· · -	_	-	· · -	· -		-		l
\$500,000,000 under \$1,000,000,000 \$1,000,000,000 or more		6,600	4,712		837 11,965	2,936,632		104,438	1,964,711	6,600	1
• • • • • • • • • • • • • • • • • • • •								15,919	116,618	_	21
Insurance Carriers	. 237,53		193,896 *18		28,501	102,802	1 I	15,918	*41		- '
ero under \$50,000,000 50,000,000 under \$250,000,000	26	4 <u> </u>	40		40		] –			-	
250.000.000 or more, total	. 237,23	2 80	193,838		28,461 687			15,919	116,577 36		21
\$250,000,000 under \$500,000,000 \$500,000,000 under \$1,000,000,000	48,47	2 80		9,217	237	2,506	× –	_	47,045	- 1	2
\$1,000,000,000 or more			183,106		27,537		4 -	15,919	69,496	- 1	18
ervices	172,02	5 13,193	520,014	114,826	69,150	48,265			212,410	13,993	
ero under \$50,000,000	49,27	2 1,740	67,109	17,074	10,388	10.591	279	334	51,857		
50.000.000 under \$250,000,000	. 81,64			11,669			2,774		109,829 50,725		5
250,000,000 or more, total \$250,000,000 under \$500,000,000	41,10			4,553	3 27,499	4,362	2	174	12,056	- 1	4
\$250,000,000 under \$1,000,000,000		ol —	62,784	1,859	4,928	642	2	<del>مر بر</del> ا	14,238	1 -	
\$1,000,000,000 or more		8 28	258,252	79,672	2 1,386	28,211	99	25,442	24,431	4	1

\*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.

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## 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)

•	Y .	L			Control	ed Foreign Corp	orations			
Selected industry of U.S. corporation filing return and selected industry	Number of U.S.	Number of			Current earnings	Foreign corp current earnin (+) befo	gs and profits	Foreign	Distrib	utions
of Controlled Foreign Corporation	corporation returns	foreign corporations	Total ` assets	Businets receipts	and profits (less deficit) before taxes	Current earnings and profits before taxes	Foreign income taxes (net)	income taxes (net)	Total	Out of current earnings and profits
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
ul 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	9,643,63
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	15,95
Mining			15,017,247 7,028,446	11,392,971 11,244,627	3,430,646	3,820,565	1,273,353	1,272,931	975,082	446,77
Manufacturing		10.901	226,062,259	354,511,342	798,147 25,832,360	907,458 29,871,292	199,234 9,895,433	193,706 9,666,940	343,556 7,238,667	154,80 5.409.84
Transportation and public utilities	336	1,145	21,412,678	18,442,328	980.649	1.428.419	242,569	259,358	571.348	239.37
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	1.862.03
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	1,041,04
Services	1,081	4,090	20,359,450	19,911,917	1,841,033	2,221,868	716,536	706,075	730,411	473,09
Nature of business not allocable Inactive	195 1,538		276,175 2,210,599	181,164	4,153	11,923	2,409	2,426	4,166 15,827	. 71
griculture, forestry and fishing (U.S. Parent)	20	142	878,019	1,312,264	34,278	46,747	16,963	15,695	1,971	87
CFC Industries			1	}	1			1	· • •	
Agriculture, forestry and fishing	7	. 28	186.851	132,898	10,061	14,845	4,421	4,380	<b>.</b> 802	49
Mining		_			10,001			-,000	_	40
Construction	<del></del>	<u> </u>		_	-	_	-	_	_	_
Manufacturing	3	26	96,976	111,220	8,507	9,695	3,829	3,575	70	7
Transportation and public utilities Wholesale and retail trade	11	27	373,530	992.797	9,389	13,165	7,480	6,538	391	30
Finance, insurance, and real estate			29,986	1.405	103	613	7,480	6,536	391	
Services	4	6 8	38,801	33,020	952	1,853	304	273	694	_
Nature of business not allocable inactive	••	37	7,482	••	**	••	••	• *	••	•
lining (U.S. Parent)	172		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	· ·	· · · · · · · · · · · · · · · · · · ·			· · · · · · · · · · · · · · · · · · ·			·····		
Mining	86	274	4,263,998	2,989,371	855,937	903,006	173,518	174,150	195,779	184,605
Construction	3 10 8	6	74,524	32,857	11,972	13,698	3,054	3,054	778	· ·
Manufacturing	10	89 18	1,197,545	1,345,806	126,946	143,033	46,927	46,481	47,489	32,252
Transportation and public utilities	11	57	100,010 287,452	128,009 791,662	16,385 49,720	17,871 50,291	4,485 9,606	4,494 9,570	38 9,878	3.16
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	24 15	63 33	65,406	55,163	14,495	14,985	4,138	4,139	1,669	1,609
Nature of business not allocable	5	14	11,165	9,043	1,721	1,784	603	603	5	
Inactive	95	239	108,687	-	. —	-	-	-	5,162	_
il and gas extraction (U.S. Parent)	143	609	5,931,264	4,443,410	968,939	1,049,350	209,866	210,159	328,502	214,977
CFC industries			ł					1		
Agriculture, forestry and fishing			3,706,062	2,604,253	779,895	825,069	153,898	154,537	187,002	
Mining	71	244	3,700,002	2,004,203	118,685	020,009	103,698	154,537	187,002	177,10
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	3,438	4,815	·	31	·	
Transportation and public dames	e .	31	226,412	724,352	42,544	42,634	8,183	8,183	4,324	510
Wholesale and retail trade	9									
Wholesale and retail trade Finance, insurance, and real estate	16	40	1,020,967	151,692	53,589	54,277	9,574	9,574	99,414	11,580
Wholesale and retail trade	16 8	40 23 5	1,020,967 60,533 272	151,692 49,234 - 25	53,589 12,044 60	54,277	9,574 3,966	9,574 3,967	99,414 1,580	11,580

Footnotes at end of table

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]

					Control	ed Foreign Corp	prations			
Selected industry of U.S. corporation	Number of U.S.	Number of			Current earnings	Foreign com current earnin (+) befo	gs and profits	Foreign	Distrib	utions
filing return and selected industry of Controlled Foreign Corporation	corporation returns	foreign corporations	Total assets	Business receipts	and profits (less deficit) before taxes	Current earnings and profits before taxes	Foreign income taxes (net)	income taxes (net)	Total	Out of current earnings and profits
	(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	57,84
CFC Industries										
Agriculture, forestry and fishing								•12	-	-
Mining		*69 297	*31,321 2,593,870	20,832 6,371,216	*- 1,512 366,298		*14 79,034	74.929	177.057	57.1
Construction		21	2,593,870	98.914	5.270		2,586		563	5
Transportation and public utilities		7	7.005	1,750	- 348		- 77	- 103		-
Wholesale and retail trade	*15	*22	*42,840	*75,570	*2,583	*3,154	*1,365	, *1,104	_l	-
Finance, insurance, and real estate	20	28	82,763	58,724	4,014	8,787	742	216	50	
Services	22	46	196,610	361,840	10,290	15,689	- 9,309	- 10,184	85	ł
Nature of business not allocable Inactive	4	6 112	4,165 35,903	1,206	465	468	_	=	=	-
Manufacturing (U.S. Parent)		23,665	360,405,427	554,533,962	40,014,988	46,915,595	14,615,711	14,385,897	11,954,735	8,331,85
CFC industries										
Agriculture, forestry and fishing	41	152	3.817.407	694,877	- 1,190,725	87,206	30,755	29,680	18,508	15,19
Mining		416	9,182,339	7,093,135	2,467,151	2,744,040	1,074,022	1,073,241	770,763	255,6
Construction	49	195	4,059,061	4,442,932	392,393	426,963	106,205	105,012	163,772	96,21
Manufacturing	1,849	10,038	215,023,493	338,721,423	24,884,125		9,535,582		6,940,230	5,205,5
Transportation and public utilities	106	344	11,852,387	12,116,234	547,563 8,766,231		115,057 2,912,010	131,208 2,898,021	445,599	147,9 1,546,3
Wholesale and retail trade Finance, insurance, and real estate	890 473	4,995 1,726	58,919,385 45,771,883	171,697,291 8,259,968	3,086,192		404.011		2,001,871	762.17
Services	366	1,466	10,377,565	11,374,635	1,061,482	1,264,086	436,517	430,759	440,691	302,13
Nature of business not allocable		359	202,860	133,468	575	7,784	1,553	1,646	2,767	6
Inactive	741	3,976	1,199,046	_	—	-	_	- 1	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	1,187,63
CFC Industries							. =			
Agriculture, forestry and fishing	10	42	141,248	152,723	2,894		4,776		3,817	1,89
Mining		32	429,342 156,256	141,966 140,318	38,518 11,452		8,197 2.902	8,196 2,773	5,743	5,5
Construction		2.345	38,529,169	51.943.251	4,667,285	5.255.716	1.743.977	1,711,216	1,253,214	909,2
Transportation and public utilities		35	589.072	596,950	102.227		25.029		11.043	8,2
Wholesale and retail trade	104	853	6,037,658	10,666,791	689,711	776,065	285,926		218,115	129,3
Finance, insurance, and real estate		259	4,705,327	870,549	367,137		40,939		162,477	128,6
Services		133	414,463	733,958	32,261		10,147	10,469	8,141	4,6
Nature of business not allocable Inactive		55 830	25,485 111,064	3,705	731	1,319	181	146	577 568	14
								] ]		
Petroleum (including intergrated) and coal products (U.S. Parent)		1,749	84,258,330	202,490,759	13,234,911	13,951,428	4,256,245	4,272,051	3,485,298	2,458,53
CFC Industries			••							
Agriculture, forestry and fishing		- 171	5.390.086	5,106,495	2,040,094	2,286,601	936,313	936,209	625,299	163,29
Mining Construction	25	· ''	243,622	488,649			600,013	550,208	020,200	100,2
Manufacturing		279	32,967,165	73,731,311	5,209,680	5,260,548	1,754,618		1,252,347	1,198,2
Transportation and public utilities	17	98	8,404,320	8,658,339	151,450	405,874	35,240	37,012	354,458	76,9
Wholesale and retail trade	25	518	28,280,233	112,973,192	4,828,483	4,975,779	1,465,956		995,395	829,9
Finance, insurance, and real estate	29	148	8,241,740	1,133,921	917,714		58,720		241,049	173,9
Services		71	441,628	394,104	47,363	49,141	5,323	5,429	16,619	16,1
Nature of business not allocable		435	230.342						12	_
Inactive	L	400	230,342			L			14	

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Footnotes at end of table.

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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]

· · · · · · · · · · · · · · · · · · ·		Controlled Foreign Corporations									
Selected industry of U.S. corporation	Number "of U.S." corporation returns				Current	current earnin	orations with gs and profits ire taxes	Foreign income taxes (net)	Distributions		
filing return and selected industry of Controlled Foreign Corporation		Number of foreign corporations	Total 'assets	Business receipts	eamings and profits (less deficit) before taxes	Current earnings and profits before taxes	Foreign income taxes (net)		Totai	Out of current earnings and profits	
Fare	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	
Renufacturing — Continued								•. •	- N		
tachinery, 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	••	60	269.892	338,721	60,444		22,859		**		
Construction	5	15	209,092	119,291	53.476	62,615 54,174	22,859	22,859 10,147	9,534 1,659,853	6,996 1,030,011	
Manufacturing	308	1,305	29,194,196	35,837,546	4,478,443			1,714,756	- 1,000,000	1,000,011	
Transportation and public utilities		3	8,517	3,070	256	726	249	249	. —	· · · · ·	
Wholessle and retail trade Finance, insurance, and real estate	. 147	742	6,640,541	10,896,549	706,110	859,075	256,558	244,366	152,962	. 112,656	
Services		201 276	4,242,436 4,646,459	979,098 5,371,512	543,101 650,755	559,705 676,015	36,451 264,066	35,040 261,022	328,972 282,931	. 192,575 201,455	
Nature of business not allocable	56	2,0	**	0.011.012	0.00,7.00	••	204,000	201,022	. 202,831	201,400	
inactive	108	416	53,242	, <b>-</b>	·. —	—	. —	_	258	· · <u>-</u>	
lectrical 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	119,165	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 Wholesale and retail trade	147	564	1,062,386 3,529,358	1,214,834 6.501,579	64,111 564,422	91,044 609,740	17,938 189,106	32,358 189,159	30,882 122,366	29,719	
Finance, insurance, and real estate	52	176	4,488,663	588,456	219.355	246,745	33,513	32,616	142,539	58,846	
Services	. 39	259 20	1,403,950	1,861,605	84,913	144,985	39.827	40,792	27,990	17.555	
Nature of business not allocable	ii 14	20	8,700	4,579	- 643	136	78	64	358	35	
Ináctive	87	366	102,940		· · · -	-	-		2,126		
ransportation and public utilities (U.S. Parent).	242	1,759		14,976,283	1,033,718	1,389,411		324,495	500,890	273,123	
						· · ·					
Adhcumure, torestry and tisning				••	**	**	•	**	••	**	
Mining Construction	13	47 15	1,121,974 54.097	1,104,682 135,177	116,786 5,775	124,508 6,750	19,964	19,706	5,298	.4,725	
Manufacturing	22	221	2,868,310	4,220,285	181,880	309,071	3,434 100,322	3,434 98,226	1,443 73,818	903 48,901	
Transportation and public utilities	161	563	7,385,776	5.079.039	320.840	421,424	106.049	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		170	4,792,735	781,513	255,143	266,767	18,382	18,300	130,961	79,149	
Services	- 45	- 177	945,138	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		
Pholesale and retail trade (U.S. Parent)	· 768	2,863	31,926,928	88,804,810	2,661,007	2,968,414	700,690	689,283	482.022	335.260	
CFC industries	· > [										
Agriculture, forestry and fishing	i 11	- 29	150,507	785.357	8,589	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 92	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	8,186	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	152	225	4,980,646 608,223	3,185,662 463,551	139,974 21.619	194,311 33.694	47,808 5,550	38,126 5,515	43,783	26,245	
Nature of business not allocable	14	28	9.088	403,551	- 108	407	. 5,550	5,515 81	6,726 1,310	3,542 78	
Inactive	249	560	475.355	2,010	· <u>~</u>				365	70	

Footnotes at end of table.

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]

	1				Controll	ed Foreign Corpo	rations	r		
Selected industry of U.S. corporation	Number of U.S.	Number of			Current eemings	Foreign corporations with current earnings and profits (+) before taxes		Foreign	Distribu	itions
filing return and selected industry of Controlled Foreign Corporation	corporation returns	foreign corporations	Totai asseta	Business receipts	and profits (less deficit) before taxes	Current earnings and profits before taxes	Foreign income taxes (net)	income taxes (net)	Total	Out of current earnings and profits
	(1)	(2)	(3)	(4)	(5)	(6)	(n)	(8)	(9)	(10)
Pholesale and retail trade — Continued										
holesale 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,
CFC industries									-	
Agriculture, forestry and fishing	8	26	146,150	780,041	6,822	11,929 12,014	1,948 194	2,024 - 202	54	
Mining		26 13	158,279 11,919	71,708 4,691	- 21,900 - 23	138	- 184	- 202	_	
Construction	12 73 24 409 58	208	3,932,814	4,864,854	240.364		95,403		46.003	32,
Manufacturing Transportation and public utilities	73	104	1,010,913		70,029		8,211	8,186	14.610	8.
Wholesale and retail trade		1,184	14.849.915		1,556,241		352,596	353,154	272,458	182
Finance, insurance, and real estate		148	2,132,474	2.385,508	53,354	99,349	21,298	11,585	29,206	14
Services	130	186	215,053		7,386		4,212	4,170	4,664	1
Nature of business not allocable	8	14	2,449	656	- 42	185	49	- 18		
Inactive	217	418	468,774	-	-	-	-	-	365	
inance, insurance, and real estate (U.S. arent)	481	2,980	79,517,280	20,472,199	1,842,647	2,112,712	543,719	506,460	480,666	318,
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	
Construction		••	••						117.000	01
Manufacturing	29	120	2,087,883		255,777		78,291	75,898	117,622	81
Transportation and public utilities	18	55	598,693	124,274	8,314	10,148	1,039	1,170	30,339	20
Wholesale and retail trade	31	144	771,965	2,354,321	148,627	160,779 1.408.427	40,965 365,238	39,349 333,334	219.638	147
Finance, insurance, and real estate	313	1,516	71,763,175	12,338,533	1,223,869	1,400,427	57,174		112,172	68
Services	74	348	3,979,775	1,612,432	230,441	248,230	57,174	35,703	112,172	
Nature of business not allocableinactive	179	644	55,461	_	_	_	_	_	58	
	531	2.660	5.833,160	6.362.369	505.065	674,867	203.035	196.476	148.465	87.
ervices (U.S. Parent)		2,000	0,000,100	0,002,000			,	,		
CFC Industries Agriculture, forestry and fishing	. 9	9	8,183	3,380	- 501		-	_	-	
Mining		**	**	••					506	
Construction	5	28	225,216	248,085	20,363		7,239	7,008	10,645	9
Manufacturing	5 33 10 55 69	136 38 95	443,176		50,904 9,450		7,003	6,544	196	
Transportation and public utilities	10	38	295,782 73,799				7,003	- 1,094	916	
Wholesale and retail trade	55	95 128			2,122 46,734	55,346	3.889	3.582	10.874	8
Finance, insurance, and real estate	69	128	567,579			507,722	175,025	172,348	125,096	68
Services	405	1,793	4,147,931	5,145,352	375,510	J	**		120,000	
Nature of business not allocable Inactive	139	409	64,034	4 <u> </u>		-		-	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
CFC industries			_	_	_		_		_	
Agriculture, forestry and fishing	1 -		=	ı I		I		_	_	
Mining	1 3	17	193,893	226,848	17,818	17.974	6,712	6,485	506	
Mondoth ring	22	32	95.604		599	3,291	56	- 310	-1	
Manufacturing Transportation and public utilities	22 4 17	32 20 32 64	164.988		13,851	17,754	6,122		214	
Wholesate and retail trade	1 17	32	37,499	50,556	3,393	5,669	-11	-11	6,064	4
Finance, insurance, and real estate	I 41	64	217,187	37,906	23,210	27,448	1,609		97,219	49
Services	259	1.230	2,576,076	3,256,632	200,758	287,387	101,798	101,151	70	
Nature of business not allocable			2,001				4	0	107	
Inactive		212	42,861	ı –	I _	· _		I — I		

\*Estimate should be used with caution because of the small number of sample returns on which it was based. \*\*Data deleted to evoid disclosure of information to specific corporations. \*Less than \$500. Nota: Detail may not add to total because of rounding.

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## **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]

	Controlled Foreign Corporations										
Major industry of Controlled Foreign Corporations	Number of U.S.	Number of	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign	Distributions		Selected receipts by foreign corpo- rations from:		
	corporation returns	foreign corporations				taxes (net)	Totai	Out of current earnings and profits	All related persons		
	(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		
Wining	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	10,735,884	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	970,030		
Nanufacturing	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 Chemicals and allied products Petroleum (including integrated) and coal products Machinery except electrical Electrical and electronic equipment	136 290 53 409 309	788 2,417 149 1,253 1,491	13,466,353 40,450,536 32,683,871 15,817,952 32,282,019	26,357,350 56,287,396 71,175,546 20,872,998 44,601,989	1,479,715 4,987,665 5,053,419 1,436,800 4,797,484	520,772 1,923,308 1,679,034 524,225 1,816,831	355,129 1,319,657 1,226,036 340,345 1,761,443	273,630 964,886 1,161,867 253,727 1,126,228	1,327,549 4,605,916 11,461,832 3,806,561 8,628,934		
Transportation and public utilities	336	1,145	21,412,678	18,442,328	980,649	259,358	571,348	239,379	6,088,863		
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 Retail trade	1,308 240	5,782 942	72,053,590 9,264,414	232,838,975 22,476,053	9,889,956 1,028,202	3,114,646 324,398	2,338,275 176,222	1,706,315 132,443	37,144,563 979,879		
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 Insurance carriers Holding and other investment companies, except bank	182 359	673 593	39,661,444 16,940,222	5,262,895 6,202,612	838,743 1,054,382	239,712 71,496	220,835 166,599	99,187 131,855	5, <b>340,335</b> 1,271,367		
holding companies	479	1,170	27,795,528	4,257,834	2,076,270	236,334	1,096,794				
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 nactive	· 195 1,538	456 6,363	276,175 2,210,599	181,164 —	4,153 - 2	2,426 - 2	4,166 15,827	718	58,491 570		

	Controlled Foreign Corporations Continued									
			Sele	ected receipts by	foreign corporation	ns from — Contin	nued			
Major industry of Controlled Foreign Corporations		U.S. corporation	on filling return	×	Ar	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	
	(10)	(11)	. (12)	(13)	(14)	(15)	(16)	(17)	(18)	
Ail 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	31,155,58	
Agriculture, forestry and fishing	971,347	959,076	2,006	9,590	39,730	36,985	348	1,592	69,97	
Mining	1,063,241	670,416	9,673	364,546	591,372	565,287	9,782	5,718	558,94	
Oil and gas extraction	929,613	<ul><li>555,645</li></ul>	8,422	349,323	536,712	514,897	9,766	2,362	467,21	
Construction	120,094	12,474	53,336	42,229	201,448	37,609	145,782	11,499	647,54	
Manufacturing	26,694,700	22,450,168	1,351,532	2,043,615	6,815,766	4,547,632	304,078	1,688,014	13,402,65	
Food and kindred products Chemicals and allied products Petroleum (including integrated) and coal products Machinery except electrical. Electrical and electronic equipment	344,231 1,829,416 6,690,697 1,444,734 4,609,797	200,082 955,514 6,417,461 1,253,318 3,786,489	3,494 62,070 37,767 68,271 679,505	122,660 432,664 209,802 65,833 74,908	120,236 369,921 3,733,206 80,553 1,514,830	101,528 240,113 1,925,552 68,281 1,458,636	23,781 139,512 910	6,131 55,414 1,525,017 5,234 15,782	742,733 2,403,620 970,965 2,194,735 2,482,870	
Fransportation and public utilities	1,813,016	487,488	904,657	134,977	970,918	. 27, 194	553, 150	153,095	2,843,35	
Transportation	1,779,014	478,541	898,820	122,188	956,673	18,692	553,133	153,095	2,582,05	
Wholesale and retail trade	29,318,887	28,007,272	204,603	507,510	4,324,239	3,972,878	70,656	138,411	4,515,03	
Wholesale trade Retail trade	29,042,903 245,437	27,796,001 198,066	190,925 1,753	486,950 18,975	4,056,633 255,808	3,751,877 212,954	63,809 3,895	111,551 26,860	4,004,558 462,282	
Finance, insurance and real estate	4,036,992	291,258	8,574	2,425,060	3,237,948	18,031	· · · · 13,171	2,377,227	7,437,67	
Credit agencies other than banks Insurance carriers Holding and other investment companies, except bank	1,224,630 428,276	1,930 	2,026 827	747,934 40,652	1,424,059 222,261	10	· 33	1,214,553 21,121	3,112,93 615,71	
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	s <b>935,6</b> 81	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	1,180,32	
Nature of business not allocable inactive	18,684	3,170 —	650 	13,629 —	28,511	4	6 	25,000 —	11,265 570	

Footnote at end of table.

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]

	Controlled Foreign Corporations Continued										
	Rec	eipts by Contin	beu	Selected payments by foreign corporations to:							
Major industry of Controlled Foreign Corporations	Any foreig U.S. corpora	n corporation con ation filing return -	trolled by - Continued		U.S. corporation filing return						
Poreign Corporations	Sales of stock in trade	Compensation received for certain services:	received Amounts for certain 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, <b>000,000</b>	13,873		
Mining	47,076	31,879	242,429	1,867,748	1,010,657	72,985	61,162	29,791	615,963		
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 Chemicals and allied products Petroleum (including integrated) and coal products Machinery except electrical Electrical and electronic equipment	303,401 1,099,386 210,735 1,909,469 1,708,631	230,554	621,289 262,566 166,543	1,773,046 8,940,769 20,781,668 4,338,473 11,125,461	1,058,441 4,225,313 10,666,594 3,043,496 7,926,514	636,069 2,319,653 9,612,808 530,337 2,422,886	34,473 221,233 25,087 54,537 139,818	43,860 39,663 21,316 16,787 64,154	212,997 845,972 937,826 233,896 125,618		
Transportation and public utilities	152,083	206,134	2,0 <b>29</b> ,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	1,334,15		
Wholesale trade	1,713,968 280,301	347,022 15,164	1,156,757 111,161	48,459,398 1,632,197		29,271,030 545,295	191,570 28,441	203,266 29,419	1,250,264 63,233		
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	742,31		
Credit agencies other than banks	7,642	558,696 2,415				2,261 6,100	14,855 7,826	4,387,864 284,966	81,30 49,96		
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	566,96		
Services	168,863	782,626	344,115	5,098,014	2,518,240	806,049	227,735	476,558	381,92		
Business services	137,813	636,158	184,390	3,653,643	1,927,385	699,162	124,868	407,700	288,14		
Nature of business not allocable Inactive	1,161	779	2,551	32,178 10,027	15,788 591	11,592	1,046 —	439	1,79 59		

	Controlled Foreign Corporations Continued											
				Selected pays	nents by foreign	corporations to	- Continued					
Major industry of		Any domestic cor	corporation contr poration filing retu	olled by U.S. Im	Any foreign corporation controlled by U.S. corporation filing return							
Controlled Foreign Corporations	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	,	11,032		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 Chemicals and allied products Petroleum (including integrated) and coal	204,984 1,962,085	93,030 1,611,197		23,741 10,347	42,077 115,995	2,716,252		446,024	54,614 522,426	91,798 312,547		
products	6,161,568 226,409 304,768	5,556,833 145,252 206,245	9,222	75,803 1,472 7,072	114,796 58,950 96,912	965,249	76,797 546,763 1,268,551		274,746 154,673 137,586	68,221 43,105 399,159		
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	8,646,286 189,975	7,858,423 65,833		108,707 58,837	488,375 46,360		3,825,373 466,665		892,031 84,775	409,346 32,783		
Finance, insurance and real estate	4,858,523	46,058	30,252	3,578,231	501,718	6,213,650	636,754	116,439	4,331,724	301,355		
Credit agencies other than banks	1,826,848 73,697	416	8,809 1,905	1,495,778 14	76,486 53,763			70,374 10,142	1,427,577 142,680	54,689 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	748,650	51,852	62,418	183,239	1,372,251	219,108	446,823	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 4,884	2,590		110	19 4,884	10,192 4,552	4,685	5 <u>224</u> —	1,249	1,344 4,552		

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