# Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004 

by Mark R. Lowe

The total value of nonloan transactions between large foreign-owned domestic corporations (see Explanation of Terms) and related foreign parties reached $\$ 1$ trillion for the first time in 2004, an increase of over 100 percent from 2002. While the increase between 2002 and 2004 ( $\$ 520$ billion to $\$ 1,134$ billion, respectively) appears dramatic, it brings the average value of nonloan transactions by 1120 parent corporations back in line with the figures from previous years. Sales and purchases of stock in trade represent the bulk of the total value of nonloan transactions, 86 percent, which is consistent with prior years.

The total amounts received (excluding loan balances) rose 163 percent between 2002 and 2004, from $\$ 167$ billion to $\$ 439$ billion, respectively. A similar rise occurred in the total amounts paid. When these amounts are averaged by the number of parent corporations, they appear more in line with previous studies. The average amounts received and paid, however, are at their highest since this study began in 1988 (see Figure A for a comparison of Study Years 1992 through 2004).

The large U.S. companies represented in this study continued to send out more in property, services, and money than they received through transactions with related foreign parties. This net outflow came to $\$ 224$ billion in 2004 compared to $\$ 176$ billion in 2002. A precipitous rise can be seen in net outflows from 1996 to 2004 (with the exception of 2002). Net outflows are the difference between total outflows (total amounts paid plus the net amount loaned) and total inflows (total amounts received plus the net amount borrowed).

There was a modest 5 -percent increase in the number of large foreign parent corporations since 2002, rising from 737 to 774 . The number of related persons increased from 14,515 to 16,565 between 2002 and 2004. (See the sample selection information below for an explanation of the increasing sample size.) For 2004, the 774 large foreign-owned domestic corporations filing Forms 5472 comprised only 1.2 percent of all 25 -percent or more foreign-

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owned domestic corporations but accounted for 77.7 percent of the total assets and 73.6 percent of the total receipts. These large corporations accounted for 10.5 percent of the total assets and 10.1 percent of the total receipts reported by all domestic corporations for 2004. (See Figure D for more data.) These data showed a relative lessening of the importance of these corporations among the total population of domestic corporations. Compared to 2002, the 774 returns in this study experienced an increase in their shares of corporate receipts, assets, income subject to tax, and income tax after credits for all domestic returns.

## Transactions by Industrial Sector

As in prior studies, over three-fourths of the foreignowned domestic corporations with reportable transactions in this study can be classified in three industrial sectors: manufacturing (41 percent); wholesale trade ( 26 percent); and finance and insurance ( 9.3 percent). This same group accounts for 80 percent of the related foreign persons and 95 percent of all nonloan transactions. See Figure B for the number of returns by industry.

While the manufacturing sector had the most related foreign persons $(9,671)$, the finance and insurance sector had more than twice the value of nonloan transactions as manufacturing ( $\$ 559$ billion to $\$ 269$ billion, respectively). The finance and insurance sector had the third most related persons (772). (See Table 1 for statistics by industry of the for-eign-owned domestic corporation.) The number of foreign-owned domestic corporations in the finance and insurance sector declined by 15 percent between 2002 and 2004; however, the total value of nonloan transactions increased by over 400 percent ( $\$ 104.9$ billion to $\$ 559$ billion). While this increase is dramatic, it largely makes up for the 66-percent decline between 2000 and 2002 ( $\$ 309.9$ billion to $\$ 104.9$ billion, respectively). The manufacturing sector edged out wholesale trade for the second largest amount of total nonloan transactions (\$268.7 billion to \$250.1 billion, respectively). Both sectors experienced an increase in these transactions over 2002 (manufacturing by 55 percent and wholesale by 26 percent).

It is important to note that the number of related foreign persons is not necessarily the same as the

# Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004 

Statistics of Income Bulletin | Fall 2008

## Figure A

Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Forms 5472: Selected Items for Selected Tax Years 1992 through 2004

| Item | 1992 | 1993 | 1994 | 1996 | 1998 | 2000 | 2002 | 2004 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) |
| Foreign-owned domestic corporations with total receipts of $\$ 500$ million or more and with Form 5472 [1] Number of returns | 366 | 437 | 444 | 545 | 610 | 612 | 737 | 774 |
| Total assets | 1,317.3 | 1,540.5 | 1,681.6 | 2,125.8 | 2,929.4 | 4,486.1 | 4,712.3 | 6,293.0 |
| Total receipts | 808.0 | 871.4 | 944.6 | 1,175.4 | 1,292.9 | 1,920.8 | 1,851.1 | 2,301.7 |
| Income subject to U.S. tax | 14.5 | 15.7 | 18.5 | 36.2 | 36.4 | 72.7 | 46.4 | 74.9 |
| Total U.S. income tax after credits | 4.1 | 4.9 | 5.8 | 10.2 | 10.8 | 20.2 | 12.1 | 20.4 |
| Transactions between foreign-owned domestic corporations and related foreign persons <br> Number of related foreign persons | 6,708 | 7,662 | 8,540 | 10,316 | 11,379 | 12,276 | 14,515 | 16,565 |
| Amounts received from related foreign persons: Total (excluding loan balances) [2] | 63.1 | 77.1 | 112.3 | 132.5 | 297.9 | 265.3 | 166.7 | 439.0 |
| Sales of stock in trade | 49.0 | 53.1 | 69.4 | 65.8 | 259.4 | 159.2 | 110.3 | 371.4 |
| Sales of tangible property other than stock in trade | 0.7 | 0.5 | 1.1 | 2.8 | 3.3 | 4.7 | 8.2 | 4.7 |
| Consideration for technical, managerial or like services | 3.0 | 3.1 | 3.6 | 4.4 | 10.6 | 10.9 | 12.2 | 14.6 |
| Interest | 1.1 | 1.1 | 1.1 | 1.8 | 2.7 | 4.6 | 4.2 | 6.2 |
| Premiums for insurance or reinsurance | 2.8 | 1.4 | 0.7 | 0.9 | 1.0 | 1.2 | 1.4 | 4.5 |
| Other amounts | 4.7 | 15.7 | 33.6 | 53.3 | 17.0 | 79.7 | 20.9 | 26.5 |
| Amounts borrowed, ending balance | 67.9 | 88.6 | 87.9 | 134.2 | 206.5 | 418.2 | 498.8 | 679.4 |
| Amounts paid to related foreign persons: Total (excluding loan balances) [2] | 139.2 | 185.3 | 220.0 | 212.3 | 398.9 | 480.2 | 353.6 | 695.2 |
| Purchases of stock in trade | 120.8 | 153.4 | 177.9 | 178.0 | 348.7 | 347.0 | 278.2 | 608.2 |
| Purchases of tangible property other than stock in trade | 2.6 | 3.9 | 2.7 | 3.9 | 5.3 | 7.4 | 2.4 | 6.8 |
| Consideration for technical, managerial or like services | 2.1 | 2.5 | 3.4 | 4.4 | 6.5 | 8.5 | 7.3 | 8.7 |
| Interest | 5.4 | 5.7 | 6.2 | 8.8 | 14.5 | 26.1 | 24.6 | 26.0 |
| Premiums for insurance or reinsurance | 3.1 | 1.7 | 1.8 | 1.8 | 1.8 | 2.0 | 14.0 | 13.8 |
| Other amounts | 3.4 | 15.5 | 23.2 | 9.6 | 15.0 | 81.1 | 15.0 | 15.2 |
| Amounts loaned, ending balance | 19.2 | 24.0 | 28.4 | 30.4 | 55.8 | 97.0 | 189.1 | 307.3 |

[1] Includes data for a few foreign life insurance companies filing Form 1120L. See footnote 4 at the end of this article.
[2] Includes items not shown separately.
NOTE: Detail may not add to totals because of rounding.
number of transactions. A related foreign person may have had multiple transactions with a foreignowned domestic corporation during an accounting period included in this study. The number of transactions was not available for this study.

## Transactions with Whom?

Nearly 80 percent of the total nonloan transactions come from related persons in just five countries. In descending order of total nonloan transactions, the five countries are: the United Kingdom, Japan, Canada, Germany, and Switzerland. This group of five was the same in 2002, with the exception that the United Kingdom was second to Japan. As the country with the most transactions, the UK alone
accounted for 48.8 percent of the total amount of transactions. Figure C shows a chart of countries and their percentages of contribution to total transactions. This figure only includes the 12 countries with at least 1 percent of the total value of transactions. Table 3 shows transactions by industry and country of related party. For the UK, over 95 percent of the value of total transactions comes from the finance and insurance industry.

Domestic corporations reporting transactions with related persons from four of the five countries mentioned above paid out more in transactions than they received (meaning that there was a net outflow of money during 2004 from the domestic corporations to the related persons from these particular

# Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004 

Statistics of Income Bulletin | Fall 2008

## Figure B

Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Forms 5472: Number of Returns, by NAICS Industrial Sector of Domestic Corporation, Tax Year 2004

[1] "Administrative and support and waste management and remediation services"
NOTE: NAICS is the abbreviation for the North American Industry Classification System. Not shown to avoid disclosure of information about specific corporations are the NAICS industrial sectors, "Arts, entertainment, and recreation;" "Agriculture, forestry, fishing, and hunting;" and, "Other services (except Public Administration)."
countries). (See Explanation of Selected Terms for more information.) Additionally, 80 percent of the 60 selected countries and regions shown in Table 2 had net outflows.

The largest net outflow of transactions was between domestic corporations and related persons resident and doing business in Japan, which were paid $\$ 103.5$ billion more than U.S. corporations transacting with them received. The largest net inflow of money came from Switzerland, where U.S. corporations received $\$ 35$ billion more than was paid to the foreign persons transacting with them. The industry with the largest net outflow of transactions was wholesale trade, with $\$ 153$ billion more in transactions paid out than received. The largest net inflow ( $\$ 22.8$ billion) came to U.S. domestic corporations in the finance and insurance sector.

## Study History and Inclusion Criteria

This study covers transactions between reporting corporations and foreign related persons. A reporting corporation is defined as either a domestic corporations that is 25 percent or more owned by a single foreign person or a foreign corporation engaged in a U.S. trade or business (i.e., a U.S. branch of a foreign corporation). More than 99 percent of the reporting corporations included in this study are companies incorporated in the United States. These corporations must report transactions made with each foreign related party during the taxable year. ${ }^{1}$

Foreign related persons include any direct or indirect 25-percent foreign shareholder as well as any foreign person related to either the reporting corporation or a 25 -percent foreign shareholder as defined by the Internal Revenue Code. ${ }^{2}$ The

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# Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004 

Statistics of Income Bulletin | Fall 2008

## Figure C

Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons: Total Value of Non-loan Transactions by Country of Selected Related Foreign Persons


## Figure D

Foreign-Owned and Other Domestic Corporations, Tax Year 2004
[Money amounts are in billions of dollars]

| Item | All domestic corporations | 25 percent or more foreign-owned domestic corporations [1] |  | 25 percent or more foreign-owned domestic corporations with total receipts of $\$ 500$ million or more and with Form 5472 as a percentage of: |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Total | With total receipts of $\$ 500$ million or more and with Form 5472 | All domestic corporations | 25 percent or more foreign-owned domestic corporations [1] |
|  | (1) | (2) | (3) | (4) | (5) |
| Number of returns | 5,557,965 | 62,706 | 774 | 0.01 | 1.23 |
| Total assets | 60,117.8 | 8,094.8 | 6,293.0 | 10.47 | 77.74 |
| Total receipts | 22,711.9 | 3,127.9 | 2,301.7 | 10.13 | 73.59 |
| Income subject to U.S. tax | 857.4 | 108.5 | 74.9 | 8.74 | 69.03 |
| Total U.S. income tax after credits | 224.4 | 31.0 | 20.4 | 9.09 | 65.81 |

[1] Includes data for a few foreign life insurance corporations filing Form 1120-L. See footnote 4 at the end of this article.
transactions are reported on Form 5472, Information Return of a 25-Percent Foreign-Owned U.S. Corporation or a Foreign Corporation Engaged in a U.S. Trade or Business. A consolidated corporate tax return can and frequently does include multiple Forms 5472, ranging in 2004 from 1 to 1,875. Data
in this study are not published by individual reporting corporations but instead are published by either the corporation on whose Form 1120 tax return the Form 5472 was filed or by the country of the foreign related person (or both) (see Tables 1, 2, and 3).

Statistics of Income conducted this study annually beginning in 1988, then biennially since

# Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004 

Statistics of Income Bulletin<br>Fall 2008

1994.3,4 For inclusion in this study, a corporation must report $\$ 500$ million or more in total receipts and have filed a Form 5472. In 2004, a domestic corporation was required to file a Form 5472 if it was at least 25-percent foreign owned and engaged in transactions with at least one foreign related party. The Internal Revenue Code subjects each reporting corporation to a fine of $\$ 10,000$ for each related party failing to file all reportable transactions on Form $5472 .{ }^{5}$

Congress, concerned that related party transactions could be manipulated to avoid U.S. taxation, added reporting requirements to corporations so that they provide the Internal Revenue Service with more information about the nature and amount of these transactions. This led the IRS to publish and distribute Form 5472. ${ }^{6}$ This new form was attached to corporation income tax returns for tax years beginning after December 31, 1983. The data in this study are of particular interest because they cover transactions between U.S. and foreign companies where an armslength relationship cannot be assumed.

## Sample Selection, Data Sources, and Limitations

The corporation Statistics of Income study is based on a sample of over 145,000 corporate income tax returns chosen from 5.98 million returns, which companies filed for Tax Year 2004, i.e., accounting periods ending July 2004 through June 2005. These returns were selected after completion of administrative processing, but before the start of any audit examinations. ${ }^{7}$ From the sample, only those returns of domestic corporations reporting total receipts of $\$ 500$ million or more and with attached Forms 5472
were selected for this study. Returns, however, with at least one Form 5472 attached and selected in previous studies were included in these statistics, even if the corporation fell below the $\$ 500$-million receipts threshold. Foreign corporations (filing Form 1120F) engaged in a U.S. trade or business were not included in these statistics, even though the corporation may have filed Forms 5472 for transactions with related foreign persons. ${ }^{8}$ Because corporation income tax returns with total receipts of $\$ 500$ million or more are sampled at the 100-percent rate, the data in this study are not subject to sampling variability, though possibly subject to nonsampling error.

The industry code used to classify returns for Figure B and Tables 1 and 3 represents the principal business activity of the corporation filing the tax return (i.e., the activity that accounted for the largest portion of total receipts as reported in the corporation's income statement. ${ }^{9}$ However, a given return may refer to a company engaged in several business activities or an affiliated group of corporations that conducted different business activities (consolidated return filing). To the extent that some consolidated (and nonconsolidated) returns were engaged in more than one type of business activity, transaction data in this article are not entirely related to the industrial activity under which they are shown.

## Explanation of Selected Terms

Amounts borrowed and loaned-Because the beginning and ending balances, in general, reflect only the amounts outstanding at the beginning and end of the accounting period, respectively, these amounts do not reflect amounts borrowed and loaned in transactions that took place entirely within the accounting period.

[^1]
# Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004 

Statistics of Income Bulletin | Fall 2008

Country of residence of a related person-Based on the income tax regulations related to Internal Revenue Code section 6038A, Form 5472 requires the reporting of each country in which a related person files an income tax return as a resident under the tax laws of that country. The statistics in Tables 2 and 3 are based on this reported residence, and, within this meaning, the related foreign person is a resident of a particular foreign country.

Foreign-owned domestic corporations-For purposes of these statistics, a domestic corporation was considered foreign-owned if at least 25 percent of the total voting power of all classes of stock permitted to vote, or 25 percent of the total value of all classes of stock of the corporation, was owned, directly or indirectly, at any time in the tax year, by a single foreign shareholder (generally a foreign parent corporation). This is in contrast to the other Statistics of Income data on "foreign-controlled" domestic corporations, which are based on 50-percent or more ownership by a foreign person. ${ }^{10}$

Foreign person-The term "foreign person" generally includes: (1) any partnership, association, company, or corporation that was not created or organized under the laws of the United States or of any of its States; (2) any individual who is not a citizen or resident of the United States; (3) any individual who is a citizen of a U.S. possession, but is not otherwise a U.S. citizen or resident; and (4) any foreign trust, estate, or government. For the most part, the foreign persons referred to in this article are corporations. See also "Related Foreign Person," below.

Number of foreign persons-The data shown in the figures and tables, in general, represent the number of foreign persons reported on the Forms 5472 appended to the 774 income tax returns filed by domestic corporations with $\$ 500$ million or more in total receipts (defined below) that were 25-percent-ormore owned by a foreign person. Domestic member corporations of an affiliated group that filed a consolidated income tax return could also join in filing a consolidated Form 5472 for transactions with a given related foreign person. However, some affiliated domestic corporations that could have filed consolidated Forms 5472 filed separate forms instead. When these forms were identified during statistical processing, the information on them was combined, and the
result treated as a single Form 5472 for consistency. To this extent, the "number of persons" understates the actual number of Forms 5472 attached to the 774 income tax returns included in the statistics.

OPEC countries-Summary statistics are provided in Table 2 for the following Middle Eastern countries that were members of the Organization of Petroleum Exporting Countries (OPEC) for 2002: Iran, Iraq, Kuwait, Qatar, Saudi Arabia, and the United Arab Emirates. Data for non-Middle Eastern OPEC members are not shown by country.

Related foreign person-Persons related to the domestic corporation that filed a Form 5472 include the 25 -percent-or-more foreign shareholder, any foreign person who was related to the reporting corporation or the 25 -percent-or-more shareholder (as described in Internal Revenue Code sections 267(b) or 707(b)), or any other foreign person who was related to the reporting corporation within the meaning of Internal Revenue Code section 482 (covering the allocation of income and deductions among related taxpayers) and the associated regulations. See also "Foreign Person," above, for the definition of "person."

Total nonloan transactions-A term used in the article for the total value of transactions paid to or received from a foreign related person, excluding the net borrowed or loaned amount.

Total receipts-Total receipts are the total income of the domestic corporation as reported in the U.S. income tax return. In general, they are derived from the tax return as follows: (1) gross taxable receipts (before deduction of cost of sales and operations, and ordinary and necessary business expenses), plus (2) tax-exempt interest received from State and local government obligations, less (1) net losses from sales of property other than capital assets and (2) certain taxable income from related foreign corporations only constructively received.

Net outflows/inflows-The flow of transactions can be calculated by adding back net loaned amounts to amounts paid and net borrowed amounts to total received. The difference between this computed total received and total paid is the net flow of transactions. A negative amount indicates more money was paid out by the U.S. domestic corporations to related foreign parties than was received from them (net outflow); a positive amount is a net inflow.

[^2]
# Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004 

Statistics of Income Bulletin | Fall 2008

Table 1. Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Forms 5472: Transactions Between Corporations and Related Foreign Persons, by NAICS Industrial Sector of Domestic Corporation, 2004


[^3]
## Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004

Statistics of Income Bulletin | Fall 2008

Table 1. Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Forms 5472: Transactions Between Corporations and Related Foreign Persons, by NAICS Industrial Sector of Domestic Corporation, 2004-Continued
[Money amounts are in thousands of dollars]

| Industrial sector | Transactions between foreign-owned domestic corporations and related foreign persons |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | Number of related foreign persons | Amounts received from related foreign persons |  |  |  |
|  |  | Total (excluding loan balances) | Sales of stock in trade | Sales of tangible property other than stock in trade | Rents and royalties |
|  | (6) | (7) | (8) | (9) | (10) |
| All industries | 16,565 | 439,038,479 | 371,445,143 | 4,724,233 | 1,430,815 |
| Agriculture, forestry, fishing, and hunting | d | d | d | d | d |
| Mining | 408 | 5,044,606 | 4,046,447 | 83,431 | 92,681 |
| Utilities | 44 | 569,638 | 349,205 | 0 | 250 |
| Construction | 300 | 349,970 | 190,783 | 13,744 | 85 |
| Manufacturing | 9,671 | 75,935,007 | 58,118,172 | 862,884 | 906,449 |
| Wholesale trade | 2,744 | 48,376,166 | 37,109,300 | 1,368,780 | 307,111 |
| Retail trade | 222 | 962,274 | 272,304 | 0 | 9,826 |
| Transportation and warehousing | 612 | 6,615,598 | 262,964 | 6,924 | 71,311 |
| Information | 656 | 2,236,277 | 314,937 | 18,358 | 11,919 |
| Finance and insurance | 772 | 291,535,515 | 270,143,708 | 0 | 24,336 |
| Real estate and rental and leasing | 113 | 568,172 | 134,587 | 1,270 | 0 |
| Professional, scientific, and technical services | 597 | 996,218 | 155,903 | 2,736 | 0 |
| Management of companies and enterprises | 168 | 2,668,060 | 77,799 | 0 | 3,149 |
| Administrative and support and waste management and remediation services | 83 | 2,800,328 | 86,991 | 2,366,106 | 0 |
| Health care and social assistance | 30 | 119,855 | 119,855 | 0 | 0 |
| Arts, entertainment, and recreation | d | d | d | d | d |
| Accommodation and food services | 134 | 253,789 | 61,848 | 0 | 3,699 |
| Other services | d | d | d | d | d |

Footnotes at end of table.

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Statistics of Income Bulletin | Fall 2008

Table 1. Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Forms 5472: Transactions Between Corporations and Related Foreign Persons, by NAICS Industrial Sector of Domestic Corporation, 2004-Continued
[Money amounts are in thousands of dollars]

| Industrial sector | Transactions between foreign-owned domestic corporations and related foreign persons-continued |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | Amounts received from related foreign persons-continued |  |  |  |  |
|  | Sales, leases, and licenses of intangible property rights | Consideration for technical, managerial, or like services | Commissions | Interest | Premiums for insurance or reinsurance |
|  | (11) | (12) | (13) | (14) | (15) |
| All industries | 1,717,863 | 14,592,991 | 7,992,736 | 6,169,075 | 4,462,034 |
| Agriculture, forestry, fishing, and hunting | d | d | d | d | d |
| Mining | 658 | 489,083 | 252 | 57,156 | 45,408 |
| Utilities | 0 | 9,003 | 0 | 49,263 | 0 |
| Construction | 6,157 | 109,995 | 724 | 13,971 | 2,220 |
| Manufacturing | 879,649 | 5,263,063 | 261,368 | 1,417,727 | 6,188 |
| Wholesale trade | 339,538 | 5,588,603 | 430,027 | 366,072 | 9,002 |
| Retail trade | 284 | 223,267 | 3,610 | 17,025 | 174,415 |
| Transportation and warehousing | 296,910 | 291,488 | 2,510,500 | 3,225 | 654 |
| Information | 150,147 | 731,502 | 62,169 | 235,853 | 5,412 |
| Finance and insurance | 384 | 911,955 | 4,634,056 | 3,523,136 | 4,218,735 |
| Real estate and rental and leasing | 0 | 63,836 | 600 | 95,200 | 0 |
| Professional, scientific, and technical services | 590 | 757,657 | 2,325 | 71,452 | 0 |
| Management of companies and enterprises | 0 | 54,774 | 84,956 | 258,697 | 0 |
| Administrative and support and waste management and remediation services | 419 | 39,705 | 2,150 | 2,838 | [1] |
| Health care and social assistance | 0 | 0 | 0 | 0 | 0 |
| Arts, entertainment, and recreation | d | d | d | d | d |
| Accommodation and food services | 43,128 | 53,414 | 0 | 57,460 | 0 |
| Other services | d | d | d | d | d |

[^4]
## Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004

Statistics of Income Bulletin | Fall 2008

Table 1. Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Forms 5472: Transactions Between Corporations and Related Foreign Persons, by NAICS Industrial Sector of Domestic Corporation, 2004-Continued

| Industrial sector | Transactions between foreign-owned domestic corporations and related foreign persons-continued |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | Amounts received from related foreign persons-continued |  |  | Amounts paid to related foreign persons |  |
|  | Other | Amounts borrowed |  |  |  |
|  |  | Beginning balance | Ending balance | Total (excluding loan balances) | Purchases of stock in trade |
|  | (16) | (17) | (18) | (19) | (20) |
|  | 26,503,590 | 503,994,226 | 679,401,133 | 695,175,300 | 608,203,199 |
| Agriculture, forestry, fishing, and hunting | d | d | d | d | d |
| Mining | 229,490 | 9,178,781 | 5,424,427 | 5,576,482 | 4,275,372 |
| Utilities | 161,917 | 13,534,372 | 16,244,585 | 2,602,305 | 298,504 |
| Construction | 12,291 | 516,381 | 806,806 | 742,977 | 432,978 |
| Manufacturing | 8,219,507 | 101,371,222 | 151,008,634 | 192,769,719 | 165,939,175 |
| Wholesale trade | 2,857,734 | 22,182,854 | 25,134,341 | 201,763,544 | 188,571,589 |
| Retail trade | 261,541 | 11,230,247 | 10,249,130 | 4,735,385 | 3,308,054 |
| Transportation and warehousing | 3,171,624 | 7,210,634 | 7,373,332 | 5,096,395 | 109,768 |
| Information | 705,980 | 46,269,270 | 45,357,015 | 5,820,299 | 1,898,383 |
| Finance and insurance | 8,079,204 | 242,050,934 | 350,223,322 | 267,494,055 | 240,635,418 |
| Real estate and rental and leasing | 272,679 | 12,621,280 | 10,157,101 | 711,683 | 329,506 |
| Professional, scientific, and technical services | 5,556 | 5,930,677 | 5,729,137 | 4,478,364 | 2,080,413 |
| Management of companies and enterprises | 2,188,685 | 13,515,548 | 32,361,406 | 1,526,982 | 178,429 |
| Administrative and support and waste |  |  |  |  |  |
| management and remediation services | 302,119 | 9,687,103 | 10,962,064 | 902,119 | 13,146 |
| Health care and social assistance | 0 | 1,770,405 | 1,674,491 | 270,901 | 116,324 |
| Arts, entertainment, and recreation | d | d | d | d | d |
| Accommodation and food services | 34,239 | 6,226,950 | 6,096,968 | 573,968 | 0 |
| Other services | d | d | d | d | d |

[^5]
# Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004 

Statistics of Income Bulletin | Fall 2008

Table 1. Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Forms 5472: Transactions Between Corporations and Related Foreign Persons, by NAICS Industrial Sector of Domestic Corporation, 2004-Continued
[Money amounts are in thousands of dollars]

| Industrial sector | Transactions between foreign-owned domestic corporations and related foreign persons-continued |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | Amounts paid to related foreign persons-continued |  |  |  |  |
|  | Purchases of tangible property other than stock in trade | Rents and royalties | Purchases, leases, and licenses of intangible property rights | Consideration for technical, managerial, or like services | Commissions |
|  | (21) | (22) | (23) | (24) | (25) |
| All industries | 6,801,008 | 7,687,864 | 5,201,419 | 8,654,370 | 3,699,590 |
| Agriculture, forestry, fishing, and hunting | d | d | d | d | d |
| Mining | 62,512 | 134,115 | 0 | 377,649 | 5,683 |
| Utilities | 0 | 0 | 1 | 56,196 | 0 |
| Construction | 16,986 | 526 | 30,933 | 140,723 | 336 |
| Manufacturing | 2,035,574 | 4,021,623 | 3,010,670 | 4,237,464 | 272,362 |
| Wholesale trade | 4,567,866 | 2,875,412 | 863,449 | 1,287,680 | 114,442 |
| Retail trade | 489 | 14,451 | 10 | 170,461 | 52,240 |
| Transportation and warehousing | 16,056 | 115,702 | 5,720 | 344,159 | 2,688,381 |
| Information | 110 | 228,426 | 255,155 | 121,694 | 96,738 |
| Finance and insurance | 46,155 | 143,458 | 36,930 | 697,681 | 368,749 |
| Real estate and rental and leasing | 17,521 | 73 | 0 | 9,556 | 242 |
| Professional, scientific, and technical services | 37,739 | 200 | 910,730 | 860,296 | 58,560 |
| Management of companies and enterprises | 0 | 798 | 33 | 74,602 | 41,858 |
| Administrative and support and waste management and remediation services | 0 | 131,234 | 63,184 | 35,300 | 0 |
| Health care and social assistance | 0 | 3,000 | 0 | 0 | 0 |
| Arts, entertainment, and recreation | d | d | d | d | d |
| Accommodation and food services | 0 | 18,845 | 24,605 | 240,908 | 0 |
| Other services | d | d | d | d | d |

[^6]
## Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004

Statistics of Income Bulletin | Fall 2008

Table 1. Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Forms 5472: Transactions Between Corporations and Related Foreign Persons, by NAICS Industrial Sector of Domestic Corporation, 2004-Continued
[Money amounts are in thousands of dollars]

| Industrial sector | Transactions between foreign-owned domestic corporations and related foreign persons-continued |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | Amounts paid to related foreign persons-continued |  |  | Amounts loaned |  |
|  | Interest | Premiums for insurance or reinsurance | Other | Beginning balance | Ending balance |
|  | (26) | (27) | (28) | (29) | (30) |
| All Industries | 26,000,543 | 13,755,679 | 15,171,630 | 164,062,547 | 307,259,008 |
| Agriculture, forestry, fishing, and hunting | d | d | d | d | d |
| Mining | 405,820 | 3,387 | 311,944 | 1,413,598 | 1,434,306 |
| Utilities | 938,723 | 20,506 | 1,288,375 | 1,581,728 | 4,484,999 |
| Construction | 49,807 | 558 | 70,129 | 375,605 | 884,503 |
| Manufacturing | 8,510,503 | 585,235 | 4,157,114 | 37,387,292 | 52,366,057 |
| Wholesale trade | 1,051,942 | 41,348 | 2,389,817 | 5,423,746 | 8,081,500 |
| Retail trade | 702,154 | 361,538 | 125,989 | 1,472,304 | 1,743,197 |
| Transportation and warehousing | 360,475 | 39,851 | 1,416,282 | 1,495,531 | 2,042,841 |
| Information | 2,784,610 | 2,894 | 432,288 | 4,503,815 | 7,682,849 |
| Finance and insurance | 8,466,672 | 12,595,009 | 4,503,983 | 91,959,744 | 201,336,043 |
| Real estate and rental and leasing | 353,010 | 374 | 1,401 | 2,125,942 | 1,952,921 |
| Professional, scientific, and technical services | 477,262 | 5,909 | 47,254 | 3,902,277 | 4,414,402 |
| Management of companies and enterprises | 945,637 | 833 | 284,792 | 9,801,113 | 17,139,765 |
| Administrative and support and waste management and remediation services | 530,928 | 69,435 | 58,892 | 175,884 | 385,940 |
| Health care and social assistance | 133,476 | 18,102 | 0 | 1,524,155 | 1,685,155 |
| Arts, entertainment, and recreation | d | d | d | d | d |
| Accommodation and food services | 213,425 | 0 | 76,186 | 918,952 | 1,620,134 |
| Other services | d | d | d | d | d |

[^7][1] Amounts less than $\$ 500$.
NOTE: Detail may not add to totals because of rounding

# Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004 

Statistics of Income Bulletin | Fall 2008

## Table 2. Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Forms 5472: Transaction Between Corporations and Related Foreign Persons, by Selected Country of Residence of Related Foreign Person, 2004

| Residence of related foreign person [1] | Number <br> of <br> related <br> foreign <br> persons | Transactions between foreign-owned domestic corporations and related foreign persons |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Amounts received from related foreign persons |  |  |  |  |  |  |  |
|  |  | Total (excluding Ioan balances) | Sales of stock in trade | Sales <br> of tangible property other than stock in trade | Rents and royalties | Sales, leases, and licenses of intangible property rights | Consideration for technical, managerial, or like services | Commissions | Interest |
| All geographic areas, total | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) |
|  | 16,565 | 439,038,479 | 371,445,143 | 4,724,233 | 1,430,815 | 1,717,863 | 14,592,991 | 7,992,736 | 6,169,075 |
| Canada | 896 | 29,560,117 | 24,288,460 | 112,054 | 132,750 | 6,724 | 1,386,791 | 125,423 | 187,576 |
| Latin America, total | 2,224 | 17,837,594 | 12,999,498 | 86,219 | 88,132 | 22,242 | 866,486 | 34,044 | 147,585 |
| Argentina | 211 | 277,816 | 226,477 | 382 | 1,945 | 1,654 | 6,877 | 3,154 | 19,838 |
| Brazil | 462 | 1,292,325 | 1,145,202 | 15,331 | 7,943 | 1,744 | 56,721 | 4,613 | 16,646 |
| Mexico | 592 | 9,624,742 | 8,591,512 | 43,438 | 35,261 | 15,334 | 653,811 | 13,545 | 31,105 |
| Panama | 86 | 1,479,948 | 1,256,779 | 14,942 | 17 | 1,244 | 49,721 | 8,000 | 1,767 |
| Venezuela | 112 | 314,899 | 272,704 | 1,602 | 490 | 187 | 8,617 | 54 | 599 |
| Other Western Hemisphere, total | 241 | 3,050,730 | 405,871 | 26,933 | 1,298 | 8,004 | 439,558 | 231,451 | 142,239 |
| Bermuda | 128 | 2,072,275 | 52,502 | 90 | 3 | 0 | 126,874 | 231,219 | 61,696 |
| Europe, total | 8,114 | 352,750,514 | 307,230,059 | 3,024,351 | 1,024,032 | 1,504,148 | 8,935,198 | 5,817,191 | 5,391,763 |
| Belgium | 341 | 1,970,732 | 879,720 | 268,818 | 3,456 | 11,111 | 54,343 | 10,826 | 374,608 |
| Finland | 161 | 836,253 | 120,258 | 816 | 3,617 | 5,964 | 678,069 | 6,110 | 7,245 |
| France | 1,016 | 4,907,501 | 1,994,274 | 7,368 | 22,360 | 84,166 | 775,272 | 597,603 | 551,253 |
| Germany | 1,235 | 19,728,894 | 14,382,219 | 16,146 | 108,073 | 200,142 | 1,902,733 | 425,759 | 168,015 |
| Hungary | 137 | 2,165,801 | 21,644 | 222 | 2,203 | 78,109 | 5,616 | [2] | 867 |
| Ireland | 235 | 8,301,232 | 682,721 | 2,505 | 43,146 | 33,419 | 945,066 | 1,903,815 | 115,047 |
| Italy | 366 | 1,363,741 | 1,227,712 | 9,242 | 2,423 | 9,220 | 35,045 | 6,429 | 47,506 |
| Netherlands | 699 | 5,056,292 | 2,781,747 | 41,231 | 85,682 | 357,001 | 804,814 | 17,800 | 165,240 |
| Spain | 327 | 414,121 | 364,598 | 1,975 | 3,207 | 1,899 | 12,373 | 2,123 | 2,392 |
| Sweden | 407 | 2,885,758 | 1,914,954 | [1] | 4,082 | 46,155 | 508,996 | 2,685 | 19,674 |
| Switzerland | 423 | 15,071,518 | 5,058,262 | 2,369,362 | 600,864 | 412,386 | 1,401,400 | 1,165,501 | 1,239,876 |
| United Kingdom | 1,623 | 286,764,037 | 277,030,370 | 34,676 | 103,599 | 115,850 | 1,570,496 | 426,292 | 2,421,497 |
| Africa, total | 337 | 477,066 | 401,422 | 2,028 | 21,474 | 10,526 | 26,080 | 455 | 183 |
| South Africa | 196 | 334,116 | 292,752 | 604 | 6,103 | 10,443 | 12,066 | 89 | 0 |
| Asia, total | 3,995 | 32,606,283 | 24,076,872 | 1,426,937 | 118,776 | 151,003 | 2,764,622 | 1,774,735 | 163,200 |
| China | 529 | 1,504,931 | 1,405,365 | 33,188 | 4,023 | 4,828 | 33,962 | 7,817 | 48 |
| Hong Kong | 339 | 838,723 | 687,386 | 743 | 2,722 | 3,071 | 29,734 | 34,091 | 14,958 |
| Indonesia | 142 | 96,507 | 77,113 | 1,952 | 722 | 661 | 5,262 | 187 | 327 |
| Japan | 957 | 18,621,984 | 14,390,637 | 106,777 | 70,915 | 131,105 | 1,720,874 | 426,241 | 140,584 |
| Middle East countries (except OPEO | 79 | 174,177 | 80,020 | 10,397 | 7 | 771 | 4,723 | 1,868 | 47 |
| OPEC countries (excluding Indonesi | 115 | 466,775 | 404,709 | 1,638 | 683 | 3,005 | 23,166 | 61 | 3,453 |
| Singapore | 469 | 5,913,262 | 3,755,520 | 23,752 | 7,309 | 3,943 | 591,131 | 1,296,968 |  |
| South Korea | 260 | 2,997,245 | 1,505,901 | 1,206,851 | 7,521 | 1,534 | 257,752 | 4,062 | 3,273 |
| Taiwan | 255 | 442,845 | 390,715 | 9,872 | 1,960 | 610 | 26,962 | 616 | 18 |
| Oceania, total | 682 | 2,125,663 | 1,542,776 | 39,569 | 34,518 | 15,217 | 98,019 | 7,835 | 135,374 |
| Australia | 519 | 1,775,735 | 1,251,897 | 3,921 | 34,098 | 13,681 | 93,815 | 7,791 | 135,374 |
| Puerto Rico and U.S. Possessions | 74 | 630,513 | 500,185 | 6,142 | 9,835 | 0 | 76,238 | 1,600 | 1,155 |

Footnotes at the end of table

## Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004

Statistics of Income Bulletin | Fall 2008

Table 2. Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Forms 5472: Transactions Between Corporations and Related Foreign Persons, by Selected Country of Residence of Related Foreign Person, 2004-Continued

| [Money amounts are in thousands of dollars] |
| :--- |

[^8]
# Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004 

Statistics of Income Bulletin | Fall 2008

Table 2. Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Forms 5472: Transactions Between Corporations and Related Foreign Persons, by Selected Country of Residence of Related Foreign Person, 2004—Continued

| Residence of related foreign person [1] | Transactions between foreign-owned domestic corporations and related foreign persons-continued |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Amounts paid to related foreign persons-continued |  |  |  |  |  | Amounts loaned |  |
|  | Purchases, leases, and licenses of intangible property rights | Consideration for technical, managerial, or like services | Commissions | Interest | Premiums for insurance <br> or reinsurance | Other | Beginning balance | Ending balance |
|  | (18) | (19) | (20) | (21) | (22) | (23) | (24) | (25) |
| All geographic areas, total | 5,201,419 | 8,654,370 | 3,699,590 | 26,000,543 | 13,755,679 | 15,171,630 | 164,062,547 | 307,259,008 |
| Canada | 86,026 | 1,346,229 | 165,267 | 379,656 | 121,865 | 1,555,401 | 5,731,176 | 10,827,248 |
| Latin America, total | 23,467 | 346,896 | 39,773 | 683,798 | 907,851 | 615,688 | 2,107,358 | 3,407,015 |
| Argentina | 130 | 30,994 | 3,227 | 633 | 0 | 14,086 | 19,546 | 25,313 |
| Brazil | 3,926 | 31,661 | 7,826 | 1,395 | 1,341 | 31,979 | 201,515 | 238,734 |
| Mexico | 19,169 | 198,646 | 16,997 | 33,612 | 13,204 | 153,652 | 831,125 | 1,208,487 |
| Panama | 0 | 1,294 | 3,390 | 618 | 0 | 61,467 | 25,933 | 48,858 |
| Venezuela | 0 | 675 | 1,100 | 144 | 25 | 177,243 | 18,386 | 16,553 |
| Other Western Hemisphere, total | 6,317 | 172,040 | 155,670 | 140,567 | 1,764,713 | 437,167 | 3,381,401 | 4,520,451 |
| Bermuda | 0 | 8,799 | 155,366 | 134,761 | 1,452,944 | 372,709 | 1,589,990 | 2,563,588 |
| Europe, total | 3,127,551 | 5,546,148 | 478,999 | 24,388,830 | 10,937,137 | 11,020,918 | 147,949,817 | 276,023,714 |
| Belgium | 1,271 | 67,608 | 13,731 | 590,862 | 3,549 | 128,781 | 4,017,568 | 51,318,586 |
| Finland | 6,468 | 43,859 | 2,177 | 36,847 | 48 | 5,925 | 35,578 | 582,483 |
| France | 427,627 | 1,144,024 | 128,339 | 1,333,068 | 59,177 | 1,120,912 | 12,368,798 | 9,787,326 |
| Germany | 1,007,770 | 432,581 | 34,320 | 1,336,046 | 1,329,700 | 1,501,829 | 2,587,574 | 6,725,939 |
| Hungary | 1 | 9,736 | 40 | 1,279,326 | 0 | 44,699 | 726 | 14,330 |
| Ireland | 13,848 | 61,570 | 7,943 | 660,310 | 2,790,108 | 981,580 | 3,527,755 | 2,484,591 |
| Italy | 1,259 | 48,228 | 8,529 | 6,067 | 4,049 | 59,730 | 851,942 | 855,935 |
| Netherlands | 127,048 | 459,228 | 97,931 | 3,157,313 | 10,395 | 1,559,209 | 6,763,557 | 8,260,761 |
| Spain | 1,157 | 31,660 | 2,375 | 2 | 1,272 | 17,269 | 49,277 | 37,572 |
| Sweden | 13,660 | 159,175 | 20,199 | 316,249 | 4,943 | 324,081 | 1,744,917 | 2,341,051 |
| Switzerland | 1,276,684 | 871,696 | 39,864 | 6,381,108 | 5,699,202 | 1,012,464 | 39,168,733 | 52,030,460 |
| United Kingdom | 239,312 | 2,024,699 | 117,097 | 6,865,689 | 986,087 | 3,527,218 | 72,739,342 | 134,471,561 |
| Africa, total | 3,462 | 20,435 | 6,898 | 7,416 | 137 | 5,755 | 5,691 | 25,340 |
| South Africa | 12 | 13,004 | 6,363 | 36 | 0 | 3,465 | 1,084 | 1,802 |
| Asia, total | 1,953,389 | 1,105,646 | 2,842,659 | 156,846 | 18,227 | 1,248,763 | 4,068,318 | 9,628,340 |
| China | 0 | 9,996 | 6,042 | 3 | 0 | 66,437 | 24,967 | 27,460 |
| Hong Kong | 38 | 73,948 | 64,711 | 36,627 | 137 | 168,075 | 888,060 | 5,359,375 |
| Indonesia | 0 | 8,162 | 474 | 0 | 1 | 4,133 | 7,064 | 1,486 |
| Japan | 1,374,857 | 518,842 | 114,731 | 89,050 | 6,847 | 679,778 | 2,694,253 | 3,758,052 |
| Middle East countries (except OPEC) | 11,078 | 94,635 | 344 | 4,665 | 11,087 | 115,753 | 64,024 | 49,888 |
| OPEC countries (excluding Indonesia) | 44 | 5,990 | 950 | 0 | 0 | 24,975 | 292 | 209 |
| Singapore | 403,924 | 151,683 | 2,639,287 | 15,160 | [2] | 47,252 | 174,909 | 284,851 |
| South Korea | 160,587 | 176,065 | 7,482 | 2,777 | 113 | 32,167 | 172,779 | 110,305 |
| Taiwan | 1,475 | 14,421 | 1,527 | 0 | 24 | 35,841 | 7,524 | 14,781 |
| Oceania, total | 724 | 113,942 | 9,779 | 239,369 | 5,749 | 280,979 | 736,685 | 2,787,674 |
| Australia | 704 | 56,238 | 9,281 | 200,682 | 5,654 | 272,937 | 731,877 | 2,786,110 |
| Puerto Rico and U.S. Possessions | 482 | 3,034 | 543 | 4,062 | 0 | 6,960 | 82,093 | 39,227 |

[1] Selected country data have been deleted to prevent disclosure of information for individual taxpayers. However, the data are included in the appropriate totals.
[2] Amounts less than $\$ 500$.
NOTE: Detail may not add to totals because of rounding.

## Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004

Statistics of Income Bulletin | Fall 2008

Table 3. Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Forms 5472: Transactions Between Corporations and Related Foreign Persons, by NAICS Industrial Sector of Domestic Corporation and Selected Country of Residence of Related Foreign Person, 2004
[Money amounts are in thousands of dollars]

| Selected NAICS industrial sector of domestic corporation and residence of related foreign person [1] | Transactions between foreign-owned domestic corporations and related foreign persons |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Number of returns | Number of related foreign persons | Amounts received from related foreign persons |  |  |  |  |  |  |
|  |  |  | Total (excluding loan balances | Sales of stock in trade | Sales <br> of tangible property other than stock in trade | Rents and royalties | Sales, leases, and licenses of intangible property rights | Consideration for technical, managerial, or like services | Commissions |
| All industries | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) |
|  | 774 | 16,565 | 439,038,479 | 371,445,143 | 4,724,233 | 1,430,815 | 1,717,863 | 14,592,991 | 7,992,736 |
| Australia | 267 | 519 | 1,775,735 | 1,251,897 | 3,921 | 34,098 | 13,681 | 93,815 | 7,791 |
| Belgium | 169 | 341 | 1,970,732 | 879,720 | 268,818 | 3,456 | 11,111 | 54,343 | 10,826 |
| Bermuda | 57 | 128 | 2,072,275 | 52,502 | 90 | 3 | 0 | 126,874 | 231,219 |
| Brazil | 224 | 462 | 1,292,325 | 1,145,202 | 15,331 | 7,943 | 1,744 | 56,721 | 4,613 |
| Canada | 386 | 896 | 29,560,117 | 24,288,460 | 112,054 | 132,750 | 6,724 | 1,386,791 | 125,423 |
| China | 204 | 529 | 1,504,931 | 1,405,365 | 33,188 | 4,023 | 4,828 | 33,962 | 7,817 |
| France | 277 | 1,016 | 4,907,501 | 1,994,274 | 7,368 | 22,360 | 84,166 | 775,272 | 597,603 |
| Germany | 329 | 1,235 | 19,728,894 | 14,382,219 | 16,146 | 108,073 | 200,142 | 1,902,733 | 425,759 |
| Hong Kong | 197 | 339 | 838,723 | 687,386 | 743 | 2,722 | 3,071 | 29,734 | 34,091 |
| Hungary | 109 | 137 | 2,165,801 | 21,644 | 222 | 2,203 | 78,109 | 5,616 | [2] |
| Ireland | 129 | 235 | 8,301,232 | 682,721 | 2,505 | 43,146 | 33,419 | 945,066 | 1,903,815 |
| Japan | 326 | 957 | 18,621,984 | 14,390,637 | 106,777 | 70,915 | 131,105 | 1,720,874 | 426,241 |
| Mexico | 255 | 592 | 9,624,742 | 8,591,512 | 43,438 | 35,261 | 15,334 | 653,811 | 13,545 |
| Netherlands | 250 | 699 | 5,056,292 | 2,781,747 | 41,231 | 85,682 | 357,001 | 804,814 | 17,800 |
| Singapore | 232 | 469 | 5,913,262 | 3,755,520 | 23,752 | 7,309 | 3,943 | 591,131 | 1,296,968 |
| South Korea | 156 | 260 | 2,997,245 | 1,505,901 | 1,206,851 | 7,521 | 1,534 | 257,752 | 4,062 |
| Sweden | 130 | 407 | 2,885,758 | 1,914,954 | [1] | 4,082 | 46,155 | 508,996 $\quad 2,685$ |  |
| Switzerland | 175 | 423 | 15,071,518 | 5,058,262 | 2,369,362 | 600,864 | 412,386 | 1,401,400 | 1,165,501 |
| Taiwan | 148 | 255 | 442,845 | 390,715 | 9,872 | 1,960 | 610 | 26,962 | 616 |
| United Kingdom | 420 | 1,623 | 286,764,037 | 277,030,370 | 34,676 | 103,599 | 115,850 | 1,570,496 | 426,292 |
| $\begin{aligned} & \begin{array}{r} \text { Agriculture, forestry, } \\ \text { fishing, and hunting } \end{array} \\ & \text { All geographic areas } \end{aligned}$ | ** | ** | ** | ** | ** | ** | ** | ** | ** |
| Mining |  |  |  |  |  |  |  |  |  |
| All geographic areas | 15 | 408 | 5,044,606 | 4,046,447 | 83,431 | 92,681 | 658 | 489,083 | 252 |
| Australia | 7 | 29 | 75,084 | 5,009 | 289 | 14,091 | 0 | 9,941 | 0 |
| Belgium | 3 | 4 | 787 | 0 | 665 | 0 | 0 | 0 | 0 |
| Brazil | 7 | 18 | 476,323 | 474,180 | 584 | 0 | 0 | 1,334 | 0 |
| Canada | 9 | 29 | 1,753,819 | 1,647,288 | 6,475 | 24 | 0 | 27,155 | 0 |
| France | 5 | 18 | 41,245 | 15,250 | 2,796 | 9 | 0 | 5,758 | 0 |
| Germany | 3 | 6 | 2,273 | 840 | 41 | 3 | 0 | 1,263 | 0 |
| Hungary | 3 | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Ireland | 4 | 6 | 27,791 | 14,927 | 1,978 | 1 | 0 | 835 | 0 |
| Japan | 3 | 4 | 48,605 | 31,737 | 251 | 0 | 0 | 1,034 | 0 |
| Mexico | 4 | 13 | 108,241 | 33,655 | 7,320 | 1,991 | 0 | 45,703 | 58 |
| Netherlands | 5 | 12 | 27,042 | 4,992 | 130 | 0 | 0 | 16,674 | 0 |
| Singapore | 5 | 17 | 16,901 | 7,841 | 113 | 3,845 | 0 | 2,466 | 0 |
| United Kingdom | 9 | 48 | 151,783 | 96,037 | 198 | 2,025 | 0 | 7,784 | 194 |
| Utilities <br> All geographic areas, total | 8 | 44 | 569,638 | 349,205 | 0 | 250 | 0 | 9,003 | 0 |
| Canada | 4 | 9 | 511,601 | 348,702 | 0 | 250 | 0 | 0 | 0 |
| United Kingdom | 5 | 17 | 48,677 | 503 | 0 | 0 | 0 | 7,846 | 0 |

# Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004 

Statistics of Income Bulletin | Fall 2008

Table 3. Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Form: 5472: Transactions Between Corporations and Related Foreign Persons, by NAICS Industrial Sector of Domestic Corporation and Selected Country of Residence of Related Foreign Person, 2004-Continued [Money amounts are in thousands of dollars]

| Selected NAICS industrial sector of domestic corporation and residence of related foreign person [1] | Transactions between foreign-owned domestic corporations and related foreign persons |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Number of returns | Number of related foreign persons | Amounts received from related foreign persons |  |  |  |  |  |  |
|  |  |  | Total (excluding loan balances) | Sales of stock in trade | Sales <br> of tangible property other than stock in trade | Rents and royalties | Sales, leases, and licenses of intangible property rights | Consideration for technical, managerial, or like services | Commissior |
| Construction <br> All geographic areas, total | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) |
|  | 15 | 300 | 349,970 | 190,783 | 13,744 | 85 | 6,157 | 109,995 | 72 |
| Australia | 3 | 8 | 12,975 | 5,760 | 0 | 0 | 0 | 4,363 |  |
| Brazil | 3 | 3 | 4,114 | 3,487 | 0 | 0 | 625 | 2 |  |
| Canada | 4 | 6 | 55,328 | 49,257 | 450 | 0 | 0 | 4,770 |  |
| France | 4 | 14 | 3,490 | 3,392 | 0 | 0 | 0 | 4 |  |
| Germany | 5 | 18 | 9,843 | 7,049 | 0 | 0 | 0 | 2,679 | 11 |
| Japan | 3 | 5 | 1,774 | 1,608 | 0 | 0 | 0 | 80 |  |
| Mexico | 3 | 6 | 5,420 | 5,199 | 0 | 85 | 0 | 0 |  |
| Singapore | 3 | 4 | 6,867 | 6,806 | 0 | 0 | 0 | 61 |  |
| Sweden | 3 | 21 | 6,371 | 2,998 | 0 | 0 | 336 | 1,708 | 30 |
| United Kingdom | 8 | 29 | 30,513 | 15,287 | 0 | 0 | 0 | 2,940 | 2 |
| Manufacturing All geographic areas, total | 320 | 9,671 | 75,935,007 | 58,118,172 | 862,884 | 906,449 | 879,649 | 5,263,063 | 261,36 |
| Australia | 137 | 293 | 1,250,215 | 1,051,652 | 301 | 18,037 | 266 | 30,818 | 1,32 |
| Belgium | 101 | 223 | 1,130,346 | 767,898 | 267,234 | 2,174 | 8,578 | 41,840 | 10,19 |
| Bermuda | 22 | 42 | 111,782 | 0 | 0 | 3 | 0 | 91,149 |  |
| Brazil | 142 | 315 | 638,522 | 566,526 | 14,162 | 7,886 | 442 | 20,175 | 2,00 |
| Canada | 198 | 485 | 17,919,011 | 16,414,854 | 88,307 | 44,323 | 3,003 | 449,688 | 35,66 |
| China | 123 | 336 | 264,620 | 252,939 | 1,764 | 3,681 | 307 | 3,021 | 7 |
| France | 153 | 651 | 2,157,993 | 1,537,625 | 4,567 | 11,786 | 29,939 | 273,301 | 116,52 |
| Germany | 180 | 799 | 9,298,053 | 8,211,919 | 14,428 | 70,904 | 174,669 | 362,653 | 16,54 |
| Hong Kong | 85 | 154 | 472,108 | 459,398 | 396 | 1,569 | 1,298 | 6,072 | 1,30 |
| Hungary | 63 | 84 | 2,150,045 | 9,565 | 171 | 1,470 | 78,041 | 4,025 |  |
| Ireland | 62 | 126 | 990,583 | 647,461 | 0 | 42,649 | 32,904 | 200,323 | 1,07 |
| Japan | 153 | 383 | 2,927,936 | 1,896,441 | 26,278 | 14,949 | 79 | 526,105 | 13,93 |
| Mexico | 154 | 378 | 7,273,579 | 7,007,803 | 24,966 | 31,892 | 4,802 | 55,315 | 7,82 |
| Netherlands | 129 | 423 | 3,505,576 | 2,426,176 | 41,093 | 59,054 | 16,092 | 617,704 | 11,70 |
| Singapore | 115 | 251 | 2,131,436 | 2,052,157 | 17,369 | 732 | 539 | 44,839 | 5,32 |
| South Korea | 94 | 163 | 749,296 | 740,332 | 250 | 1,168 | 753 | 3,450 | 16 |
| Sweden | 89 | 283 | 793,783 | 260,067 | 0 | 925 | 43,256 | 239,165 | 2,28 |
| Switzerland | 99 | 249 | 5,339,753 | 3,105,056 | 2,855 | 472,736 | 407,487 | 509,757 | 8,12 |
| Taiwan | 73 | 148 | 247,992 | 239,652 | 2,636 | 1,287 | 0 | 1,319 |  |
| United Kingdom | 196 | 879 | 8,789,690 | 5,250,053 | 13,316 | 54,424 | 36,782 | 881,658 | 13,90 |
| Wholesale trade All geographic areas, total | 202 | 2,744 | 48,376,166 | 37,109,300 | 1,368,780 | 307,111 | 339,538 | 5,588,603 | 430,02 |
| Australia | 61 | 78 | 287,610 | 182,481 | 889 | 1,145 | 0 | 14,849 | 1,20 |
| Belgium | 28 | 39 | 72,970 | 64,767 | 920 | 1,276 | 287 | 4,068 | 18 |
| Bermuda | 7 | 10 | 249,328 | 19,934 | 0 | 0 | 0 | 290 | 1,27 |
| Brazil | 41 | 72 | 123,159 | 94,668 | 585 | 0 | 0 | 24,895 | 2,39 |
| Canada | 79 | 139 | 6,016,713 | 5,324,289 | 1,277 | 5,106 | 2 | 641,064 | 3,65 |
| China | 60 | 139 | 1,189,625 | 1,120,920 | 31,424 | 0 | 0 | 25,711 | 7,57 |
| France | 51 | 117 | 701,546 | 291,718 | 6 | 10,555 | 35,631 | 330,671 | 1,62 |
| Germany | 82 | 192 | 7,757,887 | 6,032,598 | 1,678 | 37,156 | 0 | 1,127,300 | 2,01 |
| Hong Kong | 56 | 89 | 236,736 | 214,759 | 339 | 1,133 | 539 | 9,463 | 4,18 |
| Hungary | 17 | 19 | 12,698 | 12,019 | [2] | 4 | 0 | 662 |  |
| Ireland | 16 | 19 | 874,946 | 11,835 | 0 | 496 | 0 | 97,002 | 95 |
| Japan | 104 | 421 | 14,539,846 | 12,265,894 | 80,249 | 47,628 | 123,433 | 966,502 | 318,04 |
| Mexico | 57 | 125 | 2,105,678 | 1,522,924 | 11,153 | 961 | 0 | 530,966 | 5,60 |
| Netherlands | 50 | 89 | 650,104 | 347,525 | 7 | 25,153 | 43,949 | 76,018 | 31 |
| Singapore | 67 | 107 | 2,325,904 | 1,682,023 | 6,270 | 998 | 2,690 | 500,206 | 4,19 |
| South Korea | 36 | 65 | 2,236,577 | 761,975 | 1,206,270 | 6,353 | 0 | 253,004 | 3,86 |
| Sweden | 12 | 38 | 1,848,799 | 1,536,408 | [2] | 3,156 | 0 | 181,056 | 6 |
| Switzerland | 27 | 51 | 2,462,240 | 1,766,939 | 401 | 128,128 | 0 | 544,396 | 1,75 |
| Taiwan | 50 | 77 | 177,252 | 148,701 | 7,236 | 673 | 0 | 17,004 | 55 |
| United Kingdom | 89 | 183 | 1,788,747 | 1,556,892 | 10,602 | 30,019 | 0 | 56,293 | 4,37 |

Footnotes at end of table.

## Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004

Statistics of Income Bulletin | Fall 2008

Table 3. Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Forms 5472: Transactions Between Corporations and Related Foreign Persons, by NAICS Industrial Sector of Domestic Corporation and Selected Country of Residence of Related Foreign Person, 2004-Continued [Money amounts are in thousands of dollars]

| Selected NAICS industrial sector of domestic corporation and residence of related foreign person [1] | Transactions between foreign-owned domestic corporations and related foreign persons |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Number of returns | Number of related foreign persons | Amounts received from related foreign persons |  |  |  |  |  |  |
|  |  |  | Total (excluding loan balances) | Sales of stock in trade | Sales of tangible property other than stock in trade | Rents and royalties | Sales, leases, and licenses of intangible property rights | Consideration for technical, managerial, or like services | Commissions |
| Retail trade <br> All geographic areas, total | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) |
|  | 28 | 222 | 962,274 | 272,304 | 0 | 9,826 | 284 | 223,267 | 3,610 |
| Australia | 3 | 3 | 737 | 7 | 0 | 0 | 0 | 730 | 0 |
| Belgium | 3 | 3 | 18,752 | 0 | 0 | 0 | 0 | 0 | 0 |
| Brazil | 4 | 4 | 620 | 620 | 0 | 0 | 0 | 0 | 0 |
| Canada | 7 | 20 | 105,825 | 96,914 | 0 | 0 | 0 | 7,639 | 0 |
| France | 7 | 33 | 107,442 | 91,983 | 0 | 0 | 0 | 18 | 75 |
| Germany | 5 | 10 | 23,930 | 16,755 | 0 | 0 | 0 | 6,760 | 0 |
| Hong Kong | 5 | 12 | 906 | 906 | 0 | 0 | 0 | 0 | 0 |
| Ireland | 4 | 4 | 166,640 | 0 | 0 | 0 | 0 | 131,967 | 0 |
| Japan | 6 | 20 | 88,519 | 60,296 | 0 | 0 | 0 | 23,395 | 3,534 |
| Mexico | 4 | 5 | 3,701 | 440 | 0 | 0 | 0 | 0 | 0 |
| Netherlands | 7 | 10 | 140,002 | 260 | 0 | 0 | 0 | 0 | 0 |
| Switzerland | 6 | 14 | 3,620 | 90 | 0 | 0 | 0 | 0 | 0 |
| United Kingdom | 11 | 17 | 54,432 | 1,674 | 0 | 0 | 0 | 52,758 | 0 |
| Transportation and warehousing |  |  |  |  |  |  |  |  |  |
| All geographic areas, total | 17 | 612 | 6,615,598 | 262,964 | 6,924 | 71,311 | 296,910 | 291,488 | 2,510,500 |
| Australia | 9 | 14 | 16,769 | 0 | 0 | 0 | 0 | 4,486 | 72 |
| Belgium | 5 | 11 | 24,865 | 0 | 0 | 0 | 0 | 1,817 | 0 |
| Bermuda | 3 | 7 | 101,815 | 18,053 | 1 | 0 | 0 | 23,300 | 0 |
| Brazil | 7 | 18 | 36,902 | 4,253 | 0 | 0 | 0 | 3,433 | 92 |
| Canada | 12 | 25 | 2,080,663 | 182,433 | 6,871 | 63,040 | 0 | 12,039 | 11 |
| China | 3 | 9 | 7,800 | 0 | 0 | 0 | 0 | 616 | 15 |
| France | 5 | 15 | 11,193 | 0 | 0 | 0 | 0 | 1,959 | 8 |
| Germany | 7 | 29 | 370,106 | 7,941 | 0 | 0 | 0 | 11,031 | 262 |
| Hong Kong | 8 | 14 | 34,872 | 5,665 | 0 | 0 | 0 | 9,577 | 7,476 |
| Hungary | 6 | 6 | 671 | 0 | 0 | 0 | 0 | 0 | [2] |
| Ireland | 4 | 7 | 11,501 | 0 | 0 | 0 | 0 | 547 | 7 |
| Japan | 7 | 16 | 282,566 | 912 | 0 | 8,271 | 0 | 134,188 | 18,087 |
| Mexico | 7 | 15 | 38,685 | 3,969 | 0 | 0 | 9,159 | 1,402 | 13 |
| Netherlands | 6 | 14 | 298,576 | 0 | 0 | 0 | 287,750 | 0 | 80 |
| Singapore | 7 | 27 | 1,343,173 | 0 | 0 | 0 | 0 | 41,279 | 1,283,663 |
| South Korea | 4 | 6 | 3,682 | 0 | 0 | 0 | 0 | 884 | 13 |
| Sweden | 4 | 6 | 3,274 | 0 | 0 | 0 | 0 | 102 | 0 |
| Switzerland | 4 | 6 | 2,173 | 0 | 0 | 0 | 0 | 174 | 3 |
| Taiwan | 5 | 6 | 3,927 | 0 | 0 | 0 | 0 | 1,815 | 37 |
| United Kingdom | 12 | 44 | 323,957 | 4,232 | 0 | 0 | 0 | 20,352 | 614 |
| Information <br> All geographic areas, total | 24 | 656 | 2,236,277 | 314,937 | 18,358 | 11,919 | 150,147 | 731,502 | 62,169 |
| Australia | 10 | 26 | 23,294 | 4,776 | 284 | 825 | 9,721 | 7,144 | 366 |
| Belgium | 7 | 16 | 6,203 | 717 | 0 | 0 | 1,428 | 3,370 | 0 |
| Bermuda | 5 | 12 | 212,335 | 14,516 | 0 | 0 | 0 | 0 | 0 |
| Brazil | 6 | 9 | 2,486 | 313 | 0 | 57 | 678 | 116 | 0 |
| Canada | 15 | 38 | 95,187 | 62,494 | 7,403 | 3,017 | 3,719 | 5,190 | 628 |
| China | 3 | 4 | 428 | 85 | 0 | 343 | 0 | 0 | 0 |
| France | 11 | 31 | 30,891 | 531 | 0 | 0 | 16,204 | 945 | 654 |
| Germany | 12 | 55 | 172,323 | 5,146 | 0 | 0 | 23,380 | 4,606 | 2,147 |
| Hong Kong | 8 | 16 | 5,543 | 108 | 0 | 20 | 655 | 3,597 | 7 |
| Hungary | 6 | 9 | 168 | [2] | 0 | 0 | 69 | 99 | 0 |
| Ireland | 10 | 18 | 62,350 | 137 | 0 | 0 | 216 | 7,888 | 0 |
| Japan | 9 | 21 | 59,026 | 12,529 | 0 | 24 | 7,593 | 22,267 | 1,377 |
| Mexico | 5 | 11 | 12,433 | 9,551 | 0 | 331 | 1,373 | 511 | 0 |
| Netherlands | 15 | 35 | 38,534 | 10 | 0 | 739 | 6,152 | 26,574 | 0 |
| Singapore | 8 | 14 | 10,352 | 5,635 | 0 | 1,735 | 453 | 1,077 | 504 |
| South Korea | 6 | 10 | 2,783 | 636 | 0 | 0 | 782 | 296 | 0 |
| Sweden | 7 | 19 | 113,382 | 1 | 0 | 1 | 2,562 | 86,825 | 0 |
| Switzerland | 8 | 14 | 348,012 | 13,413 | 0 | 0 | 647 | 183,531 | 0 |
| Taiwan | 4 | 7 | 1,830 | 76 | 0 | 0 | 550 | 0 | 0 |
| United Kingdom | 17 | 90 | 798,703 | 64,656 | 10,559 | 4,470 | 59,074 | 351,354 | 53,236 |

Footnotes at end of table.

# Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004 

Statistics of Income Bulletin | Fall 2008

Table 3. Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Forms 5472: Transactions Between Corporations and Related Foreign Persons, by NAICS Industrial Sector of Domestic Corporation and Selected Country of Residence of Related Foreign Person, 2004—Continued [Money amounts are in thousands of dollars]

| Selected NAICS industrial sector of domestic corporation and residence of related foreign person [1] | Transactions between foreign-owned domestic corporations and related foreign persons |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Number of returns | Number of related foreign persons | Amounts received from related foreign persons |  |  |  |  |  |  |
|  |  |  | Total (excluding loan balances) | Sales of stock in trade | Sales of tangible property other than stock in trade | Rents and royalties | Sales, leases, and licenses of intangible property rights | Consideration for technical, managerial, or like services | Commissions |
| Finance and insurance All geographic areas, total | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) |
|  | 72 | 772 | 291,535,515 | 270,143,708 | 0 | 24,336 | 384 | 911,955 | 4,634,056 |
| Australia | 22 | 34 | 96,282 | 0 | 0 | 0 | 0 | 20,658 | 3,736 |
| Belgium | 10 | 17 | 666,059 | 0 | 0 | 6 | 0 | 1,007 | 299 |
| Bermuda | 15 | 49 | 1,386,072 | 0 | 0 | 0 | 0 | 10,863 | 229,753 |
| Brazil | 4 | 4 | 64 | 0 | 0 | 0 | 0 | 0 | 0 |
| Canada | 30 | 63 | 678,549 | 0 | 0 | 11,650 | 0 | 178,739 | 65,571 |
| China | 4 | 5 | 2,932 | 0 | 0 | 0 | 0 | 1,300 | 151 |
| France | 18 | 34 | 1,393,952 | 0 | 0 | 9 | 0 | 39,890 | 475,044 |
| Germany | 14 | 38 | 1,604,6/1 | 0 | 0 | 10 | 0 | 5,153 | 401,952 |
| Hong Kong | 18 | 21 | 60,629 | 0 | 0 | 0 | 0 | 632 | 3,802 |
| Hungary | 4 | 5 | 302 | 0 | 0 | 0 | 0 | 13 | 0 |
| Ireland | 17 | 36 | 5,871,106 | 0 | 0 | 0 | 0 | 308,510 | 1,901,533 |
| Japan | 23 | 40 | 529,034 | 109,375 | 0 | 0 | 0 | 13,383 | 71,233 |
| Mexico | 9 | 11 | 61,832 | 0 | 0 | 0 | 0 | 12,890 | 44 |
| Netherlands | 14 | 36 | 265,931 | 0 | 0 | 0 | 0 | 34,151 | 373 |
| Singapore | 13 | 21 | 10,368 | 0 | 0 | 0 | 0 | 318 | 1,491 |
| South Korea | 3 | 3 | 861 | 0 | 0 | 0 | 0 | 0 | 0 |
| Sweden | 4 | 4 | 550 | 0 | 0 | 0 | 0 | 0 | 33 |
| Switzerland | 16 | 39 | 4,024,178 | 0 | 0 | 0 | 0 | 122,289 | 1,153,011 |
| Taiwan | 4 | 4 | 1,927 | 0 | 0 | 0 | 0 | 516 | 22 |
| United Kingdom | 38 | 161 | 214,321,699 | 210,034,333 | 0 | 12,661 | 384 | 112,345 | 319,841 |
| Real estate and rental and leasing All geographic areas, total | 7 | 113 | 568,172 | 134,587 | 1,270 | 0 | 0 | 63,836 | 600 |
| Canada | 3 | 10 | 54,193 | 33,993 | 1,270 | 0 | 0 | 0 | 13 |
| Netherlands | 3 | 6 | 9 | 9 | 0 | 0 | 0 | 0 | 0 |
| Professional, scientific, and technical services All geographic areas, total | 25 | 597 | 996,218 | 155,903 | 2,736 | 0 | 590 | 757,657 | 2,325 |
| Australia | 8 | 18 | 5,418 | 40 | 2,158 | 0 | 0 | 537 | 0 |
| Belgium | 6 | 11 | 3,188 | 2,590 | 0 | 0 | 0 | 618 | 86 |
| Brazil | 6 | 11 | 7,168 | 268 | 0 | 0 | 0 | 6,766 | 1 |
| Canada | 14 | 53 | 146,332 | 122,067 | 0 | 0 | 0 | 21,981 | 0 |
| China | 6 | 10 | 963 | 77 | 0 | 0 | 0 | 887 | 0 |
| France | 8 | 63 | 61,792 | 3,682 | 0 | 0 | 0 | 53,987 | 32 |
| Germany | 8 | 49 | 377,965 | 8,211 | 0 | 0 | 0 | 367,054 | 2,108 |
| Hong Kong | 8 | 13 | 393 | 0 | 0 | 0 | 0 | 393 | 0 |
| Hungary | 3 | 3 | 307 | 0 | 51 | 0 | 0 | [1] | 0 |
| Ireland | 4 | 7 | 198,568 | 42 | 527 | 0 | 0 | 197,994 | 0 |
| Japan | 10 | 26 | 56,962 | 11,235 | 0 | 0 | 0 | 30,646 | 0 |
| Mexico | 5 | 17 | 9,056 | 1,992 | 0 | 0 | 0 | 7,024 | 0 |
| Netherlands | 8 | 21 | 19,095 | 349 | 0 | 0 | 0 | 10,019 | 0 |
| Singapore | 7 | 11 | 478 | 20 | 0 | 0 | 0 | 454 | 0 |
| South Korea | 3 | 3 | 118 | 0 | 0 | 0 | 0 | 118 | 0 |
| Sweden | 4 | 6 | 1,822 | 15 | 0 | 0 | 0 | 45 | 0 |
| Switzerland | 4 | 8 | 660 | 24 | 0 | 0 | 0 | 634 | 0 |
| Taiwan | 5 | 5 | 1,626 | 0 | 0 | 0 | 0 | 664 | 0 |
| United Kingdom | 13 | 81 | 81,776 | 2,823 | 0 | 0 | 590 | 43,141 | 0 |
| Management of companies and enterprises All geographic areas, total | 12 | 168 | 2,668,060 | 77,799 | 0 | 3,149 | 0 | 54,774 | 84,956 |
| Australia | 3 | 5 | 1,282 | 128 | 0 | 0 | 0 | 0 | 1,087 |
| Canada | 4 | 7 | 134,512 | 6,148 | 0 | 3,130 | 0 | 33,099 | 19,875 |
| France | 3 | 8 | 52,184 | 40,510 | 0 | 0 | 0 | 1,335 | 3,640 |
| Japan | 3 | 8 | 77,362 | 0 | 0 | 18 | 0 | 3,274 | 5 |
| United Kingdom | 6 | 23 | 259,222 | 2,988 | 0 | 0 | 0 | 329 | 32,090 |

## Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004

Statistics of Income Bulletin | Fall 2008

Table 3. Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Form: 5472: Transactions Between Corporations and Related Foreign Persons, by NAICS Industrial Sector of Domestic Corporation and Selected Country of Residence of Related Foreign Person, 2004—Continued [Money amounts are in thousands of dollars]

| Selected NAICS industrial sector of domestic corporation and residence of related foreign person [1] | Transactions between foreign-owned domestic corporations and related foreign persons |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Number of returns | Number of related foreign persons | Amounts received from related foreign persons |  |  |  |  |  |  |
|  |  |  | Total (excluding loan balances) | Sales of stock in trade | Sales of tangible property other than stock in trade | Rents and royalties | Sales, leases, and licenses of intangible property rights | Consideration for technical, managerial, or like services | Commissior |
| Administrative and support and waste management and remediation services | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) |
|  |  | 83 |  | 86,991 | 2,366,106 | 0 | 419 | 39,705 | 2,15 |
| All geographic areas, total | 12 |  | 2,800,328 |  |  |  |  |  |  |
| Canada | 3 | 4 | 354 | 0 | 0 | 0 | 0 | 354 |  |
| France | 3 | 6 | 166 | 0 | 0 | 0 | 0 | 0 |  |
| Netherlands | 5 | 9 | 3,517 | 0 | 0 | 0 | 0 | 0 |  |
| Switzerland | 3 | 8 | 2,663,685 | 0 | 2,366,106 | 0 | 0 | 0 |  |
| United Kingdom | 7 | 16 | 6,683 | 0 | 0 | 0 | 419 | 3,870 | 1,90 |
| Health care and <br> social assistanceAll geographic areas, total | 3 | 30 | 119,855 | 119,855 | 0 | 0 | 0 | 0 |  |
| Arts, entertainment, and recreation All geographic areas, total | d | d | d | d | d | d | d | d |  |
| Accommodation and food services <br> All geographic areas, total | 10 | 134 | 253,789 | 61,848 | 0 | 3,699 | 43,128 | 53,414 |  |
| France | 3 | 14 | 6,068 | 0 | 0 | 0 | 2,392 | 3,564 |  |
| Germany | 3 | 8 | 67,959 | 61,848 | 0 | 0 | 2,093 | 934 |  |
| United Kingdom | 6 | 26 | 101,149 | 0 | 0 | 0 | 18,601 | 29,826 |  |
| Other services <br> All geographic areas, total | d | d | d | d | d | d | d | d |  |

# Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004 

Statistics of Income Bulletin | Fall 2008

Table 3. Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Form: 5472: Transactions Between Corporations and Related Foreign Persons, by NAICS Industrial Sector of Domestic Corporation and Selected Country of Residence of Related Foreign Person, 2004-Continued [Money amounts are in thousands of dollars]


[^9]
## Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004

Statistics of Income Bulletin | Fall 2008

Table 3. Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Form: 5472: Transactions Between Corporations and Related Foreign Persons, by NAICS Industrial Sector of Domestic Corporation and Selected Country of Residence of Related Foreign Person, 2004-Continued [Money amounts are in thousands of dolaras]

| Selected NAICS industrial sector of domestic corporation and residence of related foreign person [1] | Transactions between foreign-owned domestic corporations and related foreign persons-continued |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Amounts received from related foreign persons-continued |  |  |  |  | Amounts paid to related foreign persons |  |  |  |
|  | Interest | Premiums for insurance or reinsurance | Other | Amounts borrowed |  | Total (excluding loan balances) | Purchases of stock in trade | Purchases of tangible property other than stock in trade | Rents and royalties |
|  |  |  |  | Beginning balance | Ending balance |  |  |  |  |
| Construction All geographic areas, total | (10) | (11) | (12) | (13) | (14) | (15) | (16) | (17) | (18) |
|  | 13,971 | 2,220 | 12,291 | 516,381 | 806,806 | 742,977 | 432,978 | 16,986 | 52 |
| Australia | 0 | 152 | 2,700 | 117 | 188 | 65,600 | 689 | 0 |  |
| Brazil | 0 | 0 | 0 | 2,505 | 2,533 | 104 | 2 | 10 |  |
| Canada | 329 | 94 | 428 | 0 | 84,239 | 31,855 | 22,837 | 709 |  |
| France | 0 | 0 | 94 | 0 | 0 | 42,656 | 16,070 | 3,579 |  |
| Germany | 0 | 0 | 0 | 88,411 | 178,392 | 80,522 | 68,995 | 692 |  |
| Japan | 0 | 0 | 86 | 0 | 0 | 5,163 | 4,974 | 0 |  |
| Mexico | 0 | 0 | 137 | 0 | 0 | 1,098 | 640 | 0 |  |
| Singapore | 0 | 0 | [2] | 0 | 0 | 2,862 | 220 | 0 |  |
| Sweden | 1,029 | 0 | 0 | 0 | 0 | 158,718 | 142,404 | 196 |  |
| United Kingdom | 7,110 | 1,256 | 3,891 | 226,216 | 413,732 | 39,011 | 7,202 | 242 |  |
| Manufacturing <br> All geographic areas, total | 1,417,727 | 6,188 | 8,219,507 | 101,371,222 | 151,008,634 | 192,769,719 | 165,939,175 | 2,035,574 | 4,021,62 |
| Australia | 22,314 | 140 | 125,363 | 724,639 | 658,168 | 889,130 | 637,116 | 2,070 | 15,50 |
| Belgium | 24,221 | 1,238 | 6,973 | 5,120,379 | 3,576,112 | 1,091,906 | 752,611 | 9,387 | 52,06 |
| Bermuda | 20,267 | 0 | 362 | 1,261,421 | 1,307,727 | 190,353 | 45,001 | 0 |  |
| Brazil | 13,932 | 531 | 12,866 | 27,157 | 153,423 | 1,481,026 | 1,408,519 | 14,418 |  |
| Canada | 91,635 | 101 | 791,430 | 2,501,256 | 2,059,646 | 35,648,248 | 33,008,327 | 1,047,380 | 201,74 |
| China | 29 | [2] | 2,800 | 1,079 | 5,823 | 888,094 | 876,548 | 903 | 23 |
| France | 45,224 | 483 | 138,545 | 5,151,592 | 11,106,139 | 7,294,553 | 5,802,527 | 33,465 | 230,12 |
| Germany | 14,367 | 256 | 432,317 | 3,437,054 | 8,160,554 | 21,479,054 | 19,979,505 | 274,621 | 390,07 |
| Hong Kong | 99 | 6 | 1,961 | 168,510 | 180,700 | 1,580,980 | 1,564,539 | 318 | 34 |
| Hungary | 867 | 0 | 2,055,906 | 9,468,994 | 10,692,954 | 948,314 | 77,982 | 0 | 32,37 |
| Ireland | 16,647 | 365 | 49,160 | 3,706,773 | 4,443,549 | 1,463,183 | 834,698 | 133 | 63,06 |
| Japan | 225 | 435 | 449,484 | 352,645 | 506,358 | 32,139,946 | 28,053,966 | 333,009 | 1,965,00 |
| Mexico | 19,799 | 516 | 120,663 | 1,446,671 | 178,940 | 10,457,639 | 10,120,757 | 58,775 | 2 |
| Netherlands | 19,240 | 220 | 314,294 | 8,452,832 | 10,874,906 | 14,540,330 | 12,703,080 | 56,218 | 146,85 |
| Singapore | 737 | 88 | 9,650 | 85,664 | 83,063 | 3,496,598 | 3,405,718 | 21,106 | 87 |
| South Korea | 0 | 12 | 3,167 | 1,849 | 1,256 | 3,475,203 | 3,458,234 | 2,605 |  |
| Sweden | 11,633 | 46 | 236,409 | 4,773,577 | 6,175,550 | 2,895,592 | 1,868,842 | 13,786 | 360,53 |
| Switzerland | 599,043 | 197 | 234,500 | 14,224,154 | 32,021,513 | 15,437,592 | 11,252,524 | 52,419 | 255,95 |
| Taiwan | 18 | 1 | 3,078 | 637 | 3,327 | 350,934 | 324,891 | 5,022 | 74 |
| United Kingdom | 417,635 | 673 | 2,121,247 | 28,331,041 | 42,561,102 | 14,312,128 | 9,221,963 | 21,081 | 164,99 |
| Wholesale trade All geographic areas, total | 366,072 | 9,002 | 2,857,734 | 22,182,854 | 25,134,341 | 201,763,544 | 188,571,589 | 4,567,866 | 2,875,41 |
| Australia | 86,367 | 0 | 672 | 925,910 | 1,030,501 | 487,562 | 326,734 | 0 |  |
| Belgium | 351 | 0 | 1,116 | 15,159 | 1,756 | 16,144 | 13,810 | 8 |  |
| Bermuda | 36,198 | 0 | 191,635 | 133,214 | 700 | 876,259 | 853,620 | 0 |  |
| Brazil | 496 | 0 | 116 | 1,539 | 1,474 | 378,297 | 374,009 | 703 |  |
| Canada | 13,163 | 8,462 | 19,693 | 489,757 | 1,779,048 | 18,739,289 | 16,391,816 | 1,602,238 | 8,22 |
| China | 0 | 0 | 3,996 | 458 | 14,174 | 2,185,135 | 2,151,997 | 7,000 | 12,30 |
| France | 21,624 | 251 | 9,465 | 2,015,455 | 1,280,320 | 3,714,864 | 491,427 | 2,584,277 | 235,52 |
| Germany | 36,406 | 0 | 520,736 | 809,080 | 797,895 | 23,385,292 | 22,489,324 | 5,810 | 7,53 |
| Hong Kong | 3,837 | 0 | 2,480 | 6,172 | 8,054 | 1,979,214 | 1,938,022 | 10,107 |  |
| Hungary | 0 | 0 | 12 | 1,517,392 | 2,557,722 | 122,069 | 41,377 | 6 |  |
| Ireland | 1,087 | 0 | 763,575 | 588,439 | 377,127 | 858,503 | 90,878 | 0 |  |
| Japan | 39,405 | 63 | 698,623 | 415,201 | 1,174,449 | 86,181,703 | 83,509,662 | 198,568 | 2,011,34 |
| Mexico | 6,329 | 0 | 27,740 | 220,299 | 207,430 | 3,747,731 | 3,663,944 | 211 | 13 |
| Netherlands | 19,886 | 111 | 137,141 | 3,949,977 | 5,325,623 | 2,182,655 | 1,885,910 | 3,860 | 118,39 |
| Singapore | 2,547 | 0 | 126,977 | 13,625 | 8,010 | 3,858,163 | 3,348,346 | 25,021 |  |
| South Korea | 3,273 | 0 | 1,836 | 427,801 | 293,263 | 26,132,161 | 25,623,703 | 55,606 | 115,51 |
| Sweden | 2,377 | 0 | 125,733 | 523,644 | 226,287 | 411,548 | 359,814 | 26 | 9,05 |
| Switzerland | 12,658 | 0 | 7,960 | 3,213,273 | 3,278,908 | 3,945,665 | 3,323,032 | 21,050 | 333,01 |
| Taiwan | 0 | 0 | 3,081 | 225 | 124,503 | 9,042,697 | 9,003,459 | 37,284 |  |
| United Kingdom | 52,810 | 0 | 77,758 | 2,043,032 | 1,920,808 | 3,083,781 | 2,576,993 | 3,492 | 13,15 |

# Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004 

Statistics of Income Bulletin | Fall 2008

Table 3. Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Forms 5472: Transactions Between Corporations and Related Foreign Persons, by NAICS Industrial Sector of Domestic Corporation and Selected Country of Residence of Related Foreign Person, 2004—Continued [Money amounts are in thousands of dollars]

| Selected NAICS industrial sector of domestic corporation and residence of related foreign person [1] | Transactions between foreign-owned domestic corporations and related foreign persons-continued |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Amounts received from related foreign persons-continued |  |  |  |  | Amounts paid to related foreign persons |  |  |  |
|  | Interest | Premiums for insurance or reinsurance | Other | Amounts borrowed |  | Total (excluding loan balances) | Purchases of stock in trade | Purchasesof tangibleproperty otherthan stock intrade | Rents and royalties |
|  |  |  |  | Beginning balance | Ending balance |  |  |  |  |
| Retail trade <br> All geographic areas, total | (10) | (11) | (12) | (13) | (14) | (15) | (16) | (17) | (18) |
|  | 17,025 | 174,415 | 261,541 | 11,230,247 | 10,249,130 | 4,735,385 | 3,308,054 | 489 | 14,451 |
| Australia | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Belgium | 12,528 | 0 | 6,224 | 0 | 0 | 8,063 | 0 | 0 | 0 |
| Brazil | 0 | 0 | 0 | 0 | 0 | 27 | 0 | 0 | 0 |
| Canada | 0 | 0 | 1,271 | 35,193 | 37,038 | 122,360 | 23,110 | 0 | 0 |
| France | 0 | 0 | 15,366 | 7,920 | 4,418 | 1,316,694 | 1,284,532 | [1] | 0 |
| Germany | 0 | 0 | 415 | 114 | 123 | 36,002 | 32,667 | 401 | 0 |
| Hong Kong | 0 | 0 | 0 | 561 | 320 | 29,406 | 11,025 | 0 | 0 |
| Ireland | 0 | 34,673 | 0 | 340,039 | 352,846 | 65,867 | 0 | 0 | 0 |
| Japan | 0 | 0 | 1,295 | 227,595 | 1,877 | 881,540 | 844,207 | 88 | 1,975 |
| Mexico | 3,261 | 0 | 0 | 7,162 | 7,043 | 10,371 | 0 | 0 | 0 |
| Netherlands | 0 | 139,742 | 0 | 2,523,524 | 2,295,375 | 310,045 | 3,221 | 0 | 129 |
| Switzerland | 977 | 0 | 2,553 | 5,528,593 | 4,646,270 | 1,178,896 | 783,473 | 0 | 12,347 |
| United Kingdom | 0 | 0 | 0 | 2,090,351 | 2,415,540 | 41,379 | 5,223 | 0 | 0 |
| Transportation and warehousing |  |  |  |  |  |  |  |  |  |
| All geographic areas, total | 3,225 | 654 | 3,171,624 | 7,210,634 | 7,373,332 | 5,096,395 | 109,768 | 16,056 | 115,702 |
| Australia | 0 | 654 | 11,556 | 32 | 66 | 20,531 | 0 | 0 | 5,850 |
| Belgium | 0 | 0 | 23,049 | 0 | 321 | 24,740 | 0 | 0 | 0 |
| Bermuda | 10 | 0 | 60,451 | 116,560 | 45,418 | 12,775 | 0 | 0 | 0 |
| Brazil | 0 | 0 | 29,123 | 184 | 255 | 11,858 | 5 | 2 | 0 |
| Canada | 0 | 0 | 1,816,268 | 1,024,010 | 988,219 | 354,630 | 106,156 | 13,113 | 45,403 |
| China | 0 | 0 | 7,169 | 0 | 0 | 53,623 | 0 | 0 | 0 |
| France | 0 | 0 | 9,227 | 0 | 0 | 23,404 | 0 | 0 | 0 |
| Germany | 839 | 0 | 350,033 | 124,368 | 37,424 | 466,794 | 1,665 | 0 | 0 |
| Hong Kong | 0 | 0 | 12,154 | 0 | 0 | 178,165 | 4 | 2,475 | 0 |
| Hungary | 0 | 0 | 671 | 506,361 | 819,130 | 27,589 | 0 | 0 | 0 |
| Ireland | 0 | 0 | 10,947 | 0 | 0 | 14,644 | 0 | 0 | 0 |
| Japan | 0 | 0 | 121,109 | 239,671 | 146,641 | 50,403 | 0 | 0 | 0 |
| Mexico | 99 | 0 | 24,042 | 7,104 | 7,274 | 38,184 | 157 | 1 | 0 |
| Netherlands | 573 | 0 | 10,172 | 778,365 | 790,789 | 36,815 | 0 | 0 | 0 |
| Singapore | 0 | 0 | 18,230 | 0 | 0 | 2,644,844 | 0 | 0 | 0 |
| South Korea | 0 | 0 | 2,785 | 0 | 0 | 22,030 | 0 | 0 | 0 |
| Sweden | 0 | 0 | 3,172 | 0 | 0 | 7,161 | 0 | 0 | 0 |
| Switzerland | 0 | 0 | 1,997 | 0 | 0 | 14,305 | 0 | 0 | 0 |
| Taiwan | 0 | 0 | 2,076 | 0 | 0 | 30,371 | 0 | 0 | 0 |
| United Kingdom | 1,162 | 0 | 297,597 | 1,921,063 | 1,660,230 | 257,427 | 1,781 | 0 | 0 |
| Information All geographic areas, total | 235,853 | 5,412 | 705,980 | 46,269,270 | 45,357,015 | 5,820,299 | 1,898,383 | 110 | 228,426 |
| Australia | 0 | 0 | 179 | 1,038 | [1] | 34,307 | 31,367 | 105 | 145 |
| Belgium | 0 | 0 | 688 | 302 | 0 | 8,448 | 7,078 | 0 | 305 |
| Bermuda | 4,043 | 0 | 193,776 | 896,299 | 902,637 | 197,941 | 3,162 | 0 | 0 |
| Brazil | 0 | 0 | 1,324 | 0 | 0 | 524 | 202 | 0 | 0 |
| Canada | 3,327 | 0 | 9,409 | 573,772 | 636,071 | 213,878 | 199,791 | 1 | 221 |
| China | 0 | 0 | 0 | 0 | 0 | 1 | 1 | 0 | 0 |
| France | 0 | 0 | 12,558 | 11,175 | 11,096 | 7,893 | 1,680 | 0 | 1,035 |
| Germany | 47,619 | 0 | 89,424 | 1,212,190 | 431,579 | 123,716 | 1,948 | 0 | 24,886 |
| Hong Kong | 0 | 0 | 1,155 | 4,354 | 4,370 | 5,593 | 3,438 | 0 | 1,772 |
| Hungary | 0 | 0 | 0 | 2,320,088 | 2,371,034 | 89,016 | 0 | 0 | 0 |
| Ireland | 0 | 0 | 54,108 | 8,566 | 239 | 9,447 | 0 | 0 | 0 |
| Japan | 3 | 0 | 15,233 | 0 | 0 | 1,600,394 | 1,409,918 | 0 | 32,102 |
| Mexico | 22 | 0 | 644 | 0 | 0 | 15,817 | 9,357 | 0 | 3,719 |
| Netherlands | 3,698 | 0 | 1,361 | 10,812,791 | 10,751,961 | 809,864 | 2,798 | 0 | 2,228 |
| Singapore | 0 | 0 | 948 | 10 | 10 | 29,021 | 22,712 | 0 | 0 |
| South Korea | 0 | 0 | 1,070 | 0 | 0 | 4,617 | 1,585 | 0 | 363 |
| Sweden | 2,502 | 0 | 21,490 | 99,717 | 117 | 96,830 | 4,087 | 0 | 80,748 |
| Switzerland | 0 | 0 | 150,422 | 9,121,688 | 10,072,003 | 841,256 | 0 | 0 | 44,700 |
| Taiwan | 0 | 0 | 1,204 | 3 | 3 | 314 | 293 | 0 | 0 |
| United Kingdom | 111,426 | 0 | 143,927 | 3,419,021 | 3,105,620 | 545,650 | 133,604 | 0 | 35,680 |

[^10]
## Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004

Statistics of Income Bulletin | Fall 2008

Table 3. Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Forms 5472: Transactions Between Corporations and Related Foreign Persons, by NAICS Industrial Sector of Domestic Corporation and Selected Country of Residence of Related Foreign Person, 2004—Continued [Money amounts are in thousands of dollars]


# Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004 

Statistics of Income Bulletin | Fall 2008

Table 3. Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Form: 5472: Transactions Between Corporations and Related Foreign Persons, by NAICS Industrial Sector of Domestic Corporation and Selected Country of Residence of Related Foreign Person, 2004—Continued [Money amounts are in thousands of dollars]

| Selected NAICS industrial sector of domestic corporation and residence of related foreign person [1] | Transactions between foreign-owned domestic corporations and related foreign persons-continued |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Amounts received from related foreign persons-continued |  |  |  |  | Amounts paid to related foreign persons |  |  |  |
|  | Interest | Premiums for insurance or reinsurance | Other | Amounts borrowed |  | Total (excluding loan balances) | Purchases of stock in trade | Purchases of tangible property other than stock in trade | Rents and royalties |
|  |  |  |  | Beginning balance | Ending balance |  |  |  |  |
|  | (10) | (11) | (12) | (13) | (14) | (15) | (16) | (17) | (18) |
| Administrative and support and waste management and remediation services |  |  |  |  |  |  |  |  |  |
| All geographic areas, total | 2,838 | [2] | 302,119 | 9,687,103 | 10,962,064 | 902,119 | 13,146 | 0 | 131,23 |
| Canada | 0 | 0 | 0 | 859 | 18,794 | 3,231 | 0 | 0 |  |
| France | 0 | 0 | 166 | 3,960,318 | 1,936,863 | 132,586 | 0 | 0 | 19,69 |
| Netherlands | 1 | 0 | 3,516 | 424,575 | 424,575 | 62,465 | 0 | 0 |  |
| Switzerland | 0 | 0 | 297,579 | 972,473 | 3,717,586 | 325,545 | 0 | 0 | 80,25 |
| United Kingdom | 28 | 0 | 467 | 3,425,122 | 3,818,693 | 206,453 | 13,146 | 0 |  |
| Health care and social assistance All geographic areas, total | 0 | 0 | 0 | 1,770,405 | 1,674,491 | 270,901 | 116,324 | 0 | 3,00 |
| Arts, entertainment, and recreation All geographic areas | d | d | d | d | d | d | d | d |  |
| Accommodation and food services All geographic areas, total | 57,460 | 0 | 34,239 | 6,226,950 | 6,096,968 | 573,968 | 0 | 0 | 18,84 |
| France | 0 | 0 | 112 | 0 | 0 | 9,648 | 0 | 0 | 1,09 |
| Germany | 133 | 0 | 2,950 | 453,489 | 607,087 | 65,446 | 0 | 0 |  |
| United Kingdom | 24,998 | 0 | 27,725 | 3,719,009 | 3,313,601 | 363,213 | 0 | 0 | 16,21 |
| Other services <br> All geographic areas, total | d | d | d | d | d | d | d | d |  |

Footnotes at end of table.

## Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004

Statistics of Income Bulletin | Fall 2008

Table 3. Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Forms 5472: Transactions Between Corporations and Related Foreign Persons, by NAICS Industrial Sector of Domestic Corporation and Selected Country of Residence of Related Foreign Person, 2004-Continued

| Selected NAICS industrial sector of domestic corporation and residence of related foreign person [1] | Transactions between foreign-owned domestic corporations and related foreign persons-continued |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Amounts paid to related foreign persons-continued |  |  |  |  |  |  |  |
|  | Purchases, leases, and licenses of intangible property rights | Consideration for technical, managerial, or like services | Commissions | Interest | Premiums for insurance or reinsurance | Other | Amounts loaned |  |
|  |  |  |  |  |  |  | Beginning balance | Ending balance |
| All industries | (19) | (20) | (21) | (22) | (23) | (24) | (25) | (26) |
|  | 5,201,419 | 8,654,370 | 3,699,590 | 26,000,543 | 13,755,679 | 15,171,630 | 164,062,547 | 307,259,008 |
| Australia | 704 | 56,238 | 9,281 | 200,682 | 5,654 | 272,937 | 731,877 | 2,786,110 |
| Belgium | 1,271 | 67,608 | 13,731 | 590,862 | 3,549 | 128,781 | 4,017,568 | 51,318,586 |
| Bermuda | 0 | 8,799 | 155,366 | 134,761 | 1,452,944 | 372,709 | 1,589,990 | 2,563,588 |
| Brazil | 3,926 | 31,661 | 7,826 | 1,395 | 1,341 | 31,979 | 201,515 | 238,734 |
| Canada | 86,026 | 1,346,229 | 165,267 | 379,656 | 121,865 | 1,555,401 | 5,731,176 | 10,827,248 |
| China | 0 | 9,996 | 6,042 | 3 | 0 | 66,437 | 24,967 | 27,460 |
| France | 427,627 | 1,144,024 | 128,339 | 1,333,068 | 59,177 | 1,120,912 | 12,368,798 | 9,787,326 |
| Germany | 1,007,770 | 432,581 | 34,320 | 1,336,046 | 1,329,700 | 1,501,829 | 2,587,574 | 6,725,939 |
| Hong Kong | 38 | 73,948 | 64,711 | 36,627 | 137 | 168,075 | 888,060 | 5,359,375 |
| Hungary | 1 | 9,736 | 40 | 1,279,326 | 0 | 44,699 | 726 | 14,330 |
| Ireland | 13,848 | 61,570 | 7,943 | 660,310 | 2,790,108 | 981,580 | 3,527,755 | 2,484,591 |
| Japan | 1,374,857 | 518,842 | 114,731 | 89,050 | 6,847 | 679,778 | 2,694,253 | 3,758,052 |
| Mexico | 19,169 | 198,646 | 16,997 | 33,612 | 13,204 | 153,652 | 831,125 | 1,208,487 |
| Netherlands | 127,048 | 459,228 | 97,931 | 3,157,313 | 10,395 | 1,559,209 | 6,763,557 | 8,260,761 |
| Singapore | 403,924 | 151,683 | 2,639,287 | 15,160 | [2] | 47,252 | 174,909 | 284,851 |
| South Korea | 160,587 | 176,065 | 7,482 | 2,777 | 113 | 32,167 | 172,779 | 110,305 |
| Sweden | 13,660 | 159,175 | 20,199 | 316,249 | 4,943 | 324,081 | 1,744,917 | 2,341,051 |
| Switzerland | 1,276,684 | 871,696 | 39,864 | 6,381,108 | 5,699,202 | 1,012,464 | 39,168,733 | 52,030,460 |
| Taiwan | 1,475 | 14,421 | 1,527 | 0 | 24 | 35,841 | 7,524 | 14,781 |
| United Kingdom | 239,312 | 2,024,699 | 117,097 | 6,865,689 | 986,087 | 3,527,218 | 72,739,342 | 134,471,561 |
| Agriculture, forestry, <br> fishing, and huntingAll geographic areas | ** | ** | ** | ** | ** | ** | ** | ** |
| Mining <br> All geographic areas, total | 0 | 377,649 | 5,683 | 405,820 | 3,387 | 311,944 | 1,413,598 | 1,434,306 |
| Australia | 0 | 8,925 | 0 | 0 | 0 | 199 | 8,793 | 13,579 |
| Belgium | 0 | 2,201 | 8 | 0 | 0 | 4,028 | 0 | 0 |
| Brazil | 0 | 168 | 2 | 0 | 0 | 384 | 2,693 | 26,713 |
| Canada | 0 | 26,338 | 0 | 14,135 | 286 | 10,493 | 113,885 | 225,373 |
| France | 0 | 34,438 | 0 | 8,379 | 0 | 26,762 | 440,467 | 573,451 |
| Germany | 0 | 72 | 0 | 29,773 | 0 | 256 | 0 | 0 |
| Hungary | 0 | 0 | 0 | 154,327 | 0 | 0 | 0 | 0 |
| Ireland | 0 | 1,173 | 0 | 0 | 0 | 6,943 | 29 | 22 |
| Japan | 0 | 0 | 15 | 0 | 0 | 467 | 0 | 0 |
| Mexico | 0 | 0 | 0 | 0 | 0 | 832 | 2,386 | 0 |
| Netherlands | 0 | 0 | 0 | 1,898 | 0 | 497 | 7,956 | 7,648 |
| Singapore | 0 | 2,763 | 551 | 0 | 0 | 1,155 | 185 | 142 |
| United Kingdom | 0 | 37,127 | 102 | 79,797 | 0 | 36,266 | 554,389 | 331,543 |
| Utilities <br> All geographic areas, total | 1 | 56,196 | 0 | 938,723 | 20,506 | 1,288,375 | 1,581,728 | 4,484,999 |
| Canada | 0 | 19,119 | 0 | 63,172 | 0 | 524,614 | 4,565 | 17 |
| United Kingdom | 1 | 35,985 | 0 | 587,655 | 0 | 1,870 | 162 | 2,680,281 |

# Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004 

Statistics of Income Bulletin | Fall 2008

Table 3. Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Forms 5472: Transactions Between Corporations and Related Foreign Persons, by NAICS Industrial Sector of Domestic Corporation and Selected Country of Residence of Related Foreign Person, 2004-Continued

| Selected NAICS industrial sector of domestic corporation and residence of related foreign person [1] | Transactions between foreign-owned domestic corporations and related foreign persons-continued |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Amounts paid to related foreign persons-continued |  |  |  |  |  |  |  |
|  | Purchases, leases, and licenses of intangible property rights | Consideration for technical, managerial, or like services | Commissions | Interest | Premiums for insurance or reinsurance | Other | Amounts loaned |  |
|  |  |  |  |  |  |  | Beginning balance | Ending balance |
| Construction <br> All geographic areas, total | (19) | (20) | (21) | (22) | (23) | (24) | (25) | (26) |
|  | 30,933 | 140,723 | 336 | 49,807 | 558 | 70,129 | 375,605 | 884,503 |
| Australia | 0 | 1 | 0 | 16,875 | 0 | 48,035 | 441 | 0 |
| Brazil | 0 | 39 | 53 | 0 | 0 | 0 | 0 | 0 |
| Canada | 0 | 7,730 | 0 | 579 | 0 | 0 | 0 | 0 |
| France | 8,102 | 14,906 | 0 | 0 | 0 | 0 | 0 | 0 |
| Germany | 0 | 3,694 | 0 | 3,397 | 23 | 3,721 | 0 | 0 |
| Japan | 0 | 162 | 0 | 0 | 0 | 27 | 0 | 68 |
| Mexico | 0 | 142 | 0 | 0 | 0 | 316 | 0 | 0 |
| Singapore | 0 | 2,642 | 0 | 0 | 0 | 0 | 2,099 | 1,577 |
| Sweden | 0 | 15,583 | 1 | 0 | 535 | 0 | 58,887 | 100,050 |
| United Kingdom | 0 | 6,765 | 0 | 17,970 | 0 | 6,832 | 1,197 | 428,919 |
| Manufacturing All geographic areas, total | 3,010,670 | 4,237,464 | 272,362 | 8,510,503 | 585,235 | 4,157,114 | 37,387,292 | 52,366,057 |
| Australia | 387 | 9,094 | 2,206 | 24,082 | 2,018 | 196,648 | 636,460 | 1,170,182 |
| Belgium | 1,139 | 58,065 | 10,641 | 185,331 | 681 | 21,984 | 82,951 | 135,251 |
| Bermuda | 0 | 5,323 | 4,342 | 69,019 | 14,407 | 52,262 | 1,081,945 | 1,863,551 |
| Brazil | 3,831 | 27,124 | 4,946 | 209 | 1,331 | 20,647 | 127,981 | 121,066 |
| Canada | 80,279 | 803,999 | 109,912 | 35,238 | 6,976 | 354,397 | 1,904,214 | 3,049,406 |
| China | 0 | 4,219 | 1,894 | 0 | 0 | 4,291 | 3,797 | 9,371 |
| France | 158,070 | 488,730 | 10,763 | 406,505 | 1,413 | 162,956 | 309,532 | 695,475 |
| Germany | 71,221 | 264,321 | 18,149 | 316,874 | 972 | 163,321 | 912,737 | 851,669 |
| Hong Kong | 35 | 6,404 | 7,640 | 0 | 0 | 1,705 | 54,154 | 24,385 |
| Hungary | 0 | 9,595 | 8 | 786,507 | 0 | 41,844 | 608 | 528 |
| Ireland | 13,848 | 26,043 | 0 | 322,900 | 121,389 | 81,107 | 1,355,313 | 871,466 |
| Japan | 1,213,931 | 175,927 | 9,159 | 7,076 | 616 | 381,253 | 11,563 | 18,146 |
| Mexico | 16,645 | 165,948 | 8,966 | 7,766 | 0 | 78,756 | 448,162 | 740,327 |
| Netherlands | 105,921 | 269,640 | 44,568 | 679,198 | 247 | 534,609 | 166,233 | 895,067 |
| Singapore | 659 | 40,238 | 2,331 | 8,631 | 0 | 17,041 | 46,500 | 54,457 |
| South Korea | 0 | 4,938 | 1,766 | 0 | 113 | 7,548 | 298 | 1,204 |
| Sweden | 3,652 | 112,424 | 731 | 224,990 | 3,739 | 306,895 | 91,534 | 399,641 |
| Switzerland | 1,170,736 | 294,445 | 5,480 | 2,154,650 | 9,387 | 241,994 | 13,497,614 | 15,434,612 |
| Taiwan | 633 | 8,073 | 882 | 0 | 0 | 10,690 | 6,907 | 11,894 |
| United Kingdom | 142,835 | 1,183,497 | 14,627 | 2,451,069 | 358,138 | 753,929 | 14,728,850 | 22,663,339 |
| Wholesale trade All geographic areas, total | 863,449 | 1,287,680 | 114,442 | 1,051,942 | 41,348 | 2,389,817 | 5,423,746 | 8,081,500 |
| Australia | 0 | 18,081 | 15 | 141,276 | 147 | 1,309 | 28,113 | 145,138 |
| Belgium | 0 | 413 | 0 | 261 | 0 | 1,650 | 193,285 | 146,486 |
| Bermuda | 0 | 0 | 0 | 77 | 22,200 | 362 | 0 | 0 |
| Brazil | 0 | 808 | 2,147 | 16 | 10 | 605 | 17,903 | 18,778 |
| Canada | 675 | 224,802 | 12,305 | 13,478 | 495 | 485,260 | 162,706 | 262,284 |
| China | 0 | 1,509 | 6 | 3 | 0 | 12,320 | 20,951 | 17,426 |
| France | 212,923 | 80,001 | 183 | 67,509 | 0 | 43,021 | 547,990 | 660,278 |
| Germany | 58,765 | 35,422 | 2,106 | 76,360 | 84 | 709,891 | 419,457 | 815,739 |
| Hong Kong | 0 | 132 | 30,527 | 71 | 0 | 354 | 9,553 | 41,899 |
| Hungary | 0 | 141 | 1 | 80,144 | 0 | 400 | 42 | 13,669 |
| Ireland | 0 | 14,127 | 0 | 21,041 | 0 | 732,456 | 19 | 9,220 |
| Japan | 22,392 | 274,649 | 56,204 | 19,893 | 5,545 | 83,446 | 766,804 | 1,112,733 |
| Mexico | 0 | 30,310 | 2,173 | 10,041 | 680 | 40,234 | 90,286 | 92,820 |
| Netherlands | 23 | 49,017 | 0 | 118,095 | 419 | 6,940 | 335,971 | 191,650 |
| Singapore | 403,092 | 76,260 | 1,121 | 99 | 0 | 4,224 | 85,289 | 155,618 |
| South Korea | 158,953 | 167,089 | 3,380 | 2,777 | 0 | 5,142 | 167,301 | 103,996 |
| Sweden | 0 | 12,016 | 387 | 25,540 | 123 | 4,593 | 32,720 | 16,092 |
| Switzerland | 136 | 33,539 | 285 | 183,292 | 1,700 | 49,614 | 9,891 | 822 |
| Taiwan | 842 | 265 | 193 | 0 | 0 | 653 | 425 | 2,694 |
| United Kingdom | 1,530 | 225,922 | 470 | 94,317 | 7 | 167,893 | 1,049,335 | 2,682,866 |

Footnotes at end of table

## Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004

Statistics of Income Bulletin | Fall 2008

Table 3. Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Forms 5472: Transactions Between Corporations and Related Foreign Persons, by NAICS Industrial Sector of Domestic Corporation and Selected Country of Residence of Related Foreign Person, 2004-Continued

| Selected NAICS industrial sector of domestic corporation and residence of related foreign person [1] | Transactions between foreign-owned domestic corporations and related foreign persons-continued |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Amounts paid to related foreign persons-continued |  |  |  |  |  |  |  |
|  | Purchases, leases, and licenses of intangible property rights | Consideration for technical, managerial, or like services | Commissions | Interest | Premiums for insurance or reinsurance | Other | Amounts loaned |  |
|  |  |  |  |  |  |  | Beginning balance | Ending balance |
| Retail trade <br> All geographic areas, total | (19) | (20) | (21) | (22) | (23) | (24) | (25) | (26) |
|  | 10 | 170,461 | 52,240 | 702,154 | 361,538 | 125,989 | 1,472,304 | 1,743,197 |
| Australia | 0 | 0 | 0 | 0 | 0 | 0 | 908 | 201 |
| Belgium | 0 | 1,840 | 0 | 0 | 0 | 6,224 | 547,460 | 225,939 |
| Brazil | 0 | 0 | 27 | 0 | 0 | 0 | 811 | 1,747 |
| Canada | 0 | 91,521 | 0 | 5,685 | 0 | 2,044 | 170,176 | 472,193 |
| France | 0 | 7,147 | 0 | 699 | 0 | 24,316 | 1,900 | 4,783 |
| Germany | 10 | 2,008 | 287 | 0 | 0 | 629 | 2,968 | 5,316 |
| Hong Kong | 0 | 0 | 18,381 | 0 | 0 | 0 | 0 | 0 |
| Ireland | 0 | 0 | 0 | 13,188 | 52,679 | 0 | 0 | 0 |
| Japan | 0 | 31,608 | 55 | 898 | 0 | 2,709 | 19,046 | 14,819 |
| Mexico | 0 | 0 | 0 | 10,371 | 0 | 0 | 289,084 | 374,544 |
| Netherlands | 0 | 8,287 | 0 | 224,864 | 0 | 73,544 | 436,130 | 630,992 |
| Switzerland | 0 | 478 | 14,272 | 362,564 | 0 | 5,762 | 19 | 0 |
| United Kingdom | 0 | 6,231 | 0 | 29,926 | 0 | 0 | 2,971 | 2,953 |
| Transportation and warehousing |  |  |  |  |  |  |  |  |
| All geographic areas, total | 5,720 | 344,159 | 2,688,381 | 360,475 | 39,851 | 1,416,282 | 1,495,531 | 2,042,841 |
| Australia | 0 | 2,682 | 3,095 | 0 | 0 | 8,904 | 636 | 88 |
| Belgium | 0 | 2,365 | 0 | 0 | 0 | 22,375 | 0 | 0 |
| Bermuda | 0 | 0 | 12,698 | 77 | 0 | 0 | 94,485 | 47,045 |
| Brazil | 0 | 2,799 | 62 | 0 | 0 | 8,990 | 0 | 0 |
| Canada | 0 | 56,382 | 1 | 46,113 | 0 | 87,462 | 337,869 | 473,823 |
| China | 0 | 0 | 3,907 | 0 | 0 | 49,715 | 0 | 0 |
| France | 0 | 4,574 | 42 | 0 | 0 | 18,788 | 0 | 0 |
| Germany | 0 | 17,975 | 3,947 | 21,694 | 670 | 420,844 | 529,752 | 898,114 |
| Hong Kong | 0 | 65,069 | 698 | 0 | 0 | 109,918 | 0 | 0 |
| Hungary | 0 | 0 | [2] | 25,135 | 0 | 2,454 | 0 | 0 |
| Ireland | 0 | 375 | 7 | 0 | 0 | 14,262 | 0 | 0 |
| Japan | 0 | 4,044 | 18,155 | 3,223 | 0 | 24,981 | 4,409 | 5,300 |
| Mexico | 0 | 1,599 | 3,266 | 204 | 0 | 32,957 | 0 | 301 |
| Netherlands | 5,720 | 6,818 | 47 | 12,718 | 0 | 11,513 | 14,912 | 40,560 |
| Singapore | 0 | 2,054 | 2,630,541 | 0 | 0 | 12,249 | 0 | 0 |
| South Korea | 0 | 3,991 | 0 | 0 | 0 | 18,039 | 0 | 0 |
| Sweden | 0 | 278 | 12 | 0 | 0 | 6,871 | 0 | 0 |
| Switzerland | 0 | 920 | 36 | 0 | 0 | 13,349 | 0 | 0 |
| I aiwan | 0 | 6,082 | 35 | 0 | 0 | 24,255 | 0 | 0 |
| United Kingdom | 0 | 61,649 | 7,508 | 103,713 | 39,181 | 43,596 | 508,901 | 537,232 |
| Information All geographic areas, total | 255,155 | 121,694 | 96,738 | 2,784,610 | 2,894 | 432,288 | 4,503,815 | 7,682,849 |
| Australia | 317 | 751 | 754 | 0 | 0 | 867 | 1,790 | 2,900 |
| Belgium | 82 | 2 | 189 | 0 | 0 | 791 | 10 | 10 |
| Bermuda | 0 | 0 | 0 | 12,751 | 926 | 181,102 | 398,702 | 327,367 |
| Brazil | 95 | 46 | 0 | 0 | 0 | 182 | 0 | 0 |
| Canada | 3,256 | 6,672 | 828 | 96 | 0 | 3,014 | 364,287 | 466,456 |
| China | 0 | 0 | 0 | 0 | 0 | 0 | 45 | 0 |
| France | 2,676 | 1,056 | 872 | 0 | 0 | 574 | 19,688 | 19,116 |
| Germany | 11,903 | 2,629 | 848 | 53,701 | 0 | 27,801 | 123,775 | 3,343,444 |
| Hong Kong | 3 | 81 | 130 | 0 | 0 | 169 | 8,151 | 5,151 |
| Hungary | 1 | 0 | 0 | 89,015 | 0 | 0 | 76 | 76 |
| Ireland | 0 | 39 | 2,387 | 0 | 0 | 7,021 | 23,413 | 12 |
| Japan | 138,534 | 1,194 | 17,656 | 0 | 0 | 990 | 2,242 | 179 |
| Mexico | 2,524 | 17 | 4 | 0 | 0 | 195 | 0 | 0 |
| Netherlands | 2,620 | 6,112 | 51,764 | 741,180 | 0 | 3,163 | 6,159 | 6,678 |
| Singapore | 172 | 4,031 | 62 | 0 | 0 | 2,044 | 248 | 248 |
| South Korea | 1,634 | 42 | 876 | 0 | 0 | 118 | 0 | 0 |
| Sweden | 10,008 | 569 | 395 | 14 | 0 | 1,009 | 10 | 10 |
| Switzerland | 10 | 14,808 | 2 | 619,549 | 0 | 162,188 | 11,488 | 5 |
| Taiwan | 0 | 0 | 20 | 0 | 0 | 0 | 193 | 193 |
| United Kingdom | 76,397 | 82,974 | 13,956 | 161,491 | 1,968 | 39,580 | 2,967,412 | 2,854,806 |

Footnotes at end of table.

# Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004 

Statistics of Income Bulletin | Fall 2008

Table 3. Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Forms 5472: Transactions Between Corporations and Related Foreign Persons, by NAICS Industrial Sector of Domestic Corporation and Selected Country of Residence of Related Foreign Person, 2004-Continued

| Selected NAICS industrial sector of domestic corporation and residence of related foreign person [1] | Transactions between foreign-owned domestic corporations and related foreign persons-continued |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Amounts paid to related foreign persons-continued |  |  |  |  |  |  |  |
|  | Purchases, leases, and licenses of intangible property rights | Consideration for technical, managerial, or like services | Commissions | Interest | Premiums for insurance or reinsurance | Other | Amounts loaned |  |
|  |  |  |  |  |  |  | Beginning balance | Ending balance |
| Finance and insurance <br> All geographic areas, total | (19) | (20) | (21) | (22) | (23) | (24) | (25) | (26) |
|  | 36,930 | 697,681 | 368,749 | 8,466,672 | 12,595,009 | 4,503,983 | 91,959,744 | 201,336,043 |
| Australia | 0 | 257 | 1,667 | 18,266 | 3,489 | 16,184 | 19,792 | 1,413,841 |
| Belgium | 0 | 198 | 1,714 | 405,006 | 2,868 | 65,523 | 3,185,875 | 50,802,185 |
| Bermuda | 0 | 3,476 | 138,325 | 52,837 | 1,394,208 | 116,879 | 14,857 | 325,625 |
| Brazil | 0 | 0 | 81 | 0 | 0 | 544 | 6 | 6 |
| Canada | 1,784 | 40,832 | 38,174 | 190,974 | 113,274 | 56,557 | 1,564,455 | 4,547,432 |
| China | 0 | 875 | 210 | 0 | 0 | 0 | 145 | 663 |
| France | 1,000 | 49,701 | 109,281 | 598,159 | 34,992 | 86,171 | 8,658,588 | 5,083,325 |
| Germany | 0 | 297 | 1,572 | 602,838 | 1,327,189 | 107,961 | 530,872 | 620,779 |
| Hong Kong | 0 | 1,130 | 731 | 749 | 137 | 53,559 | 101,160 | 5,179,532 |
| Hungary | 0 | 0 | 30 | 48,084 | 0 | 0 | 0 | 0 |
| Ireland | 0 | 19,748 | 5,549 | 19,404 | 2,558,659 | 139,728 | 364,339 | 295,739 |
| Japan | 0 | 5,328 | 10,530 | 54,102 | 687 | 126,325 | 1,166,465 | 1,028,724 |
| Mexico | 0 | 0 | 5 | 0 | 12,524 | 356 | 125 | 131 |
| Netherlands | 0 | 45,021 | 512 | 872,788 | 5,617 | 743,528 | 5,622,270 | 5,971,173 |
| Singapore | 0 | 0 | 3,761 | 6,423 | [2] | 10,458 | 26,306 | 64,589 |
| South Korea | 0 | 0 | 0 | 0 | 0 | 1,313 | 5,180 | 5,072 |
| Sweden | 0 | 0 | 82 | 0 | 172 | 0 | 0 | 0 |
| Switzerland | 34,146 | 461,426 | 14,173 | 2,833,438 | 5,688,115 | 530,370 | 25,016,405 | 31,706,774 |
| Taiwan | 0 | 0 | 113 | 0 | 24 | 84 | 0 | 0 |
| United Kingdom | 0 | 66,711 | 36,962 | 2,357,460 | 580,621 | 2,406,011 | 42,515,540 | 88,503,651 |
| Real estate and rental and leasing All geographic areas, total |  |  |  |  |  |  |  |  |
|  | 0 | 9,556 | 242 | 353,010 | 374 | 1,401 | 2,125,942 | 1,952,921 |
| Canada | 0 | 63 | 0 | 2,050 | 0 | 147 | 341,000 | 587,879 |
| Netherlands | 0 | 1,524 | 0 | 57,288 | 0 | 1,029 | 0 | 0 |
| Professional, scientific, and technical services |  |  |  |  |  |  |  |  |
| All geographic areas, total | 910,730 | 860,296 | 58,560 | 477,262 | 5,909 | 47,254 | 3,902,277 | 4,414,402 |
| Australia | 0 | 16,399 | 1,311 | 0 | 0 | 116 | 31,733 | 35,578 |
| Belgium | 0 | 2,139 | 1,179 | 0 | 0 | 0 | 7,988 | 8,716 |
| Brazil | 0 | 677 | 177 | 0 | 0 | 626 | 2,412 | 3,398 |
| Canada | 0 | 14,989 | 1,245 | 0 | 0 | 2,591 | 12,460 | 39,063 |
| China | 0 | 63 | 0 | 0 | 0 | 1 | 29 | 0 |
| France | 44,858 | 454,120 | 4,974 | 11,974 | 926 | 139 | 84,731 | 102,637 |
| Germany | 865,872 | 103,278 | 7,333 | 21,187 | 763 | 12,035 | 61,493 | 145,334 |
| Hong Kong | 0 | 2 | 1,271 | 38 | 0 | 213 | 186 | 1,147 |
| Hungary | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Ireland | 0 | 64 | 0 | 0 | 0 | 63 | 55 | 0 |
| Japan | 0 | 6,802 | 2,484 | 13 | 0 | 1 | 481,853 | 1,121,684 |
| Mexico | 0 | 630 | 2,198 | 5 | 0 | 0 | 422 | 335 |
| Netherlands | 0 | 52,068 | 739 | 149,826 | 4,113 | 450 | 122,507 | 200,671 |
| Singapore | 0 | 598 | 0 | 0 | 0 | 83 | 55 | 102 |
| South Korea | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 33 |
| Sweden | 0 | 0 | 0 | 0 | 0 | [2] | 19,609 | 24,503 |
| Switzerland | 0 | 413 | 444 | 0 | 0 | 3 | 113 | 116 |
| Taiwan | 0 | 0 | 0 | 0 | 0 | 3 | 0 | 0 |
| United Kingdom | 0 | 104,794 | 18,264 | 255,434 | 108 | 23,312 | 3,019,124 | 2,682,792 |
| Management of companies and enterprises |  |  |  |  |  |  |  |  |
| All geographic areas, total | 33 | 74,602 | 41,858 | 945,637 | 833 | 284,792 | 9,801,113 | 17,139,765 |
| Australia | 0 | 47 | 234 | 182 | 0 | 675 | 3,211 | 4,604 |
| Canada | 33 | 50,018 | 2,802 | 1,049 | 833 | 14,989 | 747,505 | 685,229 |
| France | 0 | 0 | 2,224 | 64,243 | 0 | 0 | 728,901 | 843,561 |
| Japan | 0 | 2,366 | 441 | 3,845 | 0 | 59,036 | 329 | 2,296 |
| United Kingdom | 0 | 6,770 | 25,209 | 424,177 | 0 | 40,132 | 6,942,525 | 10,105,660 |

[^11]
## Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004

Statistics of Income Bulletin | Fall 2008

Table 3. Foreign-Owned Domestic Corporations with Total Receipts of $\$ 500$ Million or More and with Forms 5472: Transactions Between Corporations and Related Foreign Persons, by NAICS Industrial Sector of Domestic Corporation and Selected Country of Residence of Related Foreign Person, 2004-Continued
[Money amounts are in thousands of dollars]

| Selected NAICS industrial sector of domestic corporation and residence of related foreign person [1] | Transactions between foreign-owned domestic corporations and related foreign persons-continued |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Amounts paid to related foreign persons-continued |  |  |  |  |  |  |  |
|  | Purchases, leases, and licenses of intangible property rights | Consideration for technical, managerial, or like services | Commissions | Interest | Premiums for insurance or reinsurance | Other | Amounts loaned |  |
|  |  |  |  |  |  |  | Beginning balance | Ending balance |
| Administrative and support and All geographic areas, total | (19) | (20) | (21) | (22) | (23) | (24) | (25) | (26) |
|  | 63,184 | 35,300 | 0 | 530,928 | 69,435 | 58,892 | 175,884 | 385,940 |
| Canada | 0 | 3,231 | 0 | 0 | 0 | 0 | 39 | 51 |
| France | 0 | 0 | 0 | 111,549 | 1,340 | 0 | 0 | 0 |
| Netherlands | 0 | 0 | 0 | 31,109 | 0 | 31,355 | 51,341 | 527 |
| Switzerland | 60,859 | 16,731 | 0 | 166,078 | 0 | 1,618 | 0 | 0 |
| United Kingdom | 2,325 | 13,507 | 0 | 169,422 | 6,063 | 1,990 | 7,997 | 135,424 |
| Health care and social assistance All geographic areas, total | 0 | 0 | 0 | 133,476 | 18,102 | 0 | 1,524,155 | 1,685,155 |
| Arts, entertainment, and recreation All geographic areas | d | d | d | d | d | d | d | d |
| Accommodation and food services All geographic areas, total | 24,605 | 240,908 | 0 | 213,425 | 0 | 76,186 | 918,952 | 1,620,134 |
| France | 0 | 3,462 | 0 | 1,972 | 0 | 3,120 | 0 | 0 |
| Germany | 0 | 0 | 0 | 10,696 | 0 | 54,750 | 6,519 | 45,543 |
| United Kingdom | 16,225 | 191,923 | 0 | 133,259 | 0 | 5,589 | 440,585 | 861,862 |
| Other services All geographic areas, total | d | d | d | d | d | d | d | d |

d-In order to avoid disclosure of information for specific corporations, some data have been deleted. Data are included in appropriate totals.
[1] Selected country data have been deleted to prevent disclosure of information for individual taxpayers. However, the data are included in the appropriate totals.
[2] Amounts less than $\$ 500$.
NOTES: NAICS is the abbreviation for the North American Industry Classification System. Detail may not add to totals because of rounding.


[^0]:    ${ }^{1}$ IR Code section 6038A.
    2 IR Code sections 267(b), 482, and 707(b)(1).

[^1]:    ${ }^{3}$ Form 5472 statistics for Tax Years 1988 through 1990 covered all foreign-owned domestic corporations with total receipts of $\$ 1$ billion or more. Statistics for Tax Years 1991 through 1994, 1996, 1998, 2000, and 2002 covered all foreign-owned domestic corporations with total receipts of $\$ 500$ million or more. Consequently, data for 1991 and thereafter are not comparable to the earlier studies.
    ${ }^{4}$ Additional information about Statistics of Income Form 5472 studies for Tax Years 1988 through 1998 may be found in the following Statistics of Income Bulletin issues: Tax Year 1988, Summer 1992, Volume 12, Number 1; Tax Year 1989, Spring 1993, Volume 12, Number 4; Tax Year 1990, Summer 1994, Volume 14, Number 1; Tax Year 1991, Summer 1995, Volume 15, Number 1; Tax Year 1992, Fall 1996, Volume 16, Number 2; Tax Year 1993, Fall 1997, Volume 17, Number 2; Tax Year 1994, Winter 1997-1998, Volume 17, Number 3; Tax Year 1996, Fall 1999, Volume 19, Number 2; Tax Year 1998, Fall 2001, Volume 21, Number 2; Tax Year 2000, Fall 2003, Volume 23, Number 2; Tax Year 2002, Winter 2006, Volume 25, Number 3.
    5 IR Code section 6038A(d).
    6 For a more extensive discussion of the legislative history of this reporting requirement, see Duffy, Heather R. "Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2000," Statistics of Income Bulletin, Fall 2003, Volume 23, Number 1. For the discussion of these requirements in the Congressional record, see 135 Congressional Record. S13057-03, S13147.
    7 For more information on the corporate sample and statistics on corporation income tax returns for 2004, see Statistics of Income-2004, Corporation Income Tax Returns. ${ }^{8}$ Foreign corporations (except life insurance companies) engaged in a U.S. trade or business file Form 1120-F, U.S. Income Tax Return of a Foreign Corporation. These returns are excluded from the Form 5472 statistics. However, data reported by a few foreign life insurance companies filing Form 1120-L, U.S. Life Insurance Company Income Tax Return, are included in the Form 5472 statistics to ensure completeness of the industry statistics for domestic corporations.
    ${ }^{9}$ For the first time in Tax Year 1998, corporate returns reported their principal business activities according to the North American Industry Classification System (NAICS). This system was developed as a result of the North American Free Trade Agreement (NAFTA) to standardize business classifications for the United States, Canada, and Mexico. NAICS divides the economy into twenty sectors, with an emphasis on production processes. NAICS replaced the Standard Industrial Classification (SIC) codes, which were used to classify corporations in past Statistics of Income studies, causing a break in the year-to-year comparability of the industrial data.

[^2]:    ${ }^{10}$ Statistics on domestic corporations controlled by foreign persons for 2004 are reported in Hobbs, James R., "Foreign-Controlled Domestic Corporations, 2004," Statistics of Income Bulletin, Summer 2007, Volume 27, Number 1

[^3]:    Footnotes at end of table

[^4]:    Footnotes at end of table.

[^5]:    Footnotes at end of table.

[^6]:    Footnotes at end of table.

[^7]:    d-In order to avoid disclosure of information for specific corporations, some data have been deleted. Data are included in appropriate totals

[^8]:    Footnotes at the end of table.

[^9]:    Footnotes at end of table.

[^10]:    Footnotes at end of table

[^11]:    Footnotes at end of table.

