Corporate Foreign Tax Credit, 1980: An Industry Focus

By William States*

For 1980, the foreign tax credit provisions of U.S. tax law enabled corporations to reduce their U.S. tax liability by almost \$25 billion. Although this amount was the smallest since the \$23.6 billion claimed for 1976, it still reduced the total corporate U.S. tax liability from \$105.1 billion to \$80.3 billion, a reduction of almost 24 percent. This sizeable reduction in the total corporate U.S. tax liability was accounted for by a relatively small number of corporations. Of the nearly 1.2 million corporations with U.S. tax liability before credits, fewer than 0.6 percent (6,199) claimed a foreign tax credit for income taxes paid to foreign countries [1].

As in past years, corporations primarily engaged in integrated petroleum activities (i.e., extracting, refining and marketing petroleum products) accounted for a significant portion of the total foreign tax credit claimed. Although only 43 of the 6,199 corporations claiming a foreign tax credit were engaged in integrated petroleum activities, their \$11.0 billion in foreign tax credit claimed accounted for more than 44 percent of the total credit. In addition, the U.S. tax liability of all corporations in the integrated petroleum industry was reduced from \$21.0 billion to \$10.0 billion, or by more than 52 percent.

EVOLUTION OF THE FOREIGN TAX CREDIT

Generally, U.S. corporations are subject to U.S. tax on their worldwide income. When a portion of this income is derived from foreign sources, the foreign income is also typically subject to tax by the country in which it was earned. This results in double taxation of the foreign income. To alleviate the consequences of this double taxation, U.S. tax law allows corporations a credit against U.S. income tax for income taxes paid to foreign countries [2].

The United States was the first country to provide a tax credit for income taxes paid to foreign countries [3]. The foreign tax credit was established as part of the Revenue Act of 1918. The original foreign tax credit provisions allowed corporations to reduce their U.S. tax liability by the amount of their foreign income tax burden, without limitation. In cases in which the foreign tax rate exceeded the U.S. tax rate, the foreign taxes paid in excess of the U.S. tax rate effectively reduced the U.S. tax on domestic income.

The ability of some corporations to offset U.S. tax on domestic income with the credit for foreign income taxes led to the development of the foreign tax credit limitation. The limitation was first adopted as part of the Revenue Act of 1921 and still remains as a fundamental principle of the current foreign tax credit provisions of U.S. tax law. The basis of the limitation is to restrict the crediting of foreign income taxes to the lesser of (1) the U.S. tax on foreign-source taxable income, or (2) the actual foreign income taxes paid.

Before the enactment of the Revenue Act of 1962, corporations combined all types of foreign income for purposes of computing their foreign tax credit limitation. With passage of the 1962 Act, corporations were required to compute a separate foreign tax credit limitation for certain investment interest income. This separate limitation removed the incentive for corporations with foreign-source income, taxed at rates in excess of the U.S. tax rate, from making interest-bearing investments abroad to generate additional foreign income. Since this foreign-source interest income was usually subject to little or no foreign tax, the addition of this lower-taxed foreign income to the higher-taxed foreign income enabled corporations to increase the total foreign tax credit claimed. Subsequent legislation required additional separate foreign tax credit limitations with respect to certain other types of foreign income.

For Tax Year 1980, separate foreign tax credit limitations were required with respect to (1) certain investment interest income, (2) dividends received from a Domestic International Sales Corporation (DISC) or former DISC, (3) foreign oil-related income, and (4) all other income from foreign sources [4]. The total foreign tax credit claimed was the sum of the four separate types of income credits. In certain instances, the total foreign tax credit claimed was reduced for participation in or for cooperation with international boycotts [5].

FOREIGN TAX CREDIT BY INDUSTRY

Foreign Income, Tax and Credit Trends

Although there was little change in the total foreign tax credit claimed from 1977 to 1980 (see Figure A), there were distinctly different industry trends. During this period, the foreign tax credit claimed for all industries except the oil and gas extraction industry increased by approximately 24 percent per year. Particularly noteworthy was the integrated petroleum industry, which increased by almost 40 percent per year over the 3-year period. On the other hand, the foreign tax credit claimed by corporations primarily engaged in oil and gas extraction decreased by almost 87 percent from 1977 to 1980, while alternatingly decreasing and increasing during the intervening years [6].

For Tax Year 1979, corporate profits, as measured by total income subject to U.S. tax, increased by \$40.6 billion over the 1978 level to almost \$280.2 billion (see Figure B). A significant portion of this increase was accounted for by the \$27.4 billion increase in foreign-source taxable income, as both foreignsource taxable income (\$92.5 billion) and foreign tax credit claimed (\$36.8 billion) reached all-time highs for 1979.

Although every industry contributed to the \$10.5 billion increase in foreign tax credit claimed for 1979, the oil and gas extraction industry alone accounted for \$6.1 billion, or almost 60 percent of the total increase. An additional \$1.8 billion (or 17 percent) of the increase was attributed to the integrated petroleum industry. As many of the corporations in the oil and gas extraction and integrated petroleum industries had substantial operations in countries that were members of the Organization of Petroleum Exporting Countries (OPEC) [7], much of the increase in foreign income and foreign tax credit claimed can be attributed to the OPEC-induced rise in petroleum prices and the increased foreign taxes paid on their larger foreign earnings.

For 1980, corporate profits declined from 1979, as illustrated by the \$33.6 billion reduction in total income subject to U.S. tax. While corporate profits declined in many industries [8], the decreases in total foreignsource taxable income and total foreign tax credit_claimed_were_largely_restricted_to_the oil and gas extraction industry. Excluding this industry, the foreign tax credit claimed increased by 26 percent over 1979. In particular, the foreign tax credit claimed by the

Figure A. --Foreign Tax Credit Claimed and Percent Change in Foreign Tax Credit Claimed, by Selected Industry, 1977-1980

· · · · · · · · · · · · · · · · · · ·	1977	1	978	1	979	1	980	_
Selected industry	Amount	Amount	Percent change from 1977	Amount	Percent change from 1978	Amount	Percent change from 1979	Percent change 1977 to 1980
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
All industries	\$26,006	\$26,358	1.48	\$36,828	39.7%	\$24,880	-32.4%	-4.3%
Mining Oil and gas	13,959	12,513	-10.4	18,719	49.6	1,964	-89.5	-85.9
extraction Manufacturing	13,898 10,154	12,446 11,654	-10.5 14.8	18,591 15,286	49.4 31.2	1,822 19,192	-90.2 25.5	-86.9 89.0
Chemicals and allied products Petroleum (including	904	1,156	27.8	1,531	32.5	1,721	12.4	90.3
integrated) and coal products Machinery, except	4,041	4,665	15.5	6,447	`38.2	11,028	71.0	172.9
electrical	1,624	1,915	17.9	2,216	15.7	2,331	5.2 [·]	43.6
Wholesale and retail trade Finance, insurance,	604	594	-1.6	891	50.0	1,525	71.1	152.4
and real estate	867	1,104	27.3	1,290	16.8	1,397	8.3	61.1

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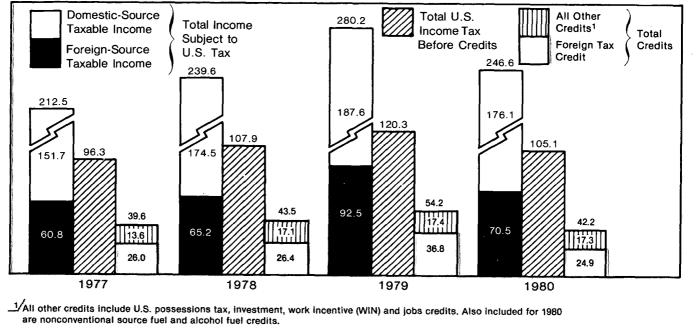
[All figures are estimates based on samples--money amounts are in millions of dollars]

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Figure B

Domestic-Source Taxable Income, Foreign-Source Taxable Income, Total Income Subject to U.S. Tax, Total U.S. Income Tax Before Credits, Foreign Tax Credit and All Other Credits, 1977–1980

(Billions of Dollars)



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

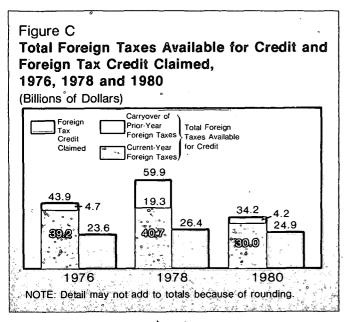
integrated petroleum industry increased by \$4.6 billion, or by 71 percent over 1979. The foreign tax credit claimed by corporations engaged in wholesale and retail trade also increased by 71 percent, from almost \$900 million to more than \$1.5 billion. This increase was largely attributable to those corporations involved in wholesaling petroleum and petroleum products.

Although the foreign tax credit claimed by most industries increased for 1980, these increases were more than offset by a \$16.8 billion reduction in foreign tax credit claimed by the oil and gas extraction industry. This decline was largely the result of the foreign nationalization of certain U.S. oil interests in the Middle East. This nationalization adversely affected the industry's foreign earnings, which reduced the amount of foreign taxes available for credit [9].

Since foreign taxes can only offset the U.S. income tax on foreign income, the total foreign taxes available for credit often exceed the allowable credit. The combined effect of the foreign tax credit limitation and the statutory reduction for excess foreign oil and gas extraction taxes [10] are illustrated by Figure C [11]. For 1980, the \$24.9 billion in foreign tax credit claimed represented only 73 percent of the \$34.2 billion in total foreign taxes available for credit. Of the \$9.3 billion in foreign taxes that were not creditable for 1980, \$4.1 billion were foreign oil and gas extraction taxes in excess of 46 percent (the maximum U.S. tax rate) of foreign oil and gas extraction taxable income [12].

Impact of Prior-Year Foreign Taxes

Foreign taxes that cannot be claimed as a credit currently because of the operation of the foreign tax credit limitation may be credited in prior or subsequent years. With the exception of excess foreign oil and gas extraction taxes, U.S. tax law permitted all foreign taxes that could not be claimed currently as a tax credit to be carried back 2 years and forward 5 years. The foreign taxes carried to other years may be credited in such years' to the extent that the current-year foreign taxes do not equal or exceed the foreign tax credit limitation for that year. The amount



of excess foreign oil and gas extraction taxes that could be carried to prior or subsequent years was limited to 2 percent of foreign oil and gas extraction taxable income.

Nearly 1,200 corporations carried more than \$4.2 billion in unused prior-year foreign taxes to 1980 [13] for potential crediting against their U.S. income tax on foreign-source taxable income. As shown in Figure D, 514 corporations credited \$736 million, or more than 17 percent of the total carryover. No foreign tax credit was claimed with respect to the foreign tax carryover for the remaining 680 corporations with carryover. In the case of these corporations, the current-year foreign income taxes offset completely the U.S. tax on foreign-source taxable income, precluding the crediting of any foreign tax carryover.

The oil and gas extraction and integrated petroleum industries together accounted for more than \$3.2 billion of the \$4.2 billion in unused foreign taxes carried to 1980. The substantial carryover for these industries was largely a function of the relatively high effective foreign tax rates in prior years. More than \$485 million of the \$3.2 billion available carryover for these industries was used to offset U.S. income tax on foreign-source taxable income. Of this amount, \$452 million was accounted for by three large integrated petroleum companies.

On a percentage basis, the banking industry credited the largest proportion of its available foreign tax carryover. The \$52 million in credited carryover represented 98 percent of the total carryover available. The \$53 million in uncredited prior-year foreign taxes carried to 1980 were primarily the result of substantial prior-year domestic losses. These losses effectively reduced the U.S. tax before credits on foreign-source taxable income, thereby reducing the amount of foreign taxes that could be credited in the domestic loss years.

For some corporations, the choice between domestic and foreign investments is influenced by the amount of unused prior-year foreign taxes available for credit. Those corporations with carryover that may not be used because the 5-year carryforward period is about to expire often choose to make the foreign investment if the resulting income is subject to a relatively low foreign tax rate. In many instances, the addition of this relatively low-taxed foreign income enables corporations to credit some portion of their carryover against the U.S. tax on the additional foreign income. This results in a lower U.S. tax liability after credit than if the alternative domestic investment was made, as the U.S. tax on the income from the domestic investment cannot be reduced by the foreign tax carryover.

Estimated Effective U.S. Tax Rates on Foreign-Source Taxable Income

The actual U.S. income tax paid on a corporation's foreign-source taxable income is a function of the overall foreign tax rate as well as the U.S. income tax rate. Since the U.S. tax on foreign-source taxable income is reduced on a dollar-for-dollar basis by the amount of foreign income taxes paid, the effective U.S. tax rate on foreign-source taxable income is often much less than the U.S. statutory rate. In general, a measure of a corporation's effective U.S. tax rate on tax rate on foreign-source taxable income is the actual amount of U.S. income tax (U.S. income tax on foreign-source taxable income less the foreign tax credit claimed) on foreign-source taxable income, expressed as a percentage of foreignsource taxable income. For those corporations for which the U.S. income tax on foreign-source taxable income is entirely eliminated by the foreign tax credit, the effective U.S. tax rate on foreign-source taxable income is zero.

For purposes of obtaining a relative measure of the effective U.S. tax rate on foreign-source taxable income for selected major industries, the five corporations with the largest foreign tax credit claimed and the five corporations with the largest foreign-source taxable income in each industry were selected. Those corporations among the five largest in both categories were included only once for purposes of this analysis [14]. The results of the analysis of the 99 selected corporations is presented in Brief summaries of the methodology Figure E. and the limitations of the statistics are presented in the Data Sources and Limitations section of this article.

The average effective U.S. tax rate on foreign-source taxable income for the selected corporations was 2.7 percent [15]. Many of the Figure D.--Foreign Tax Credit Claimed, Carryover Credited and Carryover Credited as a Percent of Both Total Carryover and Foreign Tax Credit Claimed, by Selected Major Industry, 1980

		ign tax claimed	of pri	arrryover or year n taxes	Carryover for		Carryover as a perc	
Selected major industry	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Total carryover	Total foreign tax credit claimed
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
All industries Agriculture, forestry, and	6,199	\$24,879,737	1,194	\$4,210,788	514	\$735,656	17.58	3.0%
fishing	89	7,490	3	697		72	10.3	1.0
Mining	162	1,963,897	71	992,350		37,616	3.8	1.9
Oil and gas extraction		1,822,371	59	940,635		26,055	2.8	1.4
Construction	161	150,842	20	23,529		8,237	35.0	5.5
Manufacturing		19,191,909	351	2,842,132		576,779	20.3	3.0
Food and kindred products Chemicals and allied	169	653,025	34	24,778	31	10,335	41.7	1.6
products Petroleum (including inte-	246	1,720,564	41	94,869	26	7,126	7.5	0.4
grated) and coal products .	43	11,027,563	17	2,284,333	12	459,430	20.1	4.2
Primary metal industries	79	611,160	11	91,132		36,517	40.1	6.0
Electrical and electronic	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	,						
equipment	225	643,169	40	148,917	17	14,498	9.7	2.3
Transportation equipment,	70	1 141 477		62.071	**	33 (37		15 7
except motor vehicles Transportation and public	39	141,473	8	52,231	**	21,613	41.4	15.3
utilities	147	462,236	32	134,461	18	21,922	16.3	4.7
Transportation	109	211,438	24	109,465	11	20,610	18.8	9.7
Wholesale and retail trade	769	1,524,766	117	91,490		18,023	19.7	1.2
Wholesale trade	649	1,387,957	77	71,020	49	8,557	12.0	0.6
Retail trade	120	136,809	39	20,470		9,467	46.2	6.9
Finance, insurance, and real			ļ			,		
estate	1,738	1,397,281	522	89,317	134	66,958	75.0	4.8
Banking		1,061,486	19	53,361	**	52,283	98.0	4.9
Services	862	181,307	78	36,812	47	6,048	16.4	3.3

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

******Data deleted to avoid disclosure of information for specific corporations. NOTE: Detail may not add to totals because of rounding.

selected corporations effectively had no U.S. income tax liability on their foreign-source taxable income, while some had effective U.S. tax rates on foreign-source taxable income approaching 46 percent (the maximum U.S. tax rate). Although these 99 corporations represented only 1.6 percent of the total number of corporations claiming a foreign tax credit, their foreign-source taxable income and foreign tax credit claimed accounted for approximately two-thirds of the respective totals for all corporations claiming a foreign tax credit.

Most industries had corporations with effective U.S. tax rates on foreign-source taxable income ranging from zero to well above the 2.7 percent overall average rate. However, the corporations representing the oil and gas extraction, integrated petroleum and banking industries had effective U.S. tax rates on foreign-source taxable income ranging from zero to only 1.7 percent. The average effective U.S. tax rate on foreign-source taxable income for the 17 corporations in these industries was less than 0.5 percent. For the remaining 82 corporations in other industries, the average effective U.S. tax rate on foreign-source taxable income was 5.8 percent.

As discussed earlier, the corporations representing the oil and gas extraction and integrated petroleum industries had two of the lowest average effective U.S. tax rates on foreign-source taxable income. These low effective U.S. tax rates were the result of the relatively high current-year foreign tax rates in combination with the prior-year foreign taxes available for credit (carryover). In particular, these corporations effectively had no U.S. income tax liability on their foreign oil-related income as the foreign taxes available for credit (current-year foreign taxes after reduction for excess oil and gas extraction taxes plus carryover of prior-year foreign taxes) exceeded the amount needed to offset completely the U.S. income tax on this income. A small amount of U.S. income tax was payable by some of the corporations in both industries with respect to their non oil-related income from foreign sources. In these instances, the Figure E.--Estimated Effective U.S. Tax Rates on Foreign-Source Taxable Income for Selected Corporations, by Selected Major Industry, 1980¹

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

Selected major industry	Number of returns	Total income subject to U.S. tax (adjusted)	Foreign- source taxable income (adjusted)	U.S. income tax before credits	Foreign tax credit claimed (adjusted)	Effective U.S rate on fore source taxal income (perco Range	ign- ble
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All industries Agriculture, forestry, and	99	\$58,797	\$44,361	\$26,937	\$17,032	0.0% to 45.6%	2.78
fishing	5	167	30	76	7	0.0 to 24.3	4.7
lining	10	4,056	3,614	1,867	1,579	0.0 to 24.4	0.7
Oil and gas extraction	5	3,556	3,277	1,637	1,451	0.0 to 1.3	(²)
All other mining	5	500	337	230	128	0.0 to 24.4	7.1
Construction	5.	385	406	177	130	0.0 to 15.1	10.0
fanufacturing	47	· 45,658	30,070	20,981	12,710	0.0 to 45.6	2.7
Food and kindred products	5	1,942	836	893	371	0.0 to 8.9	1.6
Chemicals and allied products Petroleum (including integrated)	6	3,012	1,850	1,373	799	0.0 to 12.1	2.3
and coal products	6	25,061	17,579	11.528	7,987	0.0 to 1.5	0.6
Primary metal industries	6	1,334	959	608	390	0.0 to 12.1	2.7
Machinery, except electrical Electrical and electronic	6	7,173	4,609	3,298	1,930	1.4 to 12.9	3.6
equipment	6	2,324	1,400	1,070	413	0.0 to 12.8	4.1
Motor vehicles and equipment	5	1,040	1,038	477	2 84	0.0 to 21.8	16.6
All other manufacturing Transportation and public	7	3,773	1,799	1,734	537	0.0 to 45.6	12.8
utilities	6	1,731	1,016	796		1.2 to 24.6	7.3
Molesale and retail trade Finance, insurance, and real	6	3,414	3,181	1,564	1,335	0.0 to 25.5	3, 3
estate	13	2,746	5,780	1,212	840	0.0 to 34.2	1.8
Banking All other finance, insurance,	6	1,618	5,252	721	694	0.0 to 1.7	0.5
and real estate	7	1,128	528	491	146	0.0 to 34.2	13.9
Services	7	641	263	264	66	0.0 to 36.3	13.4

 1 For each industry the 5 corporations with the largest foreign tax credit claimed and the 5 corporations with the largest foreign-source taxable income were selected. Those corporations among the 5 largest in both categories were included only once.

²Less than 0.05%.

NOTE: See text for additional information. Detail may not add to totals because of rounding.

foreign taxes available for credit were somewhat less than the U.S. income tax on this income.

The corporations selected to represent the banking industry had a 0.5 percent average effective U.S. tax rate on foreign-source taxable income. Although this effective U.S. tax rate on foreign-source taxable income is petroleum the integrated comparable to industry's rate, the cause of the banking industry's relatively low effective U.S. tax rate was distinctly different. Since all the corporations representing the banking industry had domestic losses, their total worldwide income (total income subject to U.S. tax) was less than their foreign-source taxable income. In the aggregate, the \$1.6 billion in total worldwide income for these banks resulted from \$5.3 billion in foreign-source taxable income reduced by domestic losses of \$3.6 billion. Since the U.S. income tax before credits is

based on worldwide income, the effect of the domestic losses was to reduce the pre-credit U.S. income tax on foreign-source taxable income from approximately \$2.4 billion (or 46 percent of \$5.3 billion) to slightly more than \$700 million (or 46 percent of \$1.6 billion). As a result, the \$721 million in pre-credit U.S. tax liability on foreign-source taxable income was largely eliminated by the \$694 million in foreign tax credit claimed. Without the domestic losses, the average effective U.S. tax rate on foreign-source taxable income would have been approximately 33 percent, as the average foreign tax rate on this foreign-source taxable income was only 13 percent.

The highest average effective U.S. tax rate on foreign-source taxable income for any of the selected industries was the 16.6 percent rate for the corporations primarily engaged in the manufacturing of motor vehicles and equipment. The relatively high average U.S. tax rate was primarily the result of the low overall foreign tax rate of 28 percent on foreign-source taxable income. The average effective U.S. tax rate on foreign-source taxable income would have been slightly higher were it not for the domestic losses of some of the selected corporations.

SUMMARY

Although the foreign tax credit claimed for Tax Year 1980 declined by more than 32 percent from its 1979 all-time high, the \$24.9 billion claimed was still the largest single credit against the U.S. corporate income tax. This nearly 24 percent reduction in the total U.S. corporate tax liability was accounted for by the relatively few corporations (6,199) that claimed a credit for income taxes paid to foreign governments.

For 1980, those corporations in the oil and extraction and integrated petroleum gas industries collectively accounted for more than one-half of the foreign tax credit claimed by all corporations. Particularly noteworthy was the continued growth of the foreign activities of the integrated petroleum industry. The \$11.0 billion in foreign tax credit claimed by corporations in this industry represented a 71 percent increase over 1979. On the other hand, the foreign tax credit claimed by corporations in the oil and gas extraction industry was at its lowest level since 1972. The \$1.8 billion in foreign tax credit claimed by corporations in this industry was nearly \$17 billion less than the credit claimed for 1979. This substantial decrease was largely the result of the nationalization of certain U.S. oil interests in the Middle East.

An analysis of the corporations with the largest foreign-source taxable income and foreign tax credit claimed revealed that the average effective U.S. tax rate on foreignsource taxable income for the selected corporations was less than 3 percent. Many of these corporations effectively had no U.S. income tax liability on their foreign-source taxable income, while some had effective U.S. tax rates on foreign-source taxable income approaching the maximum U.S. tax rate. The average effective U.S. tax rate on foreign-source taxable income for each of the oil and gas extraction, integrated petroleum and banking industries was less than 1 percent. There was very little range in the effective U.S. tax rates on foreign-source taxable income for the corporations selected to represent these three industries, as every effective U.S. tax rate was less than the 2.7 percent average for all industries.

DATA SOURCES AND LIMITATIONS

Sample Selection and Variability

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

From the general corporate sample described earlier, all returns claiming a foreign tax credit were used for the 1980 statistics presented in this article. However, slight differences exist between the 1980 foreign tax credit data presented in this article and the previously published data in <u>Statistics of Income--1980</u>, Corporation Income Tax Returns. These differences are the result of the different weighting methods used for returns sampled at less than the 100 percent rate [16]. In addition, the statistics presented in this article include certain returns with foreign tax credit that were prescribed for inclusion in the 100 percent sample class but were received too late to be included in <u>Statistics of Income--1980</u>, Corporation Income Tax Returns.

Sampling variability (i.e., the degree to which estimates based on a sample differ from similar data based on a complete count or census) arises only in strata in which returns are selected at a rate of less than 100 percent. For this article, returns selected at the 100 percent rate accounted for the largest part of the estimated amounts. For instance, for 1980, those corporations with \$250 million or more in total assets (which were selected at a 100 percent rate) accounted for a major portion of total assets (96.5 percent), foreign tax credit claimed (96.1 percent), and foreign-source taxable income (95.8 percent) of all corporations claiming a foreign tax credit. Because of the predominance of these large corporations, sampling variability is not considered a major limitation of the statistics.

General Limitations

The foreign tax credit is claimed under section 901 of the Internal Revenue Code. Corporations claiming a foreign tax credit generally provide supporting foreign income and tax data on Form 1118, Computation of Foreign Tax Credit--Corporations, attached to the U.S. income tax return. Form 1118 is the source of the foreign income and tax data for this article. The statistics presented in this article do not reflect any adjustments that may be made during audit, when the acceptability of the foreign income and taxes reported for purposes of this credit is finally determined. Additionally, some corporations provided only preliminary foreign income and tax data with their U.S. tax returns because not all the information on their foreign operations was available at the time the U.S. income tax return was filed.

There is a certain amount of undercoverage of foreign income and tax data. In some instances, corporations did not provide a Form 1118 in support of their foreign tax credit claimed with their tax return as originally filed. However, the foreign tax credit claimed by these corporations represented only a fraction of 1 percent of the total foreign tax credit claimed by all corporations. Some corporations with foreign income and taxes operated at a deficit and had no U.S. tax liability against which a foreign tax credit could be claimed. In addition, some corporations chose to deduct their foreign income taxes from gross income rather than credit them against their U.S. tax liability. Data from such returns are excluded from this study. For 1980, the amount of foreign income and tax data so excluded was estimated to be in the range of \$15 billion to \$20 billion.

The U.S. tax law allows parent corporations to file consolidated income tax returns presenting the combined financial data of an entire group of affiliated corporations. Therefore, the actual number of corporations claiming a foreign tax credit is understated, as the statistics in this article represent the number of corporation income tax returns with foreign tax credit. For purposes of this article, however, the term "corporations" is used to denote "returns."

Effective Tax Rate Methodology and Limitations

An effective U.S. tax rate on foreign-source taxable income was computed for each of the 99 corporations selected for inclusion in Figure The computation was made by first deter-Ε. mining each corporation's U.S. income tax before credits on its total foreign-source taxable income. This result represented the portion of a corporation's pre-credit U.S. tax liability that was attributable to its foreign-source taxable income. Each corporation's effective income tax on foreign-source taxable U.S. income was computed by reducing the pre-credit U.S. tax liability on foreign-source taxable income by the amount of foreign tax credit claimed. This represented the actual U.S. income tax liability of the corporation on its foreign-source taxable income. The final step was to calculate the effective U.S. tax rate on foreign-source taxable income by relating the corporation's actual U.S. income tax liability on its foreign-source taxable income to the total amount of foreign-source taxable income.

After computing the effective U.S. tax rate on foreign-source taxable income for each corporation, the data were aggregated to determine the industry averages.

In some instances it was necessary to make relatively small adjustments in foreign-source taxable income, total income subject to U.S. tax, and foreign tax credit claimed for purposes of computing the effective U.S. tax rate on foreign-source taxable income. These adjustments were necessary to ensure the comparability of the resulting effective tax rates. Additional information on the adjustments is available on request.

Since all the corporations selected for this effective tax rate analysis claimed a foreign tax credit against the U.S. income tax on their foreign-source taxable income, the results should not be "generalized" to include those corporations that did not claim a foreign tax credit. For example, the foreign-source taxable income of corporations deducting their foreign income taxes (in lieu of crediting them) and the distributions and tax-deferred profits of Domestic International Sales Corporations (DISC's) were not included in this analysis.

EXPLANATION OF SELECTED TERMS

<u>Current-year foreign taxes.--Generally</u>, currentyear foreign taxes available for credit included both (1) foreign taxes directly paid or accrued by the U.S. corporation on profits of foreign branch operations; withholding taxes on dividends, interest, rents, royalties and license fees; and other foreign taxes paid or accrued on partnership and services income; and (2) foreign taxes indirectly, or deemed, paid by the U.S. corporation. These "deemed paid" taxes were the taxes paid or accrued by a related foreign corporation on the profits from which dividends were paid (or constructive distributions made) to the U.S. corporation.

Foreign oil and gas extraction income.--This was income derived from foreign sources from the extraction of minerals from oil and gas wells or the sale or exchange of assets used in such extraction. Foreign oil and gas extraction income was a part of foreign oil-related income (see following definition). The amount of foreign oil and gas extraction taxes that could be used in the foreign oil-related tax credit computation was limited to 46 percent (the maximum U.S. tax rate for 1980) of foreign oil and gas extraction income.

Foreign oil-related income.--This was income derived from foreign sources from (1) extracting of minerals from oil and gas wells, (2) processing such minerals into their primary products, (3) transporting such minerals or primary products, and (4) selling or exchanging assets used in these activities.

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Foreign-source taxable income.--Foreign-source taxable income was gross foreign-source income (including certain income "constructively," although not "actually," received, i.e., "foreign dividend gross-up" and "includable income of Controlled Foreign Corporations") less the allocable deductions determined under the Internal Revenue Code and by provisions of any tax treaty between the United States and a particular foreign country. This taxable income was the amount on which the U.S. income tax on foreign earnings was determined. It could differ from the net profit from overseas business operations and investments computed under foreign tax law, which was used as the basis for foreign taxation. In general, foreign-source taxable income included foreign branch profits, dividends received from foreign corporations, rental income, royalties, license fees, interest, gains from the sale of real property, and compensation for labor or services performed.

Foreign taxes available for credit.--Generally, foreign taxes available for credit was the sum of (1) current-year foreign taxes (foreign taxes paid or accrued or "deemed paid"), and (2) uncredited prior-year foreign taxes (carryover). In some instances, this sum was reduced for participation in or cooperation with international boycotts or by any excess oil and gas extraction taxes.

NOTES AND REFERENCES

- There will be an article in the Winter 1984-85 issue of the Statistics of Income Bulletin presenting geographically classified foreign income and tax data for Tax Year 1980.
- [2] Under U.S. tax law, corporations could deduct foreign income, war profits and excess profits taxes in lieu of claiming a foreign tax credit. However, most corporations obtained a greater tax benefit by electing to credit these taxes against U.S. income tax rather than deducting them from gross income. Foreign taxes other than income, war profits and excess profits taxes are always deducted from gross income as such taxes cannot be claimed as a foreign tax credit.
- [3] See Owens, Elisabeth A., <u>The Foreign Tax</u> Credit: A Study of the Credit for Foreign <u>Taxes under United States Income Tax Law</u>, <u>Cambridge: Harvard Law School</u>, 1961.
- [4] The Tax Equity and Fiscal Responsibility Act of 1982 repealed the separate foreign tax credit limitation for foreign oilrelated income. For taxable years beginning after December 31, 1982, separate foreign tax credit limitations were

required with respect to (1) certain investment interest income, (2) dividends received from a DISC or former DISC, and (3) all other income from foreign sources.

- [5] U.S. Department of Treasury, The Operation and Effect of the International Boycott Provisions of the Internal Revenue Code -Third Report, May 1982.
- [6] Corporations in the oil and gas extraction industry are primarily engaged in exploring for and extracting natural gas and crude petroleum. Corporations primarily engaged in refining or extracting and refining crude petroleum are classified in the integrated petroleum industry. Corporations in the integrated petroleum industry may also transport and market petroleum products. However, since corporations were classified in the industry which accounted for the greatest portion of worldwide receipts, the industrial classification of some of these corporations does not reflect their actual foreign For example, some of the activity. corporations classified in the integrated petroleum industry were primarily engaged in the extraction of oil and gas abroad, but were not classified as such because their industry classification was based on worldwide rather than foreign receipts.
- [7] The Organization of Petroleum Exporting Countries (OPEC) includes Algeria, Ecuador, Gabon, Indonesia, Iran, Iraq, Kuwait, Libya, Nigeria, Qatar, Saudi Arabia, United Arab Emirates and Venezuela.
- [8] See Hobbs, James R., "Corporation Income Tax Returns: 1980," <u>Statistics of Income</u> <u>Bulletin</u>, Winter 1982-83, pp. 11-16.
- [9] The nationalization resulted in the deduction of certain foreign income taxes from gross income rather than the inclusion of these taxes for foreign tax credit purposes. The foreign income taxes deducted were estimated to be in excess of \$15 billion.
- [10] Under U.S. tax law, oil and gas extraction taxes in excess of 46 percent of foreign oil and gas extraction income were excluded from the foreign tax credit computation with respect to foreign oil-related income.
- [11] Data on the total foreign taxes available for credit for Tax Years 1975, 1977, and 1979 are not available.
- [12] The excess oil and gas extraction taxes for Tax Years 1976 and 1978 were \$11.3 billion and \$7.8 billion, respectively.

- [13] These statistics do not include the carryback of subsequent-year unused foreign taxes. These taxes would be reported at some future date on amended returns and were therefore not available.
- [14] For example, the seven corporations representing the services industry were selected by first compiling a list of the five corporations with the largest foreign tax credit claimed and the five corporations with the largest foreign-source taxable Since three corporations were income. among the five largest in both categories, they were included only once for purposes of this analysis. This selection technique resulted in better effective tax rate estimates than those that would result from the use of industry totals. Effective tax rate estimates based solely on industry totals would be subject to certain "aggregation errors," such as those that would result from the inability to make industry level adjustments for the presence of corporations with domestic losses.
- [15] The 2.7 percent average effective U.S. tax rate on foreign-source taxable income may be somewhat lower than the actual average for all 6,199 corporations claiming a foreign tax credit. Since the selected corporations were those with the largest foreign operations in each industry, it is likely that these corporations placed a greater emphasis on tax planning with respect to their foreign activities than did the corporations.
- [16] The statistics in this article are based upon "initial" weights which were derived by dividing the number of returns filed per sample class by the number of sample returns for the stratum. The data published in <u>Statistics of Income-1980</u>, <u>Corporation Income Tax Returns</u> are based upon adjusted "initial," or post-stratified weights. The "post-stratified" weights were based upon a comparison of the weighted sample and population for subclasses within each major business activity grouping.

Table 1. - Total Assets, Income, Taxes and Credits and Foreign Income, Taxes and Credit, by Major Industry

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

Major industry	Number of returns	Totai assets	Total receipts	Dividends received from foreign corporations	Dividends received from DISC's	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid (gross-up)	Net income (less deficit)	Western Hemisphere Trade Corporation deduction	Income subject to U.S. tax
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
										(10)
All industries	6,199	3,245,852,517	2,303,163,923	13,877,760	4,279,440	2,873,881	12,647,655	144,244,681	2,983	138,601,997
Agriculture, forestry, and fishing	. 89	2,571,871	5,394,727	16,246	1,628	1,414	3,391	235,047	2,000	231,319
Mining		58,340,430								
Metal mining		10,709,678	39,354,919 5.030,501	271,572 57,575	39,457 3,496	58,790			774	6,418,964
Coal mining		1,942,885	1,930,241	2,304	1,669	5,675	23,312 265	504,792 65,370	_	432,138 61,371
Oil and gas extraction	127	40,886,507	28,627,917	210,091	28,692	53,115		5,636,541	774	5,458,692
Nonmetallic minerals, except fuels	12	4,801,360	3,766,260	1,603	5,599	_	672	467,851		466,762
Construction	161	11,941,943	20,678,945	82,822	4,524	107,773	109,713	905,314	39	882,761
General building contractors and operative										
builders		5,293,441	8,441,145	29,495	494	2,331	15,051	192,249	19	183,962
Heavy construction contractors Special trade contractors	40	5,463,304	10,164,336	48,361	3,816	105,351	93,973	655,626		645,676
•	1	1,185,199	2,073,464	4,965	214	91	689	57,439	19	53,123
Manufacturing		1,138,860,451	1,483,360,175	11,812,812	3,913,068	2,277,012	10,023,329	106,566,278	1,842	103,689,005
Food and kindred products	169	70,724,714	117,353,032	616,786	125,151	82,815	435,803	6,667,681	70	6,609,916
Tobacco manufactures Textile mill products	9	27,975,318 7,233,801	24,233,385 11,869,140	47,743 31,283	71,213 15,586	19,551 17,491	35,230 35,894	2,281,704 605,694		2,068,511
Apparel and other textile products	100	5,913,141	9,365,628	57,310	3,698	2,542	46,787	808,413		588,144 800,966
Lumber and wood products	24	13,832,207	13,937,902	102,407	36,777	7,078	48,760	604,290	Ċ	654,666
Furniture and fixtures Paper and allied products	33 42	1,825,688 30,907,657	2,980,465	1,305 558,256	858	851	1,454	263,563	-	262,956
Printing and publishing		20,897,582	36,978,921 25,660,381	127,228	105,937 21,183	29,996 376	335,206 75,938	2,731,238 2,491,199		2,708,125 2,433,951
Chemicals and allied products		112,852,108	138,520,636	1,217,730	735,783	565,739	1,048,548	10,678,750	83	10,598,306
Petroleum (including integrated) and coal	10	005 100 001	5 40 4 70 0 40		70.000				ļ	
products Rubber and miscellaneous plastics products	43 117	325,103,221 9,708,904	540,172,212 13,678,515	4,310,738 81,250	73,465 18,763	739,843 7,209	4,420,205 60,967	44,826,469 562,917	-1	43,014,198
Leather and leather products	14	2,583,195	4,069,961	2,248	89	357	2,105	381,408		556,384 330,345
Stone, clay, and glass products	36	19,951,952	21,541,442	178,075	41,050	16,390	113,737	1,177,159	37	1,125,164
Primary metal industries	79 214	89,393,439	85,087,390	414,798	110,324	166,481	256,429	4,088,139	-	3,895,505
Machinery, except electrical	411	32,814,788 109,074,029	38,998,056 112,240,913	429,623 2,093,455	96,816 639,305	35,319 195,843	282,800 1,783,261	2,795,607 11,341,103	527	2,781,069 11,299,754
Electrical and electronic equipment	225	112.467.170	115,974,420	621,091	609,333	184,647	392,733	6,574,213	32	6,405,388
Motor vehicles and equipment	79	78,081,450	80,556,060	422,621	243,736	50,784	231,377	1,837,617	642	1,794,178
Transportation equipment, except motor vehicles Instruments and related products	39 87	35,160,789 22,204,323	46,132,643 30,486,450	117,657 336,476	615,033 315,856	40,250 95,194	79,841 293,122	1,622,363 3,419,543	288 68	1,582,062
Miscellaneous manufacturing products and		22,204,323	50,400,450	330,470	313,050	50,194	293,122	3,419,543	00	3,385,323
manufacturing not allocable	113	10,154,976	13,522,621	44,732	33,112	18,257	43,130	807,209	88	794,093
Transportation and public utilities	147	146,392,772	122,635,801	159,615	23,983	104,803	106,024	5,682,547	_	5,554,994
Transportation	109	52,672,447	53,108,416	65,073	3,618	35.570	33,706	2,258,890	_	2,222,418
Water transportation	18	6,189,219	3,218,105	7,272	4	10,211	935	504,531	_	493,091
Other transportation	92	46,483,227	49,890,311	57,802	3,614	25,359	32,772	1,754,359	-	1,729,327
Communication Electric, gas, and sanitary services	18 20	44,591,536 49,128,789	19,566,865 49,960,519	61,601 32,941	1,559 18,806	49,442 19,791	50,887 21,431	1,371,948 2,051,709	_	1,290,292 2,042,284
Wholesale and retail trade	769	135,829,845			1					
			287,472,208	1,014,590	248,781	187,420	2,044,595	8,426,600	310	8,139,341
Wholesale trade Groceries and related products	649 28	60,794,568 5,028,237	181,538,515 10,199,336	839,518 15,234	247,758 1,349	158,559 49,231	1,955,224 37,246	5,642,658 298,795	310	5,562,673
Machinery, equipment, and supplies	114	5,945,711	10,804,893	4,209	9,303	1,637	1,080	377,444	=1	295,600 373,596
Miscellaneous wholesale trade	507	49,820,620	160,534,286	820,075	237,106	107,691	1,916,897	4,966,419	310	4,893,477
Drugs, chemicals, and allied products	31 30	2,642,293	6,056,062	21,691	4,051	373	14,263	208,125	-	201,997
Petroleum and petroleum products Other miscellaneous wholesale trade	30 446	15,497,480 31,680,847	43,019,847 111,458,376	667,860 130,523	677 232,378	91,145 16,172	1,846,603 56,031	3,029,597 1,728,697	310	3,008,740 1,682,739
Retail trade	120	75,035,277	105,933,693	175,072	1,023	28,861	89,371	2,783,942	510	
Building materials, garden supplies, and	120	10,000,277	100,000,000	110,012	1,023	20,001	09,371	2,183,942	-1	2,576,669
mobile home dealers	*19	*124,951	*271,022	*165	-1		_	*9,810	_1	*9,627
General merchandise stores	14	53,945,512	61,783,527	125,296	995	26,507	62,640	1,180,487		988,516
Food stores Automotive dealers and service stations	*21	6,149,989 *313,996	21,776,692 *808,149	32,526 *103	_	1,160	20,172 *18	274,522 *9,129		273,174 *7,511
Apparel and accessory stores	5	2,538,493	4,016,953	361	_	33	151	103,689	_	103,546
Furniture and home furnishings stores	*26	*1,006,908	*1,751,026	*1	-1	_	-1	*251,167	_	250,875
Eating and drinking places Miscellaneous retail stores	20 10	7,454,081 3,501,347	8,306,125 7,220,199	11,242 5,380	28	382 780	2,162 4,228	646,105	-1	635,259
								309,032	-	308,161
Finance, insurance, and real estate		1,716,555,976	308,944,772	406,198	4,636	101,214	188,661	13,406,894	-	11,428,706
Banking Credit agencies other than banks	168 77	1,124,652,081 28,199,656	113,544,941 6,083,354	93,425	-[40,094	62,307	3,850,487	-1	3,811,203
Security, commodity brokers and services	34	49,777,923	7,777,272	43,694 9,958	1,257	22,264 2,830	10,089 2,451	119,366 856,366	_	110,659 755,302
Insurance carriers	217	501,652,676	176,155,950	85,064	761	30,236	28,707	7,227,119	_	5,615,992
Insurance agents, brokers, and services	115	3,558,515	2,175,486	14,667		2,258	12,564	416,719	-	413,164
Real estate Holding and other investment companies except	459	2,305,302	1,046,983	2,696	319	-	179	163,135	-	128,591
bank holding companies	668	6,409,823	2,160,786	156,693	2,298	3,532	72,364	773,703	_	593,794
Services	862	35,348,612	35,309,283	113,905	43,352	35,455	90,141	2,345,154	18	2,254,615
Hotels and other lodging places	10	4,530,078	3,758,973			1,343		201,147	.5	
Personal services	*12	*1,453,003	*1,760,274	*7.300	*274	*320	*5,988	*141,825	=1	191,346 *140,175
Business services	362	9,781,884	11,848,329	65,209	1,673	17,209	55,280	754,757	_	731,462
Auto repair; miscellaneous repair services	4 96	1,731,597	1,789,487		-1	-		15,084	-	15,084
Amusement and recreational services Other services	96 379	12,146,921 5,705,129	10,945,888 5,206,332	24,053 17,336	34,843 6,562	7,866 8,717	19,818 9,053	843,301 389,042	18	801,671
	078	0,100,120	0,200,002	17,000	0,502	0,/1/]	3,033	389,042	<u> </u>	374,878

Table 1. - Total Assets, Income, Taxes and Credits and Foreign Income, Taxes and Credit, by Major Industry - Continued [All figures are estimates based on samples - money amounts are in thousands of dollars]

	U.S. inc before	ome tax credits							Foreign incom reported on	Form 1118
Major industry	Total	Regular and alternative tax	Foreign tax credit claimed	U.S. possessions tax credit	Investment credit	Jobs credit	Other credits	U.S. income tax after credits	Gross income excluding bran and sp allocable	ch operations ecially income
	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	Total (19)	Dividends (20)
f	· · · -			<u>`</u>		<u> </u>	<u>. </u>			
All industries	62,629,272	61,997,541	24,879,737	173,962	7,031,324	102,751	10,256	30,431,243	86,077,698	19,823,
Agriculture, forestry, and fishing	99,661	98,667	7,490	· –	5,713	36	_	86,421	35,258	17,
Alning	2,910,852	2,853,816	1,963,897	-	201,186	895	37	744,837	5,922,735	337,
Metal mining	182,108 32,137	161,630 24,009	58,114 770		29,307 12,173	103	- 5	94,584 19,189	801,847 4,367	66, 2.
Oil and gas extraction	2,473,323	2,461,319	1,822,371	- 1	118,880	681	5 29	531,362	4,566,340	263,
Nonmetallic minerals, except fuels	223,285	206,858	82,643	-	40,826	110	4	99,702	550,181	r 5,
Construction	399,154	394,895	150,842	-	39,733	1,081	13	207,485	1,115,560	190,
General building contractors and operative builders	81,285	79,258	38,257	_	9,411	513	10	33,094	188,516	31,
Heavy construction contractors	294,349	292,363	109,768	-	28,072	566	3	155,939	913,144 13,899	153. 5.
Special trade contractors	23,520 46,977,540	23,274 46,541,783	2,817 19,191,909	172,206	2,250 5,067,720	49,853	6,200	18,451 22,489,651	56,419,900	17,048
Vanufacturing	2.956.606	2,920,229	653,025		312,783	6,957	395	1,979,181	2,459,338	812.
Tobacco manufactures	949,282	946,602	59,486	· -	158,421	214	52	731,110	458,967	113,
Textile mill products Apparel and other textile products	270,527 367,264	268,803 366,775	39,408 64,392		34,857 15,371	4,198 3,337	167 116	191,898 283,978	116,415 242,670	52 87
Lumber and wood products	215,108	201,146	67,620	_	70,840	1,930	29	74,689	179,345	109
Furniture and fixtures	120,706 1,151,594	120,411 1,126,590	2,453 373,645		8,613 193,465	1,434 789	92	108,115 583,624	9,037 1,201,871	2 589
Paper and allied products Printing and publishing	1,086,273	1,078,592	101,596	-	113,185	779	72 78	870,635	335,551	130
Chemicals and allied products	4,832,357	4,767,929	1,720,564	112,724	591,139	3,000	485	2,404,446	4,949,400	2,056
Petroleum (including integrated) and coal products	19,544,044	19,474,445	11,027,563		1,537,544	903	125	6,977,909	25,945,850	6,484
Rubber and miscellaneous plastics products	250,480 151,449	246,984 151,250	86,094 4,889		25,310 6,095	671 770	60 88	138,346 139,608	285,573 14,439	89 2
Leather and leather products Stone, clay, and glass products	496,939	481,824	134,747	_	105,250	1,199	183	255,560	505,653	214
Primary metal industries	1,737,979 1,253,992	1,663,290	611,160 340,394	1,394	275,744 132,207	2,750 1,749	282 141	848,043 778,107	1,839,130 1,044,783	604 486
Fabricated metal products Machinery, except electrical	5,214,364	1,246,497 5,163,435	2,331,302			5,620	631	2,372,543	7,515,532	2,380
Electrical and electronic equipment	2,925,703	2,905,567	643,169	51,126	431,541	7,251 1,594	1,231 354	1,791,385 276,251	3,236,670 1,235,888	1,060 502
Motor vehicles and equipment Transportation equipment, except motor vehicles	820,276 725,130	801,035 712,073	353,684 141,473	-	188,393 217,392	1,485	757	364,022	3,438,375	566
instruments and related products	1,550,757	1,544,074		39	120,534	1,627	395	<u>1,041,246</u>	1,214,157	627
Miscellaneous manufacturing products and manufacturing not allocable	356,709	354,233	48,332	-	27,357	1,597	468	278,957	191,256	75
Fransportation and public utilities	2,508,210	2,471,005	462,236	9	841,549	2,965	1,347	1,200,104	2,421,514	264,
Transportation	996,369	980,243	211,438		331,184	432	74	453,232	1,188,992	100
Water transportation	226,061 770,308	223,899 756,345	154,699 56,739	- 9	41,607 289,578	29 403	74	29,726 423,505	716,361 472,631	. 17.
Communication	597,226	584,476	75,833	-	226,393	718	42	294,240	486,745	111
Electric, gas, and sanitary services	914,615	906,286	174,965		283,972	1,815	1,231	452,632	745,776	53,
Wholesale and retail trade	3,671,095	3,637,386	1,524,766		302,702	34,765	1,348	1,805,768	5,609,255	1,284
Wholesale trade Groceries and related products	2,495,177 130,687	2,481,670 129,277	1,387,957 49,521	156	124,372 11,290	2,180 841	557 96	979,956 68,939	5,091,724 110,619	1,079, 64,
Machinery, equipment, and supplies	170,131	168,651	18,958		16,662	85	392	134,034	148,375	5
Miscellaneous wholesale trade Drugs, chemicals, and allied products	2,194,359 88,305	2,183,741 87,240	1,319,477 21,751	156 91	96,420 6,007	1,254 86	69 2	776,983 60,369	4,832,730 51,885	1,009 22
Petroleum and petroleum products	1,353,203	1,352,573	1,219,153	—	7,378	81	3	126,587	2,952,320	759
Other miscellaneous wholesale trade	752,851	743,929	78,572		83,034	1,087	64	590,027	1,828,525	228
Retail trade Building materials, garden supplies, and	1,175,918	1,155,716	136,809	1,591	178,330	32,585	791	825,811	517,531	204
mobile home dealers	*4,006	•4,003	*67	-	*288			*3,652	*201	
General merchandise stores Food stores	447,009 128,766	434,033 125,023	90,201 25,796	1,591	71,481 34,693	6,874 5,311	153 143	278,299 61,233	282,382 75,232	152
Automotive dealers and service stations	*3,286	*2,904	*117	—	*642	*94	-	*2,433	*521	
Apparel and accessory stores Furniture and home furnishings stores	47,101 114,949*		1,805 1,712	- <u> </u>	7,140 1,520	455 *174	_	37,702 *111,543	32,967 *474	
Eating and drinking places	290,186	288,510	10,140		41,390	18,669	261	219,727	77,109	11
Miscellaneous retail stores	140,615	139,490	6,972		21,177	1,009	234	111,223	48,644	6
Finance, insurance, and real estate	5,061,456		1,397,281		401,161	7,006	406	3,255,603	13,003,448 8,392,952	507
Banking Credit agencies other than banks	1,707,102 49,476		1,061,486 17,700		215,030 5,025	4,723 8	130 11	425,733 26,732	487,921	133 65
Security, commodity brokers and services	330,425	330,034	25,007		14,862	110	6	290,441	2,042,618	12
Insurance carriers Insurance agents, brokers, and services	2,492,238 185,768		190,064 15,227		140,882 5,261	1,862	173 4	2,159,258 165,118	1,681,741 97,261	115 16
Real estate	48,196		2,220	-	6,100	36	_	39,840	17,735	2
Holding and other investment companies except bank holding companies	248,252	246,172	85,578	_	14,001	109	82	148,482	283,220	160
	1,000,268		181,307		171,218	6,150	905	640,688	1,549,866	172
Hotels and other lodging places	84,643	82.953	7,127		23,425	975	127	52,990	17,495	1
Personal services	*64,061	*63,133	*6,471	—	*8,021	*1,825	*6	*47,738	16,794	•6
Business services	330,806 6,878	327,104 6,875	90,398 76		36,013 2,772	903 111	678 3	202,815 3,917	365,855 680	82
Auto repair, miscellaneous repair services	347,968	346,404	57,181	_	60,313	. 516	5	209,952	974,712	55 26
Other services	165,912	164,723	20,055		20,674	1,820	86	123,276	174,330	

Table 1. — Total Assets, Income, Taxes and Credits and Foreign Income, Taxes and Credit, by Major Industry — Continued [All figures are estimates based on samples — money amounts are in thousands of dollars]

	Gross in	come (less loss)	excluding brand	ch operations and	specially alloca	ble income — Cor	ntinued		and gas extracti s income (less lo	
Major industry	Dividend gross-up	Interest income	Rents, royalties and license fees	Service income	Net capital gain	Partnership income (net)	Other income	Total	From extraction of oil or gas	From sale of business assets
	(21)	(22)	(23)	(24)	(25)	(26)	(27)	(28)	(29)	(30)
	10 644 505	10 500 760	7 100 044	10 200 810	1,068,403	100 101	20,242,237	31,098,661	23,487,743	261,921
All industries	12,644,525 3,391	12,509,769 2,182	7,180,244	12,380,812 790	1,000,403		8,054	31,090,001	23,467,743	201,920
Agriculture, forestry, and fishing	81,802	102,819	2,516 123,539	582,713	89,615		4,472,180	3,731,863	3,395,321	110,320
Mining Metal mining	23,312	15,754	6,498	278,083	10,489		387,539	3,731,803	3,395,321	110,320
Coal mining	265	1,777	22	—	· —		—			
Oil and gas extraction Nonmetallic minerals, except fuels	57,553 672	54,442 30,847	107,309 9,711	303,560 1,070	44,846 34,280		3,637,877 446,764	3,731,863	3,395,321	110,326
Construction	109,650	15,900	10,478	709,892	3,890		46,382	29,339	29,339	_
General building contractors and operative	100,000	.0,000	,		0,000					
builders	15,051	2,329	2,125	103,871	1,846		29,302	29,339	29,339	-
Heavy construction contractors	93,911 689	12,874 697	7,228 1,125	605,818 204	2,044	18,729 7,640	18,578 - 1,497	_	_!	_
	10,021,138	3,200,639	5,681,280	9,328,455	686,029		10,403,237	24,609,845	19,010,306	148.20
Manufacturing	435,807	141,098	285,562	84,375	60,830	974	638,354			140,20
Food and kindred products Tobacco manufactures	35,230	16,917	109,828	8,722	1,924	_	172,761	27,245	27,245	_
Textile mill products	35,603 46,787	3,203 21,470	16,171 72,241	2,385 592	83 250		6,234 13,807		_	
Apparel and other textile products	48,760	7,472	8,609	389	758	343	3,530	_	=	_
Furniture and fixtures	1,454 335,207	354 36,141	3,339 181,954	76 16,836	321 22,495	—	1,338 19,971	-	-	_
Paper and allied products Printing and publishing	75,923	10,158	76,194	12,169	2,029		23,288	=	=	_
Chemicals and allied products	1,048,124	271,837	947,516	165,892	66,568	7,995	385,193	749,594	747,945	_
Petroleum (including integrated) and coal products	4,420,201	1,437,814	135,402	5,309,432	163,852	17,063	7,977,401	23,803,179	18,229,731	148,209
Rubber and miscellaneous plastics products	60,967	9,416	84,992	23,327	11,201	- 209	6,694		-1	· —
Leather and leather products Stone, clay, and glass products	2,105 113,737	66 25,468	834 93,072	33,393	68 10.536		8,765 14,854	24,434	=	_
Primary metal industries	256,429	148,362	186,153	40,521	248,376		341,734	88	88	_
Fabricated metal products	282,800 1,783,266	40,053 363,571	161,375 2,205,663	9,555 385,134	31,344 44,806		33,680 345,637	14	7	_
Electrical and electronic equipment	392,727	243,895	633,848	724,079	11,954	2,262	167,220	5,291	5,291	-
Motor vehicles and equipment Transportation equipment, except motor vehicles	230,735 79,842	117,839 277,331	138,659 90,852	109,844 2,371,890	2,466 943	- 4,514 1.047	138,381 49,891	_	=	_
Instruments and related products	292,304	17,550	217,943	12,360	5,188		41,099	-	-	-
Miscellaneous manufacturing products and manufacturing not allocable	43,130	10,625	31,074	17,484	38	6	13,405	_	_	_
Transportation and public utilities	106,023	74,919	127,058	779,101	54,976		1,028,243	835,559	808,018	3,393
Transportation	33,705	22,684	55,574	456,541	1,828		579.833	366,115	365,355	109
Water transportation	936	3,956	3,656	324,895	2,256	- 60,960	424,142	365,472	364,712	109
Other transportation	32,769 50,887	18,728 4,039	51,918 51,092	131,647 204,976	- 428 16,795		155,691 44,145	643	643	=
Electric, gas, and sanitary services	21,431	48,197	20,392	117,584	36,353		404,265	469,444	442,663	3,284
Wholesale and retail trade	2,044,313	459,320	148,745	123,775	140,740	- 106	1,407,752	1,886,022	238,736	
Wholesale trade	1,954,944	382,772	76,047	114,734	138,489		1,344,894	1,886,022	238,736	_
Groceries and related products	37,246 1,079	3,839 19,111	6,958 38,731	2,034 43,502	66 2,463		- 3,989 37,695	_		=
Miscellaneous wholesale trade	1,916,618	359,822	30,358	69,198	135,959	- 106	1,311,188	1,886,022	238,736	-
Drugs, chemicals, and allied products Petroleum and petroleum products	14,263 1,846,603	997 17,540	10,453 290	857 2,190	1,100 134,883		2,256 191,808	1,882,664	235,379	=
Other miscellaneous wholesale trade	55,752	341,286	19,615	66,151	- 24		1,117,124	3,358	3,358	-
Retail trade	89,369	76,548	72,698	9,041	2,251		62,858	-	_	-
Building materials, garden supplies, and mobile home dealers		•35	*166		_		_	_	_	_
General merchandise stores	62,639	53,918	5,345	5,648	578	_	1,455	_	-	
Food stores	20,172	2,486 *86	6,371 *313	21	_	_	12,496	_	-	
Apparel and accessory stores	151	35	2,655	15	67	_	29,651	_		-
Furniture and home 'ishings stores Eating and drinking places	2,162	*449 18,536	34,316	*24 1,845	=	_	8,625	=	_	
Miscellaneous retail stores	4,228	1,002	23,531	1,487	1,605	_	10,630	-	-	_
Finance, insurance, and real estate	188,653	8,645,200	98,421	616,156	90,536	24,376	2,832,853	6,033	6,023	-
Banking	62,303	7,373,309	57,274	132,286	59,470		597,811	-	-	_
Credit agencies other than banks Security, commodity brokers and services	10,089 2,450	341,069 139,942	10,205 2,645	14,124 128,232	- 81 451		32,530 1,755,685	_	=	_
Insurance carriers	28,706	738,185	10,105	327,551	6,680	29,964	425,106	5,820	5,810	_
Insurance agents, brokers, and services	12,564 177	19,776 113	4,433 8,131	10,125 929	10,421 5,587		22,135 201	_	_	_
Real estate	1									
bank holding companies	72,364	32,806	5,629	2,908	8,006		-615	213	213	
Services	89,555	8,789	988,061	239,929	2,258		- 43,518	-	-	-
Hotels and other lodging places	•F 000	916 *256	10,057 *632	782 *2,135	•7	589	3,800 1,461	_	=	
Personal services Business services	*5,398 55,280	5,225	77,489	123,632	2,601	77	19,145	=	-	_
Auto repair; miscellaneous repair services	-	295	208	_	252	1 -	177 8,908	=	=	
Amusement and recreational services Other services	19,818 9,058	67 2,029	887,505 12,169		- 601	3,509	10,026	_	_	

Footnotes at end of table.

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 Table 1. — Total Assets, Income, Taxes and Credits and Foreign Income, Taxes and Credit, by Major Industry — Continued

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

		and gas extract	ion	Foreign income		rted on Form 111				<u> </u>
	gross inco	me (less loss) -	Continued		Deductions of	ther than from bra	anch operations	and specially allo	cable income	
Major industry	Dividends	Includable income of	Destaurabie			Deductions alloc	able to specific 1	types of income		Deductions not allocable to specific types of income
	from foreign corporations	Controlled Foreign	Partnership income	Total		Rental, royalty exper				
	corporations	Corporations			Total	Depreciation depletion and	Other	Service expenses	Other deductions	Total
	(31)	(32)	(33)	(34)	(35)	amortization (36)	(37)	(38)	(39)	(40)
All industries Agriculture, forestry, and fishing		200,279	136,417	38,940,201 2,714	26,936,251 1,942	310,963	614,231	4,532,287	21,478,772	12,003,94
Mining	1	_		2,714	2,051,406	41,800	15,114	323,937	1,942 1,670,556	77: 125.09
Metal mining Coal mining		-	· -	671,034 219	663,897	15,513	-	173,277	475,107	7,13
Oil and gas extraction	129,487	=	96,729	1,153,410	1,054,408		15,114	150,660	862,347	21 99,00
Nonmetallic minerals, except fuels		_	_	351,842 657,430	333,102 603,109	1	- 1.870		333,102 69.049	18,74 54,32
General building contractors and operative		·					1,070	351,040	03,045	54,52
builders Heavy construction contractors		-	_	89,346 564,947	55,680 547,111	877	20 1,849	25,541 505,503	29,243 39,759	33,66 17,83
Special trade contractors			-	3,137	318	271	-	- 1	48	2,81
Manufacturing Food and kindred products		200,279	20,412	23,011,030 954,547	19,133,156 717,149	149,101 214	307,034 4,480	2,811,393 11,555	15,865,629 700,900	3,877,87 237,39
Tobacco manufactures	- 1	=	_	206,867	164,347		1,051	2,048	161,249	42,52
Textile mill products Apparel and other textile products		=		19,643 69,780	13,541 26,762	761 60	891 4,242	2,042 3,357	9,847 19,103	6,10 43,01
Lumber and wood products Furniture and fixtures		_	-	9,813 1,807	3,099 1,569	185	214 36	33	2,700 1,500	6,71- 23
Paper and allied products Printing and publishing		_	-	210,635 59,547	73,192 41,209	109 136	3,279 17,077	4,355 6,467	65,450 17,528	137,44 18,33
Chemicals and allied products Petroleum (including integrated) and coal		-		1,536,563	887,979	545	49,211	46,782	791,441	648,58
products	5,204,556	200,279	20,404	12,316,770	11,958,331	52,749	1,968	160,612	11,743,002	358,43
Rubber and miscellaneous plastics products Leather and leather products		-	-	90,152 1,487	22,059 1,487	209 1	· 300 93	14,069 —	7,482 1,393	68,09
Stone, clay, and glass products	24,434	_	_		34,213 338,024	542 23,976	672 54,789	13,117	19,881 247,544	79,34 249,96
Fabricated metal products		_	- 7	201,693 2,274,317	98,087 1,577,875	18,166 10,310	12,845 23,336	3,170 197,235	73,906 1,346,994	103,60 696,44
Electrical and electronic equipment Motor vehicles and equipment		_	-	1,478,443 381,958	809,397 185,457	27,484 809	117,915 12,353	245,539 60,492	418,459	669,04
Transportation equipment, except motor vehicles		_	-	2,212,531	2,112,318	12,636	5,624	2,012,832	81,226	196,50 100,21
Instruments and related products Miscellaneous manufacturing products and			_	222,325	45,715	_	3,546	8,830	33,339	176,610
manufacturing not allocable Transportation and public utilities	1 1			60, <u>6</u> 04 1,1 90,745	21,348 714,548	209 30,929	3,111 12,439	7,145 172,470	10,884 498,710	39,25 476,19
Transportation	· -	_	652	662,045	342,987	26,710	4,141	96,905	215,231	319.05
Water transportation		_	652	356,267 305,778	76,416 266,571	18,102 8,608	4,141	13,304 83,601	45,010 170,221	279,85 39,20
Communication	4,872	-	18,624	176,039	141,653	3,269 949	1,802	6,870	129,711	34,38
Electric, gas, and sanitary services Wholesale and retail trade		_		352,661 1, 752,185	229,909 1 ,020,912	8,833	6,497 1 5,746	68,695 73,402	153,768 922,931	122,75 731,27
Wholesale trade	1	_	-	1,585,786	908,313	6,933	2,214	72,768	826,398	677,47
Groceries and related products Machinery, equipment, and supplies		_	-	9,504 116,745	9,084 87,353	(¹) 192	816	879 57,041	7,388 30,119	42 29,39
Miscellaneous wholesale trade Drugs, chemicals, and allied products	1,647,286		_	1,459,537 11,169	811,877 8,606	6,740	1,398	14,848	788,891 8,606	647,66 2,56
Petroleum and petroleum products Other miscellaneous wholesale trade	1,647,286	_		138,944 1,309,423	128,300 674,971	6,740	1,398		128,300	10,64
Retail trade	· _	_	-	166,400	112,599		13,532	14,848 634	651,984 96,533	634,45 53,80
Building materials, garden supplies, and mobile home dealers	_	_		*88	*88		*88		00,000	50,00
General merchandise stores	-	_	_	78,264	60,131	-	625	35	59,471	18,13
Food stores Automotive dealers and service stations		-		14,011 *115	13,274 *83	•9	1,340 *75	198	11,737	73 *3.
Apparel and accessory stores Furniture and home furnishings stores		-	_	=	_	-	_	_		=
Eating and drinking places	· · _	_		47,578 26,344	19,730 19,293	1,891	5 11,400	402	19,323 6,002	27,841 • 7,05
Finance, Insurance, and real estate		_	_	9,188,478	2,716,787	67,714	188,262	493,593	1,967,218	6,471,69
Banking	—	-	-	5,983,284	1,648,601	59,380	35,107	77,375	1,476,738	4,334,68
Credit agencies other than banks		_	_	351,247 1,951,851	148,778 206,453	3,878 704	5,867 131,305	1,747 72,454	137,285 1,989	202,47 1,745,39
Insurance carriers Insurance agents, brokers, and services	10	_	_	839,265 36,020	670,023 27,918	1,685	12,963	338,199 3,728	317,176 24,190	169,24 8,10
Real estate	-	. –	-	6,172	5,289	1,900	2,396	89	905	88
bank holding companies		-	_	20,640	9,726	167	623	-	8,935	10,91
Services		· —	-	961,114	694,390	11,440	73,767	126,448	482,736	266,72
Hotels and other lodging places Personal services	-		_	6,426 *2,979	4,740 *2,154	_	11 •40	35 *675	4,694 *1,439	1,68 *82-
Business services Auto repair; miscellaneous repair services	-	· _	_	153,727 182	83,294 33	861	22,703 33	35,247	24,483	70,43
Amusement and recreational services	-		_	687,074 110,726	521,181 82,987	10,406 173	50,668 311	22,418 68,073	437,688 14,430	165,89 27,73

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 Table 1. — Total Assets, Income, Taxes and Credits and Foreign Income, Taxes and Credit, by Major Industry — Continued
 [All figures are estimates based on samples — money amounts are in thousands of dollars]

	Deduction					rted on Form 11	o - Continued			
	and specially	er than from bra allocable income	- Continued	Deductions from	n oil and gas ex	traction income		Taxable incor	ne (less loss)	
		s not allocable t						Before los		
Major industry	types	of income — Cor	ntinued			Not		50,010,103		Other there
	Research and development expenses	Interest expenses	General and administrative expenses	Total	Allocable to specific types of income	allocable to specific types of income	Total	Foreign branch income	Specially allocable income (Section 863(B))	Other than from branch operations and specially allocable income
	(41)	(42)	(43)	(44)	(45)	(46)	(47)	(48)	(49)	(50)
\II industries	319,759	1,382,830	901,098	7,124,054	7,015,975	108,079	70,541,309	21,871,325	1,532,488	47,137,4
griculture, forestry, and fishing	-	-		-	_	—	32,842	298	—	32,5
fining	4,086	13,956	15,324	653,837	641,044	12,793	4,655,500	908,326	944	3,746,2
Metal mining		_	_	=	_	=	167,766 4,148	36,953	_	130,8 4,1
Oil and gas extraction Nonmetallic minerals, except fuels	4,030 55	13,776 180	15,286 39		641,044	12,793	4,283,729 199,857	869,855 1,518	944	3,412,9 198,3
Construction		1,861	2,467		14,765	103	491,539	33,409	_	458,1
General building contractors and operative		1,001	2,101	, ,,	,		101,000	00,100		400,1
builders	-	1,529	5	14,868	14,765	103	118,772 361,111	19,602 12,914	-	99,1 348,1
Special trade contractors	=	4 255 33	2,462	=	=	_	11,656	893	_	10,7
Manufacturing	312,223	229,630	454,882	6,208,003	6,123,810	84,193	47,993,090	13,114,023	1,470,197	33,408,8
Food and kindred products	6,347	18,998	19,255	7 201	7 204	-	1,702,583	181,640	16,152	1,504,7
Tobacco manufactures Textile mill products	1,413	1,703	8,370 213	7,381	7,381	-	199,516 97,576	- 61,832 567	9,248 236	252,1 96,7
Apparel and other textile products Lumber and wood products	351	414	460			_	175,498 192,401	2,608 2,864	20,003	172,8 169,5
Furniture and fixtures	5	5		-	-	_	7,554	324	_	7,2
Paper and allied products Printing and publishing	1,258	4,938 1,250	5,549 1,100	_	_	=	1,020,601 326,240	15,489 46,902	13,876 3,333	991,2 276,0
Chemicals and allied products Petroleum (including integrated) and coal	34,719	38,622	34,027	181,454	181,293	161	4,575,381	961,505	201,039	3,412,8
products	556	2,182	1,513	6,011,298	5,927,268	84,030	24,362,648	10,671,160	62,407	13,629,0
Rubber and miscellaneous plastics products Leather and leather products	20,040	11,075	20,075	=	_	_	200,570 13,721	3,892 769	1,258	195,4 12,9
Stone, clay, and glass products	4,347	2,300	6,695		_	_	408,680	7,809	8,777	392,0
Primary metal industries Fabricated metal products	5,504 1,513	14,302 3,646	17,811 6,440	27 —	25 —		1,721,178 943,718	422,830 83,811	47,207 16,817	1,251,1 843,0
Machinery, except electrical Electrical and electronic equipment	108,823 51,465	43,774 28,240	193,708 70,258	 7,844	7,844	_	5,818,718 2,376,966	192,348 412,968	385,155 205,771	5,241,2 1,758,2
Motor vehicles and equipment	26,727	41,685	47,157		-	_	1,243,491	61,427	328,134	853,9
Transportation equipment, except motor vehicles Instruments and related products	7,197 38,097	1,878 2,134	2,644 16,551	_	_	_	1,248,069 1,224,294	18,687 86,317	3,538 146,145	1,225,8 991,8
Miscellaneous manufacturing products and	3,861	12,485	3,057					1,936		
manufacturing not allocable Transportation and public utilities		12,405				6,827	133,689 1,346,378	61,473	1,100 54,137	130,6 1 ,230,7
Transportation	_	-		57,417	57,417		566,181	29,252	9,981	526.9
Water transportation	-	-	_	56,991	56,991		370,861	669	10,098	360,0
Other transportation	_	=	_	427	427	_	195,319 332,040	28,583 12,428	- 117 8,905	166,8 310,7
Electric, gas, and sanitary services		12,678		127,332	120,505		448,158	19,792	35,250	393,1
Wholesale and retail trade	722	26,291	19,245		58,304	4,115	3,986,687	127,416	2,201	3,857,0
Wholesale trade Groceries and related products	722	25,793	19,148	62,419	58,304	4,115	3,604,367 101,802	96,825 - 751	1,603 1,437	3,505,9 101,1
Machinery, equipment, and supplies Miscellaneous wholesale trade	722	3 25,790	7 19,141	 62,419	58,304		58,429 3,444,137	26,716 70,860	82 84	31,6 3.373,1
Drugs, chemicals, and allied products	19	428			_	_	53,669	12,953	- 04	40,7
Petroleum and petroleum products Other miscellaneous wholesale trade	702	25,362	18,690	61,271 1,148	57,156 1,148	4,115	2,867,625 522,843	54,249 3,657	84	2,813,3 519,1
Retail trade	_	498			_	_	382,320	30,591	598	351,1
Building materials, garden supplies, and mobile home dealers	_		_		_	_	•173	*60		•1
General merchandise stores	_			=	=	=	216,587	12,469	=	204,1
Food stores Automotive dealers and service stations	_		•23	_	_	_	61,221) *406	_	_	61,2 *4
Apparel and accessory stores Furniture and home furnishings stores	-	-		—	_	—	33,067	99 *7,890	-	32,9
Eating and drinking places		136	9	=	=		*8,364 35,044	4,915	598	*4 29,5
Miscellaneous retail stores		363	65			_	27,458	5,158	_	22,3
inance, insurance, and real estate		1,097,001	406,773		130	48	11,399,614	7,580,334	4,310	3,814,9
Banking Credit agencies other than banks	757	1,068,173 17,697	405,506 724		_	_	9,887,480 140,093	7,475,914 1,606	1,897 1,814	2,409,6 136,6
Security, commodity brokers and services Insurance carriers		11,131	544	- _ن	-	(') -	103,079 934,261	12,241 91,256	70 529	90,7
Insurance agents, brokers, and services	- 249	-	- 544	'' -	_	· · ·	61,445	204	- 529	842,4 61,2
Real estate Holding and other investment companies except	-	-	-	-	-	-	11,806	243	-	11,5
bank holding companies	_	-	_	178	130	48	261,450	- 1,130	_	262,5
Services		1,412			-		635,498	46,047	700	588,7
Hotels and other lodging places Personal services	-	1,130	18		-	-	30,613 *13,847	19,544 *32	-	11,0
Business services	477	273	1,187	=	_	-	242,460	29,651	680	*13,8 212,1
Auto repair; miscellaneous repair services Amusement and recreational services	_	=		-	-	_	498 280,004	- 7,634	-	4 287,6
Other services	1,246	. 9	- 3		_	_	68,078	4,454	19	63,6

Footnotes at end of table.

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Table 1. — Total Assets, Income, Taxes and Credits and Foreign Income, Taxes and Credit, by Major Industry — Continued [All figures are estimates based on samples — money amounts are in thousands of dollars]

				Foreign income	and taxes report	rted on Form 11	18 - Continued			
	Taxable (less loss)	income - Continued				Foreign taxes av	vailable for credit		_	
	(,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			[]		<u> </u>		Paid or accrued		
Major industry							T	withheld at acura		Other taxes
	Recapture of prior year	After toss	Total after	Reduction for certain	Total before		lax 1	withheld at source	5 QU	paid or accrued on
	foreign losses	recapture	reduction	foreign taxes	reduction	Total			Rents, royalties	Branch
	1 1						Dividends	Interest	and license fees	income
······································	(51)	(52)	(53)	(54)	(55)	(56)	(57)	(58)	(59)	(60)
				-						
All industries	1 1	70,463,713	30,108,786	4,098,186	34,206,972		1,373,863	676,488	547,938	10,088,10
Agriculture, forestry, and fishing	1 1	32,842	9,111		9,111	5,023	871	155	496	
Mining Metal mining		4,650,319 167,766	3,232,724 115,480	461,555 956	3,694,279 116,436	2,620,127 44,013	24,171 7.973	11,154 643	13,841 631	599,85 1,92
Coal mining	. –	4,148	846		846	581	312	267	2	-
Oil and gas extraction Nonmetallic minerals, except fuels		4,278,548 199,857	3,033,023 83,375	460,599	3,493,622 83,375	2,495,435 80,098	15,607	9,894 350	13,182 25	596,9 91
Construction	1 1	479,084	177,967	_	177,967	44,788	3,145	194	647	13,5
General building contractors and operative]		,			· · ·				
builders	. 12,455	106,317 361,111	49,439 122,779		49,439 122,779	27,257 14,957	954 1,364	34 99	62 404	8,60 4,99
Special trade contractors		11,656	5,749	=	5,749	2,573	826	60	181	4,50
lanufacturing	. 32,010	47,961,079	22,674,048	2,927,320	25,601,367	12,738,098	1, 196, 105	132,542	442,425	8,885,46
Food and kindred products		1,696,928	681,849	<u> </u>	681,849	221,264	78,063	11,944	29,317	82,74
Tobacco manufactures Textile mill products		199,516 97,576	140,788 45,752	17	140,805 45,752	24,085 5,528	3,810 3,702	1,844 138	5,641 1,332	4,3
Apparel and other textile products		175,498	65,007	—	65,007	17,581	7,385	702	8,013	1,06
Europer and wood products	. 568	191,832 7,524	73,318 2,873	_	73,318 2,873	16,731 1,112	13,612 241	1,098 73	1,207 755	. 18
Paper and allied products	. 1,883	1,018,717	427,610		427,610 110,739	85,137 30,728	64,419 13,587	2,302 1,241	11,694 • 5,370	5,22 8,40
Printing and publishing Chemicals and allied products		326,240 4,574,097	110,739 1,888,280	4,492	1,892,772	749,778	144,320	21,030	85,567	471,73
Petroleum (including integrated) and coal		24,359,266	13,696,594	2,891,389	16,587,984	9.883.449	318,765	19,452	9,692	7,726,44
Products Rubber and miscellaneous plastics products	. 3,382	24,359,200	89,123	2,091,309	89,123	27,452	12,175	1,043	8,772	1,02
Leather and leather products	. 77	13,644 407,891	6,024 147,946	2,126	6,024 150,072	2,870 35,361	564 13,122	· 22 1,642	177 10,962	32 7,59
Stone, clay, and glass products Primary metal industries		1,720,566	686,737	28,393	715,129	367,568	47,371	3,503	16,464	209,05
Fabricated metal products		935,562 5,818,665	367,048 2,372,678	· 65 95	367,113 2,372,773	77,990 571,862	39,953 241,690	,2,357 31,868	12,293 134,186	18,86 120,14
Electrical and electronic equipment	3,018	2,373,947	879,584	538	880,122	338,478	67,743	10,943	55,237	158,34
Motor vehicles and equipment Transportation equipment, except motor vehicles		1,242,506 1,244,900	359,404 172,343	204 (¹)	359,609 172,344	127,054 40,271	54,792 15,778	12,793 6,708	16,546 6,745	32,19
Instruments and related products	2,239	1,222,055	398,177	· –	398,177	98,989	48,434	1,272	18,005	29,42
Miscellaneous manufacturing products and manufacturing not allocable	. 39	133,649	62,174	÷	62,174	14,811	6,580	566	4,450	1,26
Transportation and public utilities	1	1,325,124	598,729	10,216	608,946	368,462	17,283	3,318	15,395	28,46
Transportation	1	559,657	308,212	1,676	309,888	166,718	6,734	1,992	5,942	8,66
Water transportation	349	370,512 189,145	217,756 90,456	1,676	219,432 90,456	135,525 _ 31,193	277 6,457	243 1,749	1,920 4,021) 32 8,34
Other transportation	. –	.332,040	75,881	_	75,881	24,217	7,078	660	7,775	5,14
Electric, gas, and sanitary services	1	433,427	214,636	8,540	223,177	177,527	3,470	666	1,678	14,65
Wholesale and retail trade	1 1	3,985,013	1,703,603	697,238	2,400,841	265,038	89,036	13,848	17,720	34,49
Wholesale trade Groceries and related products		3,604,365 101,802	1,552,690 49,587	697,238	2,249,928 49,587	223,964 6,152	74,195 3,842	7,594 421	11,688 1,600	24,76 1
Machinery, equipment, and supplies	. –	58,429	22,166		22,166 2,178,174	20,662	251 70,103	488 6,685	7,183 2,905	10,29
Miscellaneous wholesale trade Drugs, chemicals, and allied products		3,444,135 53,669	1,480,936 28,819	697,238 —	28,819	197,150 10,360	2,747	39	1,009	14,45 6,41
Petroleum and petroleum products	. –	2,867,625 522,841	1,355,670 96,447	697,163 74	2,052,833 96,522	155,678 31,112	55,907 11,449	700. 5,946	106 1,789	4,46 3,57
Other miscellaneous wholesale trade Retail trade	1,672	380,648	150,913	. / -	150,913	41,074	14,840	6,254	6,032	9,73
Building materials, garden supplies, and	1,072		100,010		100,010	,,,,,,,,	,	0,201		0,,, 0
mobile home dealers	1,238	*173 215,349	46 95,619		95,619	20,216	11,272	4,844	*25	1,56
Food stores	_	61,221	28,521	—	28,521	3,673	2,339	81	722 *76	35
Automotive dealers and service stations Apparel and accessory stores	: _	*406 33.067	*279 1,845	_	*279 1,845	*102 1,595	39	*13	227	2
Furniture and home furnishings stores	. *306	*8,057	*5,943	-	*5,943	*3,751	*(') 378	*67 1,138	3,357	*3,68 2,56
Eating and drinking places		34,917 27,458	11,136 7,525	_	11,136 7,525	8,531 3,159	798	105	709	1,52
inance, insurance, and real estate		11,396,448	1,483,818	1,857	1,485,675	1,207,706	29,854	514,515	18,204	506,84
Banking	507	9,886,972	1,092,302	101	1,092,403	976,740	7,403	462,357	12,770	451,63
Credit agencies other than banks Security, commodity brokers and services	2,177	140,093 100,901	27,084 25,069	931	28,015 25,069	11,413 22,274	1,746 785	4,372 287	241 13	1,89 16,06
Insurance carriers	. 88	934,173	222,366	826	223,192	176,465	7,671	45,347	2,664	37,09
Insurance agents, brokers, and services		61,445 11,802	15,612 4,663	-	15,612 4,663	3,024 2,625	1,591 229	194 16	79	1.
Holding and other investment companies except										
bank holding companies		261,061	96,721	-	96,721	15,166	10,428	1,940	. 575	-
Services	1	633,641	228,778	-	228,778	102,411	13,399	762	39,202	19,35
Hotels and other lodging places Personal services	923	29,690 *13,847	7,580 *9,645		7,580 *9,645	6,510 *1,448	*989	142 *44	· 2,035 *45	3,27
Business services		241,526	116,885	-	116,885	41,135	7,457	330	4,098	11,57
Auto repair; miscellaneous repair services Amusement and recreational services	:	498 280,004	76 58,345	_	76 58,345	76 37,418	2,938	44 7	.15 31,707	1,82
Other services		68,078	36,247	_	36,247	15,824	2,015	195	1,302	2,6

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Table 1. — Total Assets, Income, Taxes and Credits and Foreign Income, Taxes and Credit, by Major Industry — Continued [All figures are estimates based on samples — money amounts are in thousands of dollars]

Foreign income and taxes reported on Form 1118 - Continued Foreign taxes available for credit - Continued Foreign tax credit computed Major industry Refore Afte Paid or accrued --- Continued Reduction for international reduction for reduction for Deemed paid Carryover internatio boycott operations Service Partnership Other boyc boycot income operations operations (61) (62) (63) (64) (65) (66) (67) (68) All industries 364,388 50,528 4,250,346 12,644,523 4,210,788 24.881.344 2.795 24,878,551 Agriculture, forestry, and fishing 112 407 2.937 7.489 3.391 697 7.489 1,929,642 1,974,156 Mining 38,484 2,986 81,802 992.350 1,974,156 Metal mining Coal mining Oil and gas extraction Nonmetallic minerals, except fuels 58,114 770 1,832,630 58,114 770 25.396 2.564 4,881 23.312 49,111 23,312 265 57,553 672 13,053 422 1,846,34 940,635 1,832,630 _ 78,421 35 2,604 82.643 82,643 Construction 19.660 2,529 5,020 109,650 23,529 150,767 150,767 11,984 7,672 General building contractors and operative builders 697 4,925 15,051 7,131 38,257 38,257 109,695 2,815 331 94 93,911 13,911 109,695 _ 1,501 689 2.487 2.814 Manufacturing 249,039 16,346 1,816,181 10,021,138 2,842,132 19,191,703 2,789 19.188.914 12,479 7,568 190 Food and kindred products 6,648 69 435.807 24.778 653.268 243 653.025 35,230 35,603 46,787 911 71 81,491 4,621 59,486 38,865 59,486 38,865 64,388 67,620 2,453 373,725 101,513 186 222 493 639 64.388 Apparer and once textile products. Furniture and fixtures. Paper and allied products. Printing and publishing Chemicals and allied products. Petroleum (including integrated) and coal products. Rubber and miscellaneous plastics products. 138 7,827 306 7,266 4,088 48 760 67.624 11 48,760 1,454 335,206 75,923 2,453 373,780 101,526 940 214 552 55 98 1.811 11,823 64,575 1,896 1,720,834 11,027,563 86,398 710 1,720,125 11,027,563 86,094 3 054 12 25: 1.048.124 94 869 1,638,209 2,541 4,420,201 60,967 2,284,333 704 6,310 304 1,049 974 91,132 1,373 4,711 _ 1.782 2,105 4.889 4,889 14 134,761 134,747 611,209 664 113,737 85,447 4,130 25,541 1,019 256,429 282,800 389 16,119 29,868 4,018 3,750 611,209 340,384 2,331,297 643,440 352,352 141,589 Fabricated metal products. 6,322 340,507 2,331,601 123 2 313 1,783,266 392,727 230,735 304 33 14,483 148,917 643,472 352,352 1 856 1,481 306 52.231 79.842 141.589 736 453 1.402 292,304 6.88 386.578 385,842 1,082 870 43,130 4,233 48,555 245 48,310 not allocable 15,250 271,288 Transportation and public utilities..... 106.023 17.464 134.461 461,673 461,673 12,653 5,935 6,718 1,214 1,383 130,540 126,633 Transportation 191 191 33,705 109,465 211,347 211,347 Water transportation Other transportation 82.971 936 32.769 154.699 154.699 3,908 2,274 138,474 56,649 75,361 174,965 26,494 56 649 _ 50,887 21,430 75,361 777 Communication Electric, gas, and sanitary services 24,219 Wholesale and retail trade 2,044,313 8.765 101.173 91.490 1.524.461 1.524.460 Wholesale trade Groceries and related products Machinery, equipment, and supplies Miscellaneous wholesale trade Drugs, chemicals, and allied products Petroleum and petroleum products 1,954,944 37,246 1,079 71,020 8,152 97,569 1,387,672 1,387,671 268 1.849 6,189 49,52 49,521 18,941 599 425 18,942 6,035 115 1,519 64,406 4,196 50,552 9,657 1,319,209 21,751 1,219,153 1,319,209 21,751 1,219,153 78,304 96,969 36 1.916.618 14,263 _ 92,978 Other miscellaneous wholesale trade 4 402 3,952 55,752 78 304 Retail trade 613 3,604 89,369 20,470 136,789 _ 136,789 Building materials, garden supplies, and mobile home dealers..... •46 *46 90,201 25,796 *117 1,805 *1,712 10,140 62,639 20,172 18 151 90,201 25,796 *117 455 36 1,164 144 12,764 Ge 4,675 = Food stores Automotive dealers and service stations 1,299 1,805 1,712 10,140 Apparel and accessory stores 100 *2,192 442 138 2,162 4,228 991 97 20 6,972 6,972 11,634 9,276 117,380 188,652 89,317 1,390,334 1,390,330 Finance, insurance, and real estate 1,054,649 17,700 24,996 190,025 15,227 2,219 588 158 149 41,837 62,303 10,089 53,361 1,054,654 Banking Credit agencies other than banks...... Security, commodity brokers and services...... Insurance carriers 977 2,021 6.513 4,694 5,609 451 255 7,413 232 2,450 28,706 12,564 24,996 190,025 _ 70,668 18,021 15,227 Insurance agents, brokers, and services 35 176 1,861 Real estate 42 441 2,219 Holding and other investment companies except bank 9,192 85,514 85,514 90 250 1,882 72,36 holding companies..... 180,753 180.753 1,521 6,72 89,555 36,812 Services..... 21.444 7,102 *5,951 90,388 Hotels and other lodging places..... 88 974 1,069 *2,799 7,102 •5,951 *276 4,113 •20 Personal services • • 5,39 423 55,280 90,388 iness services Busi 13,140 20,470 76 76 159 1,109 57,181 57,181 159 19,818 621 Other services 8,125 851 727 9,058 11.36 20,055

 Table 1. — Total Assets, Income, Taxes and Credits and Foreign Income, Taxes and Credit, by Major Industry — Continued

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

· · ·		Income and	i taxes of related for	reign corporations a	and DISC's	
Major industry	Gains, profits and income	Taxes paid on gains, profits and income	Dividends paid or constructively distributed to domestic corporations	Taxes deemed paid by retated foreign corporations	Dividends paid to related toreign corporations and DISC's by second-tier foreign corporations	Dividends paid to second-tier foreign corporations by third-tier foreign corporations
	· (69)	(70)	(71)	(72)	(73)	(74)
II industries	82,531,082	32,674,021	15,866,406	2,877,108	3,749,830	508,49
griculture, forestry, and fishing	41,968	7,000	12,843	-	· _	· -
ining	1,062,818	250,205	290,917	22,089	43,588	-
Metal mining	260,246	63,805	52,259	· 17,940	34,905	-
Coal mining		3,793 180,528	500 237,046	 4,149	8,683	-
Oil and gas extraction Nonmetallic minerals, except fuels		2,080	1,113	4,145	0,003	_
onstruction		116,493	178,583	65,007	131,701	_
General building contractors and operative builders		18,511	25,068	_	_	_
Heavy construction contractors		96,748	149,426	65,007	131,701	
Special trade contractors	21,478	1,234	4,088	_	-	
anufacturing	69,821,250	27,523,316	13,620,405	2,492,371	3,108,716	413,78
Food and kindred products	2,561,818	857,626	664,318	120,462	182,789	11,49
Tobacco manufactures		58,546	76,739	12,742	34,864	4,09
Textile mill products		74,900 91,094	51,208 59,622	653 137	673 260	- 3
Lumber and wood products		56,924	95,215	1,408	2,280	-
Furniture and fixtures	15,566	6,726	2,138			-
Paper and allied products Printing and publishing		796,205 215,152	558,616 107,546	58,991 20,055	161,197 33,767	6,72 1.99
Chemicals and allied products	7.452.741	2,344,156	1,905,872	283,273	383,111	12,05
Petroleum (including integrated) and coal products		12,426,021	4,497,445	457,797	537,803	192,64
Rubber and miscellaneous plastics products		200,785 2,748	86,330 2,215	1,133	1,946	-
Stone, clay, and glass products		335,658	183,909	42,689	45,267	4,16
Primary metal industries		805,798	508,350	112,855	156,652	51,33
Fabricated metal products	2,122,366	908,916 5,538,772	399,589 2,252,662	33,761 935,839	59,990 873,731	6,74 84.00
Electrical and electronic equipment		1,109,482	722,033	167,455	327,941	35,66
Motor vehicles and equipment	2,371,913	790,283	458,362	141,426	185,994	-
Transportation equipment, except motor vehicles		166,206 627,045	503,124 422,017	65,497 30,282	79,005 34,980	2,80
Miscellaneous manufacturing products and manufacturing not allocable		110,272	63,095	5,916	6,465	
ransportation and public utilities		254,176	196,147	66,196	99,604	17,74
Transportation		80,040	70,458	22,117	29,053	32
Water transportation	14,353	1,347	7,852	84	82	
Other transportation		78,693 135,918	62,606 84,922	22,033 36,951	28,971 58,960	32 15,53
Electric, gas, and sanitary services		38,219	40,766	7,129	11,591	1,88
/holesale and retail trade		3,566,090	1,107,497	99,205	218,816	53,7
Wholesale trade		3,225,874	937,828	47,406	143,679	55
Groceries and related products	173,074	70,086	56,353	-	-	-
Machinery, equipment, and supplies		4,692 3,151,096	2,443 879,032	47,406	 143,679	-
Miscellaneous wholesale trade Drugs, chemicals, and allied products		25,599	21,001	79	280	· -
Petroleum and petroleum products		2,906,634	715,985	36,886	122,546	-
Other miscellaneous wholesale trade		218,863	142,045	10,441	20,852	5
Retail trade	1,040,609	340,215	169,669	51,799	75,137	53,11
Building materials, garden supplies, and mobile home dealers General merchandise stores	866.140	286,572	129,086	38,586	42,445	31,9
Food stores	126,048	32,842	32,526	13,199	32,673	21,20
Automotive dealers and service stations	*1,333 	*378 547	*46 164		-	-
Apparel and accessory stores Furniture and home furnishings stores				_		-
Eating and drinking places	4,859	2,247	2,527	_	_	-
Miscellaneous retail stores		17,629	5,321	14	19	-
nance, insurance, and real estate		787,602	· · · ·	,	,	21,9
Banking		423,900 54,406	77,784	5,826	26,793	6,0
Credit agencies other than banks Security, commodity brokers and services		54,406	6,881	3,512 2,281	18,642 4,579	2
Insurance carriers		79,332	72,307	9,157	11,420	1,3
Insurance agents, brokers, and services		35,789 9,947	15,277	32,343 (')	38,780 20	8,0
Real estate		180,911	142,814	60,826	20 25,493	6,2
ervices		169,140	130,006		21,679	1.2
		1	,			.,
Hotels and other lodging places		*26,967	*6,566		*817	
Business services	255,242	101,006			20,457	. 1,2
Auto repair; miscellaneous repair services		29,719	31,398		. —	-
Amusement and recreational services		11,446			317	

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Table 1. - Total Assets, Income, Taxes and Credits and Foreign Income, Taxes and Credit, by Major Industry - Continued [All figures are estimates based on samples - money amounts are in thousands of dollars]

		preign income and t			
		and taxes of relate			
Major industry	Inco	me and taxes of firs from which con	t, second, and third structive distribution	tier foreign corpora s were received	tions
	Gains, profits and income	Taxes paid on gains, profits and income	Dividends constructively distributed to domestic corporations	Taxes deemed paid by related foreign corporations	Taxes deemed paid by domestic corporations
	(75)	(76)	(77)	(78)	(79)
All industrias					
All industries			2,046,802	242,503	1,267,46
Agriculture, forestry, and fishing		232	1,414	_	23
Metal mining		11,506 1,470	31,170 4,834	3,788	12,20
Coal mining	.	-		_	1,470
Oil and gas extraction Nonmetallic minerals, except fuels	49,470	10,036	26,336	3,788	10,73
Construction		4,947	9,077		
General building contractors and operative builders		601	2,066	_	3,99 59
Heavy construction contractors	12.094	4,241	6,920	_	3,399
Special trade contractors		105	91	-	
Food and kindrad products			1,745,058	229,100	1,158,480
Food and kindred products Tobacco manufactures	71 376	22,928 9,179	46,454 19,177	6,156 250	20,513 4,185
l extile mill products	29 208	11,795	17,376	18	11,76
Apparel and other textile products Lumber and wood products		674	2,501	40	53
Furniture and fixtures	485	137	348	_	13
Paper and allied products	1.334	2,362 233	13,161 376	1,214	2,28 8
Chemicals and allied products	1.000.375	200,321	483,618	108,353	233,68
Petroleum (including integrated) and coal products	9 057	1,176,530 2,994	578,860 5,867	30,643 181	658,18 3,02
Leather and leather products	240	17	114	_	
Stone, clay, and glass products	14,077 222,336	2,518 37,993	8,022 87,229	1,033 3,608	2,340 11,360
Fabricated metal products	69,190	25,402	18,062	492	7,88
Machinery, except electrical	441,963 411,279	84,393 76,337	166,182 140,380	36,306 21,901	78,16 42,78
Motor vehicles and equipment	145,432	40,166	41,981	722	10,01
Transportation equipment, except motor vehicles	78,189	15,259 58,068	27,303 77,745	478 17,563	14,99 46,26
miscellaneous manufacturing products and manufacturing not allocable	34,043	16,290	10,302	141	10,24
ransportation and public utilities	86,927	24,452	55,248	428	20,414
Transportation	33,593	8,259	19,315	428	4,50
Water transportation	9,656 23,937	664 7,595	6,951 12,364	84 344	64 3,86
Communication	40,267	14,092	24,966	_	13,80
/holesale and retail trade	13,067	2,101	10,966	_	2,10
Wholesale trade	367,899 325,254	104,685	131,944	7,635	54,15
Groceries and related products	129,281	101,491 58,379	106,066 35,811	5,300	49,906 29,125
Machinery, equipment, and supplies Miscellaneous wholesale trade	3,823 192,150	429	1,567		207
Drugs, chemicals, and allied products	- 1	42,683	68,688	5,300	20,57
Petroleum and petroleum products Other miscellaneous wholesale trade	146,276 45,875	38,932 3,752	54,814	3,163	16,387
Retail trade	42 645	3,194	13,874 25,877	2,138	4,187
Building materials, garden supplies, and mobile home dealers	í <u> </u>	_	—	2,334	4,248
General merchandise stores	42,074	3,005	25,495	2,334	4,059
Automotive dealers and service stations	_	=	=	=	
Apparel and accessory stores Furniture and home furnishings stores		_	-	-	-
Eating and drinking places	571	188	382	=	180
Miscellaneous retail stores		-	-	-	_
nance, insurance, and real estate	118,528	21,638	51,365	1,552	10,981
Banking Credit agencies other than banks	35,736 3,269	7,321 714	15,289 2,555	_	3,628 714
Security, commodity brokers and services	1,940	157	1,497	_	9:
Insurance agents, brokers, and services	55,656 2,520	7,074 750	28,640 932	1,552	4,93
Real estate	28	6	4	_	
	19,380	5,617	2,449	-	1,28
ervices	38,143	7,708	21,525		6,99
Hotels and other lodging places		_1	3	_	1
Business services	14,983	3,515	9,491	=	3,282
Auto repair; miscellaneous repair services	 10,544	3.163	7,381		3,16
Other services	12,612	1,029	4,651	=1	548

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*This estimate should be used with caution because of the small number of sample returns on which it was based. *Less than \$500 per return. NOTE: Detail may not add to totals because of rounding and because nature of business not allocable is not shown.

82 Corporation Returns with Form 1118 Filed in Support of Foreign Tax Credit Claimed, 1980 Table 2. — Total Assets, Income, Taxes and Credits and Foreign Income, Taxes and Credit, by Size of Total Assets [All figures are estimates based on samples — money amounts are in thousands of dollars]

[All ligures are estimates based on samples -	money amou		1341103 01 00110							
Size of total assets	Number of returns	Total assets	Total receipts	Dividends received from foreign corporations	Dividends received from DISC's	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from toreign taxes deemed paid (gross-up)	Net income (less deficit)	Western Hemisphere Trade Corporation deduction	tncome subject to U.S. tax
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Total	6,046	3,229,777,033	2,293,231,821	13,871,443	4,274,019	2,873,674	12,644,524	143,466,463	2,983	137,930,564
Zero assets	68	_	11,309,080	97,456	22,112	3,777	29,257	588,717	-1	558,119
51 under \$1,000,000	2,072	753,207	1,437,675	9,570 28,332	378 17,930	8,565 4,389	3,996 14,753	178,857 781,743	_1	117,712 728,142
\$1,000,000 under \$10,000,000 \$10,000,000 under \$50,000,000	1,371 908	5,659,464 21,273,564	8,805,142 33,810,171	110,749	72,885	26,263	78,459	2,727,302	58	2,614,35
\$50,000,000 under \$100,000,000	334	24,323,897	35,570,165	152,641	83.985	24,768	110,765	2,817,409	291	2,694,20
\$100,000,000 under \$250,000,000	375	61,467,595	75,328,391	389,621	149,453	63,819	275,654	6,218,928	124	5,995,213
\$250,000,000 under \$500,000,000	262	93,397,655	117,274,577	458,674	218,656		331,466	7,248,837	777 340	7,137,126 11,303,247
\$500,000,000 under \$1,000,000,000	200	146,917,374	172,271,567	754,752 11,929,648	347,569 3,361,050	176,466 2,444,118	534,566 11,265,607	11,683,258 111,221,411	1,393	106,782,447
\$1,000,000,000 or more	456	2,875,984,277	1,837,425,053	11,929,040	3,301,030	2,444,110	11,200,001	111,221,111	.,	
		orne tax credits	_						Foreign incom reported on	e and taxes Form 1118
			Foreign tax	U.S. possessions	Investment	Jobs	Other	U.S. income tax	Gross income	
Size of total assets		Regutar and	credit	tax	credit	credit	credits	after	excluding operations a	nd specially
	Total	alternative tax	claimed	credit				credits	allocable	
									Total	Dividends
	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)
Total	62,324,700	61,697,948	24,866,908	173,345	6,929,275	102,398	10,226	30,242,547	86,077,698	19,823,516
	238,384	234,686		11,687	45,676	491	26	128,385	1,508,415	46,353
Zero assets \$1 under \$1,000,000	37,257	37,010		161	4,326	146	-	21,575	121,555	18,135
\$1,000,000 under \$10,000,000	304,270	301,215	56,536	751	20,279	1,382	317	225,006	335,662 955,725	36,929 141,710
\$10,000,000 under \$50,000,000	1,164,025			11,195	84,632	3,643	895 585	909,703 923,962	2,553,291	187,103
\$50,000,000 under \$100,000,000	1,216,927	1,208,190		3,893 21,014	94,614 230,904	3,349 17,939	585	1,894,471	1,683,973	471,113
\$100,000,000 under \$250,000,000	2,681,203 3,234,169	2,658,784 3,201,204		124,645	357,661	9,385	912	2,257,829	2,963,925	622,338
\$250,000,000 under \$500,000,000 \$500,000,000 under \$1,000,000,000	5,124,280			_	607,352	9,289	1,355	3,347,739	4,673,708	999,197
\$1,000,000,000 or more	48,324,185				5,483,831	56,772	5,430	20,533,879	71,281,443	17,300,640
				Foreign income	and taxes repo	rted on Form 11	18 — Continued			
	Gross incom	e (less loss) exc	luding branch							
	operatio	ns and specially come Continue	allocable		Total			Taxable incom	e (less loss)	
	· · · · · · · · · · · · · · · · · · ·	· · · ·		Total gross	deductions excluding	Total deductions		Before loss	recapture	
Size of total assets	· ·			income (less loss)	branch	from oit				Other than
				from	operations and specially	and gas extraction		Foreign	Specially allocable	from branch operations
	Obvidand	Interest	Other						income	and
	Dividend gross-up	Interest	Other income	extraction	allocable	incomé	Total	branch	income [
						income	Total	income	(Section	specially
				extraction	allocable	incomé	Total		(Section 863(B))	allocable income
				extraction	allocable	income (26)	Total (27)		(Section	allocable
	gross-up	income (22)	income (23)	extraction of oil or gas	allocable income			income	(Section 863(B))	allocable income
	gross-up (21) 12,644,525	(22) 12,509,769	(23) 41,099,887	extraction of oil or gas (24)	allocable income (25)	(26)	(27) 70,541,309 258,267	income (28) 21,871,325 693	(Section 863(B)) (29)	ailocable income (30) 47,137,497 245,272
Zero assets	gross-up (21) 12,644,525 29,257 3,996	(22) (22) 12,509,769 891,607 2,019	income (23) 41,099,887 541,199 97,405	extraction of oil or gas (24) 31,098,661	(25) (25) (38,940,201 (1,263,143) 71,609	(26) 7,124,054	(27) 70,541,309 258,267 52,458	income (28) 21,871,325 693 2,513	(Section 863(B)) (29) 1,532,488 12,303	allocable income (30) 47,137,497 245,272 49,946
	(21) (21) 12,644,52 29,257 3,996 14,758	(22) (22) 12,509,769 891,607 2,019 9,129	(23) (23) 41,099,887 541,199 97,405 274,847	extraction of oil or gas (24) 31,098,661 	(25) (25) (25) (38,940,201 (1,263,143 (71,609) (154,712)	(26) 7,124,054 	(27) 70,541,309 258,267 52,458 197,830	income (28) 21,871,325 693 2,513 15,679	(Section 863(B)) (29) 1,532,488 12,303 – 1,201	(30) (30) 47,137,49 245,27 49,94 180,956
Zero assets	(21) (21) 12,644,52 29,257 3,996 14,756 78,455	(22) 12,509,769 891,607 2,019 9,129 33,608	income (23) 41,099,887 541,199 97,405 274,847 701,949	extraction of oil or gas (24) 31,098,661 	(25) (25) 38,940,201 1,263,143 71,609 154,712 496,239	(26) 7,124,054 	(27) 70,541,309 258,267 52,458 197,830 523,477	(28) 21,871,325 693 2,513 15,679 52,029	(Section 863(B)) (29) 1,532,488 12,303 1,201 1,962	allocable income (30) 47,137,497 245,277 49,944 180,950 459,486
Zero assets	(21) (21) (23) (29,257 (3,996) (14,756) (78,456) (14,756) (14,756) (14,756) (14,756) (14,756) (14,766) (110,766) (10,766	(22) 12,509,769 891,607 2,019 9,129 33,608 35,758	(23) 41,099,887 541,199 97,405 274,847 701,949 2,219,664	extraction of oil or gas (24) 31,098,661 	(25) (25) (25) (38,940,201 (1,263,143) (71,609) (154,712) (496,239) (2,037,841)	(26) 7,124,054 1,346 19,082 23,877	(27) 70,541,309 258,267 52,458 197,830 523,477 576,055	(28) 21,871,325 693 2,513 15,679 52,029 47,441	(Section 863(B)) (29) 1,532,488 12,303 – 1,201	allocable income (30) 47,137,497 245,277 49,948 180,955 459,486 515,450
Zero assets \$1 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$50,000,000 \$50,000,000 under \$100,000,000 \$100,000,000 under \$250,000,000	(21) (21) 12,644,52 5 29,257 3,996 14,756 78,455 110,766 275,655	(22) 12,509,769 891,607 2,019 9,129 33,608 35,756 108,361	(23) (23) (23) (241,099,887 (274,847 (274,847 (274,847 (2,219,664 (828,846	extraction of oil or gas (24) 31,098,661 	(25) (25) (25) (38,940,201 (38,940,201 (38,940,201 (38,940,201 (38,940,201 (38,940,201) (38,940,	(26) 7,124,054 – 1,346 19,082 23,877 76,342 32,564	(27) 70,541,309 258,267 52,458 197,830 523,477 576,055 1,384,710 1,466,981	(28) (28) (21,871,325 (693) (2,513) (15,679) (52,029) (47,441) (123,260) (90,257)	(Section 863(B)) (29) 1,532,488 12,303 1,201 11,962 13,163 47,431 50,341	allocable income (30) 47,137,49 245,277 49,946 180,956 459,486 515,455 1,214,019 1,326,384
Zero assets	(21) (21) 12,644,525 29,257 3,996 14,756 78,456 110,766 275,654 331,455	(22) 12,509,769 891,607 9,125 33,608 35,756 108,361 168,055	(23) 41,099,887 541,199 97,405 274,847 701,949 2,219,664 828,846 1,842,070	extraction of oil or gas (24) 31,098,661 	(25) (25) (38,940,201 (1,263,143) (7,160) (154,712 (496,239) (2,037,841 (469,954) (1,637,542) (2,123,501)	(26) 7,124,054 1,346 19,082 23,877 76,342 32,564	(27) 70,541,309 258,267 52,458 197,830 523,477 576,055 1,384,710	(28) 21,871,325 693 2,513 15,679 52,029 47,441 123,260	(Section 863(B)) (29) 1,532,488 12,303 1,201 11,962 13,163 47,431	ailocable income (30) 47,137,497 245,272

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Corporation Returns with Form 1118 Filed in Support of Foreign Tax Credit Claimed, 1980

Table 2. - Total Assets, Income, Taxes and Credits and Foreign Income, Taxes and Credit, by Size of Total Assets -- Continued [All figures are estimates based on samples - money amounts are in thousands of dollars]

	Foreign income and taxes reported on Form 1118 Continued										
Size of total assets	Taxable income (less loss) Continued		Foreign taxes available for credit								
			Total after reduction	Reduction for certain foreign taxes	Total before reduction	Paid or accrued on					
	Recapture of prior year foreign losses	After loss recapture				Total	Dividends	Interest	Rents, royalties and license fees	Branch income	
	(31)	(32)	(33)	(34)	(35)	(36)	(37)	(38)	(39)	(40)	
Total	77,596	70,463,713	30,108,786	4,098,186	34,206,972	17,351,661	1,373,863	676,488	547,938	10,088,109	
Zero assets \$1 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$50,000,000	306 13 1,049	257,748 52,152 197,816 522,428	64,101 14,111 85,412 204,625		64,101 14,111 85,444 213,256	33,285 8,784 41,682 92,004	3,047 3,105 4,259 11,210	900 2,717	2,480 8,000 19,392	2,055 939 4,650 16,655	
\$50,000,000 under \$100,000,000. \$100,000,000 under \$250,000,000 \$250,000,000 under \$500,000,000. \$500,000,000 under \$1,000,000,000. \$1,000,000,000 or more	3,363 1,760 7,646 3,864 59,075	572,691 1,382,950 1,459,335 3,342,717 62,675,876	222,905 599,038 618,441 1,239,275 27,060,877	59 25,419 6,124 276,030 3,781,892	222,964 624,457 624,565 1,515,305 30,842,770	90,821 285,375 201,913 912,916 15,684,881	16,191 37,312 40,320 83,860 1,174,559	4,206 5,469 6,222 16,492 623,140	9,370 23,011 29,337 51,436 400,528		
		Foreign income and taxes reported on Form 1118 — Continued									
				Foreign taxes a	vailable for cred	it - Continued	Foreign tax credit computed				
Size of total assets					Paid or accrued on — Continued Other income	Total deemed paid	Carryover available for credit	Before reduction for international boycott operations	Reduction for international boycott operations	After reduction for international boycott operations	
		-			(41)	(42)	(43)	(44)	(45)	(46)	
Total					4,665,263	12,644,523	4,210,788	24,881,344	2,795	24,878,551	
Zero assets \$1 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$50,000,000 \$50,000,000 under \$100,000,000 \$100,000,000 under \$250,000,000 \$250,000,000 under \$1,000,000,000 \$500,000,000 under \$1,000,000,000 \$1,000,000 under \$1,000,000,000 \$10,000,000 under \$10,000,000,000 \$10,000,000 under \$10,000,000,000 \$10,000,000 under \$10,000,000,000 \$10,000,000 under \$10,000,000 \$10,000,000 under \$10,000,000 under \$10,000,000 \$10,000,000 under \$10,000,000 under					6,634 2,082 23,874 42,029 38,680 162,536 86,445 191,709 4,111,275	29,257 3,996 14,757 78,458 110,766 275,653 331,459 534,563 11,265,613	1,559 1,331 29,005 42,794 21,377 63,428 91,193 67,826 3,892,275	52,235 11,058 56,558 154,237 190,544 516,429 483,808 1,158,877 22,257,599		52,235 11,058 56,557 154,238 190,544 516,170 483,787 1,158,545 22,255,417	

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

Corporation Returns with Form 1118 Filed in Support of Foreign Tax Credit Claimed, 1980 84

Table 3. - Total Assets, Income, Taxes and Credits and Foreign Income, Taxes and Credit, by Type of Foreign Income for which Separate Credit was Computed

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

All figures are estimates based on samples -	money amoun	its are in thou	isands of dolla	arsj						
Type of foreign income for which separate credit was computed	Number of returns	Total assets	Total receipts	Dividends received from foreign corporations	Dividends received from DISC's	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid (gross-up)	Net income (less deficit)	Western Hemisphere Trade Corporation deduction	Income subject to U.S. tax
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Total Certain interest income Dividends received from DISC's Foreign oil related income Foreign oil and gas extraction income	6,046 336 138 119 93 5,892	3,229,777,033 544,122,098 368,370,279 503,793,434 458,442,624 3,190,875,770	575,642,400 388,393,928 705,623,707 653,822,721	13,871,443 5,293,790 1,569,109 5,419,230 5,090,815 13,868,102	4,274,019 1,580,718 1,696,473 409,519 316,138 4,265,212	2,873,674 769,038 644,022 960,699 929,980 2,859,841	5,806,525 1,307,465	143,466,463 41,635,411 25,818,468 57,669,045 56,065,016 137,955,756	2,983 394 1,212 323 19 2,983	137,930,56 40,400,39 24,962,73 55,674,01 54,063,31 132,563,22
Type of foreign income for which separate credit was computed	U.S. inc	ome tax		Ť					Foreign income and taxes	
	Total	Total Regular and alternative tax		U.S. possessions tax credit	Investment credit	Jobs credit	Other credits	U.S. income tax after credits	reported on Form 1118 Gross income (less loss) excluding branch operations and specially allocable income	
	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	Total (19)	Dividends (20)
•		(12)	(13)	(14)	(13)	(10)		(10)	(13)	(20)
Total Certain interest income Dividends received from DISC's Foreign oil related income Foreign oil and gas extraction income All other foreign source income	62,324,700 18,278,468 11,236,158 25,336,706 24,580,129 59,864,089	18,111,055 11,123,314	8,669,939 4,334,845 15,090,362 14,693,784	173,345 91 	6,929,275 2,212,604 1,798,998 2,106,738 2,000,763 6,674,854	102,398 19,913 12,327 4,726 4,311 101,036	1,711 1,578 1,584 1,565	30,242,547 7,374,211 5,088,410 8,133,296 7,879,706 28,478,709	86,077,698 654,108 1,564,791 31,371,441 30,751,332 52,487,357	19,823,510
			1.00	Foreign income	and taxes report	ted on Form 11	18 — Continued			
	Gross income (less loss) excluding branch operations and specially allocable income — Continued			Total	Total		Taxable income (less loss)			
Type of foreign income for which separate				gross	deductions excluding	Total deductions from oil and gas extraction income		Before loss	loss recapture	
crědit was computed	Dividend gross-up	Interest income	Other income	(less loss) from extraction of oil or gas	branch operations and specially allocable income		Totał	Foreign branch income	Specially allocable income (Section 863(B))	Other than from branch operations and speciatly allocable income
	(21)	(22)	(23)	(24)	(25)	(26)	(27)			
Total Certain interest income Dividends received from DISC's Foreign oil related income Foreign oil and gas extraction income All other foreign source income	12,644,525 3,105 5,947,972 5,659,740 6,693,449	654,108 970,888 962,927	 17,763,525 17,699,663	3 1,098,661 	38,940,201 93,305 397,673 12,688,626 12,602,771 25,760,596	7,124,054 7,124,054 7,124,054 	560,803 1,167,118 31,027,245	21,871,325 — 12,295,716 12,257,534 9,575,607	1,532,488 — 	47,137,49 560,80 1,167,11 18,682,81 18,148,56 26,726,76
· · · · · · · · · · · · · · · · · · ·				Foreign income	and taxes report	rted on Form 11	18 - Continued	-		• •
Type of foreign income for which separate credit was computed	Taxable income (less loss) - Continued Foreign taxes available for credit									
	Recapture		Total	Reduction	Total		P	aid or accrued o	n	
	of prior year foreign losses	After loss recapture	after reduction	for certain foreign taxes	before reduction	Total	Dividends	Interest	Rents, royalties and license fees	Branch income
	(31)	(32)	(33)	(34)	(35)	(36)	(37)	(38)	(39)	(40)
Total Certain interest income Dividends received from DISC's Foreign oil related income Foreign oil and gas extraction income	. 26 . 22,055	557,980 1,167,092 31,005,190	22,277 2 4,170 18,267,030	4,067,137	22,277 4,170 22,334,167	17,351,661 21,119 1,066 12,978,822 10,623,884		676,488 21,119 7,611 7,293		10,088,10
All other foreign source income						4,350,655		647,758		1,449,57
					Fereige terret		and taxes report		_	
Type of foreign income for which separate credit was computed					Paid or accrued on — Continued Other income	available for cree Total deemed paid	Carryover available for credit	Before reduction for international boycott operations	Reduction for international boycott operations	After reduction for international boycott operations
					(41)	(42)	(43)	(44)	(45)	(46)
Certain interest income Dividends received from DISC's Foreign oil related income					4,665,263 — 3,982,060 3,969,401	12,644,52 3 — 3,105 5,947,972 4,143,327	1,158 3,407,374	24,881,344 21,139 4,106 14,130,086 13,867,152		24,878,55 - - -
Foreign oil and gas extraction income					3,969,401	4,143,327			I	

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NOTE: The data in columns 1-18 pertain to the total activity of the domestic parent corporation. Since many corporations compute a foreign tax credit for more than one type of foreign income, the data in these columns are not additive. The data in columns 45 and 46 are reported as corporate totals only, not by type of income. The data in columns 19-23, 25, 28-33, 35, 37-41 and 44 of the foreign oil and gas extraction income time represent the amounts of total foreign oil related income and tax for those corporations reporting foreign oil and gas extraction income foreign oil and gas extraction income and tax of the data in columns 24, 26, 27, 34, 36, 42 and 43 of the foreign oil and gas extraction income and gas extraction income and tax months. Form 118 detail may not add to totals because of rounding.