

Controlled Foreign Corporations, 2004

by Lee Mahony and Randy Miller

For Tax Year 2004, foreign corporations controlled by U.S. multinational corporations held \$9.2 trillion in assets and reported receipts of \$3.8 trillion. These controlled foreign corporations (CFCs) paid \$69.3 billion in income taxes on \$362.2 billion of earnings and profits (E&P) before income taxes.

Approximately 79.0 percent, or 58,992, of CFCs for Tax Year 2004 were concentrated in three major industrial sectors: (1) goods production; (2) distribution and transportation of goods; and (3) services. These three industrial sectors accounted for 84.7 percent of total receipts (\$3.2 trillion), 72.6 percent of E&P (less deficit) before income taxes (\$263.1 billion), and 67.1 percent of income taxes (\$46.5 billion). Foreign corporations in the finance, insurance, real estate, and rental and leasing sector held 42.5 percent of total CFC assets (\$3.9 trillion), while generating only 9.4 percent of total CFC receipts (\$356.0 billion) and 16.0 percent of total CFC E&P (less deficit) before income taxes (\$57.9 billion).

For Tax Year 2004, 74,676 CFCs were incorporated in 185 different countries.¹ Over 45 percent, or 33,719, of these CFCs were incorporated in Europe. Slightly more than 91 percent of these European CFCs were located in European Union countries. Latin America and Asia domiciled 14.3 percent and 19.2 percent of all CFCs, respectively.

Controlled Foreign Corporations

Direct foreign investment by U.S. persons may take several forms, including foreign branches, partnerships, and separate corporations. This article deals with the use of the corporation as a vehicle for direct foreign investment. For U.S. income tax purposes, a foreign corporation is “controlled” if U.S. shareholders own more than 50 percent of its outstanding voting stock, or more than 50 percent of the value of all its outstanding stock (directly, indirectly, or construc-

tively) on any day during the foreign corporation’s tax year. A “noncontrolled” foreign corporation is any foreign corporation that fails to meet either of the above requirements for control. For purposes of determining control, a U.S. shareholder is defined as a U.S. person who owns 10 percent or more of the foreign corporation’s total combined voting stock.² However, for Statistics of Income purposes, a foreign corporation is controlled only if one U.S. corporation satisfies either of the above 50-percent ownership requirements for an uninterrupted period of at least 30 days during the foreign corporation’s tax year.³ For Tax Year 2004, there were 10,939 U.S. corporations that held such control over at least one foreign corporation.

In general, the income of a CFC is not taxable to the U.S. shareholders until repatriated in the form of a dividend. Prior to 1962, U.S. taxpayers could defer U.S. tax on such income indefinitely by accumulating this income in a CFC. To address the potential for tax avoidance, Congress enacted the Subpart F provisions of the Internal Revenue Code in 1962.⁴ These provisions require certain items of income to be treated as dividends deemed paid to the U.S. shareholders and, therefore, subject to U.S. taxation. Currently, a U.S. shareholder of a CFC may be required to include in gross income the shareholder’s ratable share of the CFC’s: (1) Subpart F income (see Subpart F income in the Explanation of Selected Terms section of this article); (2) earnings invested in U.S. property; (3) previously excluded Subpart F income withdrawn from “qualified investments” in less developed countries and in “foreign base company” shipping operations; (4) previously excluded export trade income withdrawn from investment in export trade assets; and (5) factoring income (income derived from the acquisition of a trade or service receivable).

CFCs by Industrial Sector

For Tax Year 2004, goods producers accounted for 20.2 percent of end-of-year assets and 43.0 percent of total receipts (see Figure A). These CFCs earned 34.6 percent of E&P (less deficit) before income taxes

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¹ Based on unpublished data.

² The current definition of a Controlled Foreign Corporation is provided in Internal Revenue Code section 957. Ownership attribution rules are provided in section 958.

³ The statistics in this article pertain only to foreign corporations for which one U.S. corporation satisfies the requirements for control. Generally, complete Form 5471 filings are required only for foreign corporations controlled by a single U.S. shareholder (i.e., those shareholders meeting the definition of a “Category of Filer 4” taxpayer per the Form 5471 instructions). Partial filing requirements exist for noncontrolled foreign corporations and for controlled foreign corporations which are not controlled by a single U.S. shareholder. For more details, refer to the instructions for Form 5471.

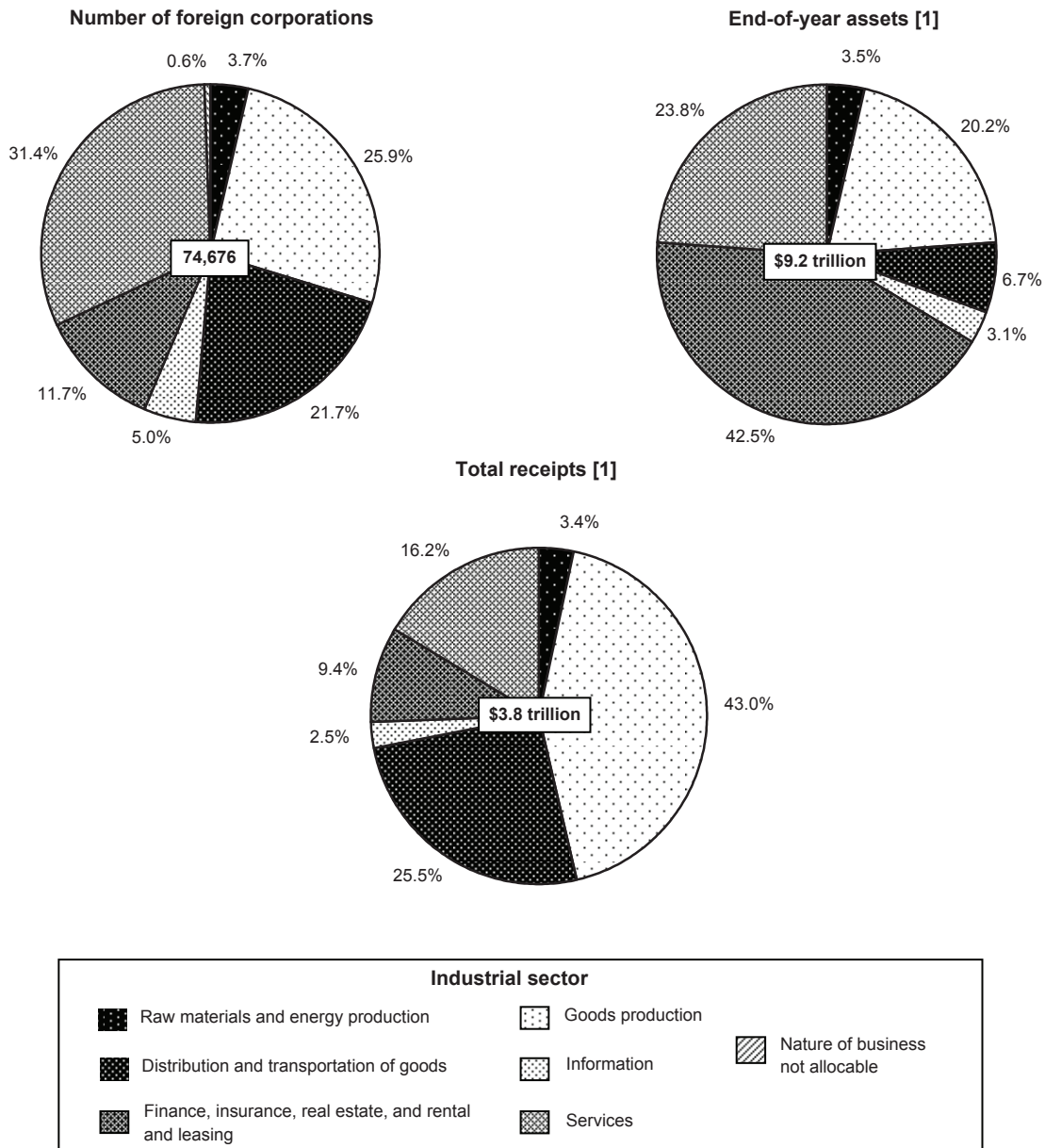
⁴ The prevention of tax avoidance was a primary tax policy objective that led to the enactment of the Subpart F provisions of the Internal Revenue Code. Other policy considerations also contributed to the enactment of Subpart F. For more detailed information on the history of Subpart F, see “*The Deferral of Income Earned Through U.S. Controlled Foreign Corporations: A Policy Study*,” Office of Tax Policy, Department of the Treasury, December 2000.

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Figure A

U.S. Corporations and Their Controlled Foreign Corporations: Number, End-of-Year Assets, and Receipts, by Industrial Sector of Controlled Foreign Corporation, Tax Year 2004



[1] Includes "Nature of business not allocable," not shown separately.
NOTE: Detail may not add to 100 percent because of rounding.

for all corporate-owned CFCs. Goods producers paid \$22.3 billion of foreign taxes, representing 32.2 percent of all taxes paid by CFCs. Chemical, computer and electronic products, petroleum and coal products, and transportation equipment manufacturers collectively reported 61.4 percent of end-of-year assets, 61.0 percent of total receipts, and 58.0 percent of E&P (less deficits) before income taxes for all goods producers. Chemical manufacturers alone generated 32.7 percent of E&P (less deficit) before income taxes and 23.9 percent of foreign income taxes reported by all goods producers.

For Tax Year 2004, CFCs engaged in finance, insurance, real estate, and rental and leasing held 42.5 percent of all assets while generating only 9.4 percent of total receipts and 16.0 percent of E&P (less deficit) before income taxes reported by all CFCs. More than \$3.3 trillion, or 85.3 percent, of the assets reported for this industrial sector were attributable to finance corporations. These finance corporations amassed 65.8 percent of receipts and 70.0 percent of E&P (less deficit) before income taxes for this industrial sector. Insurance subsidiaries reported nearly \$0.5 trillion in assets and nearly \$0.1 trillion in receipts, representing 12.0 percent and 27.7 percent of total assets and total receipts for this sector, respectively.

There were more CFCs in the services sector than any other industrial sector. More than 31 percent of all CFCs were classified as service corporations. Service providers reported nearly \$2.2 trillion in assets and more than \$0.6 trillion in receipts. However, excluding management and holding companies, CFCs classified in the services sector reported only \$0.4 trillion in assets and \$0.3 trillion in receipts.

Geographic Distribution of CFCs

Figure B shows the geographic distribution of CFCs by major region of incorporation. For Tax Year 2004, Europe remained the dominant region for CFC activity. Europe alone accounted for 62.2 percent of end-of-year assets, 54.3 percent of total receipts, and 49.8 percent of E&P (less deficit) before income taxes for all CFCs. European CFCs paid 46.9 percent of the \$69.3 billion of foreign income taxes reported by all CFCs for Tax Year 2004. Within Europe, most CFC activity was concentrated in European Union (EU) countries. More than 91 percent of European

CFCs were incorporated in EU countries. These CFCs reported 92.8 percent of ending assets, 90.6 percent of total receipts, and 86.7 percent of E&P (less deficit) before income taxes for all European CFCs. More than 47 percent of European CFCs not incorporated in EU countries were incorporated in Switzerland. These Swiss CFCs accounted for 79.6 percent of ending assets, 81.7 percent of receipts, and 72.4 percent of E&P (less deficit) before income taxes for non-EU European CFCs.

Other Western Hemisphere countries (which includes Canada) and Asia also were significant regions of CFC activity. CFCs conducting business in the Other Western Hemisphere countries held 19.5 percent of all CFC end-of-year assets and reported 18.4 percent of all CFC receipts. These CFCs reported 24.0 percent of E&P (less deficit) before income taxes and paid 22.7 percent of foreign income taxes paid by all CFCs. Within the Other Western Hemisphere region, Canada was home to most CFC activity. Canadian CFCs generated 60.2 percent of total receipts, 46.7 percent of E&P (less deficit) before income taxes, and 55.5 percent of foreign income taxes for CFCs in this region. With 6,559 CFCs, Canada had more CFCs than any other country except the United Kingdom (8,227). CFCs in Asia reported 9.5 percent of ending assets, 15.1 percent of total receipts, and 13.6 percent of E&P (less deficit) before income taxes for all CFCs. More CFC economic activity occurred in Japan than any other Asian country. Japanese CFCs accounted for 44.9 percent of ending assets, 34.7 percent of total receipts, and 30.7 percent of E&P (less deficit) before income taxes reported by all Asian CFCs. For Tax Year 2004, there were almost as many CFCs incorporated in China (2,264) as Japan (2,265). In fact, for Tax Year 2004, only 8 countries had more CFCs than China.⁵

The two geographic groupings with the smallest CFC representation were Africa and U.S. Possessions (including Puerto Rico). Only 2.7 percent of all CFCs were incorporated in these two regions. Collectively, these two regions accounted for less than 1.0 percent of end-of-year assets, 1.4 percent of total receipts, and 1.7 percent of E&P (less deficit) before income taxes for all CFCs. Within Africa, most CFC activity was concentrated in four countries. South Africa, Liberia, Mauritius, and Egypt

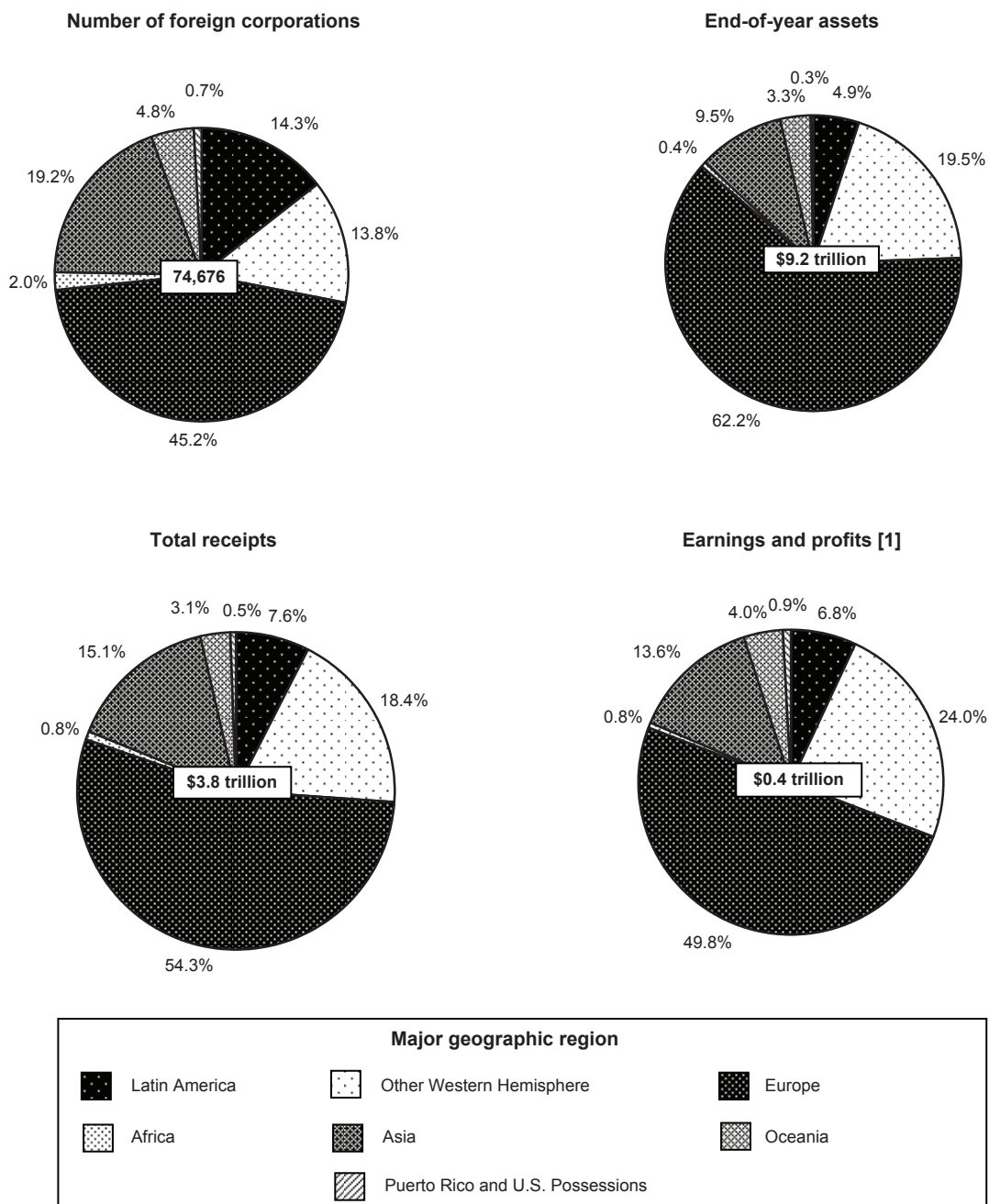
⁵ The countries with the most CFCs are: United Kingdom (8,227), Canada (6,559), Mexico (4,618), Germany (4,121), France (3,857), Netherlands (3,151), Australia (2,807), Japan (2,265), China (2,264), and Hong Kong (1,800).

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Figure B

U.S. Corporations and Their Controlled Foreign Corporations: Number, End-of-Year Assets, Receipts, and Earnings, by Geographic Region of Incorporation of Controlled Foreign Corporation, Tax Year 2004



[1] Less deficits and before income taxes.

NOTE: Includes "Other country or country unknown," not shown separately. Detail may not add to 100 percent because of rounding.

collectively accounted for 76.7 percent of ending assets, 75.4 percent of total receipts, and 94.2 percent of E&P (less deficit) before income taxes for all African CFCs. South Africa alone had 41.2 percent of African CFCs. South African CFCs reported 35.2 percent of ending assets, 54.4 percent of total receipts, and 58.9 percent of E&P (less deficit) before income taxes reported by all African CFCs. Most CFC activity in the U.S. possessions is attributable to Puerto Rico. Puerto Rican CFCs held 89.3 percent of ending assets and generated 90.2 percent of total receipts reported by all CFCs operating in the U.S. possessions. For Tax Year 2004, the average tax rate for CFCs incorporated in Puerto Rico and U.S. Possessions was 8.7 percent, compared to the average tax rate of 19.2 percent for all other CFCs (see *Average Tax Rate* in the Explanation of Selected Terms section of this article). CFCs incorporated in African countries had the highest average tax rate of any region at 29.7 percent.

Profitability

For purposes of this article, two measures are used to assess pretax profitability for CFCs: rate of return on assets and profit margin. Rate of return on assets is defined as current E&P (less deficit) before income taxes divided by end-of-year assets. Profit margin is defined as current E&P (less deficit) before income taxes divided by total receipts.

For Tax Year 2004, profitability measures varied among the six different major industrial sectors. CFCs engaged in raw materials and energy production reported both the highest rate of return on assets (10.2 percent) and the highest profit margin (26.1 percent). The high profitability of this sector is attributable to CFCs in the mining subsector. The return on assets and profit margin for mining CFCs were 11.9 percent and 33.6 percent, respectively. CFCs in the utilities subsector reported a 6.5-percent return on assets and a 13.3-percent profit margin, while CFCs engaged in agriculture, forestry, and fishing reported only a 3.8-percent return on assets and an 8.5-percent profit margin.

CFCs engaged in the distribution and transportation of goods sector reported the second highest return on assets percentage (8.5 percent). These CFCs, however, also reported the lowest profit margin of any sector (5.4 percent). Conversely, CFCs in the finance, insurance, real estate, and rental and leasing sector reported the second highest profit margin (16.3

percent), while reporting the lowest return on assets (1.5 percent).

Distributions of Earnings and Profits

For Tax Year 2004, CFCs distributed \$135.2 billion of E&P to U.S. and foreign shareholders. Nearly 68 percent of distributions of E&P were from not previously taxed E&P (\$91.4 billion), while the remainder was distributed from previously taxed E&P (\$43.8 billion). More than 34 percent of CFC distributions (\$46.6 billion) represented taxable dividends to the U.S. parent corporation.

The majority of distributions of E&P are attributed to CFCs doing business in the goods production and services sectors. These two industrial sectors distributed \$75.1 billion of E&P or 55.6 percent of total distributions. Of this total, \$49.0 billion were from not previously taxed E&P, with the remaining \$26.1 billion coming from previously taxed E&P. Almost 21.4 percent of distributions by goods producers were attributable to chemical manufacturers, while an additional 12.3 percent were attributable to petroleum and coal products manufacturers. CFCs classified as management companies reported 81.6 percent of distributions to shareholders reported by all services CFCs.

European-based CFCs accounted for 49.2 percent (\$66.5 billion) of all distributions of E&P. Nearly 62.0 percent of these distributions were from not previously taxed E&P (\$41.2 billion), with the remainder distributed from previously taxed E&P (\$25.3 billion). CFCs incorporated in European Union countries made 88.1 percent of all shareholder distributions by European CFCs. CFCs in the Other Western Hemisphere region distributed \$37.7 billion of E&P in Tax Year 2004, or 27.9 percent of all distributions. Canadian CFCs accounted for 61.6 percent of these distributions; CFCs in Bermuda and the Cayman Islands accounted for 22.5 percent and 11.1 percent, respectively.

Figure C displays taxable payout ratios by industrial sector. The taxable payout ratio is defined as taxable dividends paid to a U.S. person by a CFC with positive current E&P net of current-year Subpart F income divided by positive current E&P net of current-year Subpart F income (see U.S. person, Current earnings and profits, and Subpart F Income in the Explanation of Selected Terms section of this article). For Tax Year 2004, CFCs reported a taxable payout ratio of 8.8 percent. This ratio is lower than the tax-

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Figure C

U.S. Corporations and Their Controlled Foreign Corporations: Number of Foreign Corporations with Positive Current Earnings and Profits Net of Current-Year Subpart F Income and Taxable Payout Ratios, by Industrial Sector of Controlled Foreign Corporation, Tax Year 2004

[Money amounts are in thousands of dollars]

Industrial sector of Controlled Foreign Corporation	Number of foreign corporations with positive current earnings and profits net of current-year Subpart F income	Positive current earnings and profits net of current-year Subpart F income [1]	Taxable payout ratio (percentage)
	(1)	(2)	(3)
All industries	41,931	294,649,031	8.8
Raw materials and energy production	1,124	24,283,854	22.0
Goods production	12,037	105,657,597	8.3
Distribution and transportation of goods	10,156	36,582,974	5.9
Information	1,810	9,526,661	21.4
Finance, insurance, real estate, and rental and leasing	4,363	45,291,578	3.8
Services	12,252	73,222,646	8.3
Nature of business not allocable	189	83,721	0.3

[1] Amounts are multiplied by the total percentage of voting stock owned by the Form 5471 filer at the end of its annual accounting period.

able payout ratio reported for the previous three CFC studies (10.3 percent for Tax Year 2002, 11.9 percent for Tax Year 2000, and 16.0 for Tax Year 1998).

The taxable payout ratio varied considerably among the industrial sectors. CFCs in the raw materials and energy production sector reported the largest taxable payout ratio (22.0 percent). CFCs in the information sector also reported a substantial taxable payout ratio (21.4 percent). No other industrial sector had a double-digit taxable payout ratio.

Largest 7,500 Controlled Foreign Corporations

For Tax Year 2004, the largest 7,500 CFCs held \$8.5 trillion in assets and reported receipts of \$3.0 trillion.⁶ These amounts increased from Tax Year 2002 by 45.7 percent and 30.7 percent, respectively. These 7,500 CFCs reported foreign taxes of \$54.4 billion on pretax earnings and profits of \$313.1 billion, increases from Tax Year 2002 of 40.9 percent and 56.0 percent, respectively. These foreign corporations distributed \$113.0 billion of E&P to all shareholders during Tax Year 2004.⁷ Of these distributions, \$37.3 billion represented taxable remittances to U.S. parent corporations. U.S. parent corporations were required to include an additional \$40.4 billion

in taxable income attributable to these largest 7,500 CFCs under the subpart F income rules.

As Figure D shows, 80.5 percent of the largest 7,500 CFCs conducted business in three industrial sectors: services (28.0 percent), goods production (27.8 percent), and finance, insurance, real estate, and rental and leasing (24.7 percent). These sectors accounted for 87.8 percent of ending assets, 70.4 percent of total receipts, and 74.7 percent of E&P (less deficit) before income taxes for the largest 7,500 CFCs. Among the largest 7,500 CFCs, service corporations experienced the most significant economic growth from Tax Year 2002 to Tax Year 2004. Ending assets and receipts for these service corporations increased by 67.0 percent and 88.7 percent, respectively. For Tax Year 2004, service corporations earned 75.4 percent more in E&P (less deficit) before income taxes and paid 107.5 percent more in foreign income taxes than for Tax Year 2002. For the largest 7,500 CFCs, raw materials and energy production was the only sector to experience a decrease in ending assets (1.0 percent) and total receipts (2.5 percent). However, CFCs in this sector reported increases in E&P (less deficit) before income taxes and foreign income taxes of 77.3 percent and 63.8

⁶ The SOI Controlled Foreign Corporation Study has changed from a defined population to a sample. In prior studies, data generally were published only for the largest 7,500 foreign corporations controlled by large U.S. multinationals. Beginning with Tax Year 2004, SOI is publishing population estimates for controlled foreign corporations. For transitional purposes, this article includes limited data for the 7,500 largest controlled foreign corporations. Tax Year 2004 is the last year for which statistics will be reported for the largest 7,500 controlled foreign corporations.

⁷ Based on unpublished data.

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Figure D

U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Net Income, Earnings, Taxes, Dividends, and Subpart F Income, by Industrial Sector of Controlled Foreign Corporation, Tax Year 2004

[Money amounts are in thousands of dollars]

Industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations				
		Number of foreign corporations	Total assets		Total receipts	Net income (less deficit) before income taxes
			Beginning-of- year	End-of-year		
	(1)	(2)	(3)	(4)	(5)	(6)
All industries	1,135	7,500	6,979,508,476	8,500,682,185	2,980,832,112	353,654,732
Raw materials and energy production	97	356	283,417,594	300,251,790	110,282,162	32,619,651
Goods production	507	2,086	1,379,151,897	1,621,423,345	1,318,882,571	141,417,872
Distribution and transportation of goods	308	869	415,877,413	476,443,399	706,004,976	42,903,579
Information	67	236	153,684,612	263,476,630	66,425,947	6,226,141
Finance, insurance, real estate, and rental and leasing	385	1,856	3,112,659,865	3,834,116,468	318,224,097	57,066,692
Services	634	2,097	1,634,717,095	2,004,970,553	461,012,359	73,420,797

Industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued					
	Net income (less deficit)	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes	Dividends paid to controlling U.S. corporation	Total Subpart F income
All industries	313,734,337	313,129,621	54,388,141	258,741,480	37,332,477	40,394,360
Raw materials and energy production	22,124,651	33,293,068	9,405,697	23,887,372	8,106,735	758,816
Goods production	122,828,136	106,539,184	16,828,485	89,710,698	14,313,788	10,325,669
Distribution and transportation of goods	35,527,066	39,382,536	7,713,349	31,669,187	2,411,509	6,955,389
Information	4,735,246	6,540,116	1,591,412	4,948,704	3,607,935	421,504
Finance, insurance, real estate, and rental and leasing	47,343,462	53,142,117	9,231,256	43,910,861	2,371,365	12,411,667
Services	81,175,776	74,232,601	9,617,942	64,614,659	6,521,146	9,521,314

[1] Number of returns is not additive because some U.S. corporations had Controlled Foreign Corporations in more than one industrial sector. The industrial activity of the parent corporation filing the return often differs from that of the Controlled Foreign Corporations.

percent, respectively. For Tax Year 2002, the information sector was the only sector with an aggregate deficit in E&P before income taxes (\$4.1 billion). For Tax Year 2004, this sector reported \$6.5 billion of E&P (less deficit) before income taxes.

For Tax Year 2004, 54.2 percent of the largest 7,500 CFCs were incorporated in Europe (see Figure E). European CFCs accounted for 63.3 percent of total assets and 56.4 percent of total receipts of the largest 7,500 CFCs. These CFCs earned 51.1 percent of E&P (less deficit) before income taxes and paid 48.0 percent of foreign taxes for the largest 7,500 CFCs. Approximately, 92.9 percent of these European CFCs were incorporated in European Union countries.⁸ Other Western Hemisphere and Asia were two other regions of significant activity, accounting

for 19.0 percent and 11.6 percent of the largest 7,500 CFCs for Tax Year 2004.

The largest 7,500 CFCs accounted for 92.2 percent of ending assets, 78.5 percent of total receipts, and 86.5 percent of E&P (less deficit) before income taxes of all CFCs controlled by U.S. parent corporations. The largest 7,500 CFCs paid 78.5 percent of foreign income taxes attributable to all CFCs. These largest CFCs remitted 80.0 percent of foreign taxable dividends paid to controlling U.S. shareholders and generated 84.5 percent of total subpart F income reported by these U.S. shareholders. Figure F shows the industrial and geographic composition for all CFCs and the largest 7,500 CFCs for Tax Year 2004. As Figure F shows, the largest 7,500 CFCs accurately reflect the industrial and geographic composition

⁸ Based on unpublished data.

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Figure E

U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Net Income, Earnings, Taxes, Dividends, and Subpart F Income, by Geographic Region of Incorporation of Controlled Foreign Corporation, Tax Year 2004

[Money amounts are in thousands of dollars]

Geographic region of incorporation of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations				
		Number of foreign corporations	Total assets		Total receipts	Net income (less deficit) before income taxes
			Beginning-of-year	End-of-year		
	(1)	(2)	(3)	(4)	(5)	(6)
All geographic regions	1,135	7,500	6,979,508,476	8,500,682,185	2,980,832,112	353,654,732
Latin America	223	660	308,822,943	363,726,266	189,285,962	21,414,543
Other Western Hemisphere	571	1,422	1,439,513,081	1,688,102,041	588,225,064	79,964,308
Europe	792	4,064	4,379,055,538	5,383,455,930	1,681,081,503	201,779,814
Africa	44	74	20,676,547	23,674,901	15,716,356	1,616,450
Asia	264	869	605,903,525	753,039,347	415,463,889	37,263,580
Oceania	134	373	205,775,010	270,595,620	80,461,566	9,928,700
Puerto Rico and U.S. Possessions	27	38	19,761,832	18,088,079	10,597,773	1,687,336

Geographic region of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued					
	Net income (less deficit)	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes	Dividends paid to controlling U.S. corporation	Total Subpart F income
	(7)	(8)	(9)	(10)	(11)	(12)
All geographic regions	313,734,337	313,129,621	54,388,141	258,741,480	37,332,477	40,394,360
Latin America	17,015,430	18,345,968	4,180,562	14,165,407	1,922,479	648,480
Other Western Hemisphere	66,210,516	81,680,392	13,660,286	68,020,106	15,356,921	11,871,449
Europe	191,191,862	160,011,693	26,108,144	133,903,549	15,268,934	23,128,482
Africa	1,122,703	1,705,438	490,438	1,215,000	302,105	119,839
Asia	28,630,476	38,207,225	7,861,460	30,345,765	3,293,628	3,714,994
Oceania	8,102,410	11,305,240	1,948,484	9,356,755	991,592	783,954
Puerto Rico and U.S. Possessions	1,460,940	1,873,665	138,767	1,734,898	196,818	127,162

[1] Number of returns is not additive because some U.S. corporations had Controlled Foreign Corporations in more than one geographical region.

of the population of all CFCs at the industrial sector and major geographic region levels.⁹

Data Sources and Limitations

The statistics presented in this article are based on information collected from corporate tax returns (Form(s) 1120) with accounting periods ending July 2004 through June 2005 and their attached Form(s) 5471, *Information Return of U.S. Persons With Respect to Certain Foreign Corporations*. A U.S. corporation is required by Internal Revenue Service regulations to submit a Form 5471 for any Controlled Foreign Corporation (CFC) with an accounting peri-

od ending with or within the U.S. parent's accounting period. Thus, the accounting periods for Tax Year 2004 CFCs may have ended as early as July 2003 and as late as June 2005. However, most CFC activity occurred in Calendar Year 2004. These statistics report data for active foreign corporations controlled by U.S. corporations (see Active versus inactive Controlled Foreign Corporations in the Explanation of Selected Terms section of this article).

Coefficient of variation (CV) tables are not provided because these data are not subject to significant sampling error. For example, CFCs sampled at a 100-percent rate accounted for more than 95.0 per-

⁹ While the largest 7,500 CFCs accurately depict the industrial and geographic composition of all CFCs, the new study design allows SOI to publish more detailed data at the industry and country levels, as well as provide population estimates for CFC data. In prior CFC studies, SOI did not publish statistics for many industries and countries due to the disclosure problems associated with having data for only 7,500 CFCs.

Figure F

Percentage of the Number, Assets, Receipts, Earnings, and Taxes of All Controlled Foreign Corporations and the 7,500 Largest Controlled Foreign Corporations, by Industrial Sector and Geographic Region of Incorporation of Controlled Foreign Corporation, Tax Year 2004

Industrial sector of Controlled Foreign Corporation	Number of CFCs		End-of-year assets		Total receipts		Current E&P (less deficit) before income taxes		Income taxes	
	All CFCs	7,500	All CFCs	7,500	All CFCs	7,500	All CFCs	7,500	All CFCs	7,500
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
All industries [1]	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Raw materials and energy production	3.7	4.7	3.5	3.5	3.4	3.7	9.2	10.6	14.5	17.3
Goods production	25.9	27.8	20.2	19.1	43.0	44.2	34.6	34.0	32.2	30.9
Distribution and transportation of goods	21.7	11.6	6.7	5.6	25.5	23.7	14.5	12.6	16.8	14.2
Information	5.0	3.1	3.1	3.1	2.5	2.2	2.2	2.1	3.2	2.9
Finance, insurance, real estate, and rental and leasing	11.7	24.7	42.5	45.1	9.4	10.7	16.0	17.0	15.1	17.0
Services	31.4	28.0	23.8	23.6	16.2	15.5	23.6	23.7	18.1	17.7

Geographic area of incorporation of Controlled Foreign Corporation	Number of CFCs		End-of-year assets		Total receipts		Current E&P (less deficit) before income taxes		Income taxes	
	All CFCs	7,500	All CFCs	7,500	All CFCs	7,500	All CFCs	7,500	All CFCs	7,500
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
All geographic regions [2]	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Latin America	14.3	8.8	4.9	4.3	7.6	6.4	6.8	5.9	9.2	7.7
Other Western Hemisphere	13.8	19.0	19.5	19.9	18.4	19.7	24.0	26.1	22.7	25.1
Europe	45.2	54.2	62.2	63.3	54.3	56.4	49.8	51.1	46.9	48.0
Africa	2.0	1.0	0.4	0.3	0.8	0.5	0.8	0.5	1.3	0.9
Asia	19.2	11.6	9.5	8.9	15.1	13.9	13.6	12.2	15.7	14.5
Oceania	4.8	5.0	3.3	3.2	3.1	2.7	4.0	3.6	4.0	3.6
Puerto Rico and U.S. Possessions	0.7	0.5	0.3	0.2	0.5	0.4	0.9	0.6	0.4	0.3

[1] Includes "Nature of business not allocable," not shown separately.

[2] Includes "Other country or country unknown," not shown separately.

NOTE: Detail may not add to 100 percent because of rounding.

cent of the number of CFCs and more than 99.9 percent of the total ending assets for all CFCs.¹⁰ However, these data may be subject to nonsampling error.

Several limitations apply when making comparisons to prior-year statistics. First, the data in this article are based on a sample of U.S. corporations. For Tax Year 2004, this sample includes all CFCs controlled by U.S. corporations with \$10 million or more in total assets or \$2.5 million or more in "proceeds" and all CFCs filed by U.S. corporations with less than \$10 million in the SOI corporate sample.¹¹ The sample for the Tax Year 2004 CFC statistics is far more inclusive than recent studies, which included only the 7,500 largest CFCs controlled by U.S. corporations with \$500 million or more in total assets.

Second, statistics previously published by Statistics of Income for tax years before 1986 were for all CFCs controlled by U.S. corporations with total assets of \$250 million or more, not just the 7,500 largest active CFCs controlled by U.S. corporations with total assets of \$500 million or more. Therefore, the statistics for these years include smaller and also inactive CFCs. For this reason, comparisons between statistics on the largest CFCs and statistics for years before 1986 should be made with caution.

Third, the composition of the 7,500 largest CFCs is not consistent across tax years. For example, only 84.3 percent of the 7,500 largest CFCs for Tax Year 2004 were also included in the 7,500 largest CFCs for Tax Year 2002. Many of the 7,500 largest CFCs

¹⁰ Based on unpublished data.

¹¹ See Statistics of Income, *Corporation Income Tax Returns, 2004* for a more complete description of the SOI Corporate sample. The SOI Corporate sample is the basis for the SOI Controlled Foreign Corporation sample. In other words, the Controlled Foreign Corporation sample includes every Form 5471 filed by each corporation in the SOI Corporate sample.

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for Tax Year 2002 that were not included among the 7,500 largest CFCs for Tax Year 2004 were still controlled by U.S. corporations, but the size of their total assets for Tax Year 2004 excluded them from this group. In addition, some of the 7,500 largest CFCs for Tax Year 2002 were not included in Tax Year 2002 because they were no longer “controlled” or the U.S. parent corporation’s total assets had fallen below \$500 million.

Finally, fluctuations in exchange rates can have significant effects on the reported statistics. Financial statistics that are translated using current (as opposed to historical) rates of exchange can be distorted by large exchange rate fluctuations. The weakening of the U.S. dollar against many currencies from Tax Year 2002 to Tax Year 2004 certainly contributed to the large increases in some of the statistics presented in this article.

Caution should also be used when comparing data by industrial groupings. For Tax Years 1998, 2000, 2002, and 2004, CFCs were classified under the North American Industry Classification System (NAICS), which differs from the Standard Industrial Classification (SIC) system used before Tax Year 1998. While most industries were not affected by the implementation of NAICS, the groupings of some economic activities were changed. The most significant change was the movement of the management of companies and enterprises sector from finance, insurance, and real estate under the SIC system to the services sector under NAICS. Furthermore, CFCs were classified by industry based on their principal business activity as reported on Form 5471. However, assets, receipts, and profits may have also been related to secondary business activities. It is not possible to measure the extent of these secondary business activities due to these activities not being detailed on Form 5471.

Explanation of Selected Terms

Active versus inactive Controlled Foreign Corporations—In general, a foreign corporation was considered active if earnings and profits, income taxes, receipts, expenses, distributions of E&P, or certain transactions between the foreign corporation and its subsidiaries or majority shareholder were reported on Form 5471, *Information Return of U.S. Persons With Respect to Certain Foreign Corporations*. The filing of Form 5471 was required even if a CFC was dormant or inactive for Tax Year 2004. Only data

from active CFCs are included in the statistics in this article, unless otherwise noted.

Average tax rate—For purposes of this article, the average tax rate is defined as income tax divided by E&P (less deficit) before income taxes.

Controlled Foreign Corporation—Section 957 of the Internal Revenue Code defines a foreign corporation as being controlled if more than 50 percent of the total combined voting power of all classes of stock of such corporation entitled to vote, or more than 50 percent of the value of all its outstanding stock, is owned (directly, indirectly, or constructively) by U.S. shareholders on any day during the foreign corporation’s tax year. A U.S. shareholder for purposes of determining control is defined as a U.S. person (see definition below) owning 10 percent or more of the foreign corporation’s voting stock. For purposes of these statistics, a foreign corporation was controlled only if a single U.S. corporation satisfied the ownership requirements for an uninterrupted period of at least 30 days. These are the only foreign corporations for which complete Form 5471 filings are required. U.S. corporations may also control a CFC through a partnership where the U.S. corporation is the controlling partner. To the extent possible, these CFCs have also been included in these statistics.

Country of incorporation—The country of incorporation is the country under whose laws the CFC is legally created. The CFC’s country of incorporation is not necessarily the principal place of business. For Tax Year 2004, 1,728 CFCs (2.3 percent) reported a principal place of business that differed from the reported country of incorporation. Tables 2 and 3 provide data by country of incorporation; data by principal place of business are not included in these statistics.

Current earnings and profits—Current earnings and profits represent the difference between total earnings and profits of the foreign corporation at the end of the current year (before reduction by dividends paid during the year) and the accumulated earnings and profits of the corporation at the beginning of the year. Although current earnings and profits typically are an after-tax measure of profits, they are shown in these statistics both before and after taxes. Earnings and profits are a tax concept referring to the economic capacity of a corporation to make a distribution to shareholders that is not a return on capital. The term “earnings and profits” is not specifically defined in the Internal Revenue

Code. In those instances where current earnings and profits were not reported for the foreign corporation, net income per books was used in place of missing earnings and profits.

Distributions out of earnings and profits—A distribution comes first from current earnings and profits and then from accumulated earnings and profits.

Income taxes—CFCs reported income, war profits, and excess profits taxes paid or accrued to any foreign country or U.S. Possession as income tax for their annual accounting periods.

OPEC countries—The member countries of the Organization of Petroleum Exporting Countries for Tax Year 2004 were: Algeria, Indonesia, Iran, Iraq, Kuwait, Libya, Nigeria, Qatar, Saudi Arabia, United Arab Emirates, and Venezuela.

Previously taxed earnings and profits—This includes any earnings and profit amounts that were subject to U.S. tax in the current year or in a prior year, but not distributed. Previously taxed earnings and profits include amounts related to Subpart F income (see definition below), earnings related to investments in certain U.S. property, previously excluded Subpart F income withdrawn from qualified investments, previously excluded export trade income withdrawn from investment in export trade assets, factoring income, and earnings invested in excess passive assets.

Subpart F income—Internal Revenue Code sections 951 and 952 stipulate specific cases in which earnings and profits are deemed to have been paid by a CFC to a U.S. shareholder. Such income is subject to U.S. tax whether or not it is repatriated to U.S. shareholders in the form of an actual dividend.

Internal Revenue Code section 951 requires that U.S. shareholders include in their gross incomes certain undistributed profits of foreign corporations controlled by U.S. shareholders. Subpart F income from a CFC includes certain insurance income of U.S. risks, “foreign base company” income, international boycott participation income, bribes and other illegal payments to foreign government officials, and income from any country which the United States does not recognize or with which it has severed relations, or which repeatedly provides support for acts of international terrorism.

Total assets—For purposes of determining the 7,500 largest CFCs for these statistics, total assets are defined as the larger of the foreign corporation’s beginning-of-year and end-of-year total assets. However, the statistics cited in this article generally refer to ending assets unless otherwise noted.

Total receipts—Total receipts equal business receipts (gross receipts from sales and operations) plus income from investment activity. In the statistics reported prior to 1990, “business receipts” were used to describe the larger of “gross receipts from sales and operations” and “total income.” The latter is a tax return concept used to describe the sum of business receipts less cost of sales and operations (i.e., gross profit), plus income (less loss) from investments.

U.S. person—A U.S. person can be a U.S. citizen or resident individual, a domestic partnership, a domestic corporation, or an estate or trust (other than a foreign estate or trust whose income from sources outside the United States is not includable in the beneficiaries’ gross income).

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations			
		Number of foreign corporations	Total assets		Total receipts
			Beginning-of-year	End-of-year	
	(1)	(2)	(3)	(4)	(5)
All industries	10,939	74,676	7,613,683,688	9,217,097,520	3,795,850,571
Raw materials and energy production	574	2,744	308,810,919	326,367,994	127,239,949
Agriculture, forestry, and fishing	132	466	17,825,665	19,001,172	8,568,980
Mining	316	1,766	217,596,505	231,881,871	81,962,670
Oil and gas extraction	198	1,212	182,391,018	193,358,065	64,704,216
Mining (except oil and gas)	59	287	21,808,569	26,517,202	10,801,058
Support activities for mining	90	267	13,396,919	12,006,604	6,457,396
Utilities	155	511	73,388,749	75,484,951	36,708,299
Goods production	3,912	19,359	1,596,395,081	1,865,827,173	1,633,118,266
Construction	149	675	14,867,521	16,401,113	19,078,357
Construction of buildings	39	87	2,361,105	2,800,144	2,879,061
Heavy and civil engineering construction	45	111	1,179,045	1,327,807	1,371,193
Specialty trade contractors	76	476	11,327,370	12,273,162	14,828,102
Manufacturing	3,813	18,684	1,581,527,560	1,849,426,060	1,614,039,909
Food manufacturing	161	936	86,610,351	96,855,689	99,299,567
Beverage and tobacco product manufacturing	37	282	67,712,546	79,728,563	81,959,206
Beverage manufacturing	29	225	47,710,719	57,033,110	42,233,593
Tobacco manufacturing	9	57	20,001,826	22,695,453	39,725,612
Textile mills and textile product mills	58	136	5,734,829	5,857,783	4,564,718
Apparel manufacturing	122	416	9,284,167	9,348,293	12,504,992
Leather and allied product manufacturing	38	66	943,217	1,059,102	2,178,588
Wood product manufacturing	42	123	3,869,904	4,280,675	4,726,391
Paper manufacturing	182	729	60,040,708	71,599,496	41,049,598
Petroleum and coal products manufacturing	36	162	57,496,213	59,024,665	115,349,158
Chemical manufacturing	426	3,150	501,461,086	606,413,237	294,207,268
Basic chemical manufacturing	76	710	43,311,185	50,585,684	36,693,822
Pharmaceutical and medicine manufacturing	103	462	257,920,989	340,830,658	156,271,797
Soap, cleaning compound, and toilet preparation manufacturing	39	449	26,024,534	31,937,421	25,675,375
Other chemical manufacturing	270	1,529	174,204,378	183,059,473	75,566,273
Plastics and rubber products manufacturing	293	870	60,373,311	68,922,882	40,801,198
Nonmetallic mineral product manufacturing	96	320	27,388,944	39,250,042	18,965,226
Primary metal manufacturing	108	241	19,761,713	23,408,009	20,038,998
Fabricated metal product manufacturing	404	1,391	35,415,874	39,107,629	37,732,016
Machinery manufacturing	402	1,543	45,414,614	54,531,951	60,213,887
Computer and electronic product manufacturing	699	2,325	173,685,831	219,571,997	243,939,798
Communications equipment manufacturing	134	631	30,971,829	38,269,072	50,304,458
Semiconductor and other electronic component manufacturing	259	884	57,400,354	63,166,178	78,815,862
Other computer and electronic manufacturing	341	809	85,313,648	118,136,746	114,819,478
Electric equipment, appliance, and component manufacturing	478	1,618	57,897,341	62,323,245	65,334,991
Transportation equipment manufacturing	245	1,460	235,558,143	261,095,685	343,430,309
Motor vehicles and parts manufacturing	164	1,158	214,151,520	243,446,592	330,517,949
Other transportation equipment manufacturing	103	302	21,406,623	17,649,093	12,912,360
Furniture and related product manufacturing	48	150	3,166,327	3,419,820	3,601,417
Miscellaneous manufacturing	831	2,764	129,712,442	143,627,295	124,142,585
Medical and equipment supplies manufacturing	207	797	47,692,734	51,580,324	51,632,585
Other miscellaneous manufacturing	645	1,968	82,019,707	92,046,971	72,510,000
Distribution and transportation of goods	3,348	16,215	540,946,198	620,621,547	966,617,230
Wholesale and retail trade	3,134	14,671	510,082,149	586,224,562	928,941,783
Wholesale trade	2,397	12,461	384,856,205	439,298,527	670,099,617
Motor vehicle and motor vehicle parts and supplies wholesalers	110	439	16,249,462	17,049,510	33,635,059
Professional and commercial equipment and supplies wholesalers	97	393	7,476,149	10,209,718	9,498,981
Electrical and electronic goods wholesalers	311	1,441	28,429,868	36,786,814	60,822,703
Machinery, equipment, and suppliers wholesalers	352	1,580	32,404,960	39,699,919	42,984,479

Footnotes at end of table.

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations			
		Number of foreign corporations	Total assets		Total receipts
			Beginning-of-year	End-of-year	
	(1)	(2)	(3)	(4)	(5)
Drugs and druggists' sundries wholesalers	77	726	54,101,061	65,348,807	58,782,720
Apparel, piece goods, and notions wholesalers	122	375	7,140,170	8,412,540	9,635,183
Grocery and related product wholesalers	81	360	9,301,716	10,025,528	20,174,915
Chemical and allied products wholesalers	166	842	20,254,055	22,840,846	30,918,483
Petroleum and petroleum products wholesalers	41	358	72,066,069	80,207,355	157,337,049
Other wholesale trade	1,348	5,948	137,432,695	148,717,490	246,310,047
Retail trade	880	2,196	125,104,604	146,794,815	258,557,958
Motor vehicle dealers and parts dealers	41	181	6,368,660	7,760,681	20,038,218
Electronics and appliance stores	132	247	3,907,600	4,868,022	8,246,386
Building materials and garden equipment and suppliers dealers	25	74	3,218,596	4,728,042	5,388,728
Food and beverage stores	29	45	3,803,120	4,446,309	12,004,815
Health and personal care stores	277	331	4,189,073	4,243,487	3,806,153
Clothing and clothing accessories stores	50	149	5,021,571	5,242,857	9,841,109
General merchandise stores	21	82	43,466,356	51,524,520	84,489,591
Electronic shopping and mail-order houses	50	139	2,182,675	2,647,772	2,319,859
Other retailers	291	947	52,946,952	61,333,125	112,423,100
Wholesale and retail trade not allocable	11	13	121,340	131,220	284,208
Transportation and warehousing	327	1,544	30,864,049	34,396,985	37,675,447
Air transportation	26	137	2,334,619	2,823,566	3,345,236
Water transportation	66	267	9,719,115	10,531,691	6,800,469
Truck transportation	46	188	1,851,579	2,640,856	3,729,748
Support activities for transportation	126	565	9,168,556	10,389,880	16,094,284
Other transportation	44	188	5,957,788	5,797,708	5,462,247
Warehousing and storage	101	199	1,832,392	2,213,283	2,243,463
Information	743	3,740	176,746,514	289,705,068	95,170,491
Publishing industries	202	965	29,890,548	41,458,870	24,196,690
Newspaper, periodical, book and directory publishers	91	605	16,455,322	18,567,159	10,282,763
Software publishers	113	361	13,435,226	22,891,711	13,913,926
Motion picture and sound recording industries	51	729	22,510,608	87,496,530	22,711,463
Broadcasting (except Internet)	40	324	18,042,179	19,868,288	8,520,648
Internet publishing and broadcasting	7	15	26,358	44,836	106,435
Telecommunications	183	826	96,887,677	125,854,520	29,876,528
Internet service providers, Web search portals, and data processing services	188	403	5,063,019	8,810,756	4,987,803
Other information services	153	476	4,326,125	6,171,268	4,770,923
Finance, insurance, real estate, and rental and leasing	1,664	8,743	3,189,714,638	3,919,933,672	356,043,531
Finance and insurance	1,166	6,553	3,098,144,998	3,814,233,269	332,614,003
Credit intermediation and related activities	282	1,301	769,668,522	947,197,513	71,175,766
Depository credit intermediation	42	162	262,255,267	350,570,255	21,104,785
Nondepository credit intermediation	210	931	462,477,245	546,680,197	45,584,160
Activities related to credit intermediation	76	208	44,936,010	49,947,061	4,486,820
Securities, commodity contracts, and other financial investments and related products	614	2,724	1,620,065,500	1,999,193,785	134,418,148
Insurance carriers and related activities	456	1,891	395,195,323	470,225,006	98,474,315
Insurance carriers	185	468	273,507,721	329,084,068	68,604,725
Agencies, brokerages, and other insurance related activities	344	1,423	121,687,602	141,140,938	29,869,591
Funds, trusts, and other financial activities	174	636	313,215,653	397,616,965	28,545,774
Real estate and rental and leasing	724	2,190	91,569,640	105,700,403	23,429,529
Rental and leasing services	173	526	50,732,530	57,502,791	13,015,964
Commercial and industrial machinery and equipment rental and leasing	139	383	36,270,321	42,485,602	5,456,238
Other rental and leasing services	41	143	14,462,208	15,017,188	7,559,726
Other real estate and rental and leasing	592	1,664	40,837,111	48,197,612	10,413,565

Footnotes at end of table.

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations			
		Number of foreign corporations	Total assets		Total receipts
			Beginning-of-year	End-of-year	
	(1)	(2)	(3)	(4)	(5)
Services	4,693	23,418	1,799,886,561	2,193,185,896	616,353,220
Professional, scientific, and technical services	3,085	13,473	252,903,009	298,054,649	262,157,131
Architectural, engineering, and related services	231	769	8,324,713	9,221,079	10,729,183
Computer system design and related services	1,395	4,776	112,717,684	131,546,081	111,649,649
Custom computer programming services	281	521	1,246,137	2,150,881	2,026,579
Computer systems design services	165	603	8,635,394	11,912,588	8,265,860
Other computer system design and related services	1,008	3,653	102,836,153	117,482,613	101,357,211
Management, scientific, and technical consulting services	330	1,021	18,762,157	17,619,659	12,261,360
Scientific research and development services	406	698	9,388,783	11,044,029	4,235,699
Advertising and related services	175	2,530	42,248,570	48,256,390	42,982,333
Other professional, scientific, and technical services	1,016	3,678	61,461,103	80,367,411	80,298,907
Management of companies and enterprises	1,744	5,965	1,436,662,341	1,774,470,144	273,299,270
Administration and support and waste management and remediation services	566	1,714	39,319,851	41,489,008	33,211,070
Educational services	37	205	2,577,385	3,274,421	1,733,426
Health care and social assistance	66	299	4,312,838	5,185,507	2,914,929
Arts, entertainment, and recreation	103	405	11,824,252	12,118,074	6,092,568
Accommodation and food services	85	678	36,174,591	38,879,837	25,129,124
Other services (except public administration)	205	678	16,112,294	19,714,256	11,815,704
Nature of business not allocable	218	458	1,183,778	1,456,172	1,307,883

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued					
	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes		
				Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes
	(6)	(7)	(8)	(9)	(10)	(11)
All industries	362,199,144	69,252,227	292,946,918	432,572,981	67,997,857	364,575,123
Raw materials and energy production	33,177,301	10,066,054	23,111,247	38,092,670	9,955,655	28,137,015
Agriculture, forestry, and fishing	725,729	93,365	632,365	879,878	90,770	789,108
Mining	27,556,673	9,342,615	18,214,058	31,873,585	9,193,351	22,680,234
Oil and gas extraction	25,045,402	8,871,467	16,173,934	28,161,716	8,747,103	19,414,613
Mining (except oil and gas)	1,937,918	308,223	1,629,695	2,965,918	301,411	2,664,507
Support activities for mining	573,353	162,924	410,429	745,951	144,836	601,114
Utilities	4,894,898	630,075	4,264,823	5,339,207	671,534	4,667,673
Goods production	125,146,203	22,297,868	102,848,335	145,962,799	22,179,827	123,782,973
Construction	1,303,105	358,240	944,865	1,797,692	356,973	1,440,719
Construction of buildings	187,949	57,635	130,315	267,816	55,082	212,734
Heavy and civil engineering construction	13,857	13,146	711	102,383	13,495	88,888
Specialty trade contractors	1,101,298	287,459	813,839	1,427,493	288,396	1,139,097
Manufacturing	123,843,098	21,939,628	101,903,470	144,165,107	21,822,853	122,342,253
Food manufacturing	6,562,527	1,502,805	5,059,722	7,357,908	1,464,599	5,893,310
Beverage and tobacco product manufacturing	12,176,581	1,880,036	10,296,545	12,744,581	1,831,093	10,913,489
Beverage manufacturing	7,576,267	1,013,334	6,562,933	8,038,110	964,023	7,074,087
Tobacco manufacturing	4,600,315	866,702	3,733,613	4,706,471	867,070	3,839,402
Textile mills and textile product mills	221,500	55,708	165,792	315,066	57,583	257,483
Apparel manufacturing	742,879	111,504	631,376	1,047,059	114,959	932,100
Leather and allied product manufacturing	129,296	32,942	96,354	145,557	33,000	112,556
Wood product manufacturing	495,672	152,884	342,789	560,021	153,156	406,865
Paper manufacturing	2,491,031	632,819	1,858,212	3,336,848	631,051	2,705,797
Petroleum and coal products manufacturing	8,148,989	2,236,064	5,912,925	8,415,002	2,234,193	6,180,809
Chemical manufacturing	40,880,273	5,322,827	35,557,446	43,549,730	5,358,645	38,191,085
Basic chemical manufacturing	4,150,610	803,338	3,347,272	4,774,481	750,920	4,023,561
Pharmaceutical and medicine manufacturing	28,109,898	2,493,374	25,616,524	29,029,752	2,540,231	26,489,521
Soap, cleaning compound, and toilet preparation manufacturing	3,089,930	845,022	2,244,909	3,192,580	839,830	2,352,750
Other chemical manufacturing	5,529,834	1,181,093	4,348,741	6,552,917	1,227,664	5,325,254
Plastics and rubber products manufacturing	2,673,724	735,765	1,937,959	3,225,827	734,415	2,491,412
Nonmetallic mineral product manufacturing	3,426,841	488,420	2,938,421	3,635,794	476,464	3,159,330
Primary metal manufacturing	2,682,781	462,149	2,220,632	2,887,822	461,522	2,426,300
Fabricated metal product manufacturing	2,731,502	649,377	2,082,125	3,147,847	643,949	2,503,898
Machinery manufacturing	3,413,202	926,423	2,486,779	4,478,616	921,400	3,557,217
Computer and electronic product manufacturing	16,941,192	1,966,888	14,974,304	19,786,673	1,915,872	17,870,801
Communications equipment manufacturing	2,490,632	411,157	2,079,475	3,310,980	394,043	2,916,937
Semiconductor and other electronic component manufacturing	5,091,953	696,720	4,395,234	6,336,461	676,407	5,660,053
Other computer and electronic manufacturing	9,358,606	859,011	8,499,595	10,139,233	845,421	9,293,811
Electric equipment, appliance, and component manufacturing	4,807,806	807,120	4,000,686	5,616,302	778,785	4,837,517
Transportation equipment manufacturing	6,661,327	1,685,256	4,976,071	12,874,609	1,832,821	11,041,788
Motor vehicles and parts manufacturing	4,922,236	1,515,825	3,406,411	10,754,128	1,682,326	9,071,802
Other transportation equipment manufacturing	1,739,091	169,431	1,569,660	2,120,481	150,495	1,969,987
Furniture and related product manufacturing	72,093	28,530	43,563	175,804	27,388	148,416
Miscellaneous manufacturing	8,583,883	2,262,111	6,321,772	10,864,039	2,151,960	8,712,079
Medical and equipment supplies manufacturing	3,703,132	783,107	2,920,025	4,609,962	693,836	3,916,126
Other miscellaneous manufacturing	4,880,751	1,479,004	3,401,747	6,254,077	1,458,124	4,795,953
Distribution and transportation of goods	52,504,462	11,643,824	40,860,638	58,826,488	11,454,019	47,372,469
Wholesale and retail trade	49,583,839	11,215,390	38,368,449	55,258,912	11,026,900	44,232,012
Wholesale trade	37,916,811	7,477,862	30,438,949	41,996,815	7,314,197	34,682,619
Motor vehicle and motor vehicle parts and supplies wholesalers	662,842	248,099	414,743	1,056,330	208,813	847,517
Professional and commercial equipment and supplies wholesalers	1,802,035	172,413	1,629,623	1,867,883	169,351	1,698,532
Electrical and electronic goods wholesalers	2,435,048	562,571	1,872,477	2,839,901	551,497	2,288,404
Machinery, equipment, and suppliers wholesalers	3,312,332	511,206	2,801,126	3,581,384	507,954	3,073,429

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued					
	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes		
				Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes
	(6)	(7)	(8)	(9)	(10)	(11)
Drugs and druggists' sundries wholesalers	5,912,907	1,217,375	4,695,533	6,431,905	1,149,432	5,282,473
Apparel, piece goods, and notions wholesalers	604,425	139,021	465,404	762,479	135,664	626,815
Grocery and related product wholesalers	930,740	172,726	758,014	1,117,642	169,589	948,053
Chemical and allied products wholesalers	1,682,421	418,699	1,263,722	1,881,436	410,048	1,471,388
Petroleum and petroleum products wholesalers	5,741,597	303,359	5,438,239	5,993,096	289,203	5,703,893
Other wholesale trade	14,832,463	3,732,395	11,100,068	16,464,760	3,722,646	12,742,114
Retail trade	11,650,146	3,731,932	7,918,213	13,244,834	3,707,210	9,537,623
Motor vehicle dealers and parts dealers	304,148	89,919	214,229	395,029	88,915	306,114
Electronics and appliance stores	159,586	87,845	71,741	354,755	95,097	259,658
Building materials and garden equipment and suppliers dealers	387,341	134,822	252,519	415,950	135,667	280,283
Food and beverage stores	387,699	82,936	304,763	414,078	84,117	329,961
Health and personal care stores	394,000	82,497	311,503	421,736	81,982	339,754
Clothing and clothing accessories stores	894,159	238,379	655,781	967,543	243,642	723,900
General merchandise stores	1,706,857	769,125	937,732	2,325,981	765,729	1,560,252
Electronic shopping and mail-order houses	131,192	52,550	78,642	232,974	52,273	180,701
Other retailers	7,285,163	2,193,861	5,091,303	7,716,789	2,159,788	5,557,001
Wholesale and retail trade not allocable	16,882	* 5,596	11,287	* 17,262	* 5,493	* 11,770
Transportation and warehousing	2,920,623	428,434	2,492,189	3,567,577	427,119	3,140,458
Air transportation	150,918	30,020	120,898	182,815	30,060	152,754
Water transportation	1,265,633	64,052	1,201,580	1,441,010	69,241	1,371,769
Truck transportation	68,905	38,050	30,855	164,821	35,228	129,593
Support activities for transportation	929,570	174,666	754,904	1,022,968	173,119	849,850
Other transportation	375,143	88,282	286,860	576,241	90,592	485,649
Warehousing and storage	130,454	33,363	97,090	179,722	28,879	150,843
Information	8,073,622	2,249,857	5,823,765	12,847,072	2,133,474	10,713,598
Publishing industries	4,350,921	860,150	3,490,771	4,770,967	860,181	3,910,787
Newspaper, periodical, book and directory publishers	1,382,076	454,177	927,899	1,497,357	451,127	1,046,230
Software publishers	2,968,845	405,974	2,562,872	3,273,610	409,054	2,864,556
Motion picture and sound recording industries	1,861,241	529,000	1,332,241	2,389,116	515,078	1,874,038
Broadcasting (except Internet)	613,154	75,540	537,614	1,536,552	81,846	1,454,707
Internet publishing and broadcasting	3,507	* 1	3,506	4,139	* 1	4,138
Telecommunications	308,754	474,398	-165,644	2,803,793	363,730	2,440,063
Internet service providers, Web search portals, and data processing services	401,656	161,870	239,786	690,150	158,533	531,616
Other information services	534,389	148,897	385,492	652,356	154,106	498,250
Finance, insurance, real estate, and rental and leasing	57,870,006	10,466,173	47,403,834	71,341,733	10,020,332	61,321,401
Finance and insurance	54,283,443	9,630,755	44,652,688	65,623,136	9,215,587	56,407,549
Credit intermediation and related activities	15,322,487	2,885,988	12,436,499	18,412,537	2,768,286	15,644,251
Depository credit intermediation	4,765,030	1,082,205	3,682,825	4,927,099	1,045,345	3,881,753
Nondepository credit intermediation	9,708,306	1,639,898	8,068,408	12,432,264	1,581,327	10,850,937
Activities related to credit intermediation	849,151	163,885	685,266	1,053,174	141,613	911,561
Securities, commodity contracts, and other financial investments and related products	19,366,610	3,319,300	16,047,310	22,656,569	3,180,184	19,476,386
Insurance carriers and related activities	13,779,479	2,597,167	11,182,312	16,114,294	2,493,431	13,620,863
Insurance carriers	9,309,312	1,561,265	7,748,046	10,613,800	1,499,843	9,113,957
Agencies, brokerages, and other insurance related activities	4,470,167	1,035,902	3,434,265	5,500,493	993,588	4,506,905
Funds, trusts, and other financial activities	5,814,867	828,300	4,986,567	8,439,737	773,687	7,666,050
Real estate and rental and leasing	3,586,563	835,418	2,751,146	5,718,596	804,744	4,913,852
Rental and leasing services	2,184,110	313,809	1,870,301	3,612,290	303,249	3,309,041
Commercial and industrial machinery and equipment rental and leasing	2,011,163	204,443	1,806,720	3,141,678	195,690	2,945,988
Other rental and leasing services	172,947	109,366	63,581	470,612	107,559	363,053
Other real estate and rental and leasing	1,402,454	521,609	880,845	2,106,307	501,496	1,604,811

Footnotes at end of table.

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued					
	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes		
				Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes
	(6)	(7)	(8)	(9)	(10)	(11)
Services	85,462,899	12,510,316	72,952,583	105,385,304	12,234,108	93,151,196
Professional, scientific, and technical services	21,611,410	4,616,298	16,995,112	27,438,997	4,514,556	22,924,441
Architectural, engineering, and related services	550,949	124,505	426,444	789,742	118,581	671,161
Computer system design and related services	12,916,459	2,516,635	10,399,824	15,371,891	2,492,363	12,879,528
Custom computer programming services	163,892	42,587	121,305	254,897	41,115	213,782
Computer systems design services	437,756	123,696	314,060	830,598	120,412	710,186
Other computer system design and related services	12,314,811	2,350,352	9,964,459	14,286,395	2,330,835	11,955,560
Management, scientific, and technical consulting services	1,079,600	215,991	863,609	1,443,692	204,937	1,238,755
Scientific research and development services	196,648	47,599	149,049	662,997	45,222	617,775
Advertising and related services	1,812,426	569,399	1,243,027	2,694,178	540,789	2,153,390
Other professional, scientific, and technical services	5,055,328	1,142,168	3,913,160	6,476,497	1,112,665	5,363,832
Management of companies and enterprises	59,388,762	6,630,893	52,757,869	71,865,251	6,503,151	65,362,100
Administration and support and waste management and remediation services	1,155,902	350,002	805,899	1,748,806	321,101	1,427,705
Educational services	273,399	37,784	235,615	357,186	30,560	326,625
Health care and social assistance	294,303	75,625	218,678	429,193	73,785	355,408
Arts, entertainment, and recreation	197,886	77,726	120,160	407,252	74,761	332,491
Accommodation and food services	1,492,814	486,589	1,006,225	1,922,138	482,153	1,439,985
Other services (except public administration)	1,048,423	235,398	813,025	1,216,482	234,041	982,440
Nature of business not allocable	-35,348	18,136	-53,484	116,914	20,443	96,471

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Distributions out of earnings and profits			Dividends paid to controlling U.S. corporation	Total Subpart F income
	Total	Not previously taxed earnings and profits	Previously taxed earnings and profits		
(12)	(13)	(14)	(15)	(16)	
All industries	135,230,421	91,424,129	43,806,293	46,638,623	47,794,506
Raw materials and energy production	15,990,632	15,156,004	834,627	8,410,113	932,091
Agriculture, forestry, and fishing	408,147	135,377	* 272,770	19,012	180,532
Mining	13,399,910	12,953,615	446,295	8,360,012	661,604
Oil and gas extraction	12,624,788	12,238,401	386,388	8,029,068	593,602
Mining (except oil and gas)	605,299	552,630	* 52,669	270,678	35,651
Support activities for mining	169,822	162,585	* 7,238	60,265	32,351
Utilities	2,182,575	2,067,012	115,562	31,090	89,955
Goods production	43,338,323	31,700,160	11,638,163	17,604,019	11,898,152
Construction	518,383	461,385	56,998	87,647	91,389
Construction of buildings	* 26,431	* 24,929	* 1,502	* 18,538	* 393
Heavy and civil engineering construction	* 14,642	* 12,516	* 2,126	* 7,049	* 7,203
Specialty trade contractors	477,310	423,940	53,369	62,060	83,793
Manufacturing	42,819,940	31,238,775	11,581,166	17,516,373	11,806,763
Food manufacturing	3,170,812	2,624,196	546,616	1,048,032	586,910
Beverage and tobacco product manufacturing	4,006,222	1,864,795	2,141,426	643,082	2,279,010
Beverage manufacturing	1,245,743	1,189,052	56,691	630,578	667,005
Tobacco manufacturing	2,760,479	675,744	2,084,735	* 12,504	1,612,004
Textile mills and textile product mills	179,807	158,103	* 21,704	* 143,470	* 13,888
Apparel manufacturing	1,220,848	1,137,110	83,738	642,513	99,291
Leather and allied product manufacturing	* 48,690	* 35,097	* 13,594	* 15,946	* 8,399
Wood product manufacturing	211,684	207,536	* 4,148	* 80,460	* 10,471
Paper manufacturing	2,085,098	1,847,772	237,326	1,250,820	184,291
Petroleum and coal products manufacturing	5,316,950	4,628,937	688,013	3,094,966	731,171
Chemical manufacturing	9,269,840	6,222,778	3,047,062	3,956,916	2,436,905
Basic chemical manufacturing	929,845	797,260	132,585	387,712	265,270
Pharmaceutical and medicine manufacturing	4,209,669	2,552,883	1,656,787	1,940,985	1,389,397
Soap, cleaning compound, and toilet preparation manufacturing	1,240,729	1,032,157	208,572	749,253	229,426
Other chemical manufacturing	2,889,597	1,840,478	1,049,119	878,966	552,813
Plastics and rubber products manufacturing	799,096	632,251	166,845	302,856	177,546
Nonmetallic mineral product manufacturing	1,024,326	775,091	249,235	355,658	122,528
Primary metal manufacturing	557,404	413,641	* 143,763	172,928	181,757
Fabricated metal product manufacturing	1,061,228	942,642	118,586	404,726	199,549
Machinery manufacturing	1,505,103	1,221,557	283,546	628,182	263,294
Computer and electronic product manufacturing	4,127,249	3,296,125	831,125	2,870,441	1,239,743
Communications equipment manufacturing	999,001	853,188	145,813	668,313	292,523
Semiconductor and other electronic component manufacturing	1,264,997	817,569	447,428	693,099	324,422
Other computer and electronic manufacturing	1,863,251	1,625,367	237,883	1,509,029	622,798
Electric equipment, appliance, and component manufacturing	1,576,609	754,252	822,357	399,169	595,929
Transportation equipment manufacturing	3,018,952	1,648,771	1,370,181	781,104	1,988,217
Motor vehicles and parts manufacturing	2,807,774	1,513,743	1,294,031	738,311	1,815,960
Other transportation equipment manufacturing	211,178	135,028	* 76,150	42,794	172,257
Furniture and related product manufacturing	83,833	61,610	* 22,223	* 11,572	* 3,441
Miscellaneous manufacturing	3,556,188	2,766,510	789,678	713,531	684,423
Medical and equipment supplies manufacturing	1,483,234	1,009,522	473,712	178,402	291,253
Other miscellaneous manufacturing	2,072,954	1,756,987	315,967	535,129	393,170
Distribution and transportation of goods	15,607,374	8,856,732	6,750,642	4,030,637	8,705,972
Wholesale and retail trade	14,448,666	8,466,614	5,982,052	3,912,210	7,469,795
Wholesale trade	10,728,566	6,214,226	4,514,340	2,849,800	6,024,821
Motor vehicle and motor vehicle parts and supplies wholesalers	216,486	184,091	32,395	119,078	51,549
Professional and commercial equipment and supplies wholesalers	80,776	75,525	* 5,251	51,154	233,324
Electrical and electronic goods wholesalers	436,990	341,087	95,903	165,476	278,753
Machinery, equipment, and suppliers wholesalers	545,659	411,134	134,525	297,158	331,634

Footnotes at end of table.

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Distributions out of earnings and profits			Dividends paid to controlling U.S. corporation	Total Subpart F income
	Total	Not previously taxed earnings and profits	Previously taxed earnings and profits		
(12)	(13)	(14)	(15)	(16)	
Drugs and druggists' sundries wholesalers	1,071,111	857,661	213,450	108,603	370,882
Apparel, piece goods, and notions wholesalers	280,730	257,271	* 23,459	61,140	76,155
Grocery and related product wholesalers	366,949	238,573	128,376	146,587	123,900
Chemical and allied products wholesalers	464,137	286,219	177,918	121,868	339,288
Petroleum and petroleum products wholesalers	2,025,481	245,437	1,780,044	168,024	2,265,237
Other wholesale trade	5,240,246	3,317,227	1,923,019	1,610,711	1,954,099
Retail trade	3,712,571	2,244,859	1,467,712	1,062,410	1,444,955
Motor vehicle dealers and parts dealers	* 79,401	* 76,094	* 3,307	* 6,300	5,807
Electronics and appliance stores	* 17,462	* 17,462	0	* 5,978	* 16,987
Building materials and garden equipment and suppliers dealers	* 4,264	* 3,975	* 288	* 3,015	* 229,163
Food and beverage stores	* 4,655	* 4,655	0	* 123	* 1,953
Health and personal care stores	* 177,224	* 144,993	* 32,231	* 82,627	* 15,153
Clothing and clothing accessories stores	* 394,428	* 44,844	* 349,584	* 40,740	312,124
General merchandise stores	1,056,350	985,139	* 71,211	* 73,774	* 28,276
Electronic shopping and mail-order houses	* 109,908	* 73,920	* 35,988	* 68,122	26,703
Other retailers	1,868,880	893,776	975,104	781,731	808,788
Wholesale and retail trade not allocable	* 7,530	* 7,530	0	0	* 20
Transportation and warehousing	1,158,708	390,118	768,590	118,427	1,236,177
Air transportation	* 4,091	* 485	* 3,606	* 485	48,810
Water transportation	755,113	* 78,817	676,296	* 20,166	968,669
Truck transportation	61,997	54,438	* 7,560	* 33,985	* 9,552
Support activities for transportation	183,832	111,002	72,831	23,928	139,491
Other transportation	111,481	107,698	* 3,783	* 38,979	65,614
Warehousing and storage	42,194	37,678	* 4,515	* 886	4,040
Information	7,182,894	6,453,724	729,170	4,305,580	678,604
Publishing industries	4,785,498	4,283,337	502,161	3,771,250	393,276
Newspaper, periodical, book and directory publishers	909,839	792,075	117,763	351,738	120,308
Software publishers	3,875,659	3,491,261	384,398	3,419,511	272,968
Motion picture and sound recording industries	1,750,187	1,560,941	189,247	255,830	120,598
Broadcasting (except Internet)	128,602	123,677	* 4,925	* 16,855	13,070
Internet publishing and broadcasting	0	0	0	0	0
Telecommunications	385,344	357,354	* 27,989	164,419	117,333
Internet service providers, Web search portals, and data processing services	41,100	39,566	* 1,534	* 26,753	7,140
Other information services	92,163	88,849	* 3,314	70,474	27,187
Finance, insurance, real estate, and rental and leasing	21,287,176	11,919,322	9,367,854	3,317,628	13,505,475
Finance and insurance	19,806,590	10,883,173	8,923,417	3,095,931	11,588,536
Credit intermediation and related activities	3,647,299	2,793,419	853,880	671,972	1,431,851
Depository credit intermediation	795,237	556,050	* 239,187	466,792	314,614
Nondepository credit intermediation	2,669,017	2,140,237	528,780	184,585	986,817
Activities related to credit intermediation	183,045	97,132	85,913	* 20,594	130,421
Securities, commodity contracts, and other financial investments and related products	6,591,356	3,686,676	2,904,680	1,324,364	4,913,709
Insurance carriers and related activities	4,904,567	3,347,531	1,557,036	548,452	2,613,921
Insurance carriers	2,669,918	1,491,205	1,178,714	153,113	1,932,126
Agencies, brokerages, and other insurance related activities	2,234,648	1,856,326	378,322	395,338	681,795
Funds, trusts, and other financial activities	4,663,368	1,055,547	3,607,822	551,144	2,629,055
Real estate and rental and leasing	1,480,586	1,036,149	444,437	221,697	1,916,938
Rental and leasing services	455,080	325,437	129,643	118,270	1,663,971
Commercial and industrial machinery and equipment rental and leasing	418,502	288,859	129,643	118,270	1,619,182
Other rental and leasing services	* 36,578	* 36,578	0	* 250	* 44,789
Other real estate and rental and leasing	1,025,506	710,712	314,794	103,427	252,968

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Distributions out of earnings and profits			Dividends paid to controlling U.S. corporation	Total Subpart F income
	Total	Not previously taxed earnings and profits	Previously taxed earnings and profits		
(12)	(13)	(14)	(15)	(16)	
Services	31,805,437	17,319,610	14,485,827	8,970,235	12,067,414
Professional, scientific, and technical services	4,298,087	3,013,334	1,284,753	1,648,444	2,375,961
Architectural, engineering, and related services	98,061	63,618	34,442	44,923	81,687
Computer system design and related services	1,576,166	895,519	680,647	513,868	990,107
Custom computer programming services	* 4,095	* 4,095	0	* 3,849	16,061
Computer systems design services	116,691	60,742	* 55,949	39,418	71,408
Other computer system design and related services	1,455,380	830,682	624,698	470,601	902,639
Management, scientific, and technical consulting services	229,263	155,124	74,139	74,575	661,929
Scientific research and development services	* 35,773	* 14,554	* 21,219	* 6,209	59,327
Advertising and related services	921,054	740,225	180,829	176,089	89,441
Other professional, scientific, and technical services	1,437,770	1,144,294	293,477	832,779	493,470
Management of companies and enterprises	25,960,648	13,048,892	12,911,756	6,844,044	9,204,124
Administration and support and waste management and remediation services	268,215	187,908	80,307	72,031	171,024
Educational services	42,901	24,601	* 18,300	22,515	* 4,518
Health care and social assistance	57,277	55,575	* 1,702	* 26,087	72,742
Arts, entertainment, and recreation	49,696	48,443	* 1,253	* 22,404	14,926
Accommodation and food services	807,499	698,338	109,161	279,037	66,775
Other services (except public administration)	321,115	242,519	78,596	55,674	157,345
Nature of business not allocable	* 18,587	* 18,577	* 10	* 410	6,798

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued						
	Receipts by foreign corporations from:						
	All sources	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(17)	(18)	(19)	(20)	(21)	(22)	(23)
All industries	3,795,850,571	1,030,284,624	178,950,203	182,688,301	668,398,192	247,928	2,787,272,960
Raw materials and energy production	127,239,949	29,296,920	4,231,117	10,848,927	14,209,154	* 7,723	98,340,064
Agriculture, forestry, and fishing	8,568,980	2,903,109	133,528	454,170	2,313,820	* 1,592	5,674,577
Mining	81,962,670	22,067,053	4,095,614	8,208,153	9,760,804	* 2,482	60,217,070
Oil and gas extraction	64,704,216	18,726,210	3,569,373	7,149,288	8,007,549	0	46,145,190
Mining (except oil and gas)	10,801,058	2,128,325	421,784	767,703	936,356	* 2,482	8,673,773
Support activities for mining	6,457,396	1,212,517	104,456	291,162	816,899	0	5,398,107
Utilities	36,708,299	4,326,758	1,975	2,186,604	2,134,529	* 3,650	32,448,418
Goods production	1,633,118,266	586,394,390	125,603,543	87,895,144	372,755,348	140,355	1,051,033,213
Construction	19,078,357	1,289,164	32,539	278,018	978,606	0	17,908,695
Construction of buildings	2,879,061	22,841	0	* 1,860	* 20,982	0	2,856,220
Heavy and civil engineering construction	1,371,193	96,042	* 310	22,321	73,411	0	1,278,537
Specialty trade contractors	14,828,102	1,170,281	32,229	253,838	884,214	0	13,773,938
Manufacturing	1,614,039,909	585,105,226	125,571,004	87,617,126	371,776,741	140,355	1,033,124,518
Food manufacturing	99,299,567	16,187,804	1,507,203	2,244,081	12,436,367	* 153	83,461,471
Beverage and tobacco product manufacturing	81,959,206	26,581,329	213,221	1,267,921	25,031,041	* 69,146	55,499,091
Beverage manufacturing	42,233,593	8,722,200	120,392	1,098,987	7,433,675	* 69,146	33,632,607
Tobacco manufacturing	39,725,612	17,859,129	* 92,830	168,934	17,597,366	0	21,866,483
Textile mills and textile product mills	4,564,718	856,306	215,983	143,470	496,852	0	3,708,960
Apparel manufacturing	12,504,992	5,491,316	1,680,947	1,985,948	1,824,420	0	7,084,413
Leather and allied product manufacturing	2,178,588	885,366	201,701	350,298	333,367	0	1,293,224
Wood product manufacturing	4,726,391	1,116,101	795,659	153,328	167,114	0	3,612,459
Paper manufacturing	41,049,598	9,714,386	2,668,365	2,295,367	4,750,654	0	31,339,463
Petroleum and coal products manufacturing	115,349,158	32,665,459	4,982,430	3,878,175	23,804,855	0	82,686,685
Chemical manufacturing	294,207,268	122,478,193	13,573,716	16,070,195	92,801,569	32,714	173,909,556
Basic chemical manufacturing	36,693,822	7,073,690	1,624,715	652,188	4,770,883	25,904	29,679,767
Pharmaceutical and medicine manufacturing	156,271,797	90,386,437	8,937,714	12,810,909	68,637,814	0	67,739,948
Soap, cleaning compound, and toilet preparation manufacturing	25,675,375	4,145,374	385,784	75,409	3,684,181	0	21,602,583
Other chemical manufacturing	75,566,273	20,872,692	2,625,502	2,531,689	15,708,691	* 6,810	54,887,257
Plastics and rubber products manufacturing	40,801,198	13,335,621	2,392,342	1,081,005	9,862,274	0	27,472,866
Nonmetallic mineral product manufacturing	18,965,226	3,855,206	742,032	480,762	2,632,297	* 115	15,136,911
Primary metal manufacturing	20,038,998	5,148,069	268,379	2,117,650	2,731,535	* 30,504	14,905,206
Fabricated metal product manufacturing	37,732,016	7,614,404	1,241,192	1,451,166	4,921,914	* 132	30,133,811
Machinery manufacturing	60,213,887	16,296,197	3,874,705	2,305,852	10,115,640	0	44,001,440
Computer and electronic product manufacturing	243,939,798	95,145,112	31,931,829	9,800,564	53,407,640	* 5,078	148,968,862
Communications equipment manufacturing	50,304,458	24,673,318	6,486,068	1,448,106	16,739,144	0	25,688,255
Semiconductor and other electronic component manufacturing	78,815,862	30,683,538	15,884,416	2,983,991	11,810,053	* 5,078	48,199,879
Other computer and electronic manufacturing	114,819,478	39,788,256	9,561,345	5,368,467	24,858,444	0	75,080,728
Electric equipment, appliance, and component manufacturing	65,334,991	22,739,517	4,471,853	8,174,260	10,093,404	0	42,650,934
Transportation equipment manufacturing	343,430,309	170,409,900	50,932,662	26,877,911	92,598,000	* 1,328	173,210,529
Motor vehicles and parts manufacturing	330,517,949	167,577,588	50,039,114	25,702,670	91,834,475	* 1,328	163,128,966
Other transportation equipment manufacturing	12,912,360	2,832,313	893,547	1,175,241	763,525	0	10,081,564
Furniture and related product manufacturing	3,601,417	893,245	412,306	128,045	352,894	0	2,708,626
Miscellaneous manufacturing	124,142,585	33,691,695	3,464,479	6,811,127	23,414,904	* 1,185	91,340,010
Medical and equipment supplies manufacturing	51,632,585	17,476,461	1,034,976	3,647,327	12,793,098	* 1,059	34,956,186
Other miscellaneous manufacturing	72,510,000	16,215,233	2,429,503	3,163,800	10,621,805	* 125	56,383,824
Distribution and transportation of goods	966,617,230	187,608,587	23,294,086	47,920,107	116,359,331	35,062	784,639,700
Wholesale and retail trade	928,941,783	177,031,059	23,077,591	42,800,137	111,118,268	35,062	757,453,305
Wholesale trade	670,099,617	152,887,383	21,675,070	30,830,674	100,348,667	32,973	522,439,032
Motor vehicle and motor vehicle parts and supplies wholesalers	33,635,059	5,403,524	1,806,608	259,623	3,337,293	0	28,396,657
Professional and commercial equipment and supplies wholesalers	9,498,981	3,438,198	2,083,342	107,041	1,247,440	* 375	6,073,825
Electrical and electronic goods wholesalers	60,822,703	10,074,900	4,339,146	548,172	5,187,583	* [2]	51,196,609
Machinery, equipment, and suppliers wholesalers	42,984,479	9,371,093	2,967,215	367,118	6,036,759	0	35,078,306

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued						
	Receipts by foreign corporations from:						
	All sources	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(17)	(18)	(19)	(20)	(21)	(22)	(23)
Drugs and druggists' sundries wholesalers	58,782,720	23,298,303	1,907,229	3,032,297	18,358,778	0	38,324,240
Apparel, piece goods, and notions wholesalers	9,635,183	2,056,591	92,760	164,489	1,799,343	0	7,582,830
Grocery and related product wholesalers	20,174,915	3,905,562	197,784	1,011,544	2,696,234	0	16,275,610
Chemical and allied products wholesalers	30,918,483	5,187,229	1,212,037	335,992	3,639,200	0	25,756,954
Petroleum and petroleum products wholesalers	157,337,049	31,015,935	114,587	14,623,255	16,278,093	0	126,334,177
Other wholesale trade	246,310,047	59,136,046	6,954,362	10,381,143	41,767,943	* 32,598	187,419,824
Retail trade	258,557,958	24,095,049	1,396,388	11,967,630	10,728,942	* 2,090	234,778,692
Motor vehicle dealers and parts dealers	20,038,218	3,653,092	* 41,791	1,633,202	1,978,099	0	16,385,129
Electronics and appliance stores	8,246,386	728,497	333,476	236,375	158,646	0	7,518,872
Building materials and garden equipment and suppliers dealers	5,388,728	167,492	* 36,267	17,957	113,268	0	5,222,805
Food and beverage stores	12,004,815	70,696	* 30,804	* 6,322	* 33,570	0	11,934,119
Health and personal care stores	3,806,153	466,907	33,220	* 155	433,532	0	3,411,849
Clothing and clothing accessories stores	9,841,109	1,409,226	122,886	* 524,381	761,959	0	8,539,774
General merchandise stores	84,489,591	578,020	* 44	* 4,359	571,746	* 1,870	83,913,090
Electronic shopping and mail-order houses	2,319,859	212,427	* 9,497	55,933	146,777	* 220	2,163,897
Other retailers	112,423,100	16,808,693	788,402	9,488,947	6,531,344	0	95,689,159
Wholesale and retail trade not allocable	284,208	* 48,627	* 6,133	* 1,834	* 40,659	0	235,581
Transportation and warehousing	37,675,447	10,577,528	216,495	5,119,970	5,241,063	0	27,186,395
Air transportation	3,345,236	344,452	0	262,686	81,766	0	3,000,889
Water transportation	6,800,469	2,687,279	* 64,266	1,709,671	913,342	0	4,132,962
Truck transportation	3,729,748	563,371	5,522	100,793	457,055	0	3,170,782
Support activities for transportation	16,094,284	5,458,852	99,874	2,207,957	3,151,022	0	10,643,479
Other transportation	5,462,247	876,796	* 20,979	631,116	224,700	0	4,621,219
Warehousing and storage	2,243,463	646,778	25,854	207,747	413,177	0	1,617,065
Information	95,170,491	11,448,267	1,634,057	1,998,641	7,815,498	* 71	83,807,015
Publishing industries	24,196,690	2,176,145	1,004,320	179,438	992,387	0	22,030,106
Newspaper, periodical, book and directory publishers	10,282,763	675,215	109,640	90,045	475,529	0	9,608,842
Software publishers	13,913,926	1,500,930	894,679	89,393	516,858	0	12,421,264
Motion picture and sound recording industries	22,711,463	2,790,460	6,930	757,998	2,025,532	0	19,931,764
Broadcasting (except Internet)	8,520,648	987,825	* 9,704	61,806	916,315	0	7,533,951
Internet publishing and broadcasting	106,435	* 38,489	* 1,139	* 34,234	* 3,116	0	67,946
Telecommunications	29,876,528	4,081,956	380,291	538,905	3,162,689	* 71	25,834,685
Internet service providers, Web search portals, and data processing services	4,987,803	625,380	79,697	78,454	467,228	0	4,379,235
Other information services	4,770,923	748,012	151,975	347,806	248,231	0	4,029,328
Finance, insurance, real estate, and rental and leasing	356,043,531	72,993,541	5,016,079	18,046,853	49,902,031	28,579	286,518,993
Finance and insurance	332,614,003	68,324,088	4,862,482	17,609,268	45,824,466	* 27,872	266,055,344
Credit intermediation and related activities	71,175,766	11,020,868	266,611	2,481,180	8,266,370	* 6,707	60,391,108
Depository credit intermediation	21,104,785	2,150,291	* 701	1,521,263	628,327	0	18,960,978
Nondepository credit intermediation	45,584,160	7,700,781	144,923	797,123	6,752,028	* 6,707	38,104,605
Activities related to credit intermediation	4,486,820	1,169,797	120,988	162,794	886,015	0	3,325,525
Securities, commodity contracts, and other financial investments and related products	134,418,148	43,507,379	3,828,428	12,366,645	27,290,153	* 22,153	91,273,294
Insurance carriers and related activities	98,474,315	4,675,131	458,454	1,558,658	2,659,094	* -1,076	94,201,016
Insurance carriers	68,604,725	1,532,677	291,041	512,446	730,266	* -1,076	67,101,524
Agencies, brokerages, and other insurance related activities	29,869,591	3,142,454	167,413	1,046,213	1,928,828	0	27,099,492
Funds, trusts, and other financial activities	28,545,774	9,120,710	308,989	1,202,784	7,608,848	* 88	20,189,926
Real estate and rental and leasing	23,429,529	4,669,453	153,596	437,585	4,077,565	* 707	20,463,650
Rental and leasing services	13,015,964	2,724,044	58,525	74,981	2,589,831	* 707	11,937,768
Commercial and industrial machinery and equipment rental and leasing	5,456,238	2,402,025	40,181	49,460	2,311,678	* 707	4,700,061
Other rental and leasing services	7,559,726	322,019	* 18,344	25,521	278,153	0	7,237,707
Other real estate and rental and leasing	10,413,565	1,945,409	95,072	362,604	1,487,734	0	8,525,881

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued						
	Receipts by foreign corporations from:						
	All sources	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(17)	(18)	(19)	(20)	(21)	(22)	(23)
Services	616,353,220	142,325,656	19,147,443	15,947,123	107,194,953	36,137	481,841,887
Professional, scientific, and technical services	262,157,131	53,285,956	11,427,442	10,168,399	31,680,661	9,455	210,554,458
Architectural, engineering, and related services	10,729,183	1,163,649	265,134	187,281	711,173	* 62	9,596,624
Computer system design and related services	111,649,649	20,612,339	5,896,973	4,208,111	10,503,187	* 4,069	91,299,330
Custom computer programming services	2,026,579	693,687	322,571	200,370	166,678	* 4,069	1,344,046
Computer systems design services	8,265,860	1,420,054	760,942	180,085	479,027	0	6,850,743
Other computer system design and related services	101,357,211	18,498,598	4,813,461	3,827,656	9,857,481	0	83,104,541
Management, scientific, and technical consulting services	12,261,360	5,278,259	706,246	762,837	3,809,176	0	7,107,174
Scientific research and development services	4,235,699	2,288,574	954,344	537,174	796,416	* 641	2,040,194
Advertising and related services	42,982,333	5,147,743	215,588	219,430	4,708,930	3,795	37,937,457
Other professional, scientific, and technical services	80,298,907	18,795,391	3,389,157	4,253,567	11,151,781	* 887	62,573,679
Management of companies and enterprises	273,299,270	76,337,514	6,488,191	4,117,549	65,705,263	* 26,511	202,495,335
Administration and support and waste management and remediation services	33,211,070	8,156,603	633,961	947,335	6,575,306	0	25,571,558
Educational services	1,733,426	148,342	* 1,572	1,913	144,857	0	1,608,128
Health care and social assistance	2,914,929	261,816	31,378	2,074	228,364	0	2,656,043
Arts, entertainment, and recreation	6,092,568	1,029,151	281,163	188,662	559,326	0	5,079,242
Accommodation and food services	25,129,124	777,755	43,851	158,882	574,849	* 172	24,362,257
Other services (except public administration)	11,815,704	2,328,519	239,884	362,309	1,726,326	0	9,514,865
Nature of business not allocable	1,307,883	217,263	* 23,878	31,507	161,878	0	1,092,088

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued						Unrelated parties
	Payments by foreign corporations to:						
	All recipients	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	
	(24)	(25)	(26)	(27)	(28)	(29)	(30)
All industries	3,528,629,281	1,075,521,968	234,870,915	224,166,893	615,661,945	822,216	2,482,722,738
Raw materials and energy production	110,118,221	26,941,433	2,697,200	9,621,832	14,618,969	* 3,433	83,529,678
Agriculture, forestry, and fishing	7,891,172	2,161,021	161,827	406,155	1,592,873	* 167	5,749,170
Mining	68,426,845	21,035,285	2,477,811	8,798,778	9,758,168	* 529	47,646,612
Oil and gas extraction	53,473,687	18,644,861	2,194,169	7,814,205	8,636,488	0	35,021,814
Mining (except oil and gas)	8,945,592	1,376,342	167,543	415,248	793,022	* 529	7,580,743
Support activities for mining	6,007,566	1,014,082	116,099	569,325	328,658	0	5,044,055
Utilities	33,800,204	3,745,127	57,563	416,899	3,267,928	* 2,737	30,133,896
Goods production	1,516,669,958	471,904,526	120,735,488	88,687,221	262,190,366	291,452	1,048,195,864
Construction	18,406,045	1,598,848	96,063	315,039	1,187,746	0	16,846,387
Construction of buildings	2,767,302	56,145	27,604	* 14,600	13,942	0	2,713,041
Heavy and civil engineering construction	1,331,810	55,263	4,926	25,552	24,786	0	1,277,324
Specialty trade contractors	14,306,934	1,487,439	63,533	274,888	1,149,019	0	12,856,022
Manufacturing	1,498,263,912	470,305,678	120,639,425	88,372,181	261,002,619	291,452	1,031,349,477
Food manufacturing	95,593,130	16,306,433	1,790,307	2,859,209	11,538,704	* 118,214	79,369,272
Beverage and tobacco product manufacturing	74,305,227	17,816,297	1,768,998	4,856,101	11,191,197	0	56,533,491
Beverage manufacturing	36,460,213	8,396,216	1,673,457	2,134,437	4,588,322	0	28,073,841
Tobacco manufacturing	37,845,013	9,420,080	* 95,541	2,721,664	6,602,875	0	28,459,650
Textile mills and textile product mills	4,487,489	784,282	270,108	213,772	298,394	* 2,008	3,703,801
Apparel manufacturing	12,944,944	3,951,365	1,175,355	1,399,350	1,376,655	* 5	9,068,385
Leather and allied product manufacturing	2,096,898	588,880	313,837	* 32,094	242,949	0	1,508,018
Wood product manufacturing	4,555,791	500,249	123,942	128,845	247,462	0	4,056,252
Paper manufacturing	40,614,470	7,399,925	2,537,957	1,015,097	3,846,871	0	33,243,014
Petroleum and coal products manufacturing	110,387,935	41,055,793	7,747,733	15,074,185	18,233,621	* 255	69,368,495
Chemical manufacturing	252,782,221	98,823,129	27,355,352	13,923,467	57,433,110	111,201	155,341,212
Basic chemical manufacturing	33,884,950	8,276,705	1,823,123	2,116,988	4,226,152	110,443	25,642,292
Pharmaceutical and medicine manufacturing	122,094,985	61,702,970	17,603,288	7,060,544	37,039,138	0	61,496,517
Soap, cleaning compound, and toilet preparation manufacturing	23,519,742	7,580,845	1,794,451	736,799	5,049,595	0	16,047,828
Other chemical manufacturing	73,282,544	21,262,609	6,134,490	4,009,136	11,118,225	* 758	52,154,575
Plastics and rubber products manufacturing	38,928,127	9,253,788	2,215,810	1,121,948	5,916,031	0	29,695,629
Nonmetallic mineral product manufacturing	17,014,286	3,367,441	1,167,315	792,491	1,384,222	* 23,412	13,647,145
Primary metal manufacturing	18,172,028	3,110,677	316,593	1,130,665	1,663,419	0	15,070,984
Fabricated metal product manufacturing	35,837,982	7,223,931	1,748,374	1,643,080	3,822,635	* 9,842	28,641,029
Machinery manufacturing	58,222,242	12,767,596	3,688,088	2,620,628	6,458,880	0	45,549,309
Computer and electronic product manufacturing	228,021,272	88,893,682	31,712,858	16,604,538	40,565,932	* 10,355	139,567,449
Communications equipment manufacturing	48,171,347	20,261,696	5,132,917	1,304,921	13,823,859	0	27,944,010
Semiconductor and other electronic component manufacturing	74,408,766	31,641,595	20,956,897	2,561,867	8,112,477	* 10,355	42,926,189
Other computer and electronic manufacturing	105,441,159	36,990,391	5,623,044	12,737,751	18,629,596	0	68,697,251
Electric equipment, appliance, and component manufacturing	61,180,746	13,805,802	3,568,023	2,931,953	7,304,297	* 1,529	47,604,965
Transportation equipment manufacturing	340,391,550	113,914,446	26,871,719	15,718,137	71,321,086	* 3,504	226,628,392
Motor vehicles and parts manufacturing	328,032,162	111,024,258	26,063,444	14,744,043	70,213,267	* 3,504	217,087,912
Other transportation equipment manufacturing	12,359,387	2,890,188	808,275	974,094	1,107,819	0	9,540,480
Furniture and related product manufacturing	3,651,842	639,957	251,941	48,090	339,926	0	3,016,593
Miscellaneous manufacturing	99,075,732	30,102,004	6,015,115	6,258,532	17,817,228	* 11,129	69,736,041
Medical and equipment supplies manufacturing	30,750,341	12,679,998	1,423,908	3,217,439	8,037,471	* 1,180	18,325,289
Other miscellaneous manufacturing	68,325,391	17,422,006	4,591,207	3,041,093	9,779,757	* 9,949	51,410,752
Distribution and transportation of goods	926,291,647	298,409,189	52,477,734	66,917,712	178,998,140	15,603	635,640,389
Wholesale and retail trade	890,407,554	287,580,918	51,925,324	61,522,144	174,117,846	15,603	610,468,954
Wholesale trade	641,592,155	240,482,306	44,773,206	45,561,851	150,136,116	11,134	408,565,629
Motor vehicle and motor vehicle parts and supplies wholesalers	32,712,619	17,748,345	1,626,428	1,441,946	14,679,971	0	15,026,372
Professional and commercial equipment and supplies wholesalers	7,837,290	3,273,086	868,772	673,587	1,729,269	* 1,458	4,601,293
Electrical and electronic goods wholesalers	58,771,903	27,626,093	12,216,300	3,715,400	11,694,393	0	32,796,725
Machinery, equipment, and suppliers wholesalers	40,463,680	23,605,484	7,591,060	1,970,526	14,043,085	* 812	20,817,549

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued						
	Payments by foreign corporations to:						
	All recipients	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(24)	(25)	(26)	(27)	(28)	(29)	(30)
Drugs and druggists' sundries wholesalers	54,366,844	18,165,577	1,547,780	2,040,479	14,577,318	0	36,616,680
Apparel, piece goods, and notions wholesalers	9,304,513	2,812,752	387,292	382,099	2,043,361	0	6,501,515
Grocery and related product wholesalers	19,581,918	6,750,223	543,967	332,000	5,873,794	* 462	12,844,395
Chemical and allied products wholesalers	29,754,794	13,299,717	3,479,865	1,998,065	7,821,787	0	16,574,389
Petroleum and petroleum products wholesalers	152,304,229	27,409,399	729,732	15,988,983	10,690,684	0	125,492,559
Other wholesale trade	236,494,365	99,791,631	15,782,010	17,018,767	66,982,453	* 8,401	137,294,152
Retail trade	248,540,738	46,954,866	7,127,800	15,949,822	23,872,775	* 4,469	201,772,409
Motor vehicle dealers and parts dealers	19,846,556	10,189,581	67,830	766,968	9,354,783	0	9,657,248
Electronics and appliance stores	8,057,289	1,917,125	254,706	405,944	1,256,475	0	6,152,136
Building materials and garden equipment and suppliers dealers	5,108,724	447,932	53,684	209,069	185,179	0	4,660,890
Food and beverage stores	11,799,635	484,983	299,954	117,781	* 67,248	0	11,314,900
Health and personal care stores	3,651,159	469,181	108,844	145,170	215,167	0	3,187,098
Clothing and clothing accessories stores	9,339,710	1,975,179	221,883	569,056	1,184,240	0	7,394,849
General merchandise stores	83,345,253	3,644,720	946,076	447,748	2,248,208	* 2,687	79,705,734
Electronic shopping and mail-order houses	2,280,967	465,702	114,059	200,877	148,983	* 1,783	1,815,559
Other retailers	105,111,444	27,360,464	5,060,764	13,087,208	9,212,492	0	77,883,995
Wholesale and retail trade not allocable	274,662	* 143,745	* 24,318	* 10,472	* 108,955	0	130,916
Transportation and warehousing	35,884,093	10,828,271	552,410	5,395,568	4,880,293	0	25,171,434
Air transportation	3,243,283	208,641	* 22,812	139,404	46,426	0	3,034,674
Water transportation	6,244,643	1,007,601	201,782	181,407	624,412	0	5,240,270
Truck transportation	3,718,611	448,342	39,454	149,521	259,367	0	3,271,860
Support activities for transportation	15,363,193	6,399,176	219,096	2,921,757	3,258,323	0	9,071,672
Other transportation	5,157,061	2,175,660	7,850	1,906,603	261,206	0	2,981,736
Warehousing and storage	2,157,303	588,851	61,416	96,876	430,559	0	1,571,223
Information	94,339,501	22,085,218	6,828,301	7,355,442	7,889,450	* 12,026	72,386,356
Publishing industries	24,753,885	8,740,973	5,646,679	2,095,675	998,619	0	16,021,447
Newspaper, periodical, book and directory publishers	9,680,915	1,776,732	331,095	756,758	688,879	0	7,912,116
Software publishers	15,072,971	6,964,241	5,315,583	1,338,918	309,740	0	8,109,331
Motion picture and sound recording industries	22,703,118	7,077,842	507,535	3,687,091	2,878,898	* 4,318	15,671,006
Broadcasting (except Internet)	8,327,847	1,019,540	19,963	175,959	823,618	0	7,313,987
Internet publishing and broadcasting	103,486	* 25,586	* 408	* 17,096	* 8,082	0	78,307
Telecommunications	29,760,821	3,379,131	205,915	646,675	2,518,833	* 7,708	26,410,679
Internet service providers, Web search portals, and data processing services	4,406,077	836,351	359,824	202,313	274,215	0	3,607,635
Other information services	4,284,267	1,005,795	87,978	530,632	387,185	0	3,283,294
Finance, insurance, real estate, and rental and leasing	315,567,121	89,650,937	13,561,621	21,325,102	54,628,262	135,952	229,306,618
Finance and insurance	291,777,079	85,335,585	13,168,706	20,468,807	51,566,822	131,249	209,711,754
Credit intermediation and related activities	58,309,393	15,003,043	632,788	4,323,400	10,033,625	* 13,230	43,638,138
Depository credit intermediation	15,880,806	3,348,317	28,905	1,848,858	1,470,554	0	12,533,032
Nondepository credit intermediation	38,768,374	10,635,364	522,051	2,290,677	7,809,405	* 13,230	28,431,924
Activities related to credit intermediation	3,660,212	1,019,362	81,832	183,864	753,666	0	2,673,183
Securities, commodity contracts, and other financial investments and related products	118,972,608	48,986,108	12,078,355	9,513,498	27,286,476	* 107,778	71,368,864
Insurance carriers and related activities	90,041,186	13,003,703	291,517	2,579,113	10,131,711	* 1,363	78,553,343
Insurance carriers	62,702,383	9,138,154	180,109	1,922,458	7,035,580	* 6	55,032,391
Agencies, brokerages, and other insurance related activities	27,338,803	3,865,549	111,407	656,655	3,096,130	* 1,357	23,520,951
Funds, trusts, and other financial activities	24,453,892	8,342,731	166,046	4,052,796	4,115,010	* 8,878	16,151,409
Real estate and rental and leasing	23,790,042	4,315,352	392,915	856,295	3,061,439	* 4,702	19,594,863
Rental and leasing services	13,386,375	2,041,976	174,837	386,904	1,475,572	* 4,664	11,424,733
Commercial and industrial machinery and equipment rental and leasing	5,923,371	1,387,614	119,797	319,070	946,441	* 2,307	4,606,390
Other rental and leasing services	7,463,004	654,362	55,040	67,834	529,131	* 2,357	6,818,343
Other real estate and rental and leasing	10,403,667	2,273,376	218,078	469,392	1,585,868	* 39	8,170,130

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued						
	Payments by foreign corporations to:						
	All recipients	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(24)	(25)	(26)	(27)	(28)	(29)	(30)
Services	564,298,825	166,408,251	38,554,314	30,228,176	97,262,011	363,749	412,439,635
Professional, scientific, and technical services	245,053,918	75,412,048	25,788,109	12,644,006	36,926,036	53,897	180,821,661
Architectural, engineering, and related services	10,303,614	1,201,261	610,869	188,820	401,471	* 101	9,124,115
Computer system design and related services	100,461,303	41,775,163	20,174,828	8,057,593	13,542,743	0	68,718,241
Custom computer programming services	1,871,492	407,065	187,921	66,360	152,784	0	1,478,878
Computer systems design services	7,967,488	2,499,747	1,424,189	308,461	767,097	0	5,485,194
Other computer system design and related services	90,622,323	38,868,351	18,562,718	7,682,772	12,622,862	0	61,754,169
Management, scientific, and technical consulting services	11,413,780	2,630,520	579,306	323,283	1,727,931	0	8,832,935
Scientific research and development services	4,326,360	605,496	216,142	83,205	306,148	0	3,743,410
Advertising and related services	42,102,883	13,138,035	363,040	1,243,975	11,522,646	8,374	29,011,518
Other professional, scientific, and technical services	76,445,977	16,061,573	3,843,923	2,747,130	9,425,098	* 45,423	61,391,442
Management of companies and enterprises	241,367,327	80,387,718	9,618,184	15,409,923	55,086,236	273,375	163,971,344
Administration and support and waste management and remediation services	32,134,376	2,881,114	456,012	421,166	2,003,725	* 211	29,365,181
Educational services	1,634,024	278,037	68,663	50,487	158,887	0	1,415,394
Health care and social assistance	2,681,896	515,256	53,702	60,909	400,645	0	2,316,678
Arts, entertainment, and recreation	6,165,374	1,042,275	200,611	412,711	428,952	0	5,123,112
Accommodation and food services	24,242,868	2,683,179	654,165	641,584	1,351,165	* 36,266	21,568,311
Other services (except public administration)	11,019,042	3,208,625	1,714,869	587,390	906,366	0	7,857,953
Nature of business not allocable	1,344,009	122,413	16,257	31,407	74,747	* 2	1,224,199

* Data should be used with caution because of the small number of returns on which they are based.

[1] Number of returns is not additive because some U.S. corporations had Controlled Foreign Corporations in more than one industrial sector. The industrial activity of the parent corporation filing the return often differs from that of the Controlled Foreign Corporations.

[2] Value is less than \$500.

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

Controlled Foreign Corporations, 2004

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004

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

Selected country of incorporation of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations			
		Number of foreign corporations	Total assets		Total receipts
			Beginning-of-year	End-of-year	
(1)	(2)	(3)	(4)	(5)	
All geographic regions	10,939	74,676	7,613,683,688	9,217,097,520	3,795,850,571
Latin America, total	3,000	10,693	386,038,955	449,470,022	289,817,056
Mexico	2,249	4,618	199,333,766	243,119,233	153,372,290
Central America and Caribbean countries, total	395	1,135	21,443,511	22,983,242	16,172,951
Costa Rica	170	240	2,784,589	2,838,897	3,027,837
Dominican Republic	81	97	1,511,585	2,085,599	1,440,764
El Salvador	75	108	2,225,905	2,242,591	1,820,153
Guatemala	122	201	2,285,843	2,589,567	2,628,853
Honduras	77	160	1,073,077	1,260,753	1,937,940
Panama (including Canal Zone)	159	266	11,236,091	11,615,688	4,899,353
Other Central American and Caribbean countries	52	63	326,422	350,148	418,052
South America, total	1,411	4,939	165,261,678	183,367,547	120,271,814
Argentina	529	861	17,639,305	19,522,148	20,457,604
Bolivia	48	64	1,074,473	1,095,463	477,300
Brazil	971	1,677	84,392,775	94,877,634	58,858,281
Chile	394	712	28,344,498	30,496,318	11,789,089
Colombia	286	437	7,675,920	9,646,609	7,774,699
Ecuador	91	160	1,549,451	1,736,525	2,476,128
Peru	187	240	5,294,891	6,461,399	3,127,021
Uruguay	149	211	1,934,268	1,942,299	2,204,335
Venezuela	325	525	16,692,424	17,020,446	11,896,056
Other South American countries	39	53	663,674	568,704	1,211,301
Other Western Hemisphere, total	4,319	10,277	1,535,444,871	1,795,027,510	699,167,565
Bahamas	93	384	42,451,711	52,616,671	13,866,726
Barbados	121	154	10,070,902	9,984,235	3,429,763
Bermuda	450	974	403,544,887	467,439,769	155,961,340
British Virgin Islands	230	348	49,494,423	51,678,990	17,749,464
Canada	3,592	6,559	648,656,325	742,560,256	421,174,846
Cayman Islands	548	1,402	344,461,974	426,218,389	81,568,359
Jamaica	45	62	1,618,247	1,669,622	897,820
Netherlands Antilles	120	161	31,973,407	40,243,483	2,917,620
Trinidad and Tobago	42	52	1,027,679	979,096	314,731
Other Western Hemisphere countries	79	181	2,145,315	1,636,999	1,286,896
Europe, total	5,745	33,719	4,684,554,618	5,729,046,602	2,062,213,379
European Union, total	5,574	30,810	4,294,596,320	5,319,004,566	1,868,183,270
Austria	362	515	17,804,638	22,445,328	19,330,200
Belgium	711	1,281	85,105,269	95,580,427	53,634,950
Cyprus	56	76	894,371	1,480,541	1,388,524
Czech Republic	323	476	14,477,848	16,107,208	10,031,595
Denmark	414	681	18,948,834	27,675,432	15,208,077
Estonia	45	52	205,185	237,818	317,247
Finland	223	345	9,410,437	10,812,056	6,492,669
Reunion)	1,603	3,857	251,795,752	267,209,715	153,028,917
Germany	1,864	4,121	311,317,302	355,281,624	223,960,105
Greece	182	242	4,730,188	6,253,900	6,811,221
Hungary	284	419	14,500,721	17,198,057	11,758,735
Ireland	607	1,091	208,775,353	315,222,046	103,788,860
Italy	998	1,795	85,896,332	99,292,730	72,388,907
Latvia	36	42	84,979	163,079	202,748
Lithuania	31	33	362,069	499,484	411,748
Luxembourg	260	439	415,606,232	568,027,649	157,504,240
Malta	11	17	791,631	847,516	491,037
Netherlands	1,371	3,151	647,998,050	809,568,942	297,741,740
Poland	400	650	23,609,142	28,109,245	18,551,896
Portugal (including Azores)	238	399	19,107,469	21,930,775	14,110,759
Slovakia	119	164	2,823,783	3,338,778	2,641,785

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations			Total receipts
		Number of foreign corporations	Total assets		
			Beginning-of-year	End-of-year	
(1)	(2)	(3)	(4)	(5)	
Slovenia	36	40	367,675	593,762	924,802
Spain (including Canary Islands)	846	1,640	121,387,014	135,498,522	124,745,092
Sweden	592	1,055	65,788,559	72,202,182	43,963,634
United Kingdom and Northern Ireland (including Gibraltar)	3,721	8,227	1,972,807,487	2,443,427,749	528,753,781
Other European countries, total	1,098	2,909	389,958,298	410,042,036	194,030,109
Guernsey	32	59	981,373	4,234,617	402,259
Jersey	65	116	52,761,682	41,848,491	6,677,628
Norway	262	424	22,604,486	24,038,872	12,846,046
Romania	107	131	1,573,238	2,283,602	2,131,759
Russia	239	441	4,975,878	6,120,600	8,147,430
Switzerland	753	1,389	302,337,653	326,515,781	158,484,729
Ukraine	60	93	1,242,823	1,106,069	2,133,174
Other European countries	150	255	3,481,165	3,894,005	3,207,084
Africa, total	600	1,511	32,459,202	37,675,168	32,185,416
North Africa, total	127	229	2,853,308	3,091,486	3,315,831
Egypt	74	110	1,607,565	1,742,088	1,803,647
Morocco	55	63	878,202	951,622	1,021,743
Other North African countries	36	56	367,542	397,775	490,441
East Africa, total	190	275	5,968,471	7,711,251	3,341,112
Mauritius	156	187	4,781,150	6,390,758	1,930,671
Other East African countries	50	88	1,187,321	1,320,493	1,410,441
West and Central Africa, total	104	269	11,487,853	12,735,280	6,791,500
Liberia	31	97	6,904,612	7,479,409	3,014,292
Nigeria	50	76	3,254,729	4,008,119	1,656,448
Other West and Central African countries	45	96	1,328,512	1,247,752	2,120,760
Southern Africa, total	380	738	12,149,569	14,137,152	18,736,973
South Africa	369	623	11,354,152	13,274,856	17,521,365
Other Southern African countries	44	115	795,417	862,296	1,215,608
Asia, total	3,961	14,338	708,461,158	871,156,736	574,582,693
Central, Northern, and Southwestern Asia, total	206	304	7,082,915	9,714,871	17,251,629
Turkey	179	249	6,086,014	8,567,233	16,734,751
countries	40	55	996,902	1,147,638	516,878
Middle East, total	901	1,200	21,020,267	23,566,604	13,573,162
Israel	795	993	18,890,558	20,784,509	10,899,661
United Arab Emirates	75	86	609,894	913,632	1,324,706
Other Middle East countries	79	121	1,519,815	1,868,462	1,348,795
Southern and Southeastern Asia, total	1,806	5,190	149,172,438	175,925,073	171,241,854
India	872	1,226	14,134,939	17,319,866	16,996,271
Indonesia	196	294	10,239,618	10,857,064	7,237,821
Malaysia	480	791	24,043,518	28,267,132	20,876,512
Pakistan	40	50	607,315	639,260	696,233
Philippines	278	478	13,823,574	14,280,946	11,256,018
Singapore	1,007	1,555	69,612,527	85,185,931	90,352,458
Thailand	398	663	16,117,776	18,710,822	22,942,053
Vietnam	43	51	308,921	354,937	430,472
Other Southern and Southeastern Asian countries	53	82	284,250	309,115	454,017
Eastern Asia, total	2,580	7,645	531,185,538	661,950,188	372,516,049
China	1,161	2,264	28,663,251	38,208,863	48,118,616
Hong Kong	1,054	1,800	81,222,475	86,690,433	52,176,026
Japan (including Okinawa and Ryukyu Islands)	1,276	2,265	340,626,466	391,520,947	199,289,733
South Korea	560	757	44,175,322	100,196,395	44,396,044
Taiwan	396	539	36,076,030	44,649,995	27,409,364
Other Eastern Asian countries	18	19	421,994	683,555	1,126,266

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations				Total receipts
		Number of foreign corporations	Total assets			
			Beginning-of-year	End-of-year		
	(1)	(2)	(3)	(4)	(5)	
Oceania, total	1,433	3,613	237,315,103	305,672,278	118,773,853	
Australia	1,325	2,807	195,769,614	260,959,465	102,982,038	
New Zealand	420	696	38,750,111	41,788,662	14,586,170	
Marshall Islands	4	52	2,216,743	2,241,381	893,462	
Other countries of Oceania	35	59	578,635	682,769	312,183	
Puerto Rico and U.S. Possessions, total	327	520	29,386,420	29,031,348	19,060,268	
Puerto Rico	273	395	26,247,589	25,918,909	17,189,828	
U.S. Possessions, total	74	125	3,138,831	3,112,440	1,870,440	
Virgin Islands, U.S.	42	66	2,421,569	2,401,433	935,662	
Other U.S. Possessions	38	59	717,262	711,006	934,778	
Other country or unknown	3	4	* 23,362	* 17,857	* 50,343	
OPEC countries, total (countries included above)	491	1,054	31,601,356	33,702,308	23,172,918	

Footnotes at end of table.

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued					
	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes		
				Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes
	(6)	(7)	(8)	(9)	(10)	(11)
All geographic regions	362,199,144	69,252,227	292,946,918	432,572,981	67,997,857	364,575,123
Latin America, total	24,766,720	6,343,901	18,422,820	30,626,745	6,074,265	24,552,481
Mexico	12,269,344	3,290,568	8,978,776	14,381,348	3,209,063	11,172,285
Central America and Caribbean countries, total	1,918,429	313,226	1,605,203	2,114,260	306,208	1,808,052
Costa Rica	360,726	36,100	324,626	403,926	34,749	369,177
Dominican Republic	405,865	70,821	335,044	412,255	70,179	342,076
El Salvador	96,134	19,781	76,353	116,633	19,320	97,314
Guatemala	178,925	55,003	123,922	216,998	55,617	161,381
Honduras	91,025	12,468	78,557	104,234	10,268	93,966
Panama (including Canal Zone)	717,296	96,373	620,923	787,089	93,489	693,600
Other Central American and Caribbean countries	68,458	22,681	45,777	73,125	22,586	50,538
South America, total	10,578,947	2,740,107	7,838,840	14,131,137	2,558,994	11,572,143
Argentina	1,050,672	314,653	736,019	1,708,272	299,579	1,408,693
Bolivia	54,367	6,316	48,051	67,625	6,220	61,405
Brazil	4,369,304	1,459,802	2,909,502	6,358,952	1,328,099	5,030,853
Chile	1,152,041	138,031	1,014,010	1,536,758	127,335	1,409,424
Colombia	419,031	174,076	244,956	607,796	164,746	443,050
Ecuador	163,170	38,296	124,874	185,032	37,730	147,302
Peru	530,214	116,029	414,185	616,555	112,277	504,278
Uruguay	73,725	11,395	62,331	108,356	11,073	97,283
Venezuela	2,686,301	449,110	2,237,191	2,825,365	444,830	2,380,535
Other South American countries	80,121	32,399	47,722	116,426	27,105	89,321
Other Western Hemisphere, total	87,099,455	15,687,665	71,411,789	99,989,054	15,825,461	84,163,593
Bahamas	3,002,336	850,231	2,152,105	4,052,899	841,934	3,210,964
Barbados	499,420	61,220	438,200	602,984	62,136	540,847
Bermuda	29,060,865	3,205,672	25,855,192	30,886,332	3,176,103	27,710,229
British Virgin Islands	3,026,429	275,742	2,750,687	3,178,987	255,879	2,923,108
Canada	40,662,927	8,706,507	31,956,420	46,224,825	8,995,772	37,229,053
Cayman Islands	10,598,544	2,510,354	8,088,190	14,345,118	2,421,210	11,923,909
Jamaica	54,870	7,607	47,263	85,932	7,607	78,325
Netherlands Antilles	225,776	45,352	180,424	303,200	40,547	262,652
Trinidad and Tobago	52,608	14,783	37,825	68,116	14,657	53,459
Other Western Hemisphere countries	-84,320	10,198	-94,517	240,663	9,615	231,047
Europe, total	180,427,787	32,458,197	147,969,591	221,012,333	31,548,618	189,463,716
European Union, total	156,345,334	28,486,545	127,858,788	194,478,228	27,613,398	166,864,830
Austria	1,290,770	391,061	899,709	1,562,637	384,204	1,178,433
Belgium	2,502,831	688,667	1,814,164	3,560,441	731,072	2,829,370
Cyprus	222,928	21,841	201,087	234,249	22,117	212,132
Czech Republic	929,152	246,742	682,410	1,035,511	241,166	794,346
Denmark	1,053,031	255,864	797,166	1,409,595	250,066	1,159,529
Estonia	14,050	* 1,793	12,257	16,971	* 1,718	15,254
Finland	541,428	119,497	421,931	639,563	118,095	521,468
Reunion)	9,402,259	2,593,965	6,808,294	14,059,756	2,463,041	11,596,715
Germany	8,306,081	2,934,185	5,371,896	13,925,568	2,689,185	11,236,382
Greece	479,245	226,387	252,858	546,774	224,918	321,856
Hungary	1,419,586	141,087	1,278,499	1,569,803	135,636	1,434,167
Ireland	21,691,134	1,619,842	20,071,292	24,780,059	1,600,975	23,179,084
Italy	4,655,594	1,992,530	2,663,064	5,877,222	1,871,272	4,005,950
Latvia	19,003	2,858	16,145	20,136	2,850	17,286
Lithuania	7,622	8,203	-580	47,317	8,183	39,134
Luxembourg	10,485,073	1,014,271	9,470,802	11,302,154	979,228	10,322,927
Malta	45,345	* 940	44,405	46,970	* 920	46,050
Netherlands	41,675,726	4,694,757	36,980,968	46,513,837	4,614,303	41,899,534
Poland	1,558,708	330,082	1,228,626	1,843,817	302,263	1,541,553
Portugal (including Azores)	1,774,372	334,186	1,440,185	1,896,057	338,251	1,557,806
Slovakia	220,304	30,146	190,157	244,635	28,358	216,278

Footnotes at end of table.

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued					
	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes		
				Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes
	(6)	(7)	(8)	(9)	(10)	(11)
Slovenia	85,310	17,083	68,228	87,314	16,993	70,321
Spain (including Canary Islands)	8,440,005	3,328,322	5,111,683	9,548,466	3,303,285	6,245,181
Sweden	1,973,261	265,576	1,707,685	3,191,588	254,249	2,937,340
United Kingdom and Northern Ireland (including Gibraltar)	37,552,518	7,226,661	30,325,858	50,517,786	7,031,050	43,486,736
Other European countries, total	24,082,454	3,971,651	20,110,802	26,534,105	3,935,219	22,598,886
Guernsey	306,772	10,588	296,185	323,648	10,587	313,061
Jersey	1,801,585	58,609	1,742,976	2,734,901	53,957	2,680,944
Norway	3,043,562	2,097,751	945,811	3,339,339	2,090,470	1,248,869
Romania	173,531	50,202	123,329	194,778	49,201	145,576
Russia	1,036,076	237,618	798,458	1,139,674	235,689	903,985
Switzerland	17,424,541	1,428,253	15,996,289	18,342,079	1,407,976	16,934,103
Ukraine	158,687	53,719	104,968	174,408	53,191	121,217
Other European countries	137,698	34,911	102,787	285,280	34,148	251,132
Africa, total	2,986,024	887,787	2,098,237	3,866,123	871,777	2,994,346
North Africa, total	167,044	51,320	115,724	250,366	52,559	197,807
Egypt	126,617	36,592	90,026	160,240	36,437	123,803
Morocco	15,418	13,193	2,225	53,416	13,718	39,698
Other North African countries	25,008	1,535	23,474	36,710	2,404	34,306
East Africa, total	399,097	105,194	293,903	481,283	102,846	378,437
Mauritius	345,573	83,651	261,922	399,031	82,296	316,736
Other East African countries	53,524	21,543	31,981	82,251	20,550	61,701
West and Central Africa, total	604,711	172,866	431,845	1,024,674	168,916	855,758
Liberia	584,088	* 85,088	499,000	721,516	* 84,678	636,838
Nigeria	18,554	60,673	-42,119	216,609	58,763	157,846
Other West and Central African countries	2,069	27,104	-25,036	86,550	25,475	61,075
Southern Africa, total	1,815,172	558,408	1,256,765	2,109,801	547,457	1,562,344
South Africa	1,757,602	529,330	1,228,272	2,021,424	524,721	1,496,703
Other Southern African countries	57,570	29,078	28,492	88,377	22,736	65,641
Asia, total	49,155,965	10,839,600	38,316,365	55,934,843	10,641,408	45,293,434
Central, Northern, and Southwestern Asia, total	1,377,356	303,842	1,073,515	1,509,469	301,945	1,207,524
Turkey	1,313,859	279,615	1,034,244	1,415,563	276,848	1,138,715
countries	63,497	24,226	39,271	93,906	25,097	68,809
Middle East, total	978,075	187,160	790,915	1,575,619	174,686	1,400,934
Israel	676,371	177,893	498,478	1,218,951	165,824	1,053,127
United Arab Emirates	194,039	* 1,590	192,450	212,899	* 1,573	211,326
Other Middle East countries	107,665	7,677	99,988	143,769	7,288	136,481
Southern and Southeastern Asia, total	13,807,403	2,275,610	11,531,793	15,269,466	2,236,245	13,033,221
India	1,711,855	430,136	1,281,719	2,134,493	415,843	1,718,650
Indonesia	1,752,661	487,970	1,264,691	1,883,208	485,179	1,398,029
Malaysia	1,728,052	251,829	1,476,223	1,843,494	250,101	1,593,394
Pakistan	101,156	25,333	75,824	106,038	22,924	83,114
Philippines	1,371,488	211,354	1,160,135	1,582,462	205,872	1,376,589
Singapore	5,275,084	572,648	4,702,436	5,698,601	560,961	5,137,640
Thailand	1,838,068	281,564	1,556,504	1,947,203	281,104	1,666,098
Vietnam	-2,144	5,787	-7,931	31,295	5,841	25,454
Other Southern and Southeastern Asian countries	31,182	8,990	22,192	42,672	8,420	34,253
Eastern Asia, total	32,993,131	8,072,988	24,920,142	37,580,289	7,928,533	29,651,756
China	4,334,383	539,739	3,794,644	5,235,719	525,269	4,710,450
Hong Kong	6,247,144	977,378	5,269,766	6,738,648	989,822	5,748,827
Japan (including Okinawa and Ryukyu Islands)	15,104,588	4,975,602	10,128,986	17,628,786	4,877,307	12,751,478
South Korea	4,413,650	1,111,827	3,301,823	4,945,594	1,077,170	3,868,424
Taiwan	2,817,860	467,808	2,350,052	2,955,503	458,330	2,497,173
Other Eastern Asian countries	75,505	634	74,870	76,039	* 634	75,404

Footnotes at end of table.

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued					
	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes		
				Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes
	(6)	(7)	(8)	(9)	(10)	(11)
Oceania, total	14,549,087	2,754,386	11,794,700	17,681,186	2,747,822	14,933,365
Australia	12,341,006	2,439,551	9,901,456	15,310,790	2,438,028	12,872,761
New Zealand	1,603,082	302,271	1,300,811	1,761,544	297,127	1,464,417
Marshall Islands	547,815	* 853	546,962	547,816	* 853	546,962
Other countries of Oceania	57,183	11,711	45,472	61,037	11,813	49,224
Puerto Rico and U.S. Possessions, total	3,212,987	280,485	2,932,502	3,459,892	288,493	3,171,399
Puerto Rico	2,864,682	264,770	2,599,912	2,996,452	264,567	2,731,885
U.S. Possessions, total	348,305	15,715	332,590	463,440	23,926	439,514
Virgin Islands, U.S.	352,235	5,495	346,740	403,808	17,235	386,573
Other U.S. Possessions	-3,930	10,219	-14,150	59,632	6,690	52,942
Other country or unknown	* 1,119	* 206	* 913	* 2,804	* 14	* 2,789
OPEC countries, total (countries included above)	4,738,595	1,007,070	3,731,524	5,246,705	999,286	4,247,419

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Distributions out of earnings and profits			Dividends paid to controlling U.S. corporation	Total Subpart F income
	Total	Not previously taxed earnings and profits	Previously taxed earnings and profits		
(12)	(13)	(14)	(15)	(16)	
All geographic regions	135,230,421	91,424,129	43,806,293	46,638,623	47,794,506
Latin America, total	8,405,479	7,428,261	977,218	3,146,785	1,198,538
Mexico	2,781,934	2,511,305	270,629	755,905	375,839
Central America and Caribbean countries, total	1,195,493	826,945	368,548	541,427	310,041
Costa Rica	270,604	264,588	6,016	250,781	34,431
Dominican Republic	* 7,982	* 7,941	* 40	* 7,893	6,903
El Salvador	106,093	99,004	* 7,089	64,664	8,383
Guatemala	44,991	44,536	* 456	* 13,101	* 2,182
Honduras	130,370	127,684	* 2,686	* 112,438	* 5,123
Panama (including Canal Zone)	607,198	256,459	350,740	* 76,169	252,327
Other Central American and Caribbean countries	* 28,255	* 26,732	* 1,522	* 16,380	* 692
South America, total	4,428,052	4,090,010	338,041	1,849,453	512,658
Argentina	368,731	332,057	36,674	116,165	51,184
Bolivia	* 18,715	* 16,741	* 1,975	* 702	* 12,261
Brazil	1,954,797	1,822,095	132,703	865,814	218,413
Chile	325,424	302,850	22,574	187,270	67,150
Colombia	103,527	92,442	11,086	66,773	15,397
Ecuador	52,738	52,689	* 48	24,382	* 278
Peru	39,489	39,172	* 316	26,535	32,898
Uruguay	79,187	18,160	* 61,027	15,516	49,441
Venezuela	1,467,625	1,395,987	71,638	532,856	59,790
Other South American countries	* 17,818	* 17,818	0	* 13,440	* 5,846
Other Western Hemisphere, total	37,747,897	25,698,664	12,049,233	17,465,319	13,351,278
Bahamas	490,230	223,589	266,640	198,316	640,597
Barbados	343,756	115,181	228,575	* 68,365	202,783
Bermuda	8,504,065	2,389,949	6,114,116	2,037,671	5,961,550
British Virgin Islands	771,656	* 87,695	683,961	* 85,142	277,128
Canada	23,233,939	20,173,519	3,060,420	13,459,200	4,066,343
Cayman Islands	4,195,904	2,640,809	1,555,095	1,575,608	2,077,842
Jamaica	* 2,509	* 2,172	* 337	* 2,042	* 611
Netherlands Antilles	130,298	15,123	* 115,174	* 11,602	97,685
Trinidad and Tobago	* 32,545	* 31,755	* 790	* 17,780	* 1,767
Other Western Hemisphere countries	42,995	* 18,871	* 24,124	* 9,592	24,973
Europe, total	66,473,533	41,197,097	25,276,436	18,844,540	26,506,188
European Union, total	58,594,038	39,269,485	19,324,552	17,795,692	22,789,759
Austria	218,115	205,998	12,117	110,204	67,855
Belgium	1,044,742	681,235	363,507	461,198	356,701
Cyprus	199,351	115,829	* 83,522	* 22,051	65,179
Czech Republic	321,261	177,790	* 143,471	91,692	152,375
Denmark	237,346	151,696	85,650	70,676	398,306
Estonia	* 5,846	* 5,846	0	* 111	0
Finland	127,799	97,624	30,175	39,829	47,839
Reunion)	4,348,845	3,529,684	819,161	1,139,646	842,512
Germany	3,832,979	3,005,476	827,503	886,322	1,016,965
Greece	207,339	146,303	* 61,036	51,633	71,534
Hungary	628,438	150,494	477,944	28,896	333,100
Ireland	8,775,730	6,612,906	2,162,824	5,123,253	3,464,728
Italy	1,632,413	1,292,970	339,444	412,393	612,490
Latvia	* 4,232	* 3,121	* 1,111	* 449	* 2,299
Lithuania	* 847	* 847	0	0	* 3,663
Luxembourg	3,516,688	931,904	2,584,784	791,018	3,138,324
Malta	* 19,643	* 4,195	* 15,448	* 1,257	* 1,563
Netherlands	10,958,126	5,773,073	5,185,052	2,525,737	5,924,095
Poland	795,802	744,248	51,553	394,049	88,418
Portugal (including Azores)	439,115	267,023	172,091	45,350	683,216
Slovakia	30,426	30,426	* 1	20,616	* 12,313

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Distributions out of earnings and profits			Dividends paid to controlling U.S. corporation	Total Subpart F income
	Total	Not previously taxed earnings and profits	Previously taxed earnings and profits		
(12)	(13)	(14)	(15)	(16)	
Slovenia	* 94,344	* 90,312	* 4,032	* 10,622	* 4,623
Spain (including Canary Islands)	2,857,068	1,966,083	890,985	1,026,537	790,161
Sweden	451,665	321,307	130,358	133,088	190,846
United Kingdom and Northern Ireland (including Gibraltar)	17,845,878	12,963,096	4,882,782	4,409,066	4,520,656
Other European countries, total	7,879,495	1,927,611	5,951,884	1,048,848	3,716,429
Guernsey	* 39,408	* 2,419	* 36,989	* 2,364	59,699
Jersey	194,002	* 14,700	* 179,302	* 7,771	336,080
Norway	681,304	630,141	51,163	546,936	32,603
Romania	41,485	35,029	* 6,455	22,167	* 4,605
Russia	284,510	267,153	* 17,357	52,223	* 10,554
Switzerland	6,558,563	915,849	5,642,715	384,310	3,187,457
Ukraine	* 18,132	* 17,222	* 910	* 16,520	* 353
Other European countries	62,091	45,097	* 16,993	16,556	85,078
Africa, total	1,407,019	832,262	574,757	464,781	295,445
North Africa, total	64,047	59,530	* 4,517	8,989	3,356
Egypt	30,932	30,881	* 51	* 7,699	* 2,884
Morocco	30,476	26,050	* 4,426	* 374	* 28
Other North African countries	* 2,639	* 2,600	* 39	* 916	* 444
East Africa, total	57,429	43,087	14,343	36,336	36,089
Mauritius	32,829	* 19,081	13,748	* 18,113	35,344
Other East African countries	24,601	24,006	* 595	* 18,223	* 745
West and Central Africa, total	780,608	266,135	514,473	234,029	198,875
Liberia	564,342	* 139,778	424,564	* 139,778	192,712
Nigeria	96,585	96,585	0	86,477	* 3,180
Other West and Central African countries	119,681	29,772	* 89,909	* 7,774	* 2,984
Southern Africa, total	504,935	463,510	41,424	185,428	57,125
South Africa	481,803	441,673	40,130	173,203	53,877
Other Southern African countries	23,131	21,837	* 1,294	* 12,224	3,249
Asia, total	15,825,246	12,421,041	3,404,204	5,088,491	5,054,909
Central, Northern, and Southwestern Asia, total	339,201	268,804	* 70,398	119,982	67,819
Turkey	323,633	253,235	* 70,398	105,490	67,791
countries	* 15,569	* 15,569	0	* 14,492	* 28
Middle East, total	199,914	186,443	13,471	91,780	145,615
Israel	105,940	103,873	* 2,067	41,432	106,279
United Arab Emirates	36,123	* 27,949	* 8,174	* 16,732	32,127
Other Middle East countries	57,852	54,622	* 3,230	33,617	7,209
Southern and Southeastern Asia, total	4,393,894	3,625,570	768,324	1,543,007	991,956
India	302,603	289,859	12,744	129,969	41,287
Indonesia	646,695	636,348	* 10,347	84,476	6,118
Malaysia	539,639	434,994	104,646	299,381	120,450
Pakistan	28,980	28,926	* 55	* 8,602	* 605
Philippines	811,651	772,212	39,440	203,068	60,788
Singapore	1,579,545	1,034,941	544,604	649,335	659,632
Thailand	441,712	386,351	55,361	163,300	102,703
Vietnam	* 4,838	* 4,796	* 42	* 50	0
Other Southern and Southeastern Asian countries	* 38,230	* 37,145	* 1,086	* 4,826	* 373
Eastern Asia, total	10,892,236	8,340,224	2,552,012	3,333,722	3,849,519
China	1,306,714	1,240,924	65,790	578,033	136,223
Hong Kong	2,693,780	1,349,933	1,343,847	628,374	1,203,973
Japan (including Okinawa and Ryukyu Islands)	5,034,687	4,221,352	813,334	1,288,008	2,186,605
South Korea	1,123,974	819,749	304,225	529,885	271,969
Taiwan	733,081	708,266	24,815	309,421	48,151
Other Eastern Asian countries	0	0	0	0	* 2,599

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Distributions out of earnings and profits			Dividends paid to controlling U.S. corporation	Total Subpart F income
	Total	Not previously taxed earnings and profits	Previously taxed earnings and profits		
(12)	(13)	(14)	(15)	(16)	
Oceania, total	4,763,480	3,426,669	1,336,811	1,349,177	1,205,061
Australia	3,837,066	3,091,935	745,131	1,195,208	531,878
New Zealand	731,353	329,631	401,723	151,278	181,471
Marshall Islands	* 182,587	0	* 182,587	0	483,406
Other countries of Oceania	* 12,474	* 5,103	* 7,371	* 2,692	* 8,307
Puerto Rico and U.S. Possessions, total	607,768	420,135	187,633	279,529	183,087
Puerto Rico	592,756	406,952	185,804	266,746	159,212
U.S. Possessions, total	15,012	13,183	* 1,829	12,782	23,875
Virgin Islands, U.S.	* 6,347	* 5,863	* 484	* 5,863	* 17,811
Other U.S. Possessions	8,665	* 7,320	* 1,345	* 6,919	* 6,065
Other country or unknown	0	0	0	0	0
OPEC countries, total (countries included above)	2,296,100	2,205,941	90,160	751,248	103,284

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued						
	Receipts by foreign corporations from:						
	All sources	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(17)	(18)	(19)	(20)	(21)	(22)	(23)
All geographic regions	3,795,850,571	1,030,284,624	178,950,203	182,688,301	668,398,192	247,928	2,787,272,960
Latin America, total	289,817,056	75,211,112	13,791,258	19,817,605	41,592,288	9,962	215,349,710
Mexico	153,372,290	48,132,310	9,234,979	15,217,269	23,677,095	2,967	105,688,271
Central America and Caribbean countries, total	16,172,951	5,049,759	1,098,300	1,358,823	2,592,636	0	11,137,537
Costa Rica	3,027,837	1,344,171	703,625	217,379	423,167	0	1,689,165
Dominican Republic	1,440,764	108,899	* 6,594	92,707	9,599	0	1,332,125
El Salvador	1,820,153	446,027	40,858	53,839	351,330	0	1,374,126
Guatemala	2,628,853	543,720	46,706	52,340	444,674	0	2,091,156
Honduras	1,937,940	935,441	262,420	246,129	426,892	0	1,002,854
Panama (including Canal Zone)	4,899,353	1,591,627	19,930	648,380	923,317	0	3,309,932
Other Central American and Caribbean countries	418,052	79,874	* 18,168	* 48,050	13,656	0	338,178
South America, total	120,271,814	22,029,043	3,457,978	3,241,512	15,322,557	* 6,995	98,523,902
Argentina	20,457,604	5,514,841	775,797	490,398	4,248,646	0	14,949,927
Bolivia	477,300	149,985	* 167	4,387	145,430	0	328,600
Brazil	58,858,281	8,722,499	1,042,084	1,618,570	6,058,571	* 3,274	50,209,282
Chile	11,789,089	2,096,972	428,815	539,048	1,129,110	0	9,747,076
Colombia	7,774,699	1,107,304	167,464	98,457	841,383	0	6,672,050
Ecuador	2,476,128	608,383	217,803	25,182	365,398	0	1,867,950
Peru	3,127,021	784,458	15,704	229,573	539,180	0	2,445,058
Uruguay	2,204,335	583,699	14,589	46,003	523,107	0	1,621,475
Venezuela	11,896,056	1,797,932	795,555	189,263	809,394	* 3,721	10,133,958
Other South American countries	1,211,301	662,971	0	* 633	662,338	0	548,527
Other Western Hemisphere, total	699,167,565	206,678,969	82,296,435	61,090,594	63,232,494	59,446	494,929,786
Bahamas	13,866,726	2,183,265	* 761,899	546,301	875,065	0	11,685,369
Barbados	3,429,763	1,226,355	217,148	561,921	447,287	0	2,203,800
Bermuda	155,961,340	63,816,487	20,577,876	21,849,641	21,388,414	* 556	93,272,144
British Virgin Islands	17,749,464	7,819,198	4,187,265	746,898	2,885,341	* -305	9,938,998
Canada	421,174,846	110,435,243	49,487,612	34,853,496	26,034,939	59,196	311,869,294
Cayman Islands	81,568,359	20,523,344	6,906,323	2,405,100	11,211,921	0	61,204,509
Jamaica	897,820	32,988	* 953	* 22,161	* 9,874	0	864,832
Netherlands Antilles	2,917,620	305,745	12,564	26,155	267,027	0	2,615,392
Trinidad and Tobago	314,731	34,465	* 1,042	* 6,297	27,125	0	280,267
Other Western Hemisphere countries	1,286,896	301,879	143,754	72,625	85,500	0	995,182
Europe, total	2,062,213,379	577,363,080	51,862,639	70,133,623	455,250,608	116,209	1,502,164,240
European Union, total	1,868,183,270	512,839,006	44,257,525	63,757,850	404,714,439	109,192	1,369,808,809
Austria	19,330,200	4,500,432	85,350	2,048,599	2,366,483	0	14,854,001
Belgium	53,634,950	20,077,197	575,590	1,415,692	18,085,087	* 828	34,073,215
Cyprus	1,388,524	129,768	* 14,048	* 2,387	113,332	0	1,258,981
Czech Republic	10,031,595	2,153,485	159,121	192,999	1,801,365	0	7,894,378
Denmark	15,208,077	3,062,447	209,191	325,875	2,527,381	0	12,197,625
Estonia	317,247	115,454	* 6,560	* 35,764	73,129	0	201,801
Finland	6,492,669	1,138,072	60,269	132,614	945,189	0	5,358,891
and Reunion)	153,028,917	44,451,688	3,370,170	3,991,846	37,085,624	* 4,047	109,272,764
Germany	223,960,105	70,117,716	4,985,316	4,265,138	60,867,108	* 154	157,160,843
Greece	6,811,221	545,073	17,382	30,020	497,671	0	6,266,713
Hungary	11,758,735	3,645,476	177,769	847,297	2,620,410	0	8,127,570
Ireland	103,788,860	34,574,821	5,798,356	6,352,173	22,424,292	0	70,557,593
Italy	72,388,907	11,283,613	1,043,896	886,805	9,352,883	* 29	61,221,640
Latvia	202,748	20,570	* 22	* 6	20,542	0	182,191
Lithuania	411,748	170,089	* 639	* 16,670	152,780	0	241,715
Luxembourg	157,504,240	33,585,792	1,157,099	2,039,648	30,319,644	* 69,401	124,102,150
Malta	491,037	84,494	* 836	* 364	* 83,249	* 46	406,713
Netherlands	297,741,740	114,387,233	6,846,748	16,494,212	91,029,652	* 16,621	185,483,223
Poland	18,551,896	4,414,450	236,421	140,359	4,037,670	0	14,175,413
Portugal (including Azores)	14,110,759	3,046,922	31,164	393,804	2,621,954	0	11,090,598
Slovakia	2,641,785	773,665	* 1,679	53,569	718,417	0	1,869,285

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued						
	Receipts by foreign corporations from:						
	All sources	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(17)	(18)	(19)	(20)	(21)	(22)	(23)
Slovenia	924,802	349,159	* 7,327	2,898	338,934	0	575,643
Spain (including Canary Islands)	124,745,092	21,523,915	997,133	1,279,581	19,240,470	* 6,732	103,367,570
Sweden	43,963,634	19,869,639	4,789,314	421,062	14,656,004	* 3,260	24,174,602
United Kingdom and Northern Ireland (including Gibraltar)	528,753,781	118,817,834	13,686,126	22,388,468	82,735,166	* 8,074	415,693,693
Other European countries, total	194,030,109	64,524,074	7,605,115	6,375,773	50,536,169	* 7,017	132,355,431
Guernsey	402,259	72,424	0	* 3,876	68,549	0	332,680
Jersey	6,677,628	779,584	* 43,327	491,929	240,259	* 4,069	5,925,011
Norway	12,846,046	4,109,011	141,587	62,231	3,905,193	0	8,739,425
Romania	2,131,759	537,188	* 102,312	24,077	410,799	0	1,603,335
Russia	8,147,430	1,693,161	66,657	83,936	1,541,318	* 1,250	6,458,455
Switzerland	158,484,729	56,391,833	7,021,445	5,674,945	43,693,744	* 1,698	104,894,346
Ukraine	2,133,174	478,813	* 137,323	* 8,881	332,609	0	1,656,028
Other European countries	3,207,084	462,062	92,463	25,900	343,699	0	2,746,150
Africa, total	32,185,416	5,125,995	192,231	1,663,591	3,250,700	* 19,473	27,133,427
North Africa, total	3,315,831	663,327	* 1,412	83,047	578,869	0	2,654,839
Egypt	1,803,647	257,204	* 928	79,060	177,215	0	1,547,501
Morocco	1,021,743	308,162	* 483	* 313	307,366	0	713,580
Other North African countries	490,441	97,961	0	* 3,674	94,287	0	393,757
East Africa, total	3,341,112	715,053	21,016	356,472	318,092	* 19,473	2,643,969
Mauritius	1,930,671	531,501	* 20,825	292,293	198,910	* 19,473	1,411,469
Other East African countries	1,410,441	183,552	* 191	* 64,179	119,182	0	1,232,500
West and Central Africa, total	6,791,500	1,536,025	108,447	811,953	615,625	0	5,256,098
Liberia	3,014,292	1,091,884	* 108,384	741,176	242,324	0	1,922,550
Nigeria	1,656,448	60,919	* 3	44,666	16,251	0	1,595,979
Other West and Central African countries	2,120,760	383,222	* 61	* 26,110	357,051	0	1,737,570
Southern Africa, total	18,736,973	2,211,589	61,356	412,120	1,738,114	0	16,578,522
South Africa	17,521,365	1,852,984	60,993	410,021	1,381,970	0	15,719,788
Other Southern African countries	1,215,608	358,605	* 363	* 2,098	356,144	0	858,734
Asia, total	574,582,693	145,028,489	29,445,380	24,398,879	91,141,795	42,435	430,183,746
Central, Northern, and Southwestern Asia, total	17,251,629	5,620,463	8,170	63,786	5,548,507	0	11,631,586
Turkey	16,734,751	5,600,316	5,314	63,435	5,531,568	0	11,134,854
countries	516,878	20,147	* 2,856	* 351	* 16,939	0	496,732
Middle East, total	13,573,162	5,251,478	3,005,686	602,564	1,641,869	* 1,359	8,375,643
Israel	10,899,661	4,646,575	2,959,996	507,076	1,179,503	0	6,298,194
United Arab Emirates	1,324,706	392,145	44,909	* 58,594	288,641	0	941,413
Other Middle East countries	1,348,795	212,758	781	36,893	173,726	* 1,359	1,136,036
Southern and Southeastern Asia, total	171,241,854	54,795,367	12,312,733	13,221,440	29,254,381	* 6,813	116,740,303
India	16,996,271	5,586,476	1,714,881	1,585,225	2,285,794	* 577	11,443,140
Indonesia	7,237,821	2,618,258	150,382	1,794,926	672,950	0	4,646,699
Malaysia	20,876,512	11,581,231	4,023,098	2,695,760	4,862,372	0	9,340,022
Pakistan	696,233	25,795	* 598	* 1,633	23,564	0	670,437
Philippines	11,256,018	5,208,097	2,155,732	292,870	2,759,355	* 140	6,200,749
Singapore	90,352,458	22,866,394	4,115,192	4,725,156	14,025,316	* 730	67,518,552
Thailand	22,942,053	6,804,046	134,192	2,118,669	4,545,819	* 5,366	16,141,236
Vietnam	430,472	25,387	* 7,405	* 87	17,895	0	405,085
Other Southern and Southeastern Asian countries	454,017	79,682	* 11,251	* 7,114	61,318	0	374,382
Eastern Asia, total	372,516,049	79,361,181	14,118,791	10,511,089	54,697,038	34,263	293,436,214
China	48,118,616	17,377,196	4,742,300	1,701,476	10,929,034	* 4,387	30,792,926
Hong Kong	52,176,026	12,865,167	2,422,512	3,930,713	6,511,882	* 61	39,442,249
Japan (including Okinawa and Ryukyu Islands)	199,289,733	40,086,166	3,999,296	2,829,778	33,248,301	* 8,790	159,276,870
South Korea	44,396,044	4,256,175	993,586	496,549	2,745,017	* 21,024	40,159,184
Taiwan	27,409,364	4,110,160	1,919,362	1,099,458	1,091,339	* 1	23,305,010
Other Eastern Asian countries	1,126,266	666,317	* 41,735	* 453,115	* 171,466	0	459,976

Footnotes at end of table.

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued						
	Receipts by foreign corporations from:						
	All sources	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(17)	(18)	(19)	(20)	(21)	(22)	(23)
Oceania, total	118,773,853	15,931,179	1,153,474	2,454,736	12,322,565	* 403	103,164,503
Australia	102,982,038	14,475,708	1,019,550	2,275,332	11,180,423	* 403	88,779,687
New Zealand	14,586,170	1,311,042	121,683	137,612	1,051,747	0	13,323,599
Marshall Islands	893,462	19,680	0	* 13	19,667	0	873,782
Other countries of Oceania	312,183	124,749	* 12,241	* 41,780	70,728	0	187,434
Puerto Rico and U.S. Possessions, total	19,060,268	4,945,801	208,786	3,129,274	1,607,742	0	14,297,206
Puerto Rico	17,189,828	4,830,928	121,932	3,124,428	1,584,568	0	12,541,236
U.S. Possessions, total	1,870,440	114,873	* 86,854	* 4,845	23,174	0	1,755,970
Virgin Islands, U.S.	935,662	23,027	* 3,155	* 2,670	17,201	0	912,825
Other U.S. Possessions	934,778	91,846	* 83,699	* 2,175	5,973	0	843,146
Other country or unknown	* 50,343	0	0	0	0	0	* 50,343
OPEC countries, total (countries included above)	23,172,918	5,028,182	991,350	2,087,750	1,945,361	* 3,721	18,217,876

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued						
	Payments by foreign corporations to:						
	All recipients	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(24)	(25)	(26)	(27)	(28)	(29)	(30)
All geographic regions	3,528,629,281	1,075,521,968	234,870,915	224,166,893	615,661,945	822,216	2,482,722,738
Latin America, total	270,407,700	65,041,131	15,160,062	18,418,194	31,396,143	66,731	205,963,029
Mexico	141,811,822	38,544,627	9,317,264	12,129,978	17,039,841	57,544	103,548,445
Central America and Caribbean countries, total	15,282,787	5,162,648	1,124,499	1,726,378	2,311,771	0	10,203,547
Costa Rica	2,955,755	945,225	318,664	328,248	298,313	0	2,012,412
Dominican Republic	1,046,075	146,191	65,123	51,680	29,389	0	900,405
El Salvador	1,786,639	743,033	49,091	332,116	361,826	0	1,046,347
Guatemala	2,443,378	683,151	101,449	238,329	343,374	0	1,762,413
Honduras	1,954,411	769,841	188,356	375,738	205,748	0	1,218,913
Panama (including Canal Zone)	4,713,752	1,805,382	380,656	375,085	1,049,641	0	2,950,032
Other Central American and Caribbean countries	382,777	69,825	21,162	25,182	23,481	0	313,024
South America, total	113,313,091	21,333,856	4,718,299	4,561,838	12,044,531	9,187	92,211,037
Argentina	19,479,859	3,637,998	654,971	606,130	2,375,322	* 1,575	15,890,970
Bolivia	451,778	49,969	* 2,314	6,616	41,018	* 20	401,810
Brazil	56,589,172	8,751,578	2,311,860	2,154,116	4,284,936	* 665	47,857,978
Chile	10,497,079	2,289,384	382,942	580,094	1,325,776	* 572	8,338,512
Colombia	7,322,342	1,263,062	250,341	249,609	762,119	* 993	6,060,911
Ecuador	2,353,782	551,457	54,922	113,940	382,595	0	1,802,811
Peru	2,644,319	432,059	65,922	123,832	240,970	* 1,335	2,225,179
Uruguay	2,186,487	1,029,481	97,622	122,851	808,998	* 10	1,160,288
Venezuela	10,629,900	3,143,525	878,642	600,079	1,660,816	* 3,988	7,499,552
Other South American countries	1,158,371	185,342	* 18,763	4,570	161,981	* 28	973,029
Other Western Hemisphere, total	651,033,424	188,194,599	67,966,341	59,129,414	61,030,647	68,197	466,404,850
Bahamas	11,051,239	4,778,810	208,934	2,157,290	2,412,585	0	6,276,895
Barbados	3,184,948	1,064,057	244,816	239,970	579,271	0	2,131,013
Bermuda	136,596,478	45,065,848	12,559,971	14,172,180	18,333,413	* 285	92,961,034
British Virgin Islands	15,078,607	6,377,997	4,030,138	528,022	1,819,838	0	8,726,352
Canada	407,512,520	102,781,380	36,559,882	36,768,502	29,385,230	67,766	305,660,346
Cayman Islands	74,047,844	27,159,300	14,286,329	4,895,337	7,977,567	* 67	48,044,933
Jamaica	843,826	54,796	* 21,564	13,543	* 19,688	0	789,228
Netherlands Antilles	1,112,604	553,666	32,798	133,011	387,856	0	568,435
Trinidad and Tobago	308,259	73,974	* 10,647	41,658	21,669	0	234,285
Other Western Hemisphere countries	1,297,099	284,772	11,262	179,901	93,528	* 80	1,012,327
Europe, total	1,907,338,693	586,247,068	90,464,620	94,395,240	401,100,620	286,588	1,339,727,663
European Union, total	1,729,747,870	517,449,971	74,590,261	82,926,560	359,655,400	277,751	1,226,734,245
Austria	18,051,285	4,446,642	138,927	1,228,910	3,078,805	0	13,621,149
Belgium	51,638,670	16,214,255	1,355,484	2,771,581	12,084,407	* 2,784	35,807,155
Cyprus	1,297,959	384,507	92,586	95,311	196,610	0	919,605
Czech Republic	9,422,563	2,452,616	130,557	288,253	2,033,806	0	6,998,392
Denmark	13,888,661	3,334,471	295,722	537,921	2,500,591	* 236	10,598,695
Estonia	307,816	60,601	* 3,792	* 1,281	55,528	0	247,216
Finland	6,035,469	1,860,040	103,465	194,865	1,561,710	0	4,184,384
Reunion)	147,628,793	38,963,570	3,667,445	4,935,315	30,351,431	* 9,379	108,996,238
Germany	219,294,714	52,565,955	5,812,405	7,007,324	39,743,089	* 3,136	167,074,630
Greece	6,532,310	1,777,282	62,835	131,466	1,582,981	0	4,761,153
Hungary	10,847,573	3,184,851	139,641	376,840	2,668,370	0	7,685,780
Ireland	90,956,731	47,249,004	24,373,117	4,692,869	18,183,018	0	53,754,012
Italy	69,286,514	21,588,343	1,033,797	2,531,557	18,019,205	* 3,784	47,722,396
Latvia	190,333	66,207	* 7,144	* 3,875	55,188	0	124,127
Lithuania	369,157	88,780	* 250	* 2,455	86,075	0	283,753
Luxembourg	142,336,281	40,696,782	1,972,984	8,775,155	29,903,695	* 44,947	102,618,808
Malta	465,805	61,842	* 15,462	* 5,157	35,793	* 5,431	404,907
Netherlands	257,789,511	93,293,909	16,462,607	16,074,250	60,631,292	* 125,760	165,155,813
Poland	17,694,798	4,664,416	412,692	721,958	3,529,766	0	13,099,114
Portugal (including Azores)	11,499,743	3,613,690	82,862	719,590	2,810,462	* 776	7,968,565
Slovakia	2,507,460	454,876	51,551	55,237	348,087	0	2,052,841

Footnotes at end of table.

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued						
	Payments by foreign corporations to:						
	All recipients	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(24)	(25)	(26)	(27)	(28)	(29)	(30)
Slovenia	935,458	317,629	* 40,392	* 33,094	244,143	0	617,829
Spain (including Canary Islands)	118,328,977	32,753,492	2,181,300	2,825,740	27,732,159	* 14,294	85,628,288
Sweden	42,562,757	14,784,415	1,157,850	936,918	12,683,680	* 5,967	27,974,852
United Kingdom and Northern Ireland (including Gibraltar)	489,878,532	132,571,796	14,995,395	27,979,636	89,535,509	61,256	358,434,542
Other European countries, total	177,590,823	68,797,097	15,874,359	11,468,681	41,445,220	8,837	112,993,418
Guernsey	292,524	84,673	* 2,945	* 31,063	50,664	0	210,423
Jersey	4,942,259	756,413	* 64,844	234,174	457,395	0	4,189,710
Norway	10,433,587	2,669,853	771,800	251,250	1,646,803	0	7,780,724
Romania	1,998,879	490,069	30,057	16,808	443,204	0	1,509,413
Russia	7,599,313	3,325,939	122,823	181,160	3,020,036	* 1,921	4,341,023
Switzerland	147,152,394	60,543,000	14,823,110	10,676,900	35,036,363	* 6,627	90,703,672
Ukraine	1,997,904	450,722	* 29,397	* 23,973	397,073	* 279	1,547,406
Other European countries	3,173,964	476,427	29,382	53,353	393,682	* 10	2,711,049
Africa, total	30,787,269	9,376,361	1,896,529	2,330,920	5,038,043	* 110,868	22,364,287
North Africa, total	3,239,451	588,412	56,263	39,422	492,670	* 58	2,655,163
Egypt	1,723,273	332,300	18,870	23,456	289,975	0	1,393,855
Morocco	1,038,262	206,365	37,374	* 5,615	163,318	* 58	832,553
Other North African countries	477,915	49,747	* 19	* 10,351	39,377	0	428,755
East Africa, total	3,062,194	1,447,922	674,799	227,464	438,205	* 107,454	2,535,331
Mauritius	1,660,251	1,178,894	659,451	35,316	376,840	* 107,288	1,402,393
Other East African countries	1,401,943	269,028	15,348	192,148	61,365	* 167	1,132,938
West and Central Africa, total	6,951,663	2,098,529	412,618	703,733	982,178	0	4,856,905
Liberia	2,947,632	1,308,291	248,987	231,525	827,779	0	1,639,540
Nigeria	1,749,618	396,489	* 73,676	239,697	83,116	0	1,355,690
Other West and Central African countries	2,254,413	393,748	* 89,956	232,511	71,282	0	1,861,675
Southern Africa, total	17,533,961	5,241,497	752,849	1,360,302	3,124,990	* 3,357	12,316,888
South Africa	16,359,791	5,085,080	748,525	1,349,525	2,983,674	* 3,357	11,296,215
Other Southern African countries	1,174,171	156,417	* 4,324	10,777	141,316	0	1,020,673
Asia, total	542,158,215	198,291,065	54,920,034	42,435,467	100,655,351	280,213	349,439,089
Central, Northern, and Southwestern Asia, total	16,302,147	6,886,364	241,371	172,516	6,472,477	0	9,449,060
Turkey	15,857,430	6,830,851	236,081	145,448	6,449,323	0	9,059,856
countries	444,717	55,513	* 5,290	* 27,069	23,154	0	389,204
Middle East, total	12,571,193	2,456,920	831,088	249,320	1,374,336	2,176	10,381,804
Israel	10,095,065	1,711,791	651,934	165,771	893,979	* 107	8,646,388
United Arab Emirates	1,172,984	498,021	125,016	34,857	336,493	* 1,654	676,352
Other Middle East countries	1,303,143	247,108	54,138	48,691	143,865	* 415	1,059,065
Southern and Southeastern Asia, total	161,160,591	63,270,161	19,267,995	19,376,923	24,504,102	121,141	100,570,175
India	15,073,238	2,690,648	430,877	516,726	1,742,745	* 300	12,507,234
Indonesia	6,380,038	1,488,018	147,996	180,327	1,159,695	0	4,896,526
Malaysia	19,627,392	8,588,303	2,325,203	2,438,255	3,822,781	* 2,065	11,075,107
Pakistan	623,182	144,616	21,407	32,617	90,592	0	480,470
Philippines	10,930,061	5,487,673	3,102,799	900,619	1,483,852	* 404	5,542,554
Singapore	85,987,307	40,323,397	12,812,563	14,500,540	12,911,394	* 98,899	48,041,231
Thailand	21,653,304	4,392,413	402,201	762,971	3,215,620	* 11,621	17,288,088
Vietnam	426,389	52,996	14,298	13,722	24,831	* 144	373,393
Other Southern and Southeastern Asian countries	459,680	102,097	10,651	31,146	52,592	* 7,708	365,573
Eastern Asia, total	352,124,284	125,677,620	34,579,580	22,636,707	68,304,437	156,897	229,038,050
China	44,933,020	13,861,122	3,035,555	1,735,522	8,985,696	104,349	31,183,563
Hong Kong	48,577,234	18,805,677	4,604,812	3,658,522	10,542,343	0	30,038,255
Japan (including Okinawa and Ryukyu Islands)	190,808,277	73,144,561	21,154,240	12,187,491	39,795,960	* 6,870	119,720,971
South Korea	40,807,706	12,007,199	2,412,363	4,128,057	5,426,022	* 40,758	28,839,380
Taiwan	25,947,478	7,771,101	3,331,902	908,481	3,525,797	* 4,920	18,293,274
Other Eastern Asian countries	1,050,569	87,961	* 40,708	* 18,634	* 28,619	0	962,607

Footnotes at end of table.

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued						
	Payments by foreign corporations to:						
	All recipients	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(24)	(25)	(26)	(27)	(28)	(29)	(30)
Oceania, total	110,192,216	24,081,405	3,864,758	4,469,991	15,737,038	* 9,618	86,361,615
Australia	95,934,951	20,540,432	3,534,801	3,586,125	13,411,134	* 8,372	75,576,737
New Zealand	13,495,763	3,254,983	322,258	805,326	2,126,153	* 1,246	10,308,427
Marshall Islands	502,416	204,535	* 6	61,417	143,112	0	298,732
Other countries of Oceania	259,086	81,455	* 7,693	17,123	56,639	0	177,718
Puerto Rico and U.S. Possessions, total	16,661,978	4,290,124	598,356	2,987,666	704,102	0	12,412,633
Puerto Rico	15,051,187	4,079,454	502,564	2,926,794	650,096	0	11,008,040
U.S. Possessions, total	1,610,791	210,670	95,792	60,872	54,006	0	1,404,592
Virgin Islands, U.S.	671,690	105,842	43,940	38,949	22,953	0	565,937
Other U.S. Possessions	939,101	104,828	51,852	21,922	31,053	0	838,655
Other country or unknown	* 49,788	* 216	* 216	0	0	0	* 49,572
OPEC countries, total (countries included above)	20,966,683	5,755,504	1,277,272	1,102,224	3,370,072	5,936	15,235,829

* Data should be used with caution because of the small number of returns on which they are based.

[1] Number of returns is not additive because some U.S. corporations had Controlled Foreign Corporations in more than one country.

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

Controlled Foreign Corporations, 2004

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations		
		Number of foreign corporations	Total assets	
			Beginning-of-year	End-of-year
	(1)	(2)	(3)	(4)
ALL GEOGRAPHIC REGIONS [2]				
All industries	10,939	74,676	7,613,683,688	9,217,097,520
Raw materials and energy production	574	2,744	308,810,919	326,367,994
Goods production	3,912	19,359	1,596,395,081	1,865,827,173
Distribution and transportation of goods	3,348	16,215	540,946,198	620,621,547
Information	743	3,740	176,746,514	289,705,068
Finance, insurance, real estate, and rental and leasing	1,664	8,743	3,189,714,638	3,919,933,672
Services	4,693	23,418	1,799,886,561	2,193,185,896
ARGENTINA [2]				
All industries	529	861	17,639,305	19,522,148
Raw materials and energy production	38	71	3,663,160	4,005,238
Goods production	158	208	5,268,313	6,042,530
Distribution and transportation of goods	143	164	3,660,721	3,785,391
Information	d	d	d	d
Finance, insurance, real estate, and rental and leasing	85	144	2,644,178	2,877,122
Services	134	211	1,479,429	1,623,060
AUSTRALIA [2]				
All industries	1,325	2,807	195,769,614	260,959,465
Raw materials and energy production	59	170	15,725,696	20,726,357
Goods production	375	577	29,507,047	32,643,876
Distribution and transportation of goods	381	527	9,013,393	11,078,442
Information	98	193	7,536,549	9,738,320
Finance, insurance, real estate, and rental and leasing	111	345	85,876,477	116,800,505
Services	540	981	48,084,673	69,908,152
AUSTRIA [2]				
All industries	362	515	17,804,638	22,445,328
Raw materials and energy production	5	7	* 211,800	* 235,344
Goods production	96	120	5,406,060	8,760,904
Distribution and transportation of goods	145	174	2,482,800	2,587,285
Information	18	30	218,193	200,742
Finance, insurance, real estate, and rental and leasing	19	31	3,174,847	3,051,765
Services	111	148	6,286,573	7,587,950
BAHAMAS				
All industries	93	384	42,451,711	52,616,671
Raw materials and energy production	17	206	14,401,803	19,417,528
Goods production	d	d	d	d
Distribution and transportation of goods	25	45	2,785,694	4,186,097
Information	d	d	d	d
Finance, insurance, real estate, and rental and leasing	26	41	9,934,101	9,433,829
Services	34	70	13,255,058	17,677,028
BELGIUM [2]				
All industries	711	1,281	85,105,269	95,580,427
Raw materials and energy production	9	10	79,676	86,661
Goods production	237	361	28,585,698	31,360,438
Distribution and transportation of goods	253	339	10,211,596	10,456,925
Information	34	54	1,272,633	1,668,546
Finance, insurance, real estate, and rental and leasing	47	90	28,163,096	32,675,179
Services	265	424	16,770,193	19,308,628
BERMUDA [2]				
All industries	450	974	403,544,887	467,439,769
Raw materials and energy production	20	157	23,009,085	27,272,875
Goods production	38	45	52,846,269	94,364,534
Distribution and transportation of goods	40	49	11,326,956	14,331,644
Information	7	7	* 352,608	* 352,919
Finance, insurance, real estate, and rental and leasing	292	458	137,211,596	121,776,427
Services	148	253	178,798,274	209,339,959

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations		
		Number of foreign corporations	Total assets	
			Beginning-of-year	End-of-year
	(1)	(2)	(3)	(4)
BRAZIL [2]				
All industries	971	1,677	84,392,775	94,877,634
Raw materials and energy production	41	81	12,086,606	12,958,652
Goods production	344	505	22,670,996	26,856,653
Distribution and transportation of goods	284	353	8,206,479	7,724,068
Information	62	102	7,738,811	7,662,076
Finance, insurance, real estate, and rental and leasing	65	145	22,945,191	28,510,693
Services	329	484	10,737,434	11,155,167
CANADA [2]				
All industries	3,592	6,559	648,656,325	742,560,256
Raw materials and energy production	126	266	89,322,196	90,619,150
Goods production	1,125	1,643	179,814,507	202,780,255
Distribution and transportation of goods	1,333	1,797	57,241,835	64,293,165
Information	148	254	7,048,390	7,814,568
Finance, insurance, real estate, and rental and leasing	370	720	221,251,417	266,999,579
Services	1,169	1,849	93,908,391	109,949,068
CAYMAN ISLANDS [2]				
All industries	548	1,402	344,461,974	426,218,389
Raw materials and energy production	45	211	27,559,364	30,402,044
Goods production	81	103	26,182,478	28,414,267
Distribution and transportation of goods	47	55	2,213,791	2,873,052
Information	8	8	* 21,984	* 20,907
Finance, insurance, real estate, and rental and leasing	200	513	165,742,619	210,426,950
Services	249	504	122,715,928	154,043,998
CHILE [2]				
All industries	394	712	28,344,498	30,496,318
Raw materials and energy production	24	60	8,129,745	8,082,705
Goods production	103	127	2,647,349	2,911,944
Distribution and transportation of goods	157	188	1,853,988	2,173,178
Information	d	d	d	d
Finance, insurance, real estate, and rental and leasing	48	87	6,620,363	7,879,826
Services	107	208	6,637,889	7,224,150
CHINA [2]				
All industries	1,161	2,264	28,663,251	38,208,863
Raw materials and energy production	14	21	98,955	98,528
Goods production	698	1,255	19,684,503	26,182,998
Distribution and transportation of goods	280	418	4,317,743	5,528,784
Information	29	38	81,009	168,598
Finance, insurance, real estate, and rental and leasing	31	43	414,623	609,607
Services	315	465	4,026,579	5,520,564
COLOMBIA [2]				
All industries	286	437	7,675,920	9,646,609
Raw materials and energy production	d	d	d	d
Goods production	76	96	2,027,818	2,563,499
Distribution and transportation of goods	84	94	888,973	1,147,457
Information	32	34	996,735	1,472,230
Finance, insurance, real estate, and rental and leasing	50	80	2,629,690	3,302,462
Services	64	108	1,056,591	1,109,432
CZECH REPUBLIC [2]				
All industries	323	476	14,477,848	16,107,208
Raw materials and energy production	d	d	d	d
Goods production	123	161	4,009,218	4,647,223
Distribution and transportation of goods	102	119	791,482	939,428
Information	14	23	247,122	214,273
Finance, insurance, real estate, and rental and leasing	25	37	5,896,173	6,674,395
Services	90	125	3,148,366	3,201,299

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations		
		Number of foreign corporations	Total assets	
			Beginning-of-year	End-of-year
	(1)	(2)	(3)	(4)
DENMARK [2]				
All industries	414	681	18,948,834	27,675,432
Raw materials and energy production	9	9	* 98,379	* 1,119,564
Goods production	116	140	6,846,449	9,386,827
Distribution and transportation of goods	145	170	2,282,350	2,446,397
Information	21	24	157,545	166,103
Finance, insurance, real estate, and rental and leasing	31	48	3,417,212	4,045,692
Services	161	286	6,099,687	10,468,431
FRANCE (incl. Corsica, Guadeloupe, Martinique, and Reunion) [2]				
All industries	1,603	3,857	251,795,752	267,209,715
Raw materials and energy production	23	39	1,807,210	1,715,705
Goods production	592	1,116	67,945,491	67,319,903
Distribution and transportation of goods	489	769	36,274,196	39,806,899
Information	101	217	7,878,229	7,543,176
Finance, insurance, real estate, and rental and leasing	130	334	69,548,659	73,794,207
Services	652	1,354	68,187,509	76,876,817
GERMANY [2]				
All industries	1,864	4,121	311,317,302	355,281,624
Raw materials and energy production	75	81	705,379	699,446
Goods production	638	1,160	127,044,952	143,018,313
Distribution and transportation of goods	604	913	28,467,896	33,376,042
Information	98	174	8,472,210	9,675,028
Finance, insurance, real estate, and rental and leasing	142	280	77,414,861	84,580,640
Services	787	1,476	69,079,524	83,821,687
HONG KONG [2]				
All industries	1,054	1,800	81,222,475	86,690,433
Raw materials and energy production	6	7	* 3,739,652	* 3,760,873
Goods production	240	314	4,790,742	6,171,410
Distribution and transportation of goods	398	548	11,449,788	10,683,244
Information	58	81	732,161	904,898
Finance, insurance, real estate, and rental and leasing	83	201	46,893,148	47,812,399
Services	415	637	13,609,364	17,342,558
HUNGARY [2]				
All industries	284	419	14,500,721	17,198,057
Raw materials and energy production	5	6	* 89,907	* 109,382
Goods production	99	122	6,735,036	8,245,645
Distribution and transportation of goods	86	100	612,445	929,236
Information	19	31	565,422	550,751
Finance, insurance, real estate, and rental and leasing	25	43	5,223,321	5,935,946
Services	82	114	1,274,560	1,427,048
INDIA [2]				
All industries	872	1,226	14,134,939	17,319,866
Raw materials and energy production	6	13	261,237	67,139
Goods production	229	311	6,021,227	7,185,814
Distribution and transportation of goods	123	147	1,244,220	1,566,882
Information	78	89	469,695	585,937
Finance, insurance, real estate, and rental and leasing	29	57	2,699,447	3,400,014
Services	480	601	3,425,905	4,496,243
IRELAND [2]				
All industries	607	1,091	208,775,353	315,222,046
Raw materials and energy production	7	7	* 28,299	* 17,601
Goods production	174	231	31,222,939	47,347,102
Distribution and transportation of goods	151	175	7,399,739	9,554,638
Information	42	52	8,201,964	17,625,534
Finance, insurance, real estate, and rental and leasing	130	313	101,567,134	167,397,925
Services	211	304	60,311,601	73,234,274

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations		
		Number of foreign corporations	Total assets	
			Beginning-of-year	End-of-year
	(1)	(2)	(3)	(4)
ISRAEL [2]				
All industries	795	993	18,890,558	20,784,509
Raw materials and energy production	d	d	d	d
Goods production	121	178	13,807,134	15,124,697
Distribution and transportation of goods	54	66	645,077	748,090
Information	145	150	246,920	182,778
Finance, insurance, real estate, and rental and leasing	16	31	674,302	524,731
Services	491	546	3,507,423	4,190,809
ITALY [2]				
All industries	998	1,795	85,896,332	99,292,730
Raw materials and energy production	17	25	281,106	307,431
Goods production	326	576	41,854,700	50,003,566
Distribution and transportation of goods	402	512	15,793,726	20,665,356
Information	54	79	1,923,378	2,423,952
Finance, insurance, real estate, and rental and leasing	51	131	12,409,621	12,183,035
Services	286	459	13,603,895	13,682,868
JAPAN (including Okinawa and Ryukyu Islands) [2]				
All industries	1,276	2,265	340,626,466	391,520,947
Raw materials and energy production	4	5	* 83,925	* 85,820
Goods production	344	534	50,290,493	54,445,017
Distribution and transportation of goods	443	600	28,850,415	33,670,423
Information	102	129	2,901,689	3,363,308
Finance, insurance, real estate, and rental and leasing	69	374	232,544,479	268,010,202
Services	466	618	25,913,054	31,918,932
LUXEMBOURG [2]				
All industries	260	439	415,606,232	568,027,649
Raw materials and energy production	d	d	d	d
Goods production	54	63	90,156,382	101,052,658
Distribution and transportation of goods	24	28	54,242,243	60,987,612
Information	11	12	702,286	700,951
Finance, insurance, real estate, and rental and leasing	61	151	104,887,541	150,197,789
Services	144	181	161,252,617	253,222,775
MALAYSIA [2]				
All industries	480	791	24,043,518	28,267,132
Raw materials and energy production	11	15	142,144	149,099
Goods production	178	252	9,410,219	9,828,262
Distribution and transportation of goods	139	189	1,130,695	1,219,346
Information	22	26	38,219	22,611
Finance, insurance, real estate, and rental and leasing	35	68	11,653,769	14,578,148
Services	164	236	1,651,822	2,454,397
MEXICO [2]				
All industries	2,249	4,618	199,333,766	243,119,233
Raw materials and energy production	160	215	5,223,590	6,492,763
Goods production	1,131	1,911	49,444,087	56,359,269
Distribution and transportation of goods	624	862	14,552,502	19,453,063
Information	74	181	2,456,500	2,455,850
Finance, insurance, real estate, and rental and leasing	173	375	90,515,622	110,125,013
Services	600	1,039	37,081,389	48,180,621
NETHERLANDS [2]				
All industries	1,371	3,151	647,998,050	809,568,942
Raw materials and energy production	39	68	5,197,732	6,814,034
Goods production	419	633	268,320,601	335,879,034
Distribution and transportation of goods	386	571	38,290,245	40,941,966
Information	93	173	26,334,901	84,719,450
Finance, insurance, real estate, and rental and leasing	145	265	88,355,684	85,154,392
Services	732	1,419	221,472,370	256,010,831

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations		
		Number of foreign corporations	Total assets	
			Beginning-of-year	End-of-year
	(1)	(2)	(3)	(4)
NEW ZEALAND [2]				
All industries	420	696	38,750,111	41,788,662
Raw materials and energy production	45	82	14,987,902	15,029,776
Goods production	108	137	12,670,694	13,632,945
Distribution and transportation of goods	137	171	2,345,931	2,691,630
Information	d	d	d	d
Finance, insurance, real estate, and rental and leasing	34	83	5,871,627	7,215,747
Services	130	191	2,625,294	2,945,744
NORWAY [2]				
All industries	262	424	22,604,486	24,038,872
Raw materials and energy production	13	19	6,628,474	7,194,366
Goods production	69	81	9,552,997	9,285,760
Distribution and transportation of goods	103	127	3,496,564	3,793,194
Information	15	16	83,717	141,702
Finance, insurance, real estate, and rental and leasing	14	30	978,691	1,229,827
Services	81	147	1,861,852	2,381,988
PHILIPPINES [2]				
All industries	278	478	13,823,574	14,280,946
Raw materials and energy production	13	38	3,692,314	3,483,824
Goods production	107	134	4,210,211	4,304,501
Distribution and transportation of goods	77	98	618,963	633,449
Information	13	15	36,526	50,794
Finance, insurance, real estate, and rental and leasing	41	66	3,898,064	4,245,853
Services	91	124	1,365,331	1,560,027
POLAND				
All industries	400	650	23,609,142	28,109,245
Raw materials and energy production	11	13	113,061	183,443
Goods production	154	225	6,426,968	8,249,753
Distribution and transportation of goods	143	170	1,372,425	1,552,498
Information	15	26	353,206	330,333
Finance, insurance, real estate, and rental and leasing	26	60	14,501,523	16,666,892
Services	114	156	841,959	1,126,327
PORTUGAL (including Azores) [2]				
All industries	238	399	19,107,469	21,930,775
Raw materials and energy production	d	d	d	d
Goods production	78	101	4,066,877	4,668,997
Distribution and transportation of goods	87	124	1,919,819	2,371,164
Information	18	24	228,814	280,950
Finance, insurance, real estate, and rental and leasing	20	31	2,259,850	3,167,369
Services	72	112	10,565,471	11,425,855
PUERTO RICO [2]				
All industries	273	395	26,247,589	25,918,909
Raw materials and energy production	d	d	d	d
Goods production	62	74	7,188,321	8,824,163
Distribution and transportation of goods	96	123	4,572,066	2,415,194
Information	d	d	d	d
Finance, insurance, real estate, and rental and leasing	37	68	6,345,869	6,475,911
Services	76	100	4,792,821	4,835,973
RUSSIA [2]				
All industries	239	441	4,975,878	6,120,600
Raw materials and energy production	d	d	d	d
Goods production	76	95	1,306,840	1,553,130
Distribution and transportation of goods	71	96	1,390,203	1,694,430
Information	16	100	902,540	1,006,812
Finance, insurance, real estate, and rental and leasing	16	20	283,732	378,132
Services	76	116	587,479	930,749

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations		
		Number of foreign corporations	Total assets	
			Beginning-of-year	End-of-year
	(1)	(2)	(3)	(4)
SINGAPORE [2]				
All industries	1,007	1,555	69,612,527	85,185,931
Raw materials and energy production	13	17	159,614	230,376
Goods production	281	351	16,788,959	19,638,155
Distribution and transportation of goods	322	424	10,848,560	13,021,651
Information	62	83	587,145	810,665
Finance, insurance, real estate, and rental and leasing	76	142	24,344,240	31,313,728
Services	406	531	16,867,130	20,147,797
SOUTH AFRICA [2]				
All industries	369	623	11,354,152	13,274,856
Raw materials and energy production	6	7	* 176,656	* 235,981
Goods production	143	201	5,835,679	7,029,307
Distribution and transportation of goods	115	150	1,265,958	1,616,541
Information	13	17	203,440	145,964
Finance, insurance, real estate, and rental and leasing	35	54	2,445,222	2,481,082
Services	110	189	1,403,383	1,762,406
SOUTH KOREA [2]				
All industries	560	757	44,175,322	100,196,395
Raw materials and energy production	5	7	* 1,914,910	* 2,160,370
Goods production	203	255	17,145,900	20,853,828
Distribution and transportation of goods	177	193	4,049,881	4,898,719
Information	23	31	1,006,506	1,843,639
Finance, insurance, real estate, and rental and leasing	32	75	18,124,490	68,063,716
Services	166	189	1,872,301	2,306,679
SPAIN (including Canary Islands) [2]				
All industries	846	1,640	121,387,014	135,498,522
Raw materials and energy production	21	31	635,650	600,962
Goods production	272	457	32,020,461	37,404,646
Distribution and transportation of goods	289	400	29,153,920	31,324,340
Information	63	98	1,337,130	1,634,803
Finance, insurance, real estate, and rental and leasing	53	129	19,959,245	22,909,565
Services	294	517	38,250,156	41,581,480
SWEDEN [2]				
All industries	592	1,055	65,788,559	72,202,182
Raw materials and energy production	4	4	* 19,940	* 18,579
Goods production	178	252	18,999,270	20,583,804
Distribution and transportation of goods	199	241	3,338,708	3,805,795
Information	42	64	4,204,467	4,317,132
Finance, insurance, real estate, and rental and leasing	31	60	18,336,880	18,943,435
Services	235	421	20,886,536	24,458,571
SWITZERLAND [2]				
All industries	753	1,389	302,337,653	326,515,781
Raw materials and energy production	6	6	* 265,256	* 330,792
Goods production	216	305	108,130,473	111,755,654
Distribution and transportation of goods	294	426	35,534,424	43,017,576
Information	45	64	2,582,789	4,474,209
Finance, insurance, real estate, and rental and leasing	75	129	66,308,382	66,755,964
Services	295	450	89,511,318	100,178,091
TAIWAN [2]				
All industries	396	539	36,076,030	44,649,995
Raw materials and energy production	d	d	d	d
Goods production	182	212	7,459,817	9,144,048
Distribution and transportation of goods	111	127	2,000,178	2,469,625
Information	11	14	43,304	46,684
Finance, insurance, real estate, and rental and leasing	21	52	24,494,355	30,803,024
Services	103	131	1,914,352	2,178,703

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations		
		Number of foreign corporations	Total assets	
			Beginning-of-year	End-of-year
	(1)	(2)	(3)	(4)
THAILAND [2]				
All industries	398	663	16,117,776	18,710,822
Raw materials and energy production	11	18	583,924	560,636
Goods production	165	226	7,633,553	8,390,708
Distribution and transportation of goods	126	152	1,864,510	2,315,871
Information	12	15	141,477	164,222
Finance, insurance, real estate, and rental and leasing	30	89	4,667,130	5,864,695
Services	115	158	1,224,124	1,406,649
UNITED KINGDOM AND NORTHERN IRELAND (including Gibraltar) [2]				
All industries	3,721	8,227	1,972,807,487	2,443,427,749
Raw materials and energy production	61	135	28,700,337	24,745,525
Goods production	1,171	1,859	138,733,675	152,292,679
Distribution and transportation of goods	998	1,406	57,591,144	65,351,986
Information	233	555	65,407,889	100,407,140
Finance, insurance, real estate, and rental and leasing	532	1,411	1,333,186,120	1,697,318,873
Services	1,514	2,812	349,083,972	403,208,899
VENEZUELA [2]				
All industries	325	525	16,692,424	17,020,446
Raw materials and energy production	37	64	4,775,072	5,044,193
Goods production	113	145	5,601,604	6,263,067
Distribution and transportation of goods	92	120	1,031,890	1,582,042
Information	d	d	d	d
Finance, insurance, real estate, and rental and leasing	29	44	1,214,324	1,505,912
Services	87	119	2,898,482	1,591,424
EUROPEAN UNION, TOTAL [2]				
All industries	5,574	30,810	4,294,596,320	5,319,004,566
Raw materials and energy production	189	463	43,065,548	39,208,191
Goods production	2,014	7,822	884,756,065	1,037,529,092
Distribution and transportation of goods	1,701	6,485	293,907,212	331,896,761
Information	381	1,685	127,848,307	233,065,171
Finance, insurance, real estate, and rental and leasing	831	3,490	1,891,693,471	2,388,823,099
Services	2,520	10,655	1,052,630,419	1,287,674,895
OPEC COUNTRIES, TOTAL [2]				
All industries	491	1,054	31,601,356	33,702,308
Raw materials and energy production	56	128	12,714,871	13,807,962
Goods production	178	294	7,704,632	8,262,854
Distribution and transportation of goods	148	236	2,125,694	2,967,477
Information	31	48	1,413,160	1,172,405
Finance, insurance, real estate, and rental and leasing	42	84	4,002,649	4,889,471
Services	149	253	3,634,259	2,576,855

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued			
	Total receipts	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes
	(5)	(6)	(7)	(8)
ALL GEOGRAPHIC REGIONS [2]				
All industries	3,795,850,571	362,199,144	69,252,227	292,946,918
Raw materials and energy production	127,239,949	33,177,301	10,066,054	23,111,247
Goods production	1,633,118,266	125,146,203	22,297,868	102,848,335
Distribution and transportation of goods	966,617,230	52,504,462	11,643,824	40,860,638
Information	95,170,491	8,073,622	2,249,857	5,823,765
Finance, insurance, real estate, and rental and leasing	356,043,531	57,870,006	10,466,173	47,403,834
Services	616,353,220	85,462,899	12,510,316	72,952,583
ARGENTINA [2]				
All industries	20,457,604	1,050,672	314,653	736,019
Raw materials and energy production	1,355,401	185,003	61,272	123,731
Goods production	7,198,019	381,276	140,627	240,649
Distribution and transportation of goods	9,427,174	377,606	53,180	324,426
Information	d	d	d	d
Finance, insurance, real estate, and rental and leasing	846,671	30,513	36,905	-6,393
Services	698,745	90,082	17,760	72,322
AUSTRALIA [2]				
All industries	102,982,038	12,341,006	2,439,551	9,901,456
Raw materials and energy production	5,386,287	104,775	147,724	-42,949
Goods production	40,443,046	3,747,975	973,316	2,774,659
Distribution and transportation of goods	15,868,669	903,692	241,437	662,255
Information	3,172,345	463,843	206,428	257,415
Finance, insurance, real estate, and rental and leasing	10,775,527	2,588,720	471,546	2,117,173
Services	27,288,370	4,532,276	398,780	4,133,496
AUSTRIA [2]				
All industries	19,330,200	1,290,770	391,061	899,709
Raw materials and energy production	* 126,815	* -1,982	* 2,180	* -4,162
Goods production	8,945,226	546,446	143,736	402,711
Distribution and transportation of goods	4,381,490	256,584	98,644	157,940
Information	221,839	-25,203	2,878	-28,081
Finance, insurance, real estate, and rental and leasing	397,759	-39,995	13,800	-53,795
Services	5,232,396	556,722	129,770	426,952
BAHAMAS				
All industries	13,866,726	3,002,336	850,231	2,152,105
Raw materials and energy production	3,102,572	1,108,951	471,095	637,856
Goods production	d	d	d	d
Distribution and transportation of goods	4,549,798	159,112	43,591	115,522
Information	d	d	d	d
Finance, insurance, real estate, and rental and leasing	966,005	442,025	4,564	437,461
Services	2,188,948	978,151	321,840	656,312
BELGIUM [2]				
All industries	53,634,950	2,502,831	688,667	1,814,164
Raw materials and energy production	127,418	2,770	* 804	1,965
Goods production	28,458,839	919,993	219,788	700,205
Distribution and transportation of goods	14,332,566	247,145	109,798	137,347
Information	840,487	172,170	12,655	159,515
Finance, insurance, real estate, and rental and leasing	3,149,041	696,162	210,361	485,801
Services	6,716,616	463,760	134,745	329,015
BERMUDA [2]				
All industries	155,961,340	29,060,865	3,205,672	25,855,192
Raw materials and energy production	10,786,986	4,106,227	1,540,871	2,565,356
Goods production	59,382,856	12,050,214	459,075	11,591,139
Distribution and transportation of goods	26,357,875	1,383,207	200,260	1,182,946
Information	* 572	* 486	0	* 486
Finance, insurance, real estate, and rental and leasing	19,585,161	3,694,580	238,519	3,456,060
Services	39,847,359	7,826,178	766,946	7,059,231

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued			
	Total receipts	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes
	(5)	(6)	(7)	(8)
BRAZIL [2]				
All industries	58,858,281	4,369,304	1,459,802	2,909,502
Raw materials and energy production	7,464,677	1,251,223	198,893	1,052,331
Goods production	29,389,098	2,622,187	717,169	1,905,018
Distribution and transportation of goods	9,581,936	523,239	132,039	391,200
Information	3,532,979	-119,800	36,627	-156,426
Finance, insurance, real estate, and rental and leasing	5,560,222	41,172	284,837	-243,665
Services	3,299,001	42,654	89,568	-46,914
CANADA [2]				
All industries	421,174,846	40,662,927	8,706,507	31,956,420
Raw materials and energy production	36,940,726	9,841,084	1,955,866	7,885,219
Goods production	204,709,521	12,261,408	2,784,142	9,477,265
Distribution and transportation of goods	116,112,765	4,477,159	1,580,184	2,896,975
Information	5,926,955	475,177	185,982	289,195
Finance, insurance, real estate, and rental and leasing	28,379,999	6,577,638	1,374,640	5,202,999
Services	29,034,472	7,023,964	823,516	6,200,448
CAYMAN ISLANDS [2]				
All industries	81,568,359	10,598,544	2,510,354	8,088,190
Raw materials and energy production	9,310,827	3,162,323	1,480,697	1,681,626
Goods production	33,948,678	2,576,940	185,688	2,391,252
Distribution and transportation of goods	2,990,740	315,927	23,770	292,157
Information	* 29,683	* 6,738	* 1,663	* 5,074
Finance, insurance, real estate, and rental and leasing	21,136,764	2,475,040	434,762	2,040,278
Services	14,147,909	2,064,817	383,774	1,681,043
CHILE [2]				
All industries	11,789,089	1,152,041	138,031	1,014,010
Raw materials and energy production	3,079,730	654,266	65,366	588,900
Goods production	2,554,106	178,922	21,523	157,399
Distribution and transportation of goods	2,963,038	124,067	18,764	105,304
Information	d	d	d	d
Finance, insurance, real estate, and rental and leasing	1,350,304	103,075	13,467	89,608
Services	848,230	88,707	14,444	74,263
CHINA [2]				
All industries	48,118,616	4,334,383	539,739	3,794,644
Raw materials and energy production	80,312	-37	* 915	-952
Goods production	32,701,989	3,384,692	355,478	3,029,214
Distribution and transportation of goods	9,941,343	566,095	85,268	480,828
Information	80,422	5,751	848	4,903
Finance, insurance, real estate, and rental and leasing	172,675	25,618	2,978	22,640
Services	5,092,544	350,065	94,103	255,962
COLOMBIA [2]				
All industries	7,774,699	419,031	174,076	244,956
Raw materials and energy production	d	d	d	d
Goods production	3,168,221	224,331	79,133	145,198
Distribution and transportation of goods	2,689,553	138,706	39,535	99,171
Information	719,209	-119,014	3,739	-122,753
Finance, insurance, real estate, and rental and leasing	719,731	155,164	42,037	113,127
Services	357,670	21,700	8,570	13,130
CZECH REPUBLIC [2]				
All industries	10,031,595	929,152	246,742	682,410
Raw materials and energy production	d	d	d	d
Goods production	6,343,067	574,452	145,396	429,056
Distribution and transportation of goods	1,822,942	98,231	38,035	60,197
Information	213,552	30,850	4,335	26,515
Finance, insurance, real estate, and rental and leasing	807,467	156,693	38,595	118,098
Services	674,163	49,663	17,770	31,893

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued			
	Total receipts	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes
	(5)	(6)	(7)	(8)
DENMARK [2]				
All industries	15,208,077	1,053,031	255,864	797,166
Raw materials and energy production	* 142,935	* -4,364	* 4,365	* -8,730
Goods production	4,762,553	268,880	59,465	209,415
Distribution and transportation of goods	4,306,862	156,624	45,646	110,978
Information	127,988	-2,240	2,689	-4,929
Finance, insurance, real estate, and rental and leasing	954,205	155,476	27,095	128,381
Services	4,877,394	473,120	114,539	358,581
FRANCE (incl. Corsica, Guadeloupe, Martinique, and Reunion) [2]				
All industries	153,028,917	9,402,259	2,593,965	6,808,294
Raw materials and energy production	1,245,131	-55,283	24,758	-80,041
Goods production	69,744,251	3,064,678	834,102	2,230,577
Distribution and transportation of goods	40,349,324	2,992,753	813,376	2,179,377
Information	3,777,887	522,913	52,280	470,633
Finance, insurance, real estate, and rental and leasing	8,708,778	1,541,741	342,738	1,199,003
Services	29,063,399	1,334,580	522,654	811,925
GERMANY [2]				
All industries	223,960,105	8,306,081	2,934,185	5,371,896
Raw materials and energy production	357,266	37,328	* 5,400	31,929
Goods production	130,955,056	2,308,130	1,182,930	1,125,200
Distribution and transportation of goods	50,563,259	1,390,927	479,046	911,881
Information	5,432,087	91,184	131,476	-40,292
Finance, insurance, real estate, and rental and leasing	10,147,029	1,436,505	308,506	1,127,998
Services	26,347,286	3,040,650	824,446	2,216,205
HONG KONG [2]				
All industries	52,176,026	6,247,144	977,378	5,269,766
Raw materials and energy production	* 1,457,343	* 599,103	* 97,928	* 501,174
Goods production	9,207,084	618,757	71,759	546,998
Distribution and transportation of goods	21,654,782	1,696,437	244,574	1,451,863
Information	526,196	5,972	3,955	2,017
Finance, insurance, real estate, and rental and leasing	9,910,146	1,671,913	392,221	1,279,692
Services	9,403,784	1,653,826	166,444	1,487,382
HUNGARY [2]				
All industries	11,758,735	1,419,586	141,087	1,278,499
Raw materials and energy production	* 31,077	* 11,452	* 1,217	* 10,235
Goods production	8,068,065	955,013	53,113	901,901
Distribution and transportation of goods	1,563,647	82,549	32,246	50,304
Information	475,011	79,819	3,847	75,972
Finance, insurance, real estate, and rental and leasing	887,611	215,785	37,815	177,970
Services	733,321	75,006	12,851	62,155
INDIA [2]				
All industries	16,996,271	1,711,855	430,136	1,281,719
Raw materials and energy production	151,141	29,233	* 7,446	21,787
Goods production	7,191,119	609,122	231,150	377,972
Distribution and transportation of goods	2,567,133	151,837	62,044	89,794
Information	747,697	89,615	23,697	65,918
Finance, insurance, real estate, and rental and leasing	1,940,345	344,456	33,651	310,805
Services	4,389,000	492,157	72,026	420,132
IRELAND [2]				
All industries	103,788,860	21,691,134	1,619,842	20,071,292
Raw materials and energy production	* 24,593	* 4,905	* 35	* 4,870
Goods production	42,317,344	7,311,120	478,319	6,832,801
Distribution and transportation of goods	21,407,164	1,863,006	89,513	1,773,492
Information	8,022,658	2,438,681	178,000	2,260,681
Finance, insurance, real estate, and rental and leasing	9,821,736	1,607,382	239,277	1,368,105
Services	22,154,746	8,458,592	634,442	7,824,150

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued			
	Total receipts	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes
	(5)	(6)	(7)	(8)
ISRAEL [2]				
All industries	10,899,661	676,371	177,893	498,478
Raw materials and energy production	d	d	d	d
Goods production	7,237,372	593,601	123,797	469,804
Distribution and transportation of goods	772,522	32,183	11,302	20,882
Information	190,091	-18,469	3,330	-21,800
Finance, insurance, real estate, and rental and leasing	147,096	-15,121	2,720	-17,842
Services	2,547,248	83,368	37,253	46,114
ITALY [2]				
All industries	72,388,907	4,655,594	1,992,530	2,663,064
Raw materials and energy production	184,167	31,971	13,968	18,003
Goods production	37,630,118	2,810,905	1,053,498	1,757,407
Distribution and transportation of goods	20,006,450	853,134	404,609	448,525
Information	1,516,555	24,103	31,889	-7,386
Finance, insurance, real estate, and rental and leasing	3,043,540	505,349	246,953	258,396
Services	9,992,321	429,304	241,438	187,866
JAPAN (including Okinawa and Ryukyu Islands) [2]				
All industries	199,289,733	15,104,588	4,975,602	10,128,986
Raw materials and energy production	* 84,109	* 18,072	* 7,412	* 10,659
Goods production	85,013,535	5,493,583	2,021,253	3,472,330
Distribution and transportation of goods	52,066,043	1,901,544	1,032,656	868,888
Information	3,452,678	582,908	217,377	365,531
Finance, insurance, real estate, and rental and leasing	28,343,863	4,498,515	851,578	3,646,937
Services	30,326,669	2,612,691	844,716	1,767,975
LUXEMBOURG [2]				
All industries	157,504,240	10,485,073	1,014,271	9,470,802
Raw materials and energy production	d	d	d	d
Goods production	27,036,927	1,513,814	390,665	1,123,149
Distribution and transportation of goods	78,556,751	4,740,818	43,916	4,696,902
Information	215,723	-16,748	* 3,264	-20,012
Finance, insurance, real estate, and rental and leasing	5,834,451	522,912	92,168	430,744
Services	44,857,078	3,653,779	457,505	3,196,274
MALAYSIA [2]				
All industries	20,876,512	1,728,052	251,829	1,476,223
Raw materials and energy production	213,814	15,864	* 1,501	14,362
Goods production	14,226,855	1,065,614	117,322	948,291
Distribution and transportation of goods	3,067,381	221,858	58,078	163,780
Information	64,391	7,840	* 1,809	6,030
Finance, insurance, real estate, and rental and leasing	767,832	186,383	51,568	134,815
Services	2,516,866	229,002	21,235	207,768
MEXICO [2]				
All industries	153,372,290	12,269,344	3,290,568	8,978,776
Raw materials and energy production	4,316,563	804,141	63,443	740,698
Goods production	81,542,528	4,419,507	1,500,993	2,918,514
Distribution and transportation of goods	34,618,126	1,963,011	583,583	1,379,428
Information	2,229,846	10,877	35,537	-24,661
Finance, insurance, real estate, and rental and leasing	14,853,623	3,417,981	786,638	2,631,343
Services	15,696,760	1,661,512	318,514	1,342,998
NETHERLANDS [2]				
All industries	297,741,740	41,675,726	4,694,757	36,980,968
Raw materials and energy production	2,509,439	805,812	199,492	606,320
Goods production	159,681,490	23,763,265	2,336,939	21,426,327
Distribution and transportation of goods	56,395,909	3,895,513	545,086	3,350,426
Information	10,784,562	768,979	186,539	582,440
Finance, insurance, real estate, and rental and leasing	7,746,104	2,302,802	342,038	1,960,764
Services	60,589,199	10,141,579	1,084,437	9,057,141

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued			
	Total receipts	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes
	(5)	(6)	(7)	(8)
NEW ZEALAND [2]				
All industries	14,586,170	1,603,082	302,271	1,300,811
Raw materials and energy production	2,297,661	439,857	* 49,057	390,800
Goods production	5,508,565	462,570	75,968	386,602
Distribution and transportation of goods	3,955,149	213,290	84,102	129,187
Information	d	d	d	d
Finance, insurance, real estate, and rental and leasing	744,269	359,314	54,943	304,371
Services	1,856,704	95,296	27,586	67,710
NORWAY [2]				
All industries	12,846,046	3,043,562	2,097,751	945,811
Raw materials and energy production	4,189,293	2,763,756	1,968,420	795,336
Goods production	2,827,636	179,464	37,239	142,225
Distribution and transportation of goods	3,425,723	69,853	40,908	28,945
Information	82,941	-9,725	* 63	-9,788
Finance, insurance, real estate, and rental and leasing	146,892	-22,002	* 1,489	-23,490
Services	2,161,593	61,909	49,599	12,310
PHILIPPINES [2]				
All industries	11,256,018	1,371,488	211,354	1,160,135
Raw materials and energy production	1,159,155	381,668	61,534	320,133
Goods production	6,967,193	314,439	81,476	232,963
Distribution and transportation of goods	1,105,798	60,382	27,295	33,088
Information	81,480	23,588	* 539	23,048
Finance, insurance, real estate, and rental and leasing	978,974	397,379	27,442	369,937
Services	960,352	193,800	13,067	180,733
POLAND				
All industries	18,551,896	1,558,708	330,082	1,228,626
Raw materials and energy production	144,608	12,330	* 475	11,855
Goods production	11,612,626	916,266	175,534	740,732
Distribution and transportation of goods	3,377,392	170,026	43,079	126,947
Information	336,010	30,261	6,770	23,490
Finance, insurance, real estate, and rental and leasing	2,179,029	341,321	76,388	264,932
Services	902,230	88,505	27,836	60,669
PORTUGAL (including Azores) [2]				
All industries	14,110,759	1,774,372	334,186	1,440,185
Raw materials and energy production	d	d	d	d
Goods production	6,532,074	386,105	94,664	291,442
Distribution and transportation of goods	2,767,421	265,499	42,229	223,270
Information	325,352	36,446	10,534	25,912
Finance, insurance, real estate, and rental and leasing	437,650	44,055	15,183	28,872
Services	4,015,492	1,042,485	171,314	871,171
PUERTO RICO [2]				
All industries	17,189,828	2,864,682	264,770	2,599,912
Raw materials and energy production	d	d	d	d
Goods production	5,143,374	1,689,866	60,038	1,629,828
Distribution and transportation of goods	6,951,693	652,485	92,249	560,236
Information	d	d	d	d
Finance, insurance, real estate, and rental and leasing	1,514,051	299,310	64,496	234,815
Services	1,349,183	163,640	21,329	142,311
RUSSIA [2]				
All industries	8,147,430	1,036,076	237,618	798,458
Raw materials and energy production	d	d	d	d
Goods production	2,103,499	220,059	56,557	163,503
Distribution and transportation of goods	3,671,362	390,844	79,707	311,136
Information	972,915	255,258	60,427	194,831
Finance, insurance, real estate, and rental and leasing	166,477	22,231	2,157	20,074
Services	1,041,481	135,315	38,757	96,558

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued			
	Total receipts	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes
	(5)	(6)	(7)	(8)
SINGAPORE [2]				
All industries	90,352,458	5,275,084	572,648	4,702,436
Raw materials and energy production	257,666	12,254	11,094	1,160
Goods production	21,690,723	1,902,035	177,801	1,724,234
Distribution and transportation of goods	49,003,605	1,083,752	147,502	936,250
Information	739,276	74,495	13,592	60,904
Finance, insurance, real estate, and rental and leasing	9,037,310	798,544	115,999	682,545
Services	9,578,735	1,404,652	106,042	1,298,611
SOUTH AFRICA [2]				
All industries	17,521,365	1,757,602	529,330	1,228,272
Raw materials and energy production	* 156,813	* 40,527	* 294	* 40,234
Goods production	12,171,403	945,815	333,879	611,937
Distribution and transportation of goods	2,557,050	288,998	79,105	209,892
Information	244,592	62,540	17,582	44,958
Finance, insurance, real estate, and rental and leasing	683,180	176,384	45,645	130,739
Services	1,677,262	254,466	52,826	201,640
SOUTH KOREA [2]				
All industries	44,396,044	4,413,650	1,111,827	3,301,823
Raw materials and energy production	* 945,951	* 84,558	* 13,044	* 71,514
Goods production	26,055,844	2,657,569	649,497	2,008,072
Distribution and transportation of goods	8,742,728	659,054	198,980	460,073
Information	1,436,139	165,965	88,528	77,437
Finance, insurance, real estate, and rental and leasing	3,402,486	586,068	94,669	491,399
Services	3,739,723	259,666	66,676	192,990
SPAIN (including Canary Islands) [2]				
All industries	124,745,092	8,440,005	3,328,322	5,111,683
Raw materials and energy production	436,073	62,389	11,142	51,247
Goods production	41,804,241	2,778,792	684,988	2,093,804
Distribution and transportation of goods	48,290,306	3,024,043	1,651,826	1,372,217
Information	1,700,006	161,102	54,933	106,169
Finance, insurance, real estate, and rental and leasing	3,219,649	406,357	102,419	303,938
Services	29,222,348	2,028,565	822,826	1,205,739
SWEDEN [2]				
All industries	43,963,634	1,973,261	265,576	1,707,685
Raw materials and energy production	* 21,892	* -119	* 249	* -368
Goods production	26,222,717	1,056,990	81,643	975,347
Distribution and transportation of goods	7,843,909	148,533	52,012	96,521
Information	1,405,344	23,737	4,456	19,281
Finance, insurance, real estate, and rental and leasing	1,792,725	737,933	56,489	681,443
Services	6,657,003	7,409	71,349	-63,940
SWITZERLAND [2]				
All industries	158,484,729	17,424,541	1,428,253	15,996,289
Raw materials and energy production	* 614,039	* 126,879	* 6,126	* 120,753
Goods production	49,470,498	5,086,714	583,233	4,503,480
Distribution and transportation of goods	58,333,136	5,036,028	393,739	4,642,289
Information	2,448,364	430,088	23,414	406,674
Finance, insurance, real estate, and rental and leasing	5,398,641	427,408	90,290	337,118
Services	42,210,707	6,319,408	331,395	5,988,013
TAIWAN [2]				
All industries	27,409,364	2,817,860	467,808	2,350,052
Raw materials and energy production	d	d	d	d
Goods production	12,043,591	1,379,606	232,471	1,147,135
Distribution and transportation of goods	4,621,953	336,993	95,383	241,610
Information	74,056	5,725	* 2,613	3,111
Finance, insurance, real estate, and rental and leasing	7,715,288	934,869	78,268	856,601
Services	2,932,458	163,263	59,156	104,107

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued			
	Total receipts	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes
	(5)	(6)	(7)	(8)
THAILAND [2]				
All industries	22,942,053	1,838,068	281,564	1,556,504
Raw materials and energy production	289,786	142,311	* 57,395	84,917
Goods production	15,943,259	1,120,097	73,205	1,046,891
Distribution and transportation of goods	4,645,154	287,712	67,899	219,813
Information	48,152	4,507	* 901	3,605
Finance, insurance, real estate, and rental and leasing	907,432	140,665	51,730	88,935
Services	1,099,095	140,933	30,239	110,695
UNITED KINGDOM AND NORTHERN IRELAND (including Gibraltar) [2]				
All industries	528,753,781	37,552,518	7,226,661	30,325,858
Raw materials and energy production	11,482,098	2,832,520	608,526	2,223,994
Goods production	182,247,765	3,331,137	1,260,961	2,070,177
Distribution and transportation of goods	111,747,683	4,849,800	902,831	3,946,969
Information	23,814,225	470,628	356,978	113,650
Finance, insurance, real estate, and rental and leasing	107,183,549	15,735,025	2,300,960	13,434,065
Services	92,164,224	10,344,521	1,797,216	8,547,305
VENEZUELA [2]				
All industries	11,896,056	2,686,301	449,110	2,237,191
Raw materials and energy production	1,924,418	293,855	54,494	239,361
Goods production	5,230,882	1,318,479	223,005	1,095,474
Distribution and transportation of goods	2,048,814	259,968	50,664	209,304
Information	d	d	d	d
Finance, insurance, real estate, and rental and leasing	571,387	85,790	14,464	71,325
Services	1,025,631	523,734	26,207	497,528
EUROPEAN UNION, TOTAL [2]				
All industries	1,868,183,270	156,345,334	28,486,545	127,858,788
Raw materials and energy production	18,190,237	3,874,462	902,786	2,971,677
Goods production	801,161,293	53,035,213	9,343,918	43,691,294
Distribution and transportation of goods	474,360,272	25,556,909	5,552,716	20,004,193
Information	59,565,588	4,854,971	1,053,920	3,801,051
Finance, insurance, real estate, and rental and leasing	166,872,489	26,470,153	4,488,177	21,981,976
Services	347,335,473	42,575,596	7,135,294	35,440,302
OPEC COUNTRIES, TOTAL [2]				
All industries	23,172,918	4,738,595	1,007,070	3,731,524
Raw materials and energy production	6,023,481	1,666,654	426,207	1,240,446
Goods production	8,009,579	1,486,613	288,975	1,197,638
Distribution and transportation of goods	4,317,988	465,824	75,402	390,422
Information	1,194,190	182,537	81,212	101,324
Finance, insurance, real estate, and rental and leasing	1,450,675	313,701	77,694	236,007
Services	2,157,062	628,016	57,369	570,646

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Foreign corporations with (+) current earnings and profits before income taxes		Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation	Total Subpart F income
	Current earnings and profits before income taxes	Income taxes			
	(9)	(10)	(11)	(12)	(13)
ALL GEOGRAPHIC REGIONS [2]					
All industries	432,572,981	67,997,857	135,230,421	46,638,623	47,794,506
Raw materials and energy production	38,092,670	9,955,655	15,990,632	8,410,113	932,091
Goods production	145,962,799	22,179,827	43,338,323	17,604,019	11,898,152
Distribution and transportation of goods	58,826,488	11,454,019	15,607,374	4,030,637	8,705,972
Information	12,847,072	2,133,474	7,182,894	4,305,580	678,604
Finance, insurance, real estate, and rental and leasing	71,341,733	10,020,332	21,287,176	3,317,628	13,505,475
Services	105,385,304	12,234,108	31,805,437	8,970,235	12,067,414
ARGENTINA [2]					
All industries	1,708,272	299,579	368,731	116,165	51,184
Raw materials and energy production	230,162	53,445	43,519	* 16,572	* 4,464
Goods production	676,789	140,162	133,462	52,226	8,263
Distribution and transportation of goods	408,191	52,983	* 115,967	* 10,129	10,534
Information	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	136,049	33,499	32,744	* 10,700	20,600
Services	145,371	15,752	43,040	* 25,496	* 5,603
AUSTRALIA [2]					
All industries	15,310,790	2,438,028	3,837,066	1,195,208	531,878
Raw materials and energy production	1,083,882	148,747	* 394,682	* 209,946	* 1,755
Goods production	3,962,931	974,879	1,080,524	270,632	115,393
Distribution and transportation of goods	1,170,704	244,072	114,066	80,773	37,796
Information	590,405	202,906	326,416	* 102,334	15,857
Finance, insurance, real estate, and rental and leasing	3,150,425	464,777	865,052	211,827	237,148
Services	5,349,847	402,327	1,056,327	319,696	123,903
AUSTRIA [2]					
All industries	1,562,637	384,204	218,115	110,204	67,855
Raw materials and energy production	* 5,486	* 1,963	* 4,756	* 4,721	* 124
Goods production	570,363	144,595	93,441	* 36,382	29,252
Distribution and transportation of goods	309,491	93,088	30,639	* 4,307	9,513
Information	14,244	2,799	* 47,587	* 47,599	* 2,104
Finance, insurance, real estate, and rental and leasing	56,490	13,851	* 12,546	0	* 105
Services	606,406	127,856	29,145	* 17,194	26,756
BAHAMAS					
All industries	4,052,899	841,934	490,230	198,316	640,597
Raw materials and energy production	1,976,822	467,206	* 123,948	* 99,533	* 197,128
Goods production	d	d	d	d	d
Distribution and transportation of goods	206,609	* 39,371	* 43,078	* 11,135	86,956
Information	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	449,300	* 4,376	* 231,737	* 75,759	205,636
Services	1,104,107	321,840	55,828	* 9,972	88,211
BELGIUM [2]					
All industries	3,560,441	731,072	1,044,742	461,198	356,701
Raw materials and energy production	* 4,333	* 802	* 3,966	* 3,931	0
Goods production	1,340,226	268,504	693,787	304,529	160,481
Distribution and transportation of goods	425,931	114,589	59,060	* 5,229	24,322
Information	283,860	11,799	* 6,841	* 5,202	* 4,267
Finance, insurance, real estate, and rental and leasing	853,694	207,669	99,892	* 5,663	113,181
Services	651,382	127,194	181,197	136,644	54,450
BERMUDA [2]					
All industries	30,886,332	3,176,103	8,504,065	2,037,671	5,961,550
Raw materials and energy production	4,463,458	1,530,950	1,554,290	1,313,734	49,423
Goods production	12,079,221	459,315	1,234,691	* 340,082	1,145,502
Distribution and transportation of goods	1,385,657	200,260	376,513	* 137,054	256,598
Information	* 1,038	0	0	0	* 112
Finance, insurance, real estate, and rental and leasing	4,186,392	238,028	4,010,540	12,437	3,156,161
Services	8,770,566	747,549	1,328,032	234,364	1,353,754

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Foreign corporations with (+) current earnings and profits before income taxes		Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation	Total Subpart F income
	Current earnings and profits before income taxes	Income taxes			
	(9)	(10)	(11)	(12)	(13)
BRAZIL [2]					
All industries	6,358,952	1,328,099	1,954,797	865,814	218,413
Raw materials and energy production	1,345,275	198,187	620,338	* 68,777	30,172
Goods production	3,232,469	709,479	788,664	471,197	88,913
Distribution and transportation of goods	668,694	129,386	136,749	100,614	35,556
Information	172,789	35,422	* 22,658	* 7,210	* 2,377
Finance, insurance, real estate, and rental and leasing	578,582	177,102	334,094	201,340	34,805
Services	352,225	77,911	52,295	16,675	26,590
CANADA [2]					
All industries	46,224,825	8,995,772	23,233,939	13,459,200	4,066,343
Raw materials and energy production	10,654,401	1,988,558	7,501,191	4,066,525	71,944
Goods production	14,996,967	3,043,630	8,880,302	6,426,140	1,960,987
Distribution and transportation of goods	5,184,457	1,539,915	1,313,221	475,082	551,075
Information	606,153	193,796	119,908	71,936	38,053
Finance, insurance, real estate, and rental and leasing	6,779,359	1,323,940	1,628,349	483,808	400,847
Services	7,994,903	903,564	3,790,901	1,935,643	1,042,879
CAYMAN ISLANDS [2]					
All industries	14,345,118	2,421,210	4,195,904	1,575,608	2,077,842
Raw materials and energy production	3,661,131	1,406,570	* 331,787	* 326,817	65,624
Goods production	2,846,150	183,854	1,100,078	986,118	141,697
Distribution and transportation of goods	389,349	16,945	* 7,804	* 166	64,030
Information	* 8,949	* 1,663	0	0	* 1
Finance, insurance, real estate, and rental and leasing	3,195,156	427,349	983,196	34,511	1,434,708
Services	4,241,820	384,828	1,773,040	227,996	371,451
CHILE [2]					
All industries	1,536,758	127,335	325,424	187,270	67,150
Raw materials and energy production	729,172	65,098	126,495	* 43,126	* 3,899
Goods production	309,645	20,317	72,011	* 65,082	* 15,233
Distribution and transportation of goods	144,806	16,906	* 18,592	* 10,373	* 7,406
Information	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	139,873	13,488	* 33,910	* 20,963	22,202
Services	180,612	8,089	57,445	31,477	18,410
CHINA [2]					
All industries	5,235,719	525,269	1,306,714	578,033	136,223
Raw materials and energy production	5,129	* 915	* 3,767	* 356	0
Goods production	3,855,598	350,059	1,071,867	447,443	111,690
Distribution and transportation of goods	750,982	81,578	90,900	52,027	14,757
Information	18,014	652	0	0	* 206
Finance, insurance, real estate, and rental and leasing	36,037	* 2,774	* 10,278	* 9,854	* 343
Services	563,802	89,149	129,903	68,353	9,227
COLOMBIA [2]					
All industries	607,796	164,746	103,527	66,773	15,397
Raw materials and energy production	d	d	d	d	d
Goods production	248,349	75,126	49,240	35,876	* 2,790
Distribution and transportation of goods	147,924	39,095	27,475	24,167	* 4,503
Information	3,057	* 2,534	* 735	0	* 178
Finance, insurance, real estate, and rental and leasing	162,976	39,775	* 20,540	* 5,820	* 7,206
Services	40,344	7,372	5,176	* 720	* 719
CZECH REPUBLIC [2]					
All industries	1,035,511	241,166	321,261	91,692	152,375
Raw materials and energy production	d	d	d	d	d
Goods production	630,560	146,608	197,998	* 9,353	92,717
Distribution and transportation of goods	115,034	32,280	35,466	* 9,433	* 3,647
Information	36,559	4,380	* 12,661	* 162	* 36,973
Finance, insurance, real estate, and rental and leasing	163,275	37,683	* 65,291	* 69,751	* 322
Services	68,967	17,603	9,845	* 2,992	* 18,715

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Foreign corporations with (+) current earnings and profits before income taxes		Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation	Total Subpart F income
	Current earnings and profits before income taxes	Income taxes			
	(9)	(10)	(11)	(12)	(13)
DENMARK [2]					
All industries	1,409,595	250,066	237,346	70,676	398,306
Raw materials and energy production	* 13,384	* 4,419	* 26,117	* 10,177	0
Goods production	376,848	59,955	98,367	* 36,919	42,698
Distribution and transportation of goods	180,670	45,300	29,111	* 13,438	10,916
Information	8,972	* 2,315	0	0	* 185
Finance, insurance, real estate, and rental and leasing	182,543	27,104	* 36,919	* 2,954	* 67,200
Services	640,068	108,915	46,831	* 7,188	277,306
FRANCE (incl. Corsica, Guadeloupe, Martinique, and Reunion) [2]					
All industries	14,059,756	2,463,041	4,348,845	1,139,646	842,512
Raw materials and energy production	27,011	15,894	* 2,694	* 2,628	* 1,476
Goods production	4,397,595	813,171	2,014,904	463,557	203,361
Distribution and transportation of goods	3,408,044	745,498	828,650	193,538	87,630
Information	1,158,551	44,412	35,841	* 1,437	16,963
Finance, insurance, real estate, and rental and leasing	1,831,718	337,948	270,876	* 27,196	367,959
Services	3,225,271	502,065	1,195,696	451,290	164,938
GERMANY [2]					
All industries	13,925,568	2,689,185	3,832,979	886,322	1,016,965
Raw materials and energy production	44,138	* 5,397	* 10,774	* 112	* 17,491
Goods production	5,597,394	1,120,646	1,696,336	166,543	526,336
Distribution and transportation of goods	2,093,137	467,572	624,275	282,202	84,554
Information	309,556	57,770	168,339	* 119,110	22,754
Finance, insurance, real estate, and rental and leasing	1,777,360	258,549	566,902	* 196,626	96,355
Services	4,094,203	776,915	766,353	121,730	269,475
HONG KONG [2]					
All industries	6,738,648	989,822	2,693,780	628,374	1,203,973
Raw materials and energy production	* 600,256	* 97,905	* 477,982	0	* 503
Goods production	691,334	71,097	275,619	72,187	121,786
Distribution and transportation of goods	1,877,238	255,716	746,596	118,925	645,679
Information	24,918	3,148	* 35,888	* 33,865	* 426
Finance, insurance, real estate, and rental and leasing	1,723,682	391,774	213,487	37,876	144,135
Services	1,818,647	169,684	944,208	365,521	290,027
HUNGARY [2]					
All industries	1,569,803	135,636	628,438	28,896	333,100
Raw materials and energy production	* 11,554	* 1,073	* 890	* 576	* 1,746
Goods production	1,062,084	48,201	542,478	* 2,383	282,170
Distribution and transportation of goods	95,177	32,101	24,502	* 22,426	* 539
Information	84,789	3,780	* 10,502	* 824	* 22,670
Finance, insurance, real estate, and rental and leasing	223,442	37,788	* 14,772	* 2,445	* 9,122
Services	92,757	12,694	* 35,294	* 243	* 16,853
INDIA [2]					
All industries	2,134,493	415,843	302,603	129,969	41,287
Raw materials and energy production	30,423	* 7,446	* 3,693	0	* 156
Goods production	844,404	225,324	150,287	88,866	11,342
Distribution and transportation of goods	189,799	60,012	41,189	* 2,989	1,195
Information	113,408	23,586	* 3,987	* 3,863	* 158
Finance, insurance, real estate, and rental and leasing	359,516	28,096	* 3,245	* 955	* 953
Services	596,539	71,256	100,201	33,296	27,482
IRELAND [2]					
All industries	24,780,059	1,600,975	8,775,730	5,123,253	3,464,728
Raw materials and energy production	* 6,106	* 35	0	0	0
Goods production	7,580,654	474,698	3,476,349	1,734,976	326,660
Distribution and transportation of goods	1,915,358	89,882	147,128	* 32,514	297,634
Information	2,596,558	175,379	* 3,463,312	* 3,165,365	* 146,044
Finance, insurance, real estate, and rental and leasing	3,798,851	239,450	711,898	* 145,841	1,636,810
Services	8,874,697	621,275	977,043	* 44,558	1,057,533

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Foreign corporations with (+) current earnings and profits before income taxes		Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation	Total Subpart F income
	Current earnings and profits before income taxes	Income taxes			
	(9)	(10)	(11)	(12)	(13)
ISRAEL [2]					
All industries	1,218,951	165,824	105,940	41,432	106,279
Raw materials and energy production	d	d	d	d	d
Goods production	799,459	114,046	74,012	* 26,572	52,831
Distribution and transportation of goods	48,757	11,279	* 21,009	* 11,031	* 2,275
Information	18,387	3,332	0	0	* 983
Finance, insurance, real estate, and rental and leasing	23,261	2,720	* 819	0	* 882
Services	327,302	34,957	* 10,099	* 3,829	* 49,309
ITALY [2]					
All industries	5,877,222	1,871,272	1,632,413	412,393	612,490
Raw materials and energy production	36,469	13,956	* 19,780	* 17,210	* 2,846
Goods production	3,265,399	998,085	974,399	169,896	435,645
Distribution and transportation of goods	1,096,106	395,887	406,141	148,690	55,901
Information	134,398	27,172	* 20,912	* 16,929	* 626
Finance, insurance, real estate, and rental and leasing	589,444	214,911	66,055	* 22,962	66,958
Services	753,920	220,722	145,125	36,706	49,330
JAPAN (including Okinawa and Ryukyu Islands) [2]					
All industries	17,628,786	4,877,307	5,034,687	1,288,008	2,186,605
Raw materials and energy production	* 18,080	* 7,412	* 8,362	* 83	0
Goods production	6,014,856	1,947,929	1,322,096	338,920	1,057,638
Distribution and transportation of goods	2,434,568	1,022,673	904,306	435,382	329,064
Information	613,238	217,413	231,267	* 150,574	* 11,176
Finance, insurance, real estate, and rental and leasing	5,747,009	847,428	1,775,539	138,801	376,423
Services	2,800,524	834,451	792,445	223,905	412,304
LUXEMBOURG [2]					
All industries	11,302,154	979,228	3,516,688	791,018	3,138,324
Raw materials and energy production	d	d	d	d	d
Goods production	1,719,693	386,916	498,297	* 58,469	415,893
Distribution and transportation of goods	4,741,633	44,044	* 1,775,830	* 140,609	* 2,056,829
Information	* 2,840	* 157	0	0	* 204
Finance, insurance, real estate, and rental and leasing	622,219	90,584	69,503	* 28,967	100,240
Services	4,139,014	430,775	1,157,058	546,972	565,158
MALAYSIA [2]					
All industries	1,843,494	250,101	539,639	299,381	120,450
Raw materials and energy production	17,679	* 1,405	* 6,973	* 1,248	* 2,514
Goods production	1,127,269	115,909	265,189	142,335	66,974
Distribution and transportation of goods	235,750	57,385	105,708	* 13,055	1,965
Information	8,878	* 1,809	* 6,512	* 6,017	* 260
Finance, insurance, real estate, and rental and leasing	195,360	51,471	* 24,486	* 20,012	* 7,550
Services	257,065	21,805	130,770	116,714	41,187
MEXICO [2]					
All industries	14,381,348	3,209,063	2,781,934	755,905	375,839
Raw materials and energy production	860,293	61,888	* 35,517	* 9,853	* 10,245
Goods production	5,239,858	1,463,298	1,002,121	424,189	151,355
Distribution and transportation of goods	2,257,139	564,199	636,011	71,832	53,980
Information	159,508	37,315	* 11,103	* 3,464	* 5,126
Finance, insurance, real estate, and rental and leasing	3,727,313	781,023	198,080	* 21,273	52,674
Services	2,134,347	299,999	899,101	225,295	102,458
NETHERLANDS [2]					
All industries	46,513,837	4,614,303	10,958,126	2,525,737	5,924,095
Raw materials and energy production	896,031	198,978	* 50,116	0	17,628
Goods production	24,685,386	2,313,987	4,156,138	858,852	1,240,013
Distribution and transportation of goods	4,202,470	544,360	334,733	67,254	300,023
Information	1,155,582	186,494	* 1,518,814	* 102,302	81,872
Finance, insurance, real estate, and rental and leasing	3,866,142	313,579	885,190	* 62,123	2,446,275
Services	11,707,642	1,056,728	4,013,134	1,435,206	1,838,284

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Foreign corporations with (+) current earnings and profits before income taxes		Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation	Total Subpart F income
	Current earnings and profits before income taxes	Income taxes			
	(9)	(10)	(11)	(12)	(13)
NEW ZEALAND [2]					
All industries	1,761,544	297,127	731,353	151,278	181,471
Raw materials and energy production	446,090	* 49,055	* 156,032	0	* 75,253
Goods production	507,793	72,782	255,965	* 30,948	* 4,051
Distribution and transportation of goods	237,815	85,057	109,035	86,565	5,751
Information	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	376,337	54,430	176,253	* 19,134	72,707
Services	158,244	25,157	30,094	* 11,216	19,530
NORWAY [2]					
All industries	3,339,339	2,090,470	681,304	546,936	32,603
Raw materials and energy production	2,787,379	* 1,964,548	* 583,155	* 502,612	* 15,107
Goods production	246,610	35,834	* 6,295	* 1,926	* 4,533
Distribution and transportation of goods	173,172	40,035	68,791	34,787	2,382
Information	* 2,305	* 176	* 3,866	* 3,866	* 154
Finance, insurance, real estate, and rental and leasing	11,820	* 1,481	* 260	0	* 5,845
Services	117,748	48,364	18,937	* 3,745	4,478
PHILIPPINES [2]					
All industries	1,582,462	205,872	811,651	203,068	60,788
Raw materials and energy production	411,117	59,699	453,365	* 361	* 2,175
Goods production	425,317	79,511	83,263	76,810	18,509
Distribution and transportation of goods	94,563	26,276	72,048	* 12,720	* 32
Information	* 26,745	* 533	* 452	* 450	* 6,380
Finance, insurance, real estate, and rental and leasing	416,530	26,966	111,511	* 62,059	* 27,668
Services	207,951	12,887	91,011	* 50,668	* 6,022
POLAND					
All industries	1,843,817	302,263	795,802	394,049	88,418
Raw materials and energy production	13,472	* 475	* 29	0	* 102
Goods production	1,066,060	167,258	437,379	99,605	44,775
Distribution and transportation of goods	195,656	40,022	21,419	* 2,079	2,897
Information	52,720	6,767	* 60,460	* 27,547	* 26,195
Finance, insurance, real estate, and rental and leasing	401,089	60,221	* 250,903	* 243,606	* 12,246
Services	114,821	27,520	25,612	* 21,212	* 2,204
PORTUGAL (including Azores) [2]					
All industries	1,896,057	338,251	439,115	45,350	683,216
Raw materials and energy production	d	d	d	d	d
Goods production	429,894	96,006	214,302	* 5,192	51,985
Distribution and transportation of goods	281,297	42,563	65,686	* 2,559	* 125,930
Information	50,534	10,327	* 17,137	* 9,014	* 647
Finance, insurance, real estate, and rental and leasing	65,913	14,679	* 2,358	0	* 2,710
Services	1,067,555	174,413	126,846	* 28,584	501,944
PUERTO RICO [2]					
All industries	2,996,452	264,567	592,756	266,746	159,212
Raw materials and energy production	d	d	d	d	d
Goods production	1,713,343	60,017	* 49,301	* 28,330	* 30,589
Distribution and transportation of goods	665,486	92,964	* 145,197	* 118,972	* 10,543
Information	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	317,123	63,184	192,357	* 68,580	10,727
Services	203,676	21,395	192,132	* 41,397	* 106,700
RUSSIA [2]					
All industries	1,139,674	235,689	284,510	52,223	* 10,554
Raw materials and energy production	d	d	d	d	d
Goods production	249,960	56,445	* 10,073	* 4,845	* 736
Distribution and transportation of goods	414,065	79,359	* 208,732	* 19,440	* 9,811
Information	273,577	61,512	17,375	* 10,417	0
Finance, insurance, real estate, and rental and leasing	23,502	2,157	0	0	* 7
Services	147,861	36,244	* 24,837	* 3,350	0

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Foreign corporations with (+) current earnings and profits before income taxes		Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation	Total Subpart F income
	Current earnings and profits before income taxes	Income taxes			
	(9)	(10)	(11)	(12)	(13)
SINGAPORE [2]					
All industries	5,698,601	560,961	1,579,545	649,335	659,632
Raw materials and energy production	15,061	7,036	* 6,958	* 6,958	* 3,149
Goods production	2,038,159	175,973	893,128	486,513	244,562
Distribution and transportation of goods	1,165,392	148,177	131,076	28,816	288,834
Information	112,824	11,463	* 39,067	* 38,427	* 6,908
Finance, insurance, real estate, and rental and leasing	833,025	114,834	19,641	* 3,192	42,479
Services	1,533,293	103,360	489,674	85,428	72,970
SOUTH AFRICA [2]					
All industries	2,021,424	524,721	481,803	173,203	53,877
Raw materials and energy production	* 57,570	* 294	0	0	0
Goods production	1,123,299	333,443	194,260	121,627	21,695
Distribution and transportation of goods	316,154	78,908	78,376	* 36,035	11,826
Information	62,719	17,582	* 24,214	* 243	* 3,606
Finance, insurance, real estate, and rental and leasing	182,850	41,624	76,962	* 2,559	* 2,241
Services	278,344	52,870	107,991	12,739	14,509
SOUTH KOREA [2]					
All industries	4,945,594	1,077,170	1,123,974	529,885	271,969
Raw materials and energy production	* 84,558	* 13,044	* 46,765	0	* 184
Goods production	2,907,405	640,782	734,954	277,113	117,722
Distribution and transportation of goods	721,961	198,508	205,722	176,560	35,596
Information	172,770	88,507	* 49,370	* 49,140	* 3,983
Finance, insurance, real estate, and rental and leasing	744,531	73,596	* 6,845	* 6,631	98,128
Services	310,455	62,301	80,319	20,441	16,355
SPAIN (including Canary Islands) [2]					
All industries	9,548,466	3,303,285	2,857,068	1,026,537	790,161
Raw materials and energy production	65,680	11,083	* 88,550	* 6,802	* 115
Goods production	3,285,510	673,404	828,255	172,967	169,120
Distribution and transportation of goods	3,103,738	1,651,435	901,373	214,404	538,407
Information	196,367	54,395	113,690	* 95,638	* 2,080
Finance, insurance, real estate, and rental and leasing	506,182	99,308	106,549	* 13,774	12,663
Services	2,390,110	813,476	818,650	522,951	67,777
SWEDEN [2]					
All industries	3,191,588	254,249	451,665	133,088	190,846
Raw materials and energy production	* 683	* 249	0	0	* 95
Goods production	1,416,856	80,594	109,952	* 21,281	42,231
Distribution and transportation of goods	213,472	49,909	76,188	38,888	34,833
Information	59,574	4,659	* 17,421	* 16,101	* 11,359
Finance, insurance, real estate, and rental and leasing	744,400	56,300	107,630	* 26,498	35,109
Services	753,625	62,264	140,465	30,319	67,209
SWITZERLAND [2]					
All industries	18,342,079	1,407,976	6,558,563	384,310	3,187,457
Raw materials and energy production	* 131,606	* 6,173	* 100,701	0	* 85,768
Goods production	5,337,094	563,552	1,866,310	124,509	1,070,656
Distribution and transportation of goods	5,182,672	394,068	1,512,039	64,532	1,091,301
Information	542,566	25,566	51,011	* 32,443	* 8,906
Finance, insurance, real estate, and rental and leasing	615,015	90,060	248,246	* 135,073	127,927
Services	6,532,808	328,504	2,780,257	27,753	802,899
TAIWAN [2]					
All industries	2,955,503	458,330	733,081	309,421	48,151
Raw materials and energy production	d	d	d	d	d
Goods production	1,427,934	231,866	322,869	230,782	35,677
Distribution and transportation of goods	354,817	95,071	108,991	* 62,866	* 3,179
Information	* 9,827	* 2,596	* 3,739	* 3,715	0
Finance, insurance, real estate, and rental and leasing	949,066	74,766	* 210,456	* 674	* 6,355
Services	213,703	54,030	87,026	11,384	* 2,939

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Foreign corporations with (+) current earnings and profits before income taxes		Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation	Total Subpart F income
	Current earnings and profits before income taxes	Income taxes			
	(9)	(10)	(11)	(12)	(13)
THAILAND [2]					
All industries	1,947,203	281,104	441,712	163,300	102,703
Raw materials and energy production	* 143,831	* 57,225	* 30,055	* 13,955	* 162
Goods production	1,154,679	74,038	276,943	57,125	* 97,149
Distribution and transportation of goods	321,445	67,530	78,646	50,857	3,766
Information	* 4,641	* 901	* 555	* 565	* 168
Finance, insurance, real estate, and rental and leasing	167,621	51,321	17,205	* 12,843	* 1,223
Services	153,126	29,893	38,308	27,956	* 235
UNITED KINGDOM AND NORTHERN IRELAND (including Gibraltar) [2]					
All industries	50,517,786	7,031,050	17,845,878	4,409,066	4,520,656
Raw materials and energy production	2,904,037	604,674	1,988,335	* 1,433,655	93,925
Goods production	7,277,964	1,217,781	2,832,461	815,106	783,144
Distribution and transportation of goods	5,474,769	912,964	1,621,836	449,371	465,876
Information	1,918,656	325,723	426,685	76,574	149,869
Finance, insurance, real estate, and rental and leasing	18,175,107	2,232,485	5,486,115	721,233	1,385,424
Services	14,751,338	1,734,910	5,472,791	913,126	1,641,273
VENEZUELA [2]					
All industries	2,825,365	444,830	1,467,625	532,856	59,790
Raw materials and energy production	376,205	52,958	* 169,954	0	* 25,216
Goods production	1,338,808	221,681	711,573	148,673	7,734
Distribution and transportation of goods	275,610	50,214	21,066	* 14,162	7,730
Information	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	88,265	14,305	* 28,447	* 26,498	* 377
Services	537,730	25,484	415,698	* 342,945	9,658
EUROPEAN UNION, TOTAL [2]					
All industries	194,478,228	27,613,398	58,594,038	17,795,692	22,789,759
Raw materials and energy production	4,175,545	889,170	2,278,115	1,497,786	167,865
Goods production	65,323,901	9,157,011	19,030,499	5,010,025	4,924,203
Distribution and transportation of goods	28,407,380	5,460,880	7,096,482	1,655,388	4,140,863
Information	8,118,165	930,387	5,979,778	3,725,136	544,852
Finance, insurance, real estate, and rental and leasing	33,975,854	4,278,236	8,773,986	1,572,072	6,359,074
Services	54,410,639	6,883,899	15,417,331	4,335,284	6,650,333
OPEC COUNTRIES, TOTAL [2]					
All industries	5,246,705	999,286	2,296,100	751,248	103,284
Raw materials and energy production	1,932,938	421,790	736,083	* 73,085	* 26,723
Goods production	1,604,129	288,142	842,137	230,886	15,061
Distribution and transportation of goods	508,974	75,020	52,122	27,704	29,602
Information	210,975	81,103	* 120,886	* 578	* 9,922
Finance, insurance, real estate, and rental and leasing	324,587	77,523	90,202	* 50,362	* 4,408
Services	663,739	55,517	454,670	368,633	16,706

d—Not shown to avoid disclosure of information on specific corporations. However, the data are included in the appropriate totals.

* Data should be used with caution because of the small number of returns on which they are based.

[1] Number of returns is not additive because some U.S. corporations had Controlled Foreign Corporations in more than one industrial sector. The industrial activity of the parent corporation filing the return often differs from that of the Controlled Foreign Corporations.

[2] Includes "Nature of business not allocable," not shown separately.

NOTE: Detail may not add to totals because of rounding and because data are shown for selected countries only.