

# Section 5

## Explanation of Terms

**T**his section defines the terms used in the tables, including adjustments made in preparing the statistics and limitations in the data. Explanations are designed to aid the user with interpreting the report's statistical content and should not be construed as interpretations of the Internal Revenue Code or policies of the Internal Revenue Service. Code sections cited are those in effect for the tax years covered in this report. The tax year refers to the calendar year, unless otherwise stated. The line references given for the terms correspond to Form 1120, *U.S. Corporation Income Tax Return*, unless otherwise indicated. In most tables, items taken from other forms (1120-L, 1120-F, etc.) and attached schedules conform to Form 1120 format. Although many standardizing adjustments were made, the data presented are unaudited as reported by taxpayers and are, therefore, subject to taxpayer errors and misinterpretations, as well as statistical variability and any errors that may have arisen during processing. (See "Data Limitations and Measures of Variability," Section 3.) Definitions marked with the symbol  $\Delta$  have been revised for 2015 to reflect changes in the law.

### Accounting Periods

Data were classified according to the ending dates of the accounting periods covered by the corporations' income tax returns. Returns were generally filed covering an annual accounting period; most larger corporations filed returns for accounting periods ending in December (a calendar year period). Some corporations filed "part-year returns," which cover a shorter accounting period (less than 1 year). Corporations filed part-year returns because of business organizations or reorganizations, mergers, liquidations, or changes to accounting periods. The statistics include income and tax data from part-year returns, but do not include balance sheet data. (See "Balance Sheets.")

Figure D in Section 1 shows the number of returns filed for each accounting period covered in this report. For a discussion of this classification, see "Time Period Employed" in Section 1, Introduction.

### Accounts Payable

[Page 5, Schedule L, Line 16(d)]

This balance sheet account consists of relatively short-term liabilities arising from the conduct of trade or business and not secured by promissory notes.

### Additional Inventory (Section 263A) Costs

[Form 1125-A, Line 4]

This component of cost of goods sold includes certain inventory costs capitalized by taxpayers using a simplified method of accounting under the uniform capitalization rules of Code section 263A. However, the statistics found here do not follow the uniform capitalization rules with respect to several deduction items. These rules require certain accrued expenses, such as depreciation, to be capitalized. These accrued expenses are included as current deductions whenever they could be identified. (See "Cost of Goods Sold.")

### Additional Paid-In Capital

[Page 5, Schedule L, Line 23(d)]

This corporate balance sheet item consists of additions to capital from sources other than earnings. These sources include receipts from the sale of capital stock in excess of stated value, stock redemptions or conversions, and similar transactions. The amounts shown are after any negative amounts were deducted.

### Adjustments to Shareholders' Equity

[Page 5, Schedule L, Line 26(d)]

See "Retained Earnings, Unappropriated."

### Advertising

[Page 1, Line 22]

Code section 162(a) allowed advertising expenses as a deduction if they were ordinary, necessary, and bore a reasonable relationship to the corporation's trade or business. Under Code section 263A, these expenses include advertising identified as part of the cost of goods sold or capitalized, and advertising reported separately as a business deduction. Also included are combined advertising expenses, such as advertising and

promotion, and advertising and publicity. Excluded from the data were the costs incurred by publishers, broadcasters, and similar businesses in preparing advertisements for others. These were generally treated as part of the cost of goods sold.

### Allowance for Bad Debts

[Page 5, Schedule L, Line 2b(c)]

This balance sheet account was the allowance or reserve set aside to cover uncollectable or doubtful notes, accounts, and loans usually shown on Form 1120 as an adjustment to notes and accounts receivable. A few corporations, however, reported only net receivables and thus did not show their allowance for bad debts. Many banks and savings and loan associations included reserves for uncollectable mortgages and real estate loans in the allowance for bad debts. These amounts were transferred to this item if they were identified on supporting schedules during statistical processing.

The allowance for bad debts was a book account not necessarily related to the deduction for bad debts allowed for tax purposes. (See “Bad Debts.”)

### Alternative Minimum Tax

[Page 3, Schedule J, Line 3]

The alternative minimum tax (AMT) was designed to ensure that a minimum amount of income tax is paid, regardless of the legitimate use of exclusions, deductions, and credits. In effect, the AMT provides a second tax system by curtailing or eliminating many of the means of reducing taxes allowed in the regular tax system, and taxes the resulting “alternative” taxable income at a reduced rate. Small corporations (as defined in the Form 4626 instructions) are not subject to the AMT.

The basic computation of the AMT involves recomputing taxable income from the regular tax by adding or subtracting items allowable in both systems, but in different tax years or under different rules (“adjustment items”), adding back deductions not allowed under the minimum tax (“tax preference items”), and adding or subtracting items from the corporation’s books that had not been accounted for elsewhere (the “adjusted current earnings” computation). A net operating loss deduction, computed using the AMT rules for what constitutes a loss, was allowed.

Most of the following adjustment and preference items could be either additions or subtractions in computing alternative minimum taxable income (AMTI). The few exceptions are noted.

- (1) **Depreciation of property placed in service after 1986.** This was the difference between the accelerated depreciation allowed under the regular tax rules and the slower depreciation allowed under the AMT. Generally, the adjustment increased AMTI in the early years of a property’s life and decreased it in later

years. Certain types of property were exempt from refiguring depreciation for AMT purposes.

- (2) **Amortization of certified pollution control facilities.** This was the difference between the rapid amortization of pollution control facilities allowed under the regular tax, and the deduction under the depreciation system used for the AMT.
- (3) **Amortization of mining exploration and development costs.** This was the difference between the regular tax deduction allowed for these expenses and by AMT rules, which required expenses to be capitalized and amortized over 10 years.
- (4) **Amortization of circulation expenses.** This applies to personal holding companies only and was the difference between the regular tax deduction, which allowed these expenses, and the AMT requirement that they be capitalized and deducted ratably over a 3-year period.
- (5) **Adjusted gain or loss.** Because many of the differences between the regular tax and the AMT affect the calculation of property’s basis for determining gain or loss from its sale or exchange, gain or loss had to be recomputed for AMT purposes. This item is the difference (positive or negative) between the two, gains or losses.
- (6) **Long-term contracts.** Long-term contracts, except some home construction contracts, were required to use the percentage-of-completion method to determine current income for the AMT. This item was the difference between the current year’s income from the contract under this method, and the methods allowed for the regular tax.
- (7) **Merchant marine capital construction funds.** For the regular tax, some maritime companies were allowed to deduct profits deposited in a fund for constructing new ships. Neither the fund nor the interest it earned was taxed until the money was withdrawn. This deferral was not allowed under the AMT and any such deductions or interest had to be included in AMTI.
- (8) **Section 833(b) deduction.** Under this section of the Internal Revenue Code, certain health insurers were allowed a special deduction from regular taxable income that was not allowed for AMT purposes and was, therefore, added into the AMT calculation. This item was a current year deduction.
- (9) **Tax shelter farm activities.** This applied to only to personal service corporations with non-passive farming operations that were “tax shelters” and was the difference between farm gains and losses computed under the regular tax rules and those computed using all the AMT accounting rules.

- (10) **Passive activities.** This applied to closely held and personal service corporations only and was the difference between gains and losses from passive activities as reported for regular tax purposes and as recomputed using AMT accounting rules.
- (11) **Loss limitations.** This was the difference between gains and losses computed under the different rules of the regular tax and AMT systems, where the at-risk and partnership limitations applied in the regular tax.
- (12) **Depletion.** The depletion deduction under both the regular tax and the AMT was limited by the net income from the depletable property if percentage depletion was used. In addition, depletion under the AMT was limited to a taxpayer's basis in the property. This item is the difference between depletion figured under the regular tax rules and depletion limited by AMT net income and the AMT basis limitation.
- (13) **Tax-exempt interest from private activity bonds.** Interest from private activity bonds issued after August 7, 1986, used to finance private activity that was still tax exempt under the special exceptions in the regular tax was subject to the AMT and so was an addition to AMTI. There are various bonds excluded from this rule. Those bonds are defined in the instructions for Form 4626.
- (14) **Intangible drilling costs.** Generally, some of the intangible drilling costs for oil, gas, and geothermal wells deductible as current expenses for the regular tax, had to be capitalized and written off over 10 years for the AMT. If the difference between the two systems exceeded 65 percent of the net income from the properties, the excess was included in AMTI.
- (15) **Other adjustments.** This item covered necessary adjustments to allow for changes made to limitation amounts by AMT calculations. The various allowable entries are defined in the Form 4626, *Alternative Minimum Tax*, instructions.

After all adjustments and preferences had been included in AMTI, a catchall adjustment, called the “**Adjusted current earnings (ACE) adjustment after excess**” was added to or subtracted from the income base. The ACE adjustment considered those items for which tax treatment offered tax advantages but were not otherwise included in the AMT (such as tax-exempt interest). The “excess” (if any) was the corporation's total increase in AMTI from the prior year ACE adjustment over its total reductions in AMTI from prior ACE adjustments.

## Amortization

Amortization is a deduction for the recovery of the costs of long-lived intangible assets similar to the depreciation deduction to recover the costs of tangible assets. It is also used in the IR Code for recovering the costs of some tangible assets, usually as a tax preference for those assets. Most amortization is calculated on a straight-line basis over recovery periods

specified in the Code. Although amortization is not a line item on the tax return, for statistical purposes, specific types of amortization were edited from attached schedules (for other costs or other deductions, for example) and included in this item in the tables. Because it is not a separate line item, the statistics for this item may be less reliable than for other deduction items.

Taxpayers also reported amortization by the following specific type on Form 4562:

- (1) **Section 197 intangibles.** Purchased goodwill and other “going concern” intangibles, customer-based intangibles, licenses, franchises, and most other purchased intangible assets not included elsewhere were amortizable over a 15-year period.
- (2) **Pollution control facilities (section 169).** Twenty percent of the basis of depreciable property used to reduce pollution could be written off over 5 years instead of being depreciated.
- (3) **Bond premiums (section 171).** Premiums on bonds acquired before 1988 were amortized over the life of the bond. For bonds acquired after 1987, the pro-rata bond premium was an offset to the interest earned and was not included here.
- (4) **Research and experimental expenditures (section 174).** Taxpayers can elect to amortize their research and experimental costs, deduct them as current business expenses, or write them off over a 10-year period. If they elect to amortize these costs, the taxpayer should deduct them in equal amounts over 5 years or more.
- (5) **Lease acquisition costs (section 178).** Such costs could be amortized over the term of the lease.
- (6) **Qualified reforestation expenses (section 194).** Taxpayers can elect to amortize up to \$10,000 (or \$5,000 if married and filing separately) of reforestation costs either paid or incurred before October 22, 2004, for qualified timber property over a 7-year period.
- (7) **Qualified revitalization expenditures (section 1400I).** Certain capital expenditures related to a qualified revitalization building, which is located in an area designated as a renewal community.
- (8) **Business start-up expenditures (section 195).** For costs either paid or incurred before October 23, 2004, taxpayers could elect an amortization period of 5 years or more. For costs paid or incurred after October 22, 2004, taxpayers could elect to deduct a limited amount of start-up costs. Costs not deducted currently could be amortized ratably over a 15-year period.
- (9) **Organizational expenditures of corporations (section 248).** As with business start-up expenditures, for costs paid or incurred before October 23, 2004, taxpayers could elect an amortization period of 5 years or more. For costs paid or incurred after October 22,

2004, taxpayers could elect to deduct a limited amount of organizational costs. Costs not deducted currently could be amortized ratably over a 15-year period.

- (10) **Optional write-off of certain tax preferences (section 59(e)).** Taxpayers could avoid including some tax preference items in the minimum tax by electing to capitalize and amortize rather than deduct expenses. These options included 3-year amortization of circulation expenses (Code section 173), 10-year amortization of research and experimental expenditures (Code section 174), 5-year amortization of intangible drilling costs (section 263) (but, see below), and 10-year amortization of mining exploration and development expenses (sections 616 and 617).

Amortization of intangible drilling costs was excluded from this heading when it could be identified; instead, it was included in “Other deductions” in the statistics.

### Amount Owed at Time of Filing

[Page 1, Line 34]

See “Overpayment or Amount Owed.”

### Bad Debts

[Page 1, Line 15]

Bad debts incurred during the tax year were allowed as a deduction under Code section 166. For most businesses, the deduction was allowed only for debts written off as uncollectable. Additions to reserves, even as the taxpayer’s normal method of accounting for bad debts, were not deductible. However, “small” banks with total assets of \$500,000,000 or less were allowed to deduct additions to bad debt reserves under Code section 585 based on their own experience of bad debt losses.

### Balance Sheets

[Page 5, Schedule L]

Balance sheet data are the amounts reported by the taxpayer (when available) as of the end of the taxpayer’s accounting year. Taxpayers were instructed to provide data that agreed with their books of account but were given few other guidelines. Thus, the statistics for balance sheets contain considerably more reporting variability than those for income statement and tax computation items. These were the subject of more detailed instructions and more intense scrutiny during IRS processing. Beginning in Tax Year 2002, corporations with less than \$250,000 in total receipts, and less than \$250,000 in total assets at the end of the tax year, were not required to file Schedule L.

Since balance sheet data were from the taxpayers’ books, they were generally governed by general accounting principles rather than the special rules of tax accounting. Where these rules diverged significantly, balance sheet statistics could show little relationship to the income statement accounts. Inventories, accumulated depletion, depreciation,

amortization, accrued tax, other liability accounts, and other capitalized items were often recorded on different bases for tax and book purposes.

Several steps were taken during statistical processing to reduce the variability due to taxpayer reporting practices. Misreported amounts were transferred to their proper accounts; amounts from attached schedules were edited into the Schedule L format; and missing balance sheets were either supplied from reference books (if possible), or statistically imputed based on other data on the return and the company’s characteristics.

Some balance sheets were suppressed (or not imputed) during statistical processing. (These companies appear in the tables in the “zero-assets” category.) Except for foreign insurance companies, which are required to report U.S. assets segregated from foreign ones, the balance sheets of foreign corporations were excluded from the data because it is not possible to separate U.S. assets from foreign ones. Final returns of corporations going out of existence were not permitted balance sheets, because they should have either had zero assets (if liquidating) or assets included in some other corporation’s return (if merging). And, balance sheet data were not included from most part-year returns, because the same company’s end-of-year data could have been subject to inclusion from its complete return.

### Branch Profits Tax

[Form 1120-F, Page 1, Line 3]

This was an additional tax imposed under Code section 884 on after-income-tax U.S. earnings and profits of a foreign corporation that were not invested in a U.S. trade or business. The tax also applied to certain interest payments from income earned in U.S. operations. The provisions were designed to impose a tax on foreign companies’ branches similar to the withholding tax on dividends and interest imposed on foreign-owned subsidiaries incorporated in the U.S. Like the withholding tax, the rate was set in the law at 30 percent, but this rate only applied if the U.S. had no tax treaty setting a different rate (which could be zero) with the companies’ home country.

The branch profits tax was imposed on the “dividend equivalent” amount of earnings and profits of a U.S. branch of a foreign corporation that was attributable to its income effectively connected (or treated as effectively connected under Code section 897) with a U.S. trade or business. The effectively connected earnings and profits were: (1) reduced to reflect any reinvestment of the branch’s earnings in assets in the U.S. trade or business (or reduce liabilities in the U.S. trade or business), and (2) increased to reflect any prior reinvested earnings considered remitted to the home office of the foreign corporation.

Certain earnings and profits attributable to income effectively connected with a U.S. trade or business were exempt from the branch profits tax. These tax-exempt earnings

included: (1) certain earnings under Code sections 921(d) and 926(B) of a foreign sales corporation; (2) foreign transportation carriers (such as ships and aircraft) exempt from U.S. tax by reciprocal exemption; (3) earnings derived from the sale of any interest in U.S. real property holding corporations; (4) interest income derived by a possession bank from U.S. obligations as described in Code section 882(e); (5) earnings derived by certain insurance companies electing to treat income as effectively connected income; and (6) foreign governments and international organizations exempt under Code section 892.

The branch profits tax is the sum of the tax imposed on the earnings, profits, and interest payments of the foreign corporation. The branch tax was reported on Form 1120-F, *U.S. Income Tax Return of a Foreign Corporation*. The tax was included in total income tax in the statistics. It is also shown separately in Table 11.

### Business Receipts

[Page 1, Line 1(c)]

Business receipts are the gross operating receipts of the corporation reduced by the cost of returned goods and allowances. Generally, they represent all of a corporation's receipts except investment and incidental income. Business receipts may also include sales and excise taxes that were included in the sales price of products; some corporations reported this way, while others reported their receipts after adjustment for these taxes.

Business receipts include rents reported by real estate operators and other corporations for which rent made up a significant portion of income. The latter included manufacturers that rented their products, lessors of docks, warehouses, pipelines, and other public utility facilities, and companies engaged in rental services, such as providing lodging places and automobile or clothing rentals.

For banks and other financial institutions whose principal income was interest, business receipts, consisting of fees, commissions, credit card income, and other operating receipts as principal income, was reported under that heading and included in the statistics. Banks' business receipts also included profit from Federal funds transactions. If the bank reported gross sales and purchases, the amounts were netted during statistical processing. Likewise, security dealers included profit from security trades in business receipts. If the gross amounts were reported, costs and sales proceeds were netted during statistical processing. Regulated investment companies and real estate investment trusts did not report business receipts; all their income was included in the investment income categories in the statistics.

Business receipts for insurance companies consisted of premium income. Some small property and casualty insurance companies, however, could elect to be taxed only on investment income and thus would have reported no business receipts. Other, smaller companies were exempt from tax altogether.

Property and casualty insurance companies with premium income of \$1,200,000 or less could elect (under Code section 831(b)(2)) to be taxed on only investment income. Companies with premiums of \$600,000 or less were exempt from tax under Code section 501(c)(15).

For all industries, business receipts excluded gains from the sale of assets. See "Net Gain (or Loss), Noncapital Assets" and "Net Capital Gains."

### Capital Gains Tax (1120-RIC)

[Form 1120-RIC, Page 2, Schedule J, Line 2b]

Regulated investment companies (RIC) that did not distribute all capital gains to shareholders were taxed at the regular corporate rates of 35 percent only on the undistributed gain for nonqualified timber gain. If the RIC was in a partnership with a net gain, and received a distributive share of a qualified timber gain from the partnership for the period before May 2009, then the RIC may be eligible for an alternative tax rate on the portion of taxable income attributable to the qualified timber gain. This tax is a component of "Total Income Tax Before Credits."

### Capital Stock

[Page 5, Schedule L, Line 22(d)]

This end-of-year balance sheet equity item includes amounts shown for outstanding shares of both common and preferred stock.

### Cash

[Page 5, Schedule L, Line 1(d)]

This balance sheet asset item includes the amount of actual money or instruments and claims that were usable and acceptable as money on hand at the end of the taxable year, including certificates of deposit.

### Charitable Contributions Δ

[Page 1, Line 19]

Contributions or gifts to charitable, religious, educational, and similar organizations were deductible under Code section 170(c). In general, the deduction was limited to 10 percent of taxable income computed without regard to:

- (1) the deduction for contributions;
- (2) special deductions for dividends received and for dividends paid on certain preferred stock of public utilities;
- (3) any net operating loss carryback under Code section 172;
- (4) any capital loss carryback to the tax year under Code section 1212(a)(1);
- (5) the deduction of bond premium on repurchase under Code section 249; and
- (6) The deduction for domestic production activities under Code section 199.

Charitable contributions over the 10-percent limitation could be carried forward to the next 5 tax years; however, the carryover was not allowed if it increased a net operating loss carryover.

A corporation could receive a larger deduction for contributing scientific property used for the care of the ill, needy, or infants, or for research to an institution of higher education. These applied to all except personal holding companies and corporations whose businesses were the performance of services, and for contributions of computer technology and equipment to schools (under section 170(e)). Regulated investment companies and real estate investment trusts did not report contributions. Contributions made by S corporations were passed through to the shareholders to be deducted on the shareholders' returns.

The amount shown in the statistics includes contributions identified as part of cost of goods sold or capitalized under section 263A. It also includes contributions reported as a business deduction.

## Compensation of Officers $\Delta$

[Page 1, Line 12]

Salaries, wages, stock bonuses, bonds, and other forms of compensation were included in this deduction item if they were identified as having been paid to officers for personal services rendered. It did not include qualified deferred compensation, such as contributions to a 401(k) plan or a salary reduction agreement, which were included in the statistics for pensions and profit-sharing plans. The item included amounts reported as a part of cost of goods sold or capitalized under section 263A.

The deductible compensation of certain officers of publicly held corporations was limited under Code section 162(m) to \$1,000,000 or less, except for covered health providers, which were limited by the provisions of the Affordable Care Act to \$500,000. However, the limit did not apply to commissions or other compensation based on performance, or if the officer worked under a binding contract in effect on February 17, 1993.

## Consolidated Returns

Consolidated income tax returns contained combined financial data for two or more corporations. All corporations on the return had to meet the following requirements: (1) a common parent corporation owned at least 80 percent of the voting power of all classes of stock, and at least 80 percent of each class of nonvoting stock (except stock which was limited and preferred as to dividends) of at least one member of the group, and (2) these same proportions of stock of each group member were owned within the group.

Corporations electing to file consolidated returns in one year had to also file consolidated returns in subsequent years, with certain exceptions. The consolidated filing privilege

could be granted to all affiliated domestic corporations connected through stock ownership with a common parent corporation except: (1) regulated investment companies (RICs); (2) real estate investment trusts (REITs) that did not consolidate with qualified REIT subsidiaries; (3) corporations designated tax-exempt under Code section 501; (4) Interest Charge Domestic International Sales Corporations (IC-DISCs), and (5) S Corporations.

Under Code section 1504(c), life insurance companies could file consolidated returns with other life insurance companies without restriction. Also, a nonlife insurance parent could include a life insurance subsidiary subject to certain restrictions (e.g., the insurance company must have been a member of the controlled group for at least 5 years).

A consolidated return filed by the common parent company was treated as a unit and each statistical classification was determined based on the combined data of the affiliated group. Therefore, filing changes to or from a consolidated return basis affected year-to-year comparability of certain statistics, including data classified by industry and size of total assets.

## Constructive Taxable Income from Related Foreign Corporations

This item was the sum of (1) income from controlled foreign corporations under subpart F and (2) foreign dividend gross-up. Includable income was the income of U.S.-owned foreign corporations that was taxable to their U.S. shareholders under Code sections 951-964 ("Subpart F"). Foreign dividend gross-up was an amount equal to the foreign tax deemed paid by the foreign corporation that U.S. shareholders could claim as a foreign tax credit. A CFC was one in which more than 50 percent of the voting stock was controlled by U.S. persons, including domestic corporations, with ownership of at least 10 percent of the voting stock. Any U.S. shareholder owning 10 percent or more of the stock was required to include a share of the includable income and dividend gross-up in taxable income.

Data from foreign dividend gross-up and includable income from controlled foreign corporations were combined into constructive taxable income from related foreign corporations. These components are presented separately in Table 11. Neither includable income from controlled foreign corporations nor foreign dividend gross-up was included in the statistics for Total Receipts.

## Income from controlled foreign corporations under subpart F

[Page 2, Schedule C, Line 14(a)]

Generally, the earnings and profits of a controlled foreign corporation (CFC) were subject to U.S. taxation only when the income was distributed to U.S. shareholders or repatriated to the United States. The Subpart F provisions of the Code created an exception to this general rule by requiring

that some types of foreign income be included in the income of the U.S. shareholders even if not distributed. The types of income involved are either passive investment income, income from sources thought especially easy to shift between tax jurisdictions, or income from sources contrary to public policy.

Includable income consisted of:

- (1) Subpart F income, defined below;
- (2) any previously excluded Subpart F income which had been invested in qualified assets in less developed countries, and which was either withdrawn from those countries or repatriated to the U.S. shareholders and therefore became taxable;
- (3) any previously excluded Subpart F income which had been withdrawn from foreign base company shipping operations;
- (4) any increase in Controlled Foreign Corporation earnings due to investment in U.S. property; and
- (5) factoring income, or income that arose from the sale or transfer of a receivable.

Subpart F income, defined in Code section 952, included:

- (1) income from issuing (or reinsuring) an insurance or annuity contract that would otherwise be taxed under Subchapter L of the IR code if that income had been from a domestic insurance company;
- (2) "foreign base company income," which included several types of income derived from passive investments or from transactions outside the CFC's country of incorporation;
- (3) income from participation in international boycotts not sanctioned by the United States;
- (4) illegal bribes, kickbacks, or other payments to a government official; and
- (5) income derived from any foreign country during any period for which a foreign tax credit would be denied for taxes paid to those countries, as described in Code section 901(j) (i.e., a government not recognized by the United States, with which the United States had severed or did not conduct diplomatic relations, or a government that provided support for international terrorism).

### Foreign Dividend Gross-Up

[Page 2, Schedule C, Line 15(a)]

This item is dividend income resulting from foreign taxes deemed paid. It is constructive taxable income to corporations that claimed a foreign tax credit. A U.S. corporation could claim a foreign tax credit for a share of the foreign taxes actually paid by its related foreign corporations, including its controlled foreign corporations. The U.S. corporation's share of the foreign taxes depended on the ratio of the dividends and includable income it received to the total earnings and profits of the related foreign corporation. The foreign taxes were

treated as deemed paid by the U.S. corporation. For the corporation to receive credit against its U.S. tax liability, the foreign taxes deemed paid needed to be included in the corporation's worldwide income as well. They were included in income as an increase to foreign dividends, called a dividend gross-up. The dividend gross-up was the equivalent amount of the foreign taxes deemed paid by the U.S. corporation.

### Cost of Goods Sold

[Form 1125-A, Line 8]

Cost of goods sold represented the costs incurred by the corporation in producing the goods or providing the services that generated the corporation's business receipts. Included were costs of materials used in manufacturing, costs of goods purchased for resale, direct labor, and a share of overhead expenses, such as rent, utilities, supplies, maintenance, and repairs. (Overhead expenses, however, were not included in these statistics as the taxpayers reported them; see "Uniform Capitalization Rules" below.)

The basic cost of goods sold calculation, shown in Form 1125-A, consisted of adding beginning inventory to the current year purchases, labor, additional inventory costs (section 263a), and other costs and subtracting ending inventory. Each of the individual items included in cost of goods sold is shown separately in Table 12.

Cost of goods sold was imputed for those companies engaged in manufacturing or trade activities that reported gross receipts, but not the cost of goods sold. This was done by using the attachments for "Other Deductions." For other nonfinance industries, a cost was imputed only for companies that reported gross receipts and included inventories on the balance sheet.

Generally, returns of corporations in the finance sector were not expected to have cost of goods sold unless they were consolidated returns including nonfinance subsidiaries. Security dealers sometimes reported the cost of securities traded on their own accounts as cost of goods sold (and reported the gross sales proceeds as business receipts). Such amounts were netted during statistical processing, with the net gain reported as receipts and cost of goods made zero. The same handling was given to bank returns reporting gross receipts and costs from Federal funds transactions.

Insurance companies were made to conform to Form 1120 format using premium income as gross business receipts and showing benefits paid as cost of goods sold. For most life insurance companies, cost of goods sold was equal to death benefits. For other insurance companies, it was equal to losses incurred. These items are shown separately in Table 12.

### Uniform capitalization rules

A taxpayer reporting of cost of goods sold was governed by the "uniform capitalization rules" of Code section 263A. Most companies producing goods for sale were required to capitalize inventory costs under the uniform capitalization rules. Corporations subject to the rules were required to capitalize

direct costs and an allocable portion of most indirect costs that related to the goods produced or acquired for resale. Some of the indirect costs that were required to be allocated to capital accounts were administration expenses, taxes, depreciation, insurance costs, compensation of officers, and contributions to pension, stock bonus, profit sharing, and deferred compensation plans. Special rules were provided for the capitalization of interest expense paid or incurred during production. The rules did not apply to personal property acquired for resale for corporations with annual average gross receipts of \$10,000,000 or less. Special rules were provided for farmers and for timber property.

For statistical purposes, many components of cost of goods sold were moved to the equivalent deduction item. For this reason, these appear in the tables as current deductions rather than components of cost of goods sold. Expenses for advertising, amortization, bad debts, compensation of officers, and contributions to charitable organizations, employee benefit programs, and pension plans were transferred to their respective deduction categories when identified on the attachments for cost of goods sold. Also transferred were depletion, depreciation, interest, rent of buildings or real estate, and taxes. Intangible drilling costs were removed from cost of goods sold and included in other deductions.

In this report, therefore, cost of goods sold appears smaller, and many deduction accounts larger, than what was reported by taxpayers. However, those listed above were the only accounts affected. Inventories were not adjusted; net income or deficit and taxable income were not affected.

### Cost of Labor

[Form 1125-A, Line 3]

This component of cost of goods sold included the portions of the company's payroll representing direct labor costs, and some indirect costs allocated to inventory under the uniform capitalization rules. Some labor costs were reported in other accounts, such as Other Costs. (See "Cost of Goods Sold.")

### Cost of Treasury Stock

[Page 5, Schedule L, Line 27(d)]

This item was the total value of issued common or preferred stock that had been reacquired and was held at the end of the accounting year by issuing corporations. The stock, which was available for resale or cancellation, may have been purchased by the corporation or acquired through donation or as settlement of a debt. Treasury stock was a part of capital stock outstanding; it did not include unissued capital stock.

### Credit for Prior Year Minimum Tax

[Page 3, Schedule J, Line 5d]

Corporations received a credit against their regular income tax liability for alternative minimum taxes paid in prior years to prevent double taxation of the same income. The minimum

tax was imposed on income for which tax liability was only deferred under the regular tax; when the deferral ended and the income became taxable under the regular tax, credit was given for the taxes already paid on that income. The minimum tax credit thus acted as a mechanism to coordinate the two tax systems. The credit was limited to the excess of regular tax after credits over the current year tentative minimum tax. Any unused portion of the prior year minimum tax credit could be carried forward indefinitely to reduce the regular tax. The credit was not designed to reduce any minimum tax liability. There were no carryback provisions for this tax credit.

See also, "Alternative Minimum Tax."

### Credit to 2015 Estimated Tax

[Page 1, Line 36a]

This item was the amount of the taxpayer's 2015 overpayment applied to the firm's estimated tax for the 2015 Tax Year. See also "Overpayment or Amount Owed."

### Credit to Holders of Tax Credit Bonds

[Page 3, Schedule J, line 5e]

Form 8912, *Credit to Holders of Tax Credit Bonds*, is used to claim credit for the following tax credit bonds: Clean renewable energy bond (CREB); New clean renewable energy bond (NCREB); Qualified energy conservation bond (QECB); Qualified zone academy bond (QZAB); Qualified school construction bond (QSCB), and Build America bond (BAB).

### Death Benefits

[Form 1120-L, Page 1, Line 9]

See "Cost of Goods Sold."

### Deduction for Dividends Paid

[Form 1120-REIT, Page 1, Line 21b; Form 1120-RIC, Page 1, Line 25a]

See "Statutory Special Deductions."

### Deficit

See "Net Income (or Deficit)."

### Depletable Assets and Accumulated Depletion

[Page 5, Schedule L, Lines 11a and b]

Depletable assets represented, in general, the gross end-of-year value of mineral property, oil and gas wells, other natural deposits, standing timber, intangible development and drilling costs capitalized, and leases and leaseholds, each subject to depletion. Accumulated depletion represented the cumulative adjustment to these assets shown on the corporation's books of account.

The value of depletable assets and accumulated depletion may not be closely related to the current year depletion



deduction. The depletable assets and accumulated depletion balance sheet accounts reflected book values; the depletion deduction reflected the amount claimed for tax purposes.

## Depletion

[Page 1, Line 21]

This deduction was allowed for the exhaustion of mines, oil and gas wells, other natural deposits, and timber. The Code provided two methods for computing the deduction: (1) cost depletion, in which a share of the cost of acquiring or developing a property was written off each year; and (2) percentage depletion, which involved simply deducting a fixed percentage of the gross income from the property each year. For standing timber, depletion was computed based on cost. In the case of most natural deposits, the depletion was computed either on a cost or percentage basis. For oil and gas wells, however, percentage depletion was allowed only to “independent” producers (producing less than 50,000 barrels of oil or an equivalent amount of gas a day) and then only for the first 1,000 barrels produced each day. All other oil and gas producers were required to use cost depletion.

Generally, for gas and oil wells, the gross income was the actual sales price, or representative market or field price, if the gas or oil were later converted or manufactured prior to sale. For other natural deposits, gross income was defined to include income from mining or extraction and certain treatment processes. Percentage rates for each type of natural deposit were listed in Code section 613 and ranged from 5 to 25 percent of gross income. However, percentage depletion generally could not exceed 50 percent of the taxable income from the property computed without the depletion deduction.

The depletion deduction for natural deposits other than oil and gas could also have been limited by provisions designed to recapture previously deducted mine exploration and development costs. These capital expenditures were deductible when incurred but had to be recaptured if the mine became productive or was sold. One method that taxpayers could elect to recapture these deductions was to forego percentage depletion deductions on the mine until recapture was complete.

The statistics for depletion also did not include amounts shown by the corporation as a deduction in computing net gain or loss from sale of depletable assets under sections 631(a) or 1231. Regulated investment companies and real estate investment trusts did not report depletion.

The amounts shown in the statistics included any identifiable depletion reported as part of the cost of goods sold or capitalized under Code section 263A. Amortization of intangible drilling costs was not included in the statistics for depletion but was included in “Other Deductions.”

## Depreciable Assets and Accumulated Depreciation

[Page 5, Schedule L, Lines 10a and b]

Depreciable assets from the corporation’s end-of-year balance sheet were the book value of tangible property subject to depreciation (such as buildings and equipment with a useful life of one year or more). This item could include fully depreciated assets still in use and partially completed assets for which no deduction was yet allowed if the corporation reported them as depreciable on its balance sheet. The amounts shown as accumulated depreciation represented the portion of the assets that were written off in the current year and all prior years.

In general, depreciable assets were the gross amounts before adjustment for accumulated depreciation. Some corporations reported only the net amount of depreciable assets after deducting accumulated depreciation. Certain insurance companies were included among the corporations which reported only a net amount of depreciable assets. Life insurance companies and some property and casualty insurance companies reported their balance sheet information in the format required by State insurance regulations. This format usually provided for the reporting of only net depreciable assets and only the home and branch office buildings and equipment were included. Other real estate holdings of these corporations were reported as “Other Investments.”

The statistics for depreciable assets excluded depletable and intangible assets, which were reported in their respective items, and accumulated amortization.

Generally, the value of depreciable assets and accumulated depreciation were not closely related to the current-year depreciation deduction. The depreciable assets and accumulated depreciation balance sheet accounts reflected book values; the depreciation deduction reflected the amount claimed in the current year for tax purposes.

## Depreciation

[Page 1, Line 20]

Depreciation is a method of recovering the cost of investments in tangible assets that lose value as they are used to produce income. The depreciation deduction allowed under Code sections 167 and 168 approximated this loss in value by prescribing the rates at which various types of assets could be depreciated and the period over which the investment could be recovered. The depreciation rules in effect for property placed in service in 2015 were basically the same as those enacted in 1986; however, the tax depreciation rules were changed many times over the years, and some assets were still in use in 2015 that were originally placed in service under prior-year rules. So the depreciation claimed on 2015 returns included in these statistics could have represented amounts computed by several different sets of rules.

In 2015, the basic depreciation system was the “Modified Accelerated Cost Recovery System,” or MACRS, that provided two systems for computing the depreciation deduction. The “General Depreciation System,” or GDS, specified recovery periods of 3, 5, 7, or 10 years for livestock, fruit trees, most machinery, equipment, and tangible personal property, and prescribed the 200-percent declining balance method of determining the amount to be written off each year. Public utility property, water transportation equipment, and farm buildings were placed in the 15-year, 20-year, or 25-year category and were to be depreciated by the 150-percent declining balance method. Buildings were to be depreciated by the straight-line method and over recovery periods of 27.5 years for residential buildings, 31.5 years for nonresidential buildings placed in service before May 13, 1993, and 39 years for nonresidential buildings placed in service after May 12, 1993. Railroad roadbeds and tunnels were prescribed a recovery period of 50 years and the straight-line depreciation method.

MACRS also provided for an “Alternative Depreciation System,” or ADS, that was less accelerated than GDS and thus could help avoid the alternative minimum tax. Under ADS, the recovery period was generally based on the old “class life” system, which was a set of lives prescribed by IRS and based on studies of actual asset lives. The depreciation method was straight-line. Some types of property could only be depreciated using ADS. These were (1) tangible property used predominantly outside the U.S., (2) tax-exempt property, (3) property financed by tax-exempt bonds, (4) imported property covered by a Presidential order, or (5) farm property placed in service in a year in which the taxpayer had elected to expense preproduction period costs under section 263A.

Also included here were amounts the corporation elected to expense under section 179. For 2015, the maximum deduction was \$500,000 (\$535,000 for qualified enterprise zone businesses, renewal community businesses and qualified Liberty Zone property). This limited deduction is reduced by the amount by which the cost of section 179 property placed in service during the tax year exceed \$2 million. In 2003, the definition of section 179 property was expanded to include computer software.

Amounts for special depreciation allowance and other depreciation were also included in this item. Beginning in 2001, certain qualified property placed in service after September 10, 2001, could have an additional 30 percent special depreciation allowance. Qualified property acquired and placed in service after May 5, 2003, and before January 1, 2005, may have an additional 50-percent depreciation allowance. Qualified property for the 30-percent or 50-percent special allowance includes, but is not limited to, tangible property depreciated under MACRS with a 20-year-or-less recovery period and computer software. But, it is important to note that the 30-percent and 50-percent special depreciation allowances will not apply to most property placed in service after 2004.

This item included amounts of depreciation reported as a part of cost of goods sold or capitalized under section 263A.

For tax years ending after December 31, 2015, a corporation can elect to claim pre-2006 unused minimum tax credits in lieu of the special depreciation allowance for round 4 extension property.

## Dividends

[Page 2, Schedule C]

### Dividends received from domestic corporations

Dividends received from domestic corporations was a statistic computed from amounts reported on Schedule C. The amounts making up this statistic are shown in detail in Table 11 and represent most distributions from the earnings and profits of companies incorporated in the United States. Dividends received from domestic corporations were generally those used in computing the special deduction from net income for dividends received. This is discussed under “Statutory Special Deductions” in this section.

Deductible dividends from Interest Charge Domestic International Sales Corporations (IC-DISCs) and from former Domestic International Sales Corporations (DISCs) were included as domestic dividends received.

Dividend distributions among member corporations electing to file a consolidated return were eliminated from the statistics as part of the consolidated reporting of tax accounts. For tax purposes, dividends reported on these returns represented amounts outside the tax-defined affiliated group.

If portfolio stock was wholly or partially financed by debt, no dividend received deduction was allowed on the debt-financed portion of the stock. There was a separate line item and a separate deduction calculation for dividends on debt-financed portfolio stock. This amount was included as part of domestic dividends even though it also represented debt-financed stock of foreign corporations.

Dividends or other distributions other than those detailed in Table 11 were included in “Other Receipts.”

Dividends received by S corporations were passed through to shareholders and reported on Form 1120S, Schedule K-1, *Shareholders’ Shares of Income, Credits, Deductions, etc.* and are not included in the statistics for this item in Table 11. These statistics are presented in Tables 7.1 and 7.2 as “Dividend Income” under “Portfolio Income (less deficit) Distributed to Shareholders.”

### Dividends received from foreign corporations

These were dividends paid from the earnings and profits of companies incorporated in foreign countries. The amounts making up this statistic are shown in detail in Table 11.

Dividends received from foreign corporations out of U.S. source earnings and profits or from Foreign Sales Corporations

(FSCs) were usually eligible for the dividends received deduction, described in “Statutory Special Deductions,” below. Not eligible were dividends out of foreign earnings and profits and certain gains from the sale, exchange, or redemption of Controlled Foreign Corporation stock.

Because foreign dividend gross-up and includable income from controlled foreign corporations were not actual receipts, for statistical purposes they were excluded from dividends received. Both were combined and presented in the statistics as “Constructive Taxable Income from Related Foreign Corporations,” discussed above.

Dividends received from foreign corporations by S corporations were not included in these statistics.

### Dividends Received Deduction

[Page 2, Schedule C, Line 20]

See “Statutory Special Deductions.”

### Domestic Production Activities Deduction

[Page 1, Line 25]

The Domestic Production Activities Deduction (DPAD) was added as part of the American Jobs Creation Act and is available for tax years beginning after December 31, 2004. By keeping manufacturing and software development activities in the United States, exporters may claim a deduction for a percent of their income from qualified exports. The provision, which can be found under Code section 199, was largely written to satisfy WTO objections to Extraterritorial Income (ETI) and Foreign Sales Corporation provisions. The credit is figured on Form 8903, *Domestic Production Activities Deduction*.

### Effectively Connected Income (ECI) Deductions

[Form 1120-F, Page 3, Line 26]

Home office deductions allocated and apportioned to effectively connected income from Schedule H.

### Employee Benefit Programs

[Page 1, Line 24]

Contributions made by employers to employee plans, such as death benefits, insurance, health, accident, sickness, and other welfare plans were deductible under Code sections 419 and 419A. Generally, such programs were not an incidental part of a pension, profit sharing, or other-funded deferred compensation plan. Deductions for a welfare benefit fund were limited to the qualified cost of the fund for the taxable year, as described under Code section 419. Direct payments for employees’ welfare were not included as employee benefits; only payments into a fund for employee benefits were included.

Included in the statistics for this item were amounts identified as part of the cost of goods sold, or capitalized under section 263A. Regulated investment companies and real estate investment trusts do not report employee benefits. Some mining

companies could have reported an amount for a combination of welfare/retirement plans. When identified, the combined amount was included in the statistics for contributions to employee benefit plans.

### Estimated Tax Penalty

[Page 1, Line 33]

See “Overpayment or Amount Owed.”

### Excess Net Passive Income Tax

[Form 1120S, Page 1, Line 22a]

A Subchapter S corporation that had accumulated earnings and profits from a prior subchapter C status and had net passive income greater than 25 percent of its gross receipts was taxed on the excess (net of related expenses) at the regular corporate tax rate. Passive investment income, in general, was gross receipts derived from rents, royalties, dividends, interest, annuities, or the sales or exchanges of stock or securities.

### Foreign Dividend Gross-Up

[Page 2, Schedule C, Line 15(a)]

See “Constructive Taxable Income from Related Foreign Corporations.”

### Foreign Tax Credit

[Page 3, Schedule J, Line 5a]

Code section 901 allowed a credit against U.S. income tax for income taxes paid to foreign countries or U.S. possessions. The credit could be claimed by domestic corporations, except S corporations, and by foreign corporations engaged in trade or business in the United States for foreign taxes paid on income effectively connected with the U.S. business. The U.S. income tax that could be reduced by the credit excluded the recapture taxes and the personal holding company tax. The credit was not allowed for S corporations because their income was primarily taxed through their shareholders; any creditable foreign taxes were also passed through to their shareholders. Regulated investment companies could elect under Code section 853 to allow their shareholders to claim any credit for the foreign taxes paid. However, if the election was not made, the regulated investment company could claim the tax credit.

The foreign tax credit was subject to a limitation that prevented the corporations from using foreign tax credits to reduce U.S. tax liability on U.S.-sourced income. The credit was limited to a percentage of total U.S. income tax equal to the ratio of taxable income from foreign sources to worldwide taxable income. Previously this limitation was computed separately for foreign taxes paid or accrued with respect to nine income categories. In 2006 the number of income categories changed to four. These are (1) Passive Income; (2) General Category Income; (3) Section 901 (j) Income (Sanction Country Income); and (4) Income Re-sourced by Treaty. Foreign taxes exceeding the limitation for any 1 year could be carried back 1 year (2 years for credits arising in a tax year beginning before October

23, 2004) and forward 10 years (5 years for credits that can be carried forward to any tax year ending before October 23, 2004). The carryover periods (1 year back and 10 years forward) were modified by the American Jobs Creation Act of 2004.

A corporation that claimed (or passed through) the foreign tax credit could not also claim a business deduction for the same foreign taxes paid. The credit could be reduced for taxes paid on foreign income from operations involving participation or cooperation with an international boycott. The foreign tax credit was not allowed for taxes paid to certain foreign countries whose government was not recognized by the United States, with which the United States severed or did not conduct diplomatic relations, or which supported international terrorism.

### General Business Credit

[Page 3, Schedule J, Line 5c]

The general business credit is computed on Form 3800, *General Business Credit*. The credit consisted of a combination of several individual credits of which the following are edited by the IRS Statistics of Income Division: investment credit (Form 3468), research credit (Form 6765), low-income housing credit (Form 8586), disabled access credit (Form 8826), renewable electricity production credit (Form 8835), Indian employment credit (Form 8845), orphan drug credit (Form 8820), new markets credit (Form 8874), credit for small employer pension plan startup costs (Form 8881), credit for employer-provided child care facilities and services (Form 8882), biodiesel fuels credit (Form 8864), low sulfur diesel fuel production credit (Form 8896), alternative motor vehicle credit (Form 8910), alternative fuel vehicle refueling property credit (Form 8911), qualified plug-in electric drive motor vehicle credit (Form 8936), qualified plug-in electric vehicle credit (Form 8834, Part I), investment credit (Form 3468), work opportunity credit (Form 5884), alcohol and cellulosic biofuel fuels credit (Form 6478), low-income housing credit (Form 8586, Part II), renewable electricity, refined coal, and Indian coal production credit (Form 8835), credit for employer social security and Medicare taxes paid on certain employee tips (Form 8846), credit for small employer health insurance premiums (Form 8941), and the empowerment zone employment credit (Form 8844). If a corporation claimed more than one of these credits, reported a carryforward, had credits from a passive activity, or had the Trans-Alaska pipeline liability fund credit, or had the general credits from an electing large partnership (Schedule K-1, Form 1065-B), Form 3800 was to be filed with the income tax return.

The following general business credit forms are not edited: Forms 8900, 8906, 8907, 8908, 8909, 8923, 8931, 8932, 8933, 5884-A and 5884-B. However, the current year amount is displayed on the appropriate line of Form 3800 and included in the "credit allowed for the current year" (line 32).

The purpose of the general business credit was to provide a uniform limitation on the amount that could be used to reduce tax liability and to establish uniform rules for carrybacks and carryforwards. Each of the credits are computed separately. Total credits became the general business credit for the purpose of applying the maximum tax liability rules and the carryback and carryforward rules.

Except for the investment credits, S corporations computed these credits at the corporate level; the credits were then passed through to the shareholders. For the investment credits, the S corporation reported the basis in the qualifying property to each shareholder. The shareholders themselves computed the credits. However, S corporations that were previously C corporations could use business credit carryforwards from their C-corporation status to reduce tax on their net recognized built-in gains.

According to Code section 38(c), the general business credit shall not exceed the excess of the taxpayer's net income tax over the greater of (1) the tentative income tax, or (2) 25 percent of so much of the taxpayer's net regular tax liability as it exceeds \$25,000.

The general business credit that could be claimed by personal service corporations and closely held corporations was subject to an additional limitation if the component credits were generated in a passive activity. Passive activities generally included trade or business activities in which the corporation did not materially participate for the tax year and, with exceptions, rental activities regardless of the corporation's participation.

When the credit exceeded the limitation in any year, the excess became an unused business credit that could be carried back 1 year and forward 20 years. (For tax years beginning before December 31, 1997, the carryback period was 3 years and the carryforward period was 15 years).

### Gross Rents

[Page 1, Line 6]

These were the gross amounts received for the use or occupancy of property by corporations whose principal activities did not involve operating rental properties. Expenses related to rental property, such as depreciation, repairs, interest paid, and taxes paid, were not deducted directly from the rental income, but were reported as business deductions.

When rents were a significant portion of a corporation's operating income, they were included in the statistics for business receipts rather than in rents. These corporations included some manufacturers and public utility companies, as well as businesses whose principal operating income was expected to be rents, such as hotels, motels, and other lodging places. For real estate operators, rental income was included in business receipts if the expense schedule indicated that the owner

operated the building rather than leased it. No rent was reported for regulated investment companies (RICs). S corporations reported income from rents on Form 1120S, Schedule K-1, Shareholders' Shares of Income, Credits, Deductions, etc. and are not included in the statistics for this item.

**Gross Royalties**

[Page 1, Line 7]

Royalties were gross payments received, generally on an agreed percentage basis, for the use of property rights before taking deductions for depletion, taxes, etc. Included were amounts received from such properties as copyrights, patents, and trademarks; and from natural resources such as timber, mineral mines, and oil wells. Expenses relating to royalties, depletion or taxes, were not deducted directly from this income, but were reported among the various business deductions from total gross income. No royalties were included in the statistics for regulated investment companies and real estate investment trusts. S corporations reported this item on the Form 1120S, Schedule K-1, *Shareholders' Shares of Income, Credits, Deductions, etc.* These statistics are presented as "Royalty Income" under "Portfolio Income (less deficit) Distributed to Shareholders" in Table 7.

Excluded from the statistics were certain royalties received under a lease agreement on timber, coal deposits, and domestic iron ore deposits, which were allowed special tax treatment. Under elective provisions of Code section 631, the net gain or loss on such royalties was included in the computation of net gain or loss on sales or exchanges of certain business property under Code section 1231. If the overall result of this computation was a net gain, it was treated as a long-term capital gain. If the overall result was a net loss, it was fully deductible in the current year as an ordinary noncapital loss. See also, the discussions of "Net Capital Gains" and "Net Gain (or Loss), Noncapital Assets."

**Income from Controlled Foreign Corporations Under Subpart F**

[Page 2, Schedule C, Line 14(a)]

See "Constructive Taxable Income from Related Foreign Corporations."

**Income Subject to Tax**

[Page 1, Line 30]

This was generally the amount of income subject to tax at the corporate level. For most corporations, income subject to tax consisted of net income minus the "Statutory Special Deductions" described in this section. However, there were certain exceptions. S corporations were usually not taxable at the corporate level and so did not have income subject to tax. Some, however, had a limited tax liability on capital gains and so were included in the statistics for this item. Likewise, regulated investment companies and real estate investment trusts generally passed their net income on to be taxed at the shareholder

level; but any taxable amounts not distributed were included in income subject to tax. Because insurance companies were permitted to use reserve accounting for tax purposes, insurance income subject to tax was based on changes in reserve accounts; life insurance companies could also have been allowed an additional special deduction (discussed in "Statutory Special Deductions"). Consolidated returns that contain life insurance subsidiaries were not allowed to offset all of the life insurance subsidiary's gains by losses from nonlife companies, so it was possible for such a consolidated return to show no net income but still have a positive amount of income subject to tax.

**Income Tax**

[Page 3, Schedule J, Line 2]

Income tax was the amount of a corporation's total tax liability calculated at the regular corporate tax rates in Code section 11 (or substitutes for section 11).

The rates of tax on taxable incomes below \$18,333,333 were graduated (with some exceptions). Corporations other than members of a controlled group or personal service corporations used the following tax rate schedule. If taxable income is:

Over:	But not over:	Tax is:	Of the amount over:
\$0	\$50,000	15%	\$0
50,000	75,000	\$7,500 +25%	50,000
75,000	100,000	13,750 +34%	75,000
100,000	335,000	22,250 +39%	100,000
335,000	10,000,000	113,900 +34%	335,000
10,000,000	15,000,000	3,400,000 +35%	10,000,000
15,000,000	18,333,333	5,150,000 +38%	15,000,000
18,333,333	-----	35%	0

The 39-percent and 38-percent corporate tax rates were imposed to phase out the benefits of the lower brackets for high-income corporations.

Beginning with the 2006 Tax Year, members of controlled groups were required to complete the new Schedule O, *Consent Plan and Apportionment Schedule for a Controlled Group*, to delineate the shared apportionment of their tax liability. Controlled Group members were required to report the apportionment of taxable income, income tax, and certain tax benefits between group members. Personal service corporations (qualified under section 448 to use cash accounting) were taxed at a flat 35 percent on their taxable income.

Most income of S corporations was taxed only at the shareholder level. However, for S corporations that had once been C corporations, the corporate income tax was imposed on certain long-term capital gains, recognized built-in gains, and excess net passive income. The taxes paid on capital gains or recognized built-in gains by S corporations were included in the corporate statistics as "Income Tax."

The taxes paid on excess net passive income were excluded from “Income Tax” but were included in “Total Income Tax.”

A small number of corporations without net income had an income tax liability. These were corporations reporting all or part of their income under special life insurance rules, including consolidated returns filing a life insurance subsidiary.

See also, “Total Income Tax Before Credits” and “Total Income Tax After Credits.”

## Intangible Assets and Accumulated Amortization

[Page 5, Schedule L, Line 13a(c)]

Intangible assets represented the total gross value of goodwill, contracts, formulas, licenses, patents, registered trademarks, franchises, covenants not to compete, and similar assets that were amortizable for tax purposes. Thus, specific intangible asset items were included in this category only if amortization (or depreciation) had been taken against them.

The amounts shown as accumulated amortization represent the portion of these intangible assets that were written off in the current year as well as in prior years. In general, intangible assets were the gross amounts before adjustments for amounts of accumulated amortization. Some corporations, however, reported only the net amount of intangible assets after adjusting for amortization charges.

## Interest

[Page 1, Line 5]

Taxable interest, a component of total receipts, included interest on U.S. government obligations, loans, notes, mortgages, nonexempt private activity bonds, corporate bonds, bank deposits, and tax refunds. The statistics also included dividends from savings and loans and mutual savings banks, federal funds sold, finance charges, and sinking funds. The interest received was reduced by the amortizable bond premium under Code section 171.

Interest received from tax-exempt State or municipal bonds and ESOP loans was not included in this item. Corporations were not allowed to offset any interest expense against interest income. However, if the corporation reported only a net amount, this figure was used in the statistics. See also, “Interest Paid.”

Interest received by S corporations was passed through to shareholders and reported on Form 1120S, Schedule K-1, *Shareholders' Shares of Income, Credits, Deductions, etc.*, and are not included in the statistics for this item. These statistics are presented as “Interest Income” under “Portfolio Income (less deficit) Distributed to Shareholders” in table 7.

## Interest Paid

[Page 1, Line 18]

These amounts consisted of interest paid by corporations on all business indebtedness. For banking and savings institutions, the statistics also included interest paid on deposits and withdrawable shares. For mutual savings banks, building and loan associations, and cooperative banks, interest paid included amounts paid or credited to the accounts of depositors as dividends, interest, or earnings under Code section 591. Interest identified as part of the cost of goods sold or capitalized under section 263A was excluded from cost of goods sold and included in the statistics as interest paid.

## Inventories

[Page 5, Schedule L, Line 3(d)]

These were the corporations' end-of-year inventories as reported on their balance sheets. Inventories included such items as finished goods, partially finished goods (work in progress), new materials and supplies acquired for sale, merchandise on hand or in transit, and growing crops reported as assets by agricultural concerns. Inventories reported on balance sheets were book accounts and would not necessarily have corresponded to those reported for tax purposes in cost of goods sold.

Inventories reported on the returns of companies in financial industries were transferred during statistical processing to other balance sheet accounts (unless reported on a consolidated return with nonfinancial subsidiaries). For security brokers and dealers, commodity brokers and dealers, and holding and other investment companies (except bank holding companies), inventories were included in “Other Investments.” For the rest of the “Finance and Insurance” and “Management of Holding Companies” sectors, inventories were included in “Other Current Assets.” Inventories shown in the statistics for the “Finance and Insurance” and “Management of Holding Companies” sectors were those reported by consolidated financial companies with diversified nonfinancial subsidiaries.

See also “Cost of Goods Sold.”

## Inventory, Beginning of Year

[Form 1125-A, Line 1]

Closing inventories from the end of the previous year.

See also “Inventory, End of Year.”

## Inventory, End of Year

[Form 1125-A, Line 7]

These were ending inventories as calculated for tax purposes. Inventories included the portion of its raw materials and merchandise purchased for resale and not sold during the year. Statistical adjustments made to the current-year components of cost of goods sold were not carried over into the capitalized

inventory accounts, which were shown as reported by taxpayers (except for necessary corrections).

See “Cost of Goods Sold.”

### Land

[Page 5, Schedule L, Line 12(d)]

Land, which was reported as a separate capital asset on the balance sheet, may be understated in this report because it could not always be identified. Some corporations may have included land as part of depreciable or depletable assets or included it in other investments. Whenever corporations included and identified land as part of depreciable assets, the amount was reclassified as land, but land improvements remained as depreciable assets.

### Loans from Shareholders

[Page 5, Schedule L, Line 19(d)]

This balance sheet liability item was regarded as long term in duration and included loans to the company from holders of the company’s stock.

### Loans to Shareholders

[Page 5, Schedule L, Line 7(d)]

This balance sheet asset item was regarded as long term in duration and included loans to persons who held stock in the corporation.

### Losses Incurred

[Form 1120-PC, Schedule A, Line 26]

### Mortgage and Real Estate Loans

[Page 5, Schedule L, Line 8(d)]

In general, mortgage and real estate loans were the total amount a corporation loaned on a long-term basis, accepting mortgages, deeds of trust, land contracts, or other liens on real estate as security.

Because the return form did not provide a separate place for reporting any reserve for uncollectable mortgage and real estate loan accounts, such reserves may have been included in the allowance for bad debts, shown in this report as an adjustment to notes and accounts receivable. If a corporation reported an uncollectable mortgage and real estate loan reserve on a separate schedule, that amount was moved during statistical processing to allowance for bad debts.

### Mortgages, Notes, and Bonds Payable

[Page 5, Schedule L, Lines 17(d) and 20(d)]

Mortgages, notes, and bonds payable were separated on the balance sheet according to the length of time to maturity of the obligations. The length of time to maturity was based on the date of the balance sheet rather than on the date of issue of the obligations. Accordingly, long-term obligations maturing within the coming year were reportable with short-term

obligations as having a maturity of less than 1 year. Deposits and withdrawable shares may have been reported in mortgages, notes, and bonds payable by banks and savings institutions. When identified, such amounts were transferred to “Other Current Liabilities.”

### Net Capital Gains

[Schedule D, Lines 16 and 17]

In the tables in this report, capital gains net of capital losses were divided into two data items: “Net Short-Term Capital Gain Reduced by Net Long-Term Capital Loss” and “Net Long-Term Capital Gain Reduced by Net Short-Term Capital Loss.”

A gain or loss from the sale or exchange of capital assets was short term if the assets had been held for 1 year or less and long term if they had been held for longer than 1 year. The distinction between long-term and short-term assets was maintained in the Code and in the reporting forms even though it did not affect tax liability.

For corporations, capital losses were generally deductible only from capital gains, so only net gains were included in the statistics. Excess net losses could be carried back as short-term losses to be applied against the net capital gains of the 3 preceding years; any losses remaining after carryback were carried over the 5 succeeding years. A net capital loss for a regulated investment company could be carried forward 8 years instead of 5 years. If the unused capital loss carryover was not eliminated within the prescribed span of years, it could not be taken. Regardless of origin, all carrybacks and carryovers were treated as short-term capital losses for carryback and carryover purposes.

In general, capital assets for tax purposes meant property regarded or treated as an investment, such as stocks and bonds. Code section 1221 defined the capital assets as all property held by a corporation except:

- (1) stock in trade or other property included in inventory or held mainly for sale to customers;
- (2) notes and accounts receivable acquired in the ordinary course of business;
- (3) depreciable or real property used in the trade or business;
- (4) copyrights, literary, musical, or artistic compositions, or similar properties not acquired by purchase;
- (5) publications of the United States Government not acquired by purchase;
- (6) certain commodities derivative financial instruments held by a dealer;
- (7) certain hedging transactions entered into in the normal course of trade or business; and
- (8) supplies regularly used in the trade or business.

Gains from constructive ownership transactions entered into after July 11, 1999, that involved any equity interest in

passthrough entities such as partnerships, S corporations, trusts, regulated investment companies, and real estate investment trusts that would otherwise be treated as capital gains could be treated instead as ordinary income. Constructive ownership transactions included gains from notional principal contracts with the right to receive substantially all of the investment yield of an equity interest and the obligation to reimburse substantially all of any decline in value of the interest; a forward or futures contract to acquire an equity interest; and the holding of a call option and writing of a put option at substantially the same strike price and maturity date. A net underlying long-term capital gain had to be established by computing a net capital gain as though the asset were acquired at its fair market value when the transaction was opened and sold at its fair market value when the transaction was closed. If not established, the net underlying long-term capital gain was treated as zero. Any long-term capital gain that exceeded the net underlying long-term capital gain was treated as ordinary income. Gains from constructive ownership transactions that were marked to market were excluded from this provision to be treated as ordinary income.

Although depreciable and real property used in the trade or business was not defined as a capital asset, the gain on such property held for more than 1 year could be treated as long-term capital gain. See “Net Gain (or Loss), Noncapital Assets” below.

The capital gains of S corporations were passed through to their shareholders and not included in the corporations’ ordinary income (loss) from trade or business activities but were reported on Form 1120S, Schedule K-1, *Shareholders’ Shares of Income, Credits, Deductions, etc.* These statistics are presented as “Net Short-Term Capital Gain (less loss)” and “Net Long-Term Capital Gain (less loss)” under “Portfolio Income (less deficit) Distributed to Shareholders” in 1120S-specific tables.

## Net Gain (or Loss), Noncapital Assets

[Page 1, Line 9]

This item includes all losses from the sale or exchange of noncapital assets, but only those gains that were not treated as long-term capital gains. Noncapital assets included property used in a trade or business plus certain other transactions given special treatment by statute. After December 16, 1999, noncapital assets were expanded to also include certain financial assets such as:

- (1) certain commodities derivative financial instruments held, acquired, or entered into by commodities derivatives dealers;
- (2) any hedging transaction clearly identified as a hedging transaction before the close of the day on which it was acquired, originated, or entered into; and
- (3) supplies regularly used or consumed in the ordinary course of a trade or business.

A commodities derivative financial instrument is a commodities contract or other financial instrument with respect to commodities, for which the value or settlement price is calculated or determined by reference to a specified index as defined in Code section 1221(b). A commodities derivative dealer is an entity that regularly offers to enter into, assume, offset, assign, or terminate positions in commodities derivative financial instruments with customers in the ordinary course of a trade or business. A hedging transaction is any transaction entered into in the normal course of a trade or business primarily to manage one of the following: 1) risk of price changes or currency fluctuations involving ordinary property held (or to be held) and 2) risk of interest rate or price changes, or currency fluctuations, involving borrowed funds or ordinary obligations incurred (or to be incurred).

Rules governing the computation of a net gain or loss from noncapital assets were provided under Code section 1231. Transactions treated under these special provisions included:

- (1) the sale or exchange of real or depreciable property used in a trade or business;
- (2) the cutting or disposal of timber treated as a sale or exchange under Code sections 631(a) and (b);
- (3) the disposal of coal or iron ore treated as a sale under Code section 631(c);
- (4) the sale or exchange of livestock (excluding poultry) used in a trade or business for draft, breeding, dairy, or sporting purposes, if held for at least 12 months (24 months for horses and cattle);
- (5) the sale or exchange of unharvested crops sold with the land; and
- (6) the involuntary conversion of property or capital assets due to partial or total destruction, theft, seizure, requisition, or condemnation.

Long-term gains from section 1231 transactions were treated as long-term capital gains for tax purposes and were included in “Net Capital Gains” in these statistics. Losses under section 1231 were treated as ordinary losses, i.e., fully deductible from ordinary income. Amounts treated as long-term gains were reduced by several provisions designed to recapture (as ordinary income) previous benefits. These provisions included: sections 1245 and 1250, recapturing some depreciation taken previously; section 1252, recapturing conservation and land-clearing expenses upon the sale of some farmland; section 1254, recapturing certain depletion, intangible drilling, and mine development expenses; and section 1255, recapturing some crop-sharing payments if a farm is sold within 20 years of receiving the payments.

Statutory provisions allow that recognition of a gain or loss may be postponed under certain circumstances. The postponement of gain recognition accounts for some differences in tax versus book income. This difference is not presented in these statistics.



Gains and losses resulting from involuntary conversions, due mostly to casualty and theft, received special treatment. Such losses were to be included in the computation of net gain or loss, noncapital assets. However, some corporations reported them in other deductions, in which case, the losses were included in the statistics for other deductions. No attempt was made to recompute the net gain or loss from noncapital assets or the carryover of losses subject to recapture rules for such returns.

Although this item was a part of corporate-level income for S corporations, the portion of gain treated as long-term capital gain under section 1231 was not a part of the corporations' ordinary income (loss) from trade or business activities but rather was reported on Form 1120S, Schedule K-1, *Shareholders' Shares of Income, Credits, Deductions, etc.*

### Net Income (or Deficit)

[Page 1, Line 28]

This was net profit or loss from taxable sources of income reduced by allowable deductions. It differed from "Total Receipts Less Total Deductions" because it included "Constructive Taxable Income from Related Foreign Corporations" and excluded "Interest on Government Obligations: State and Local." Net income generally differed from "Income Subject to Tax" by the "Statutory Special Deductions" allowed corporations. More information can be found under all these headings in this section.

Net income included income from the trade or business activities of S corporations, including ordinary gain from the sale of business property. Although the income was taxable to the shareholders, it was used for the statistics as a measure of corporate business activity for these companies. For tax purposes, net income for S corporations excluded passive income, which was passed through to the shareholders and reported on Form 1120S, Schedule K-1, *Shareholders' Share of Income, Credits, Deductions, etc.* Statistics on these items are presented in 1120S-specific tables as "Net income (less deficit) from a trade or business." Although certain long-term capital gains were taxable to S corporations before the gains were passed through to the shareholders, these gains were excluded from net income.

The statistics for net income (or deficit) also included the "effectively connected income" of foreign corporations operating in the United States. Generally, income was considered effectively connected if the foreign corporation conducted a trade or business in the United States and the income was attributable to that business.

Property and casualty insurance companies with premium income of \$1,200,000 or less could elect to compute income tax on their taxable investment income only, deducting only expenses related to that income. Therefore, the statistics for net income included only net investment income for those

companies. (Such a company with premiums of \$600,000 or less was exempt from tax and so does not appear in these statistics.)

### Net Long-Term Capital Gain Reduced by Net Short-Term Capital Loss

See "Net Capital Gains."

### Net Operating Loss Deduction

See "Statutory Special Deductions."

### Net Short-Term Capital Gain Reduced by Net Long-Term Capital Loss

See "Net Capital Gains."

### Net Worth

Net worth represented the shareholders' equity in the corporation (total assets minus the claims of creditors). In the statistics, net worth comprised the net sum of the following items:

- (1) capital stock;
- (2) additional paid-in capital;
- (3) retained earnings, appropriated;
- (4) retained earnings, unappropriated;
- (5) adjustments to shareholders' equity;
- (6) less the cost of treasury stock.

### Notes and Accounts Receivable

[Page 5, Schedule L, Line 2a(c)]

In general, notes and accounts receivable were the gross amounts arising from business sales or services to customers on credit during the ordinary course of trade or business. These current assets would normally be converted to cash within 1 year. This category included commercial paper, charge accounts, current intercompany receivables, property improvement loans, and trade acceptances. Current nontrade receivables were generally included in other current assets.

Certain savings and loan associations reported loans and mortgages as notes and accounts receivable. When identified, such mortgage loans were included in the statistics for mortgage and real estate loans, rather than notes and accounts receivable.

The gross amount of the receivables and the corresponding adjustment account, allowance for bad debts, were reported on the balance sheets of most corporation income tax forms. For an explanation of the adjustment account, see "Allowance for Bad Debts." Some corporations, however, reported only the net amount of the accounts receivable.

### Number of Returns

This was a count of the returns filed by active corporations on one of Form 1120-series returns. It included ordinary

for-profit C corporations filing Form 1120 or its simplified version, S corporations electing to be taxed through their shareholders filing Form 1120S, foreign corporations with U.S.-source income filing Form 1120-F, life insurance companies filing Form 1120-L, property and casualty insurance companies filing Form 1120-PC, Real Estate Investment Trusts filing Form 1120-REIT, and Regulated Investment Companies filing Form 1120-RIC. It did not include nonprofit corporations, exempt farmers' cooperatives, and many other incorporated organizations that did not file corporation income tax returns. It also did not include the returns of inactive corporations, defined as those reporting no item of income or deductions.

See Section 3, Description of the Sample and Limitations of the Data.

Consolidated groups could file a single return covering many corporations, so the number of returns was not a count of the number of active corporations.

See "Consolidated Returns."

### Other Assets

[Page 5, Schedule L, Line 14(d)]

In general, other assets comprised noncurrent assets, which were not allocable to a specific account on the balance sheet, and certain assets not identified as current or noncurrent. Both tangible and intangible assets were included in this category. Also included were assets such as: deposits on contracts, interest discounts, and guaranty deposits, when reported as noncurrent assets.

Other assets of life insurance companies included the market value of real estate and that portion of stock and bond holdings exceeding book value. For statistical purposes, negative balance sheet asset accounts have been moved to, and included in, the computation of other assets. This procedure was adopted to address the increased usage of negative items being reported on corporate balance sheets. This process may cause other assets to become negative in certain situations. When identified on the tax return, assets held for investment were not included in other assets.

### Other Costs

[Form 1125-A, Line 5]

See "Cost of Goods Sold."

### Other Current Assets

[Page 5, Schedule L, Line 6(d)]

Other current assets included assets not allocable to a specific current account listed on the balance sheet of the tax form and assets reported as short term, but without identification of a specific current account.

Marketable securities, prepaid expenses (unless reported as long term), nontrade receivables, coupons and dividends receivable, and similar items were included in this asset account.

Deposits were included here for banks and deposit institutions. Also included were amounts that exceeded the amount billed for contract work in progress and reported as current by construction corporations.

When reported by certain nonconsolidated financial companies, inventories were included in the statistics for other current assets, rather than for inventories. Those nonconsolidated financial companies included banks, credit agencies, insurance companies, insurance agents, brokers, real estate operators, lessors, and condominium management and cooperative housing associations. Inventories were included in other current assets if reported by bank holding companies, whether consolidated or nonconsolidated. However, if consolidated with nonfinancial subsidiaries, then inventories were not moved to other current assets to the extent they were attributable to the nonfinance subsidiaries.

Some property and casualty insurance companies included investments in government obligations and tax-exempt securities with other current assets on the income tax return, Form 1120-PC. When identified, the amounts were included in the statistics for investments in government obligations and tax-exempt securities and excluded from other current assets.

### Other Current Liabilities

[Page 5, Schedule L, Line 18(d)]

Other current liabilities included certain amounts due and payable within the coming year. The account was comprised of accrued expenses, as well as current payables not arising from the purchase of goods and services. Examples of other current liabilities were taxes accrued or payable, accrued employee accounts such as for payrolls and contributions to benefit plans, dividends payable, overdrafts, accrued interest or rent, and deposits and withdrawable shares of banking and savings institutions, if not reported as long term by the corporation. For construction corporations, amounts for uncompleted contracts or jobs in progress were included in this item, if reported as current.

### Other Deductions

[Page 1, Line 26]

Other deductions included: (1) business expenses which were not allocable to a specific deduction item on the tax return, or which were not included elsewhere on the tax return, and (2) certain amounts which were given special treatment during statistical processing. It also included adjustments reported as deductions.

The first category included such items as administrative, general, and selling expenses; commissions (unless reported as cost of goods or salaries and wages); delivery, freight, and shipping expenses; sales discounts; travel and entertainment expenses; utility expenses not reported as part of the cost of goods sold; and similar items. For meal and entertainment expenses, generally only 50 percent was deductible.

The second category included intangible drilling costs, direct pensions (paid by a company to an individual but not to pension plans), employee welfare (but not payments to welfare or benefit plans), employee moving expenses, partnership net losses, and patronage dividends paid. Also included were itemized business deductions and other deductions unique to life and property and casualty insurance companies.

Losses from involuntary conversions which were reported as ordinary losses on Form 4797, *Supplemental Schedule of Gains and Losses*, were included in the statistics for Net Gain (or Loss), Noncapital Assets. However, some taxpayers reported such amounts as deduction items; if so, they were included in the statistics for "Other Deductions." Also included were net foreign currency losses for regulated investment companies, life insurance increases in reserves, and policyholder dividends paid by insurance companies on participating policies (after certain adjustments).

### Other Investments

[Page 5, Schedule L, Line 9(d)]

This category generally included long-term nongovernment investments and certain investments for which no distinction could be made as to their current or long-term nature. Examples of nongovernment investments included stocks, bonds, loans to subsidiaries, treasury stock reported as assets, and other types of financial securities.

Real estate not reported as a fixed asset could also be included. In certain instances, land and buildings owned by real estate operators (except lessors of real property other than buildings) were reported as other investments. Certain insurance carriers also included their real estate holdings (other than their home and branch office buildings) in this asset category.

When inventories were reported by companies in certain financial industries, the amounts were included in the statistics for other investments and excluded from inventories. For security brokers and dealers, commodity brokers, dealers, and exchanges, and holding and other investment companies (except bank holding companies), inventories were included in other investments unless the return was consolidated and included nonfinance subsidiaries. Inventories attributable to the nonfinance subsidiaries were not moved to other investments.

The statistics may be somewhat overstated by amounts that should have been reported for treasury stock. When treasury stock held for resale or for future distribution was reported as an asset, rather than as an offset to capital stock, the treasury stock was included in the statistics for other investments.

Some property and casualty insurance companies included investments in government obligations and tax-exempt securities in other investments on the income tax return, Form 1120-PC. When identified, these amounts were transferred to the appropriate accounts.

### Other Liabilities

[Page 5, Schedule L, Line 21(d)]

Other liabilities were obligations which were not allocable to a specific account on the balance sheet and which were either noncurrent accounts, in general not due within 1 year, or accounts which could not be identified as either current or long term. The excess of reserves for amortization, depreciation, and depletion over the respective asset accounts was included in this balance sheet account.

Examples of other liabilities were deferred or unearned income not reported as part of a current account, provisions for future or deferred taxes based on the effects of either accelerated depreciation or possible income tax adjustments, and principal amounts of employee and similar funds. Accounts and notes payable, borrowed securities, commissions, intercompany accounts, loans, overdrafts, and unearned income were also included. For statistical purposes, negative balance sheet liability accounts have been moved to, and included in, the computation of other liabilities. This procedure was adopted to address the increased usage of negative items being reported on corporate balance sheets. This process may cause other liabilities to become negative in certain situations.

### Other Receipts

[Page 1, Line 10]

Other receipts included amounts not reported elsewhere on the return form. These included income from minor operations; cash discounts; income from claims, license rights, judgments, and joint ventures; net amount earned under operating agreements; profit from commissaries; profit on prior-years' collections (installment basis); profit on the purchase of a corporation's own bonds; recoveries of losses and bad debts previously claimed for tax purposes; refunds for the cancellation of contracts; autolease inclusion income; and income from sales of scrap, salvage, or waste.

Unidentified and certain dividends received were also regarded as "other receipts." For example, those from Federal Reserve and Federal Home Loan Banks and the following special classes of corporations: corporations deriving a large percent of their gross income from sources within a U.S. possession, when they did not provide detailed attachments; tax-exempt charitable, educational, religious, scientific and literary organizations, and mutual and cooperative societies including farmers' cooperatives. Also included were any adjustment items reported by corporations and listed in other income, payments with respect to security loans, foreign currency gains for regulated investment companies, and life insurance decreases in reserves. See also "Business Receipts."

### Overpayment or Amount Owed

[Page 1, Line 35]

All corporations with more than minimal tax liability were required to have settled their liability by the time their returns were due for their accounting year, within specified tolerances.

They were required to estimate their liability at the beginning of their tax year and make payments on this estimated tax liability at least quarterly. If estimated tax payments were less than final tax liability for the year, within the allowed tolerances, the corporation was assessed a penalty. The corporation could count as tax payments its “Credit for Tax Paid on Undistributed Capital Gains,” “Credit for Federal Tax on Fuels,” and “Refundable Credits” (see these headings, above). A property and casualty insurance company could also claim a credit for taxes paid by a reciprocal and for certain other payments and credits it could have been required to make. A corporation that requested an extension of time to file its tax return was required to pay any final estimated tax liability not already covered (see “Tax Deposited with Form 7004”). When the corporation finally filed its return for the year, it would seldom have paid exactly the final liability; most corporations would have had either an overpayment or an amount owed.

Estimated tax payments were required of any corporation expecting to owe a tax liability of \$500 or more for the year. The payments had to be made quarterly, on the fifteenth day of the fourth, sixth, ninth, and twelfth months of the company’s accounting year. If the total payments for the year were greater than the liability shown on the return, the overpayment could be either refunded or applied to next year’s estimated tax liability. If a corporation realized before it filed its return that it had overpaid, and the overpayment was at least \$500 and at least 10 percent of tax liability for the year, it could apply for an immediate refund of the excess payment. The application had to be made within 2-1/2 months of the close of its taxable year.

If a corporation had \$500 or more of tax liability on the due date of its return and had not made quarterly estimated tax payments of at least 25 percent (each quarter) of the liability shown on its return or 25 percent of the tax it paid in the previous year, it was liable for a penalty for underpayment of estimated tax. This penalty, which was calculated at the current interest rate prescribed by IRS, became a part of the amount owed when the corporation filed its return. However, the penalty did not apply if there was a legitimate reason for the underpayment.

Foreign insurance companies with effectively connected income (as filed on Form 1042-S) may have reported U.S. income tax paid or withheld at source, which would be considered in their tax liability computation. These amounts are included in “Overpayment or Amount Owed.” The components of the tax payment schedule are shown in Table 11.

### Overpayments less Refunds

[Page 3, Line 12]

These were the net estimated tax payments, after deducting any amount previously refunded, remaining to be credited when the corporation’s tax return was filed. See “Overpayment or Amount Owed.”

### Pension, Profit-Sharing, Etc. Plans

[Page 1, Line 23]

This deduction was the current year’s deductible contributions to qualified pension, profit-sharing, or other funded deferred compensation plans. Contributions made by employers to these plans were deductible under Code section 404 subject to limits on contributions for owners, officers, and highly paid employees. For defined-benefit plans, contributions were also limited based on actuarial computations of the amount necessary to fund the promised benefits.

The statistics included amounts from “Cost of Goods Sold” and “Other Deductions” identified as pensions (unless clearly direct pensions), annuity plans, 401(k) plans, profit-sharing plans, retirement plans, and stock bonus plans. Any amounts identified as part of cost of goods sold or capitalized under section 263A were excluded from cost of goods sold and included in these statistics. The combined amount for companies other than mining companies that reported an amount for a combination of welfare/retirement plans was included in the statistics for contributions to pension and profit-sharing plans.

This item was not reported for regulated investment companies and real estate investment trusts.

### Portfolio Income (less deficit)

Portfolio income (less deficit) is interest, dividends, annuities and royalties, as well as gain or loss from the disposition of income-producing or investment property that is not derived in the ordinary course of trade or business.

### Purchases

[Form 1125-A, line 2]

This is the total of items purchased during the year for resale or to become a part of goods manufactured or prepared for sale. See “Cost of Goods Sold.”

### Recapture of Investment Credit

[Page 3, Schedule J, Line 9a]

The investment credit (Form 3468) was subject to recapture if the property was sold or converted to other uses, including but not limited to:

- (1) The investment credit property was disposed of before the end of 5 full years after the property was placed in service (recapture period), including leased property.
- (2) The use of the property was changed before the end of the recapture period so that it no longer qualifies as investment credit property.
- (3) The business use of the property decreased before the end of the recapture period so that it no longer qualifies (in whole or in part) as investment credit property.
- (4) In the case of a project under the Phase II gasification program or Phase II qualifying advanced coal project program, failure at any time during the applicable

recovery to attain and maintain the separation and sequestration requirements.

## Refundable Credits

[Page 3, Schedule J, Line 19]

This term includes amounts from several refundable credits, including:

(1) **Credit for tax paid on undistributed capital gains**

[Page 3, Schedule J, Part II, Line 19a]

Regulated investment companies (RIC) and real estate investment trusts (REIT) were required to pay tax on amounts of undistributed net long-term capital gain less net short-term capital loss at the regular corporate tax rate of 35 percent. Stockholder corporations, for their part, were required to include in the computation of their long-term capital gains any such gains designated by the parent as undistributed dividends. The stockholder corporations were then deemed to have paid the tax on the undistributed long-term capital gain dividends and were allowed a credit for the tax they were deemed to have paid.

(2) **Credit for Federal tax paid on fuels**

[Page 3, Schedule J, Line 19b]

Code section 34 allowed a credit in full or in stated amounts for excise taxes on:

- a) gasoline used on farms for farming purposes (Code section 6420);
- b) gasoline used for nonhighway purposes or by local transit systems (Code section 6421); and
- c) fuel not used for taxable purposes (Code section 6427), such as on the sale of fuel when tax was imposed under section 4041(a) or (e), and the purchaser used such fuel other than for the use for which it sold or resold such fuel.

This credit was also used to claim the credit for purchase of qualified diesel-powered highway vehicles.

(3) **Refundable alternative minimum tax credit**

[Page 3, Schedule J, Line 19c]

This credit is from Form 8827, line 8c. It is the refundable amount for a corporation electing to accelerate the minimum tax credit in lieu of the special depreciation allowance for certain qualified property.

(4) **Other refundable credits**

[Page 3, Schedule J, Line 19d]

This amount is from any other refundable credit the corporation is claiming, including the Credit for tax on ozone-depleting chemicals, and credits claimed under section 960(b).

## Rents Paid

[Page 1, Line 16]

This deduction consisted of rents paid for the use of land, buildings or structures, and rents paid for leased roads, and work equipment for railroad companies. Also included in rents paid was the leasing of vehicles. Auto lease inclusion income, required by law to offset this deduction for businesses that lease luxury automobiles, was reported in other receipts. Some corporations reported taxes paid and other specific expenses with rents paid. When identified, those items were included in the statistics for the respective deductions and excluded from rents paid.

Rent identified as part of the cost of goods sold, or capitalized under section 263A, was excluded from cost of goods sold and included in the statistics as rent paid on business property.

## Repairs

[Page 1, Line 14]

Repairs reported as an ordinary and necessary business expense were the costs of maintenance and incidental repairs that did not add to the value or appreciably prolong the life of the property. Expenditures for permanent improvements, which increased the basis of the property, were required to be capitalized and depreciated rather than deducted currently. Regulated investment companies did not report repairs.

## Research Activities Credit

[Form 6765]

The research activities tax credit is a credit for qualified research expenses and basic research payments to universities and other qualified organizations. The research credit is a credit taken upon expenses paid or incurred for qualified research as defined by section 174 of the Internal Revenue Code. The methods to calculate the credit are the Regular Credit and Alternative Simplified Credit.

Research is limited to research undertaken to discover information that is technological in nature and useful in the development of a new or improved business component. The research had to be conducted within the United States and could not involve the social sciences, arts, or humanities. Research funded by another person, a grant, or a government agency was also ineligible for the credit. For qualified clinical testing expenses relating to drugs for certain rare diseases, taxpayers can elect to claim the credit using Form 8820, *Orphan Drug Credit*.

For a discussion of the income tax limitations and carry-back and carryforward provisions of the credit, see "General Business Credit."

## Retained Earnings, Appropriated

[Page 5, Schedule L, Line 24(d)]

Earnings set aside for specific purposes and not available for distribution to shareholders were included under this heading. Included were guaranty funds (for certain finance

companies), reserves for plant expansion, bond retirements, contingencies for extraordinary losses, and general loss reserves. Also included was the total amount of all reserves not defined as valuation reserves or reserves included in other liabilities. Specifically excluded were the reserves for bad debts, depreciation, depletion, and amortization, which were shown separately in this report. Unrealized appreciation was included in retained earnings unappropriated. Unrealized profits were included in other liabilities. Unearned income, if not current, was also included in other liabilities. Any amount of retained earnings not identified as either appropriated or unappropriated was considered unappropriated for the purpose of these statistics.

### Retained Earnings, Unappropriated

[Page 5, Schedule L, Line 25(d)]

Retained earnings, unappropriated, consisted of the retained earnings and profits of the corporation less any reserves (these reserves were shown in the statistics as Retained Earnings, Appropriated). Dividends and distributions to shareholders were paid from this account. These accumulated earnings included income from normal and discontinued operations, extraordinary gains or losses, and prior period adjustments. Also included were undistributed or undivided earnings (income or profits), and earned surplus. For railroads, unappropriated retained earnings included additions to property and funded debt retired through income and surplus. The statistics presented here are net amounts after reduction for negative amounts reported and include adjustments to shareholders equity reported by the taxpayer.

Adjustments reported by the taxpayers primarily consisted of unrealized gains and losses from securities held "available for sale." Also included in adjustments, guarantees of employee stock ownership plan debt, and compensation related to employee stock award plans.

Form 1120S did not differentiate between appropriated and unappropriated retained earnings. For statistical tables in this report that include Forms 1120S, retained earnings unappropriated includes the total 1120S amount of retained earnings, which could include appropriated and unappropriated amounts.

### Returns of Active Corporations

These returns were the basis for all financial statistics presented in the report. They comprised the majority of returns filed, and were defined for the statistics as returns of corporations reporting any income or deduction items, including tax-exempt interest. Although corporations in existence during any portion of the taxable year were required to file a return whether or not they had income and deductions (Code section 6012(a)(2)), inactive corporate returns were excluded from the statistics. See Section 3, Description of the Sample and Limitations of the Data.

### Returns With Net Income

See "Net Income (or Deficit)."

### S Corporation Returns

Form 1120S, *U.S. Income Tax Return for an S Corporation*, was filed by corporations electing to be taxed through their shareholders under Internal Revenue Code section 1362. These companies reported corporate income and deductions from their conduct of trade or business, but generally allocated any income or loss to their shareholders to be taxed only at the individual level. Portfolio income (loss), net rental real estate income (loss), net income (loss) from other rental activities, and other income (loss) were not included in net income (loss) from ordinary trade or business but were allocated to shareholders to be reported on their returns.

Only corporate-level S corporation trade or business income and deductions are included in the items comprising "Total Receipts" and "Total Deductions." Data on rental and investment income allocated to shareholders is presented in Tables 7, 8, and 9.

Subchapter S of the Internal Revenue Code, from which these corporations take their name, provided a set of restrictive criteria which a company had to meet to qualify as an S corporation. For tax years beginning after 2004, S corporations had to meet the following criteria:

- (1) no more than 100 shareholders;
- (2) only individuals as shareholders (with an exception for estates and trusts, including charitable remainder trusts);
- (3) no nonresident alien shareholders; and
- (4) only one class of stock.

For tax years beginning after 1997, certain tax exempt organizations can be S corporation shareholders. These are qualified pension, profit-sharing, and stock bonus plans; charitable organizations; and Code section 501(c)(3) organizations.

Corporations ineligible to be treated as S corporations were:

- (1) banks or similar financial institutions using the reserve method of accounting for bad debts under section 585;
- (2) life insurance companies;
- (3) corporations electing to take the U.S. possessions tax credit;
- (4) Interest-Charge Domestic International Sales Corporations (IC-DISC) or former DISCs; and
- (5) affiliated group members eligible for inclusion on a consolidated return.

The Small Business Job Protection Act of 1996 provided significant reform for S corporations. This legislation contained 17 provisions relating to S corporations. For more

information on the impact of this legislation on S corporations see Wittman, Susan, "S Corporation Returns, 1997," *Statistics of Income Bulletin*, Spring 2000, Volume 19, Number 4.

Some S corporations were subject to certain special taxes at the corporate level. See "Excess Net Passive Income Tax" and "Income Tax" in this section.

## Salaries and Wages

[Page 1, Line 13]

Salaries and wages included the amount paid for the tax year, less any amounts paid for the work opportunity credit, empowerment zone employment credit, Indian employment credit, or welfare-to-work credit. Also included were expenses, such as bonuses, directors' fees, wages, payroll, and salaries listed in the other deductions schedule. Excluded were items deductible elsewhere on the return, such as contributions to a 401(k) plan, amounts contributed under a salary reduction agreement, or amounts included in the cost of goods sold. Also excluded was compensation of officers since it was listed as a separate deduction item on the return.

## Size of Business Receipts

Returns for nonfinance industries were classified by size of gross receipts from sales and operations. Returns of industries within the "Finance and Insurance" and "Management Holding Companies" sectors were classified by size of total receipts (the sum of business receipts and investment income). See also, "Business Receipts" and "Total Receipts."

## Statutory Special Deductions

[Page 1, line 29c]

Statutory special deductions in the tables was the sum of the deductions for net operating loss carryovers from prior years and the special deductions for dividends and other corporate attributes allowed by the Code. These deductions were in addition to ordinary and necessary business deductions and were shown in the statistics as deductions from net income. In general, net income less statutory special deductions equaled income subject to tax. Some components of Statutory Special Deductions are shown separately in Table 11.

**Net operating loss deduction.** This deduction was the result of prior-year net operating losses. For large and mid-sized corporations, net operating losses (NOLs) could have been carried back to reduce any taxes paid in the 3 years previous to the loss year (2 years for NOLs incurred in tax years beginning after August 5, 1997), and any remaining amounts carried forward for 15 years (20 years for NOLs incurred in tax years beginning after August 5, 1997). A new provision added in the American Recovery and Reinvestment Act of 2009 allows small businesses to carry back losses incurred in 2008 up to 5 prior years. Amounts carried back, however, would not have appeared on the returns used for the statistics in this report. This item represents amounts carried forward from previous years and applied to reduce taxable income in the current year.

**Dividends received deduction.** This deduction was based on the type of stock owned and the extent of ownership. Generally, dividends from other domestic members of a company's affiliated group were deducted 100 percent, those from other domestic companies owned 20 percent or more were allowed an 80-percent deduction, and those owned less than 20 percent were allowed a 70-percent deduction. These percentages were reduced if the stock was debt financed or if it was preferred stock of public utilities that were allowed a deduction for dividends paid. In the case of life insurance companies, the dividend received deduction (other than the 100-percent deduction) was further reduced by the share of the company's investment income attributed to policyholders.

A deduction for dividends received from a foreign corporation was allowed if the foreign corporation had been engaged in a trade or business within the United States for at least 3 years and if at least 50 percent of its gross income was effectively connected U.S. trade or business income. The deduction was allowed only for dividends attributable to income earned in the United States, and only if the U.S. corporation owned at least 10 percent of the stock of the foreign corporation.

The total dividends received deduction was further limited based on net income. Generally, the 70- and 80-percent deductions could not exceed 70 and 80 percent of net income less the 100-percent deductions for dividends received from affiliated groups, foreign sales corporations, and small business investment companies. This limitation did not apply if the corporation had a net operating loss (even if the loss was caused by the dividends received deduction). The various categories of stock ownership and the percentages that were deductible are shown on Form 1120, Schedule C (reproduced in Section 6). See also, "Dividends Received from Domestic Corporations" and "Dividends Received from Foreign Corporations" in this section.

Deduction for dividends paid (Forms 1120-RIC and 1120-REIT). Regulated investment companies (RICs) and real estate investment trusts (REITs) were required to distribute virtually all (90 percent for both return types) of their taxable income to their shareholders in the form of dividends to qualify for their special status. Their taxable income was reduced by the dividends they paid (which were taxable to the recipients), and they generally paid no corporate tax. This special deduction represented those required distributions.

**Deduction for dividends paid on certain public utility stock.** This special deduction was for dividends paid on preferred stock issued by regulated telephone, electric, gas, or water companies before October 1, 1942, or issued to replace such stock. Companies could deduct 40 percent of the smaller of such dividends or taxable income computed without this deduction. This item is included in "Statutory Special Deductions, Total," but is not shown separately in Table 11.

**Section 857(b)(2)(E) deduction (Form 1120-REIT).** This deduction was equivalent to the tax imposed on real estate

investment trusts (REITs) that failed to meet the restrictions imposed on their sources of income. Generally, at least 75 percent of their income had to come from real estate investments and at least 95 percent from investment sources of all kinds. A tax of 100 percent was imposed on the net income attributable to the greater of the amounts by which the trust failed to meet the 75- or 95-percent income test, and a deduction was allowed to prevent the same income from being taxed under the income tax. This item is included in “Statutory Special Deductions, Total,” but is not shown separately in Table 11.

**Section 806(a) small life insurance company deduction.** This item is included in “Statutory Special Deductions, Total,” but is not shown separately in Table 11.

### Tax Deposited with Form 7004

[Page 3, Schedule J, Line 16]

This is the amount of the corporation’s estimated tax liability deposited with the filing of Form 7004, *Application for Automatic Extension of Time to File Certain Business Income Tax, Information, and Other Returns*, as reported on the corporation’s income tax return for the year. The automatic extension of time to file a corporate tax return was 6 months, and the corporation is required to pay any remaining tax liability with the request for an extension. See “Overpayment or Amount Owed.”

### Tax-Exempt Interest

[Page 3, Form 1120, Schedule K, Line 9, or Page 5, Schedule M-1, Line 7, or Page 2, Form 9916-A, Part II, Line 1, column (c), or Page 3, Form 1120S, Schedule K, Line 16a]

The interest received from certain government obligations was not subject to U.S. income tax. These tax-exempt obligations included those issued by States, municipalities, and other local governments, the District of Columbia, and U.S. possessions, including Puerto Rico.

For statistical presentation, this interest was included in total receipts. However, it was not included in net income (less deficit) or income subject to tax.

### Tax-Exempt Securities

[Page 5, Schedule L, Line 5(d)]

This balance sheet asset item comprised: (1) State and local government obligations, the interest on which was excludable from gross income under section 103(a); and (2) stock in a mutual fund or other regulated investment company that distributed exempt-interest dividends during the tax year of the corporation. Examples included bond anticipation notes, project notes, Public Housing Authority bonds, and State and local revenue bonds.

### Tax from Section I and Tax from Section II

[Form 1120-F, Page 1, Lines 1 and 2]

Foreign corporations with income effectively connected to a trade or business conducted in the U.S. were taxable at U.S. corporation income tax rates on that income, but they could also have been taxable on income not “effectively connected” with a U.S. trade or business (generally, portfolio investment and certain transportation income) just as nonresident foreign corporations were.

On Form 1120-F, the tax on income not effectively connected with a U.S. trade or business was called “Tax from Section I” and the tax on effectively connected income was called “Tax from Section II.” Only the “Tax from Section II” is included as a component of “Income Tax” and “Total Income Tax” in the general tables in this report. It is also shown as a separate item in Table 11.

“Tax from Section II” included income tax calculated at the U.S. corporate tax rates on effectively connected income, recapture taxes, and the alternative minimum tax. It was reduced by the foreign tax credit, nonconventional source fuel credit, qualified electric vehicle credit, general business credit, and credit for prior-year minimum tax.

### Tax Refund

[Page 1, Line 36]

See “Overpayment or Amount Owed.”

### Tax Year

Tax year (income year) in this publication refers to the year covering accounting periods ending July 2015 through June 2016. The corporation returns included a span of over 23 months between the first-included accounting period, which began on August 1, 2014, and closed on July 31, 2015, and the end of the last-included accounting period, which began on July 1, 2015, and closed on June 30, 2016. Therefore, this report shows income received or expenses incurred during any or all of the months in the 23-month span. This span, in effect defines the tax year in such a way that the noncalendar-year-ended accounting periods are centered by the calendar-year-ended accounting period. The calendar year made up 91.6 percent of the number of returns for Tax Year 2015. (See “Introduction” in Section I.)

### Taxable Income

[Page 1, Line 30]

This line item from Form 1120 is called “Income Subject to Tax” in this report.

### Taxes Paid

[Page 1, Line 17]

Taxes paid included the amounts reported as an ordinary and necessary business deduction as well as identifiable amounts reported in the cost of goods sold schedules or



capitalized under section 263A. Included among the deductible taxes were ordinary State and local taxes paid or accrued during the year; Social Security and payroll taxes; unemployment insurance taxes; excise taxes, import and tariff duties; and business, license, and privilege taxes. Income and profit taxes paid to foreign countries or U.S. possessions were also deductible unless claimed as a credit against income tax. However, S corporations excluded any foreign taxes from the deduction for taxes paid, instead allocating them to their shareholders (who might either deduct them or take a foreign tax credit for them). Regulated investment companies also had to exclude those foreign taxes from the deduction for taxes when they elected under Code section 853 to allow their shareholders to claim a foreign tax credit (or a deduction) for the foreign taxes paid. See also “Foreign Tax Credit.”

Taxes not deductible generally included Federal income and excess profits taxes, gift taxes, taxes assessed against local benefits, taxes not imposed on the corporation, and certain other taxes, including State or local taxes that were paid or incurred in connection with an acquisition or disposition of property. Taxes related to the acquisition of property were to be treated as part of the cost of the property, while taxes related to the disposition of property were to be treated as a reduction in the amount realized from the disposition.

Some corporations included sales, excise, and related taxes, which were part of the sales price of their products, as receipts. When this occurred, an equal and offsetting amount was usually included in the cost of goods sold or as part of the separate deduction for taxes paid. When included in the cost of goods sold, these taxes were included in the statistics for taxes paid when they could be identified.

### Total Assets and Total Liabilities

[Page 5, Schedule L, Lines 15(d) and 28(d)]

Total assets and total liabilities were those reported in the end-of-year balance sheet in the corporations’ books of account. Total assets were net amounts after reduction by accumulated depreciation, accumulated amortization, accumulated depletion, and the reserve for bad debts. If these reserve accounts were reported as liabilities, they were treated as reductions from the asset accounts to which they related and total assets and liabilities were adjusted accordingly.

When used in this report, the term total liabilities included both the claims of creditors and shareholders’ equity (see also “Net Worth”). In addition, total liabilities were net amounts after reduction by the cost of treasury stock. See also “Balance Sheets” in this section.

### Total Deductions

As presented in this publication, total deductions comprised: (1) the cost of goods sold; (2) the ordinary and necessary business deductions from gross income; and (3) net loss from sales of noncapital assets. Components of total deductions

were shown in the income statement segment of various tables throughout this report. See also “Total Receipts.”

### Total Income Tax After Credits

[Page 3, Schedule J]

Income tax after credits in the statistics equals “total income tax before credits” less the sum of:

- (1) foreign tax credit;
- (2) qualified electric vehicle credit;
- (3) general business credit;
- (4) prior year minimum tax credit;
- (5) credit for holders of tax credit bonds; and
- (6) American Samoa economic development credit.

Many of these items are discussed under their own headings and may or may not be shown separately.

### Total Income Tax Before Credits

Total income tax before credits was the sum of the following taxes, which may or may not be shown separately:

- (1) income tax;
- (2) personal holding company tax;
- (3) recapture and other taxes;
- (4) alternative minimum tax;
- (5) excess net passive income tax (Form 1120S);
- (6) capital gains tax of regulated investment companies (Form 1120-RIC);
- (7) tax on net income from foreclosure property;
- (8) tax on net income from prohibited transactions;
- (9) branch profits tax of foreign corporations (Form 1120-F);
- (10) reciprocal tax (Form 1120-PC);
- (11) Code section 856 tax (includes 856(c)(7) and 856(g)(5)) (Form 1120-REIT); and
- (12) Code section 857 tax (includes 857(b)(5) and 857(b)(7)(A)).

Other tax and interest amounts were either included in or subtracted from the total income tax. Amounts included were tax and interest on a nonqualified withdrawal from a capital construction fund (section 7518), interest due on deferred gain (section 1260(b), interest on deferred tax attributable to installment sales of certain timeshares and residential lots (section 453(l)(3)), certain nondealer installment obligations (section 453A(c)), interest due under the look-back method, and deferred tax due upon the termination of a section 1294 election for shareholders in qualified electing funds. Amounts subtracted were deferred tax on the corporation’s share of the undistributed earnings of a qualified electing fund, recapture of new markets credit, recapture of employer-provided child-care facilities and services credit, and deferred LIFO recapture

tax (Code section 1363(d)). These amounts were included in the statistics as adjustments to total income tax, which is not shown separately.

### Total Income Tax (S Corporations)

Total income tax for S corporations (Tables 6.1 and 6.2) was the sum of the following taxes:

- (1) income tax;
- (2) income tax adjustments;
- (3) excess net passive income tax;
- (4) recapture taxes; and
- (5) adjustments to total tax.

### Total Net Income (Less Deficit) (S Corporations)

Since the Tax Reform Act of 1986, total net income (less deficit) is defined as the sum of:

- (1) ordinary income (loss);
- (2) ordinary dividends;
- (3) interest income;
- (4) royalty income;
- (5) net income (loss) from rental real estate activities;
- (6) net income (loss) from other rental activities;
- (7) total net long-term capital gain (loss), and net short-term capital gain (loss).

Prior to 1987, S corporation net income (less deficit) included most of the components of total net income (less deficit) above. The sum of the above components is a comprehensive measure of S corporation profits and losses that enables comparisons to be made with years prior to 1987.

### Total Receipts

Total receipts equal the sum of the following items, each discussed under its own heading:

- (1) business receipts;
- (2) interest;
- (3) interest on Government obligations: State and local;
- (4) rents;
- (5) royalties;
- (6) net capital gains (excluding long-term gains from regulated investment companies);
- (7) net gain, noncapital assets;
- (8) dividends received from domestic corporations;
- (9) dividends received from foreign corporations (excluding certain taxable income from related foreign corporations only constructively received); and
- (10) other receipts.

Total receipts for S corporations equal the sum of the following items, each discussed under its own heading:

- (1) business receipts;
- (2) interest on Government obligations: State and local;
- (3) net gain, noncapital assets; and
- (4) other receipts.

S corporations reported receipts for interest, rents, royalties, net capital gains, and dividends on Form 1120S, Schedule K-1, *Shareholders' Shares of Income, Credits, Deductions, etc.* These are not included in the statistics for this item.

### Total Receipts Less Total Deductions

This item differed from net income (less deficit) for tax purposes in that it included tax-exempt interest and excluded constructive taxable income from related foreign corporations.

### U.S. Government Obligations

[Page 5, Schedule L, Line 4(d)]

This balance sheet asset item comprised U.S. obligations, including those of instrumentalities of the Federal Government. State and local government obligations, the interest on which was excluded from gross income under section 103(a), were included in "Tax-Exempt Securities."

Some property and casualty insurance companies included investments in government obligations within other investments on the income tax return, Form 1120-PC. When identified, the amounts were included in the statistics for investments in government obligations and excluded from other investments.

### U.S. Tax Paid or Withheld at Source

[Form 1120-F, Page 1, Line 5i]

Foreign corporations with income related to a U.S. business activity (i.e., effectively connected income) often had U.S. income tax withheld at the source for portfolio or transportation income not effectively connected to their U.S. operations. Also withheld was certain effectively connected income such as, gains from the disposition of U.S. real property reported on Form 8288-A or income allocable to foreign partners reported on Form 8805. This withholding is shown in Table 11.

U.S. taxes paid or withheld by resident foreign corporations on income effectively connected to a U.S. trade or business are included in the statistics for "Overpayment or Amount Owed." Taxes withheld at the source on effectively connected income for foreign insurance companies are also included in "Overpayment or Amount Owed."

### Withholding

[Page 3, Schedule J, line 17]

Includes amounts of U.S. Federal income tax withheld from income.

### Zero Assets

See "Balance Sheets."

## APPENDIX A

### Industry Codes by Sector, Major Industry, and Minor Industry

Sector Code	Major Code	Published Industry Code	Industry Description
<b>11</b>			<b>Agriculture, Forestry, Fishing and Hunting</b>
	<b>111</b>	111005	<b>Agricultural Production</b>
	<b>113</b>	113005	<b>Forestry and Logging</b>
	<b>114</b>	114005	<b>Support Activities and Fishing, Hunting and Trapping</b>
<b>21</b>	<b>210</b>		<b>Mining</b>
		211110	Oil and Gas Extraction
		212110	Coal Mining
		212200	Metal Ore Mining
		212315	Nonmetallic Mineral Mining and Quarrying
		213110	Support Activities for Mining
<b>22</b>	<b>221</b>		<b>Utilities</b>
		221100	Electric Power Generation, Transmission and Distribution
		221210	Natural Gas Distribution
		221300	Water, Sewage and Other Systems
		221500	Combination Gas and Electric
<b>23</b>			<b>Construction</b>
	<b>236</b>	236115	<b>Construction of Buildings</b>
	<b>237</b>		<b>Heavy and Civil Engineering Construction and Land Subdivision</b>
		237105	Heavy and Civil Engineering Construction
		237210	Land Subdivision
	<b>238</b>		<b>Specialty Trade Contractors</b>
		238210	Electrical Contractors
		238220	Plumbing, Heating, and Air-Conditioning Contractors
		238905	Other Specialty Trade Contractors
<b>31</b>			<b>Manufacturing</b>
	<b>311</b>		<b>Food Manufacturing</b>
		311115	Animal Food Manufacturing and Grain and Oilseed Milling
		311300	Sugar and Confectionery Product
		311400	Fruit and Vegetable Preserving and Specialty Food Manufacturing
		311500	Dairy Product
		311615	Meat and Seafood Processing
		311800	Bakeries and Tortilla Manufacturing
		311900	Other Food
	<b>312</b>		<b>Beverage and Tobacco Product Manufacturing</b>
		312110	Soft Drink and Ice
		312120	Breweries
		312135	Wineries and Distilleries
		312200	Tobacco Manufacturing
	<b>313</b>		<b>Textile Mills and Textile Product Mills</b>
		313000	Textile Mills
		314000	Textile Product Mills
	<b>315</b>		<b>Apparel Manufacturing</b>
		315100	Apparel Knitting Mills
		315215	Cut and Sew Apparel Contractors and Manufacturers
		315990	Apparel Accessories and Other Apparel
	<b>316</b>	316115	<b>Leather and Allied Product Manufacturing</b>
	<b>321</b>	321115	<b>Wood Product Manufacturing</b>
	<b>322</b>		<b>Paper Manufacturing</b>
		322100	Pulp, Paper, and Paperboard Mills
		322200	Converted Paper Product
	<b>323</b>	323100	<b>Printing and Related Support Activities</b>

Sector Code	Major Code	Published Industry Code	Industry Description
	<b>324</b>		<b>Petroleum and Coal Products Manufacturing</b>
		324110	Petroleum Refineries (including integrated)
		324125	Asphalt Paving, Roofing, Other Petroleum and Coal Products
	<b>325</b>		<b>Chemical Manufacturing</b>
		325100	Basic Chemical
		325200	Resin, Synthetic Rubber, and Artificial and Synthetic Fibers and Filaments
		325410	Pharmaceutical and Medicine
		325500	Paint, Coating, and Adhesive
		325600	Soap, Cleaning Compound, and Toilet Preparation
		325905	Other Chemical Product and Preparation
	<b>326</b>		<b>Plastics and Rubber Products Manufacturing</b>
		326100	Plastics Product
		326200	Rubber Product
	<b>327</b>		<b>Nonmetallic Mineral Product Manufacturing</b>
		327105	Clay, Refractory and Other Nonmetallic Mineral Product
		327210	Glass and Glass Product
		327305	Cement, Concrete, Lime and Gypsum Product
	<b>331</b>		<b>Primary Metal Manufacturing</b>
		331115	Iron, Steel Mills and Steel Product
		331315	Nonferrous Metal Production and Processing
		331500	Foundries
	<b>332</b>		<b>Fabricated Metal Product Manufacturing</b>
		332110	Forging and Stamping
		332215	Cutlery, Hardware, Spring and Wire: Machine Shops, Screw, Nut and Bolt
		332300	Architectural and Structural Metals
		332400	Boiler, Tank, and Shipping Container
		332810	Coating, Engraving, Heat Treating, and Allied Activities
		332900	Other Fabricated Metal Product
	<b>333</b>		<b>Machinery Manufacturing</b>
		333100	Agriculture, Construction, and Mining Machinery
		333200	Industrial Machinery
		333310	Commercial and Service Industry Machinery
		333410	Ventilation, Heating, Air-Conditioning and Commercial Refrigeration Equipment
		333510	Metalworking Machinery
		333610	Engine, Turbine and Power Transmission Equipment
		333900	Other General Purpose Machinery
	<b>334</b>		<b>Computer and Electronic Product Manufacturing</b>
		334110	Computer and Peripheral Equipment
		334200	Communications Equipment
		334315	Audio and Video Equipment Mfg and Reproducing Magnetic and Optical Media
		334410	Semiconductor and Other Electronic Component
		334500	Navigational, Measuring, Electromedical, and Control Instruments
	<b>335</b>		<b>Electrical Equipment, Appliance, and Component Manufacturing</b>
		335105	Electrical Lighting Equipment and Household Appliance
		335310	Electrical Equipment
		335900	Other Electrical Equipment and Component
	<b>336</b>		<b>Transportation Equipment Manufacturing</b>
		336105	Motor Vehicles and Parts
		336410	Aerospace Product and Parts
		336610	Ship and Boat Building
		336995	Other Transportation Equipment and Railroad Rolling Stock
	<b>337</b>	337000	<b>Furniture and Related Product Manufacturing</b>
	<b>339</b>		<b>Miscellaneous Manufacturing</b>
		339110	Medical Equipment and Supplies
		339900	Other Miscellaneous Manufacturing

Sector Code	Major Code	Published Industry Code	Industry Description
42			<b>Wholesale Trade</b>
	423		<b>Merchant Wholesalers, Durable Goods</b>
		423100	Motor Vehicle and Motor Vehicle Parts and Supplies
		423300	Lumber and Other Construction Materials
		423400	Professional and Commercial Equipment and Supplies
		423500	Metal and Mineral (except Petroleum)
		423600	Electrical and Electronic Goods
		423700	Hardware, Plumbing, Heating Equipment and Supplies
		423800	Machinery, Equipment, and Supplies
		423905	Furniture, Sports, Toys, Recycle, Jewelry and Other Durable Goods
	424		<b>Merchant Wholesalers, Nondurable Goods</b>
		424100	Paper and Paper Product
		424210	Drugs and Druggists' Sundries
		424300	Apparel, Piece Goods, and Notions
		424400	Grocery and Related Product
		424500	Farm Product Raw Material
		424600	Chemical and Allied Products
		424700	Petroleum and Petroleum Products
		424800	Beer, Wine, and Distilled Alcoholic Beverage
		424915	Miscellaneous Nondurable Goods
	425	425115	<b>Wholesale Electronic Markets and Agents and Brokers</b>
44			<b>Retail Trade</b>
	441		<b>Motor Vehicle Dealers and Parts Dealers</b>
		441115	New and Used Car Dealers
		441215	Other Motor Vehicle and Parts Dealers
	442	442115	<b>Furniture and Home Furnishings Stores</b>
	443	443115	<b>Electronics and Appliance Stores</b>
	444		<b>Building Material and Garden Equipment and Supplies Dealers</b>
		444115	Homes Centers; Paint and Wallpaper Stores
		444130	Hardware Stores
		444190	Other Building Material Dealers
		444200	Lawn and Garden Equipment and Supplies Stores
	445		<b>Food, Beverage and Liquor Stores</b>
		445115	Food and Beverage Stores
		445310	Beer, Wine, and Liquor Stores
	446	446115	<b>Health and Personal Care Stores</b>
	447	447100	<b>Gasoline Stations</b>
	448	448115	<b>Clothing and Clothing Accessories Stores</b>
	451	451115	<b>Sporting Goods, Hobby, Book, and Music Stores</b>
	452	452115	<b>General Merchandise Stores</b>
	453	453115	<b>Miscellaneous Store Retailers</b>
	454	454115	<b>Nonstore Retailers</b>
48			<b>Transportation and Warehousing</b>
	481		<b>Air, Rail, and Water Transportation</b>
		481000	Air Transportation
		482110	Rail Transportation
		483000	Water Transportation
	484	484115	<b>Truck Transportation</b>
	485	485115	<b>Transit and Ground Passenger Transportation</b>
	486	486000	<b>Pipeline Transportation</b>
	487	487005	<b>Other Transportation and Support Activities</b>
	493	493100	<b>Warehousing and Storage</b>

Sector Code	Major Code	Published Industry Code	Industry Description
<b>51</b>			<b>Information</b>
	<b>511</b>		<b>Publishing Industries (except Internet)</b>
		511110	Newspaper Publishers
		511120	Periodical Publishers
		511130	Book Publishers
		511145	Database Directory and Other Publishers
		511210	Software Publishers
	<b>512</b>		<b>Motion Picture and Sound Recording Industries</b>
		512100	Motion Picture and Video Industries (except video rental)
		512200	Sound Recording Industries
	<b>515</b>	515105	<b>Broadcasting (except Internet)</b>
	<b>517</b>	517000	<b>Telecommunications (paging, cellular, cable, satellite, &amp; internet service providers)</b>
	<b>518</b>	518210	<b>Data Processing, Hosting, and Related Services</b>
	<b>519</b>	519100	<b>Other Information Services (incl. news syndicates, libraries, internet pub. &amp; broadcasting)</b>
<b>52</b>			<b>Finance and Insurance</b>
	<b>521</b>		<b>Depository Credit Intermediation</b>
		522110	Commercial Banking
		522125	Savings Institutions, Credit Unions and Other Depository Credit Intermediation
	<b>522</b>		<b>Nondepository Credit Intermediation</b>
		522215	Credit Card Issuing and Other Consumer Credit
		522292	Real Estate Credit (including mortgage bankers and originators)
		522295	International, Secondary Financing, and Other Nondepository Credit Intermediation
		522300	Activities Related to Credit Intermediation (loan brokers, check clearing, etc.)
	<b>523</b>		<b>Securities, Commodity Contracts, Other Financial Investments and Related Activities</b>
		523110	Investment Banking and Securities Dealing
		523120	Securities Brokerage
		523135	Commodity Contracts Dealing and Brokerage
		523905	Securities, Commodity Exchanges and Other Financial Investment Activities
	<b>524</b>		<b>Insurance Carriers and Related Activities</b>
		524140	Life Insurance (Form 1120-L)
		524150	Property and Casualty Companies (Form 1120-PC)
		524210	Insurance Agencies and Brokerages
		524290	Other Insurance Related Activities (including third-party admin. of Ins., etc.)
			<b>Funds, Trusts, and Other Financial Vehicles</b>
	<b>525</b>	525910	Open-End Investment Funds (Form 1120-RIC)
		525995	Other Financial Vehicles (including Mortgage REIT's)
			<b>Real Estate and Rental and Leasing</b>
<b>53</b>			<b>Real Estate</b>
	<b>531</b>	531115	Lessors of Buildings (including Equity REIT's)
		531135	Lessors of Miniwarehouses, Self-Storage Units, and Other Real Estate (including Equity REIT's)
		531210	Offices of Real Estate Agents and Brokers
		531315	Other Real Estate Activities
			<b>Rental and Leasing Services</b>
	<b>532</b>	532100	Automotive Equipment Rental and Leasing
		532215	Other Consumer Goods and General Rental Centers
		532400	Commercial and Industrial Machinery and Equipment Rental and Leasing
	<b>533</b>	533110	<b>Lessors of Nonfinancial Intangible Assets (except copyrighted works)</b>

Sector Code	Major Code	Published		
		Industry Code	Industry Description	
54	541		<b>Professional, Scientific, and Technical Services</b>	
		541115	Legal Services	
		541215	Accounting, Tax Preparation, Bookkeeping, and Payroll Services	
		541315	Architectural, Engineering, and Related Services	
		541400	Specialized Design Services	
		541515	Computer Systems Design and Related Services	
		541600	Management, Scientific, and Technical Consulting Services	
		541700	Scientific Research and Development Services	
		541800	Advertising and Related Services	
541915	Other Professional, Scientific, and Technical Services			
55	551		<b>Management of Companies (Holding Companies)</b>	
		551111	Offices of Bank Holding Companies	
		551112	Offices of Other Holding Companies	
56			<b>Administrative and Support and Waste Management and Remediation Services</b>	
	561		<b>Administrative and Support Services</b>	
		561300	Employment Services	
		561500	Travel Arrangement and Reservation Services	
	561905	Other Administrative and Support Services		
	562	562000	<b>Waste Management and Remediation Services</b>	
61	611	611000	<b>Educational Services</b>	
62			<b>Health Care and Social Assistance</b>	
	621		<b>Offices of Health Practitioners and Outpatient Care Centers</b>	
		621115	Offices of Physicians	
		621210	Offices of Dentists	
		621315	Offices of Other Health Practitioners	
		621415	Outpatient Care Centers	
	625	621515	<b>Misc. Health Care and Social Assistance</b>	
	626	622005	<b>Hospitals, Nursing, and Residential Care Facilities</b>	
	71			<b>Arts, Entertainment, and Recreation</b>
		711	711105	<b>Other Arts, Entertainment, and Recreation</b>
713		713105	<b>Amusement, Gambling, and Recreation Industries</b>	
72			<b>Accommodation and Food Services</b>	
	721	721115	<b>Accommodation</b>	
	722	722115	<b>Food Services and Drinking Places</b>	
81			<b>Other Services</b>	
	811		<b>Repair and Maintenance</b>	
		811115	Automotive Repair and Maintenance	
	811215	Other Repair and Maintenance		
	812	812115	<b>Personal and Laundry Services</b>	
	813	813000	<b>Religious, Grantmaking, Civic, Professional, and Similar Organizations</b>	