

# SOI Country-By-Country Reporting – Forms 8975/Schedule A Studies

SOI has collected data from Form 8975 (Country-by-Country Reporting) and Form 8975 Schedule A (Tax Jurisdiction and Constituent Entity Information) beginning with a part-year data file for Tax Year 2016. The result will be a microdata file and tables. More complete studies will be done starting for Tax Year 2017, when filing will be mandatory.

# Background

- Filed by U.S. parent corporations or partnerships with \$850 million or more in revenue. Foreign Controlled Domestic Corporations (FCDCs) will generally file in the country of the ultimate parent. There are some exceptions. FCDC filings will be coded as such and separated for publication purposes.
- Forms included – Forms 8975 with Forms 1120 and 1065, e-filed and paper or PDF-filed, to the extent reasonably available.
- The 2016 Tax Year data file will not include early fiscal returns, as filing was not yet available. Therefore, it will not represent a typical SOI study year.
- Filing for Tax Year 2016 is optional.
- The accounting method used in reporting is not standardized.
- Data quality will be an issue, especially in early years. Many data items do not lend themselves to thorough testing.
- Disclosure is likely to be a problem given the nature of the tables.
- File completion is tentatively scheduled for October/November 2018.

# Project Progress

- The data have been loaded and keyed
- The data are being tested and corrected
- Reviewed and commented on table proposals
- Schedules A are being consolidated or deleted when appropriate. This, and other corrections, will result in return counts being different from other published counts.
- Total corporate receipts for all corporations for Tax Year 2016 are approximately \$31.2 trillion. Form 8975 Schedule A total receipts are not a direct subset of these corporate receipts.

## Preliminary Country by Country (Form 8975) Report Summary Statistics by Type of Filer and Selected Tax Jurisdiction Tax Year 2016

Type of filer and tax jurisdiction	Number of parent returns	Number of Schedule A filings	Number of constituent entities	Total revenue
All filers	1,100	27,500	153,000	23,558,000,000
US	1,000	1,000	53,600	17,893,000,000
Stateless	400	400	10,500	661,000,000
All other	1,100	26,000	89,000	5,005,000,000
Form 1120 filers	1,000	26,000	145,500	23,160,000,000
Form 1065 Filers	100	1,100	7,400	399,000,000

Money amounts are in thousands of dollars. Counts and number of employees are in whole units.

These preliminary data are unweighted.

Detail may not add to totals due to rounding.

The number of parent returns would not be additive even without rounding as parent entities typically have operations in multiple tax jurisdictions.

Counts and money amounts have been rounded to avoid disclosure of taxpayer information

**Preliminary Country by Country (Form 8975) Report  
Summary Statistics by Type of Filer and Selected Tax Jurisdiction**

**Tax Year 2016**

Type of filer and tax jurisdiction	Number of parent returns	Number of Schedule A filings	Number of constituent entities	Total revenue	Profit or loss	Taxes paid	Taxes accrued	Stated capital	Accumulated earnings	Number of employees	Tangible assets
All filers	1,100	27,500	153,000	23,558,000,000	1,692,000,000	260,000,000	260,000,000	22,126,000,000	11,252,000,000	27,400,000	6,177,000,000
US	1,000	1,000	53,600	17,893,000,000	855,000,000	175,000,000	184,000,000	11,548,000,000	7,147,000,000	16,300,000	4,189,000,000
Stateless	400	400	10,500	661,000,000	407,000,000	1,000,000	1,000,000	1,811,000,000	952,000,000	500,000	408,000,000
All other	1,100	26,000	89,000	5,005,000,000	431,000,000	84,000,000	75,000,000	8,766,000,000	3,153,000,000	10,600,000	1,579,000,000
Form 1120 filers	1,000	26,000	145,500	23,160,000,000	1,626,000,000	259,000,000	259,000,000	21,608,000,000	11,172,000,000	26,900,000	5,977,000,000
Form 1065 Filers	100	1,100	7,400	399,000,000	66,000,000	1,000,000	2,000,000	517,000,000	80,000,000	500,000	200,000,000

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