

SOI BULLETIN

A QUARTERLY STATISTICS OF INCOME REPORT | Volume 38 Number 1

The *Statistics of Income (SOI) Bulletin* is issued quarterly by the Statistics of Income Division of the Internal Revenue Service. The report provides the earliest published annual financial statistics obtained from the various types of tax and information returns filed, as well as information from periodic or special analytical studies of particular interest to students of the U.S. tax system, tax policymakers, and tax administrators. Selected historical and other data tables, previously published in the spring issue of the *Bulletin* are now only available on SOI's pages of the IRS Web site (<https://www.irs.gov/uac/soi-tax-stats-historical-data-tables>).

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NOTE: When using information from this report, cite the publication as follows—

Internal Revenue Service
Statistics of Income Bulletin
Summer 2018
Washington, D.C.

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U.S.-source income payments to foreign persons, as reported on Form 1042-S, *Foreign Person's U.S.-Source Income Subject to Withholding*, rose to \$824.3 billion for Calendar Year 2015. This represents an increase of 13.2 percent from 2014. U.S.-source income payments subject to withholding tax rose by 24.2 percent from 2014, which fueled an increase in withholding taxes of 13.1 percent. Despite these increases, 85.7 percent of all U.S.-source income paid to foreign persons remained exempt from withholding tax. The residual U.S.-source income subject to tax was withheld at an average rate of 15.6 percent.

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The number of foreign corporations controlled by U.S. multinational corporations increased in 2012 to 88,038. End-of-year assets (\$18.6 trillion), total receipts (\$6.9 trillion), and current earnings and profits (less deficit) before income taxes (\$924 billion) all increased from Tax Year 2010. More than 79 percent of controlled foreign corporations (CFCs) were concentrated in the services; goods production; and distribution and transportation of goods sectors. CFCs were incorporated in 192 different countries of which over 40 percent were incorporated in Europe.



Foreign Recipients of U.S. Income, Calendar Year 2015

by Scott Luttrell

U.S.-source income payments to foreign persons, as reported on Form 1042-S, *Foreign Person's U.S.-Source Income Subject to Withholding*, rose to \$824.3 billion for Calendar Year 2015. This represents an increase of 13.2 percent from 2014. U.S.-source income payments subject to withholding tax rose by 24.2 percent from 2014, which fueled an increase in withholding taxes of 13.1 percent. Despite these increases, 85.7 percent of all U.S.-source income paid to foreign persons remained exempt from withholding tax. The residual U.S.-Source income subject to tax was withheld at an average rate of 15.6 percent.

Entities such as financial institutions, businesses, and academic institutions that report U.S. payments to nonresident aliens are considered withholding agents. The Internal Revenue Code (IRC) requires withholding agents to withhold tax from U.S.-source fixed, determinable, annual, or periodic (FDAP) income paid to foreign persons. This is commonly referred to as Chapter 3 withholding or nonresident alien (NRA) withholding. The withholding agent is required to report aggregate U.S.-source FDAP payments made and any associated tax withheld in a calendar year on Form 1042, *Annual Withholding Tax Return for U.S.-Source Income of Foreign Persons*. Furthermore, payments to foreign recipients are reported to the IRS on Form 1042-S; a copy is provided to the payee. Form 1042-S is used to report many types of income, including, but not limited to, interest, rents, royalties, corporate distributions, pension income, and gambling winnings.

Data Overview for 2015

In 2015, the majority of U.S.-source income paid to foreign persons (69.1 percent) went to only 12 countries (Figure A, Part 1). Foreign persons from the United Kingdom received \$108.6 billion (13.2 percent of the total) in U.S.-source income payments, a decrease of 24.7 percent from 2014. Recipients from the United Kingdom received \$40.7 billion more than any other country. United Kingdom corporations received 24.8 percent of all payments to corporate recipients. Recipients from the Cayman Islands received \$71.2 billion (8.6 percent), an increase of 36.8 percent from 2014. Japanese recipients of U.S.-source income collected \$67.9 billion (8.2 percent) and Canadian recipients collected \$49.3 billion (6.0 percent). Meanwhile, Luxembourg (\$47.1 billion) and China (\$46.7 billion) each accounted for approximately 5.7 percent of U.S.-source income in 2015.

Foreign recipients located in the 12 countries displayed in Figure A, Part 2, combined, paid \$9.7 billion in withholding

taxes, or 65.1 percent of the total, in 2015. Recipients in the Cayman Islands paid \$2.6 billion in withholding taxes (14.0 percent of the total), the most of any country, which was an increase of 12.3 percent from 2014. Recipients from Luxembourg paid nearly \$2.1 billion in withholding taxes (11.2 percent), a jump of 20.5 percent from the previous year.

Treaty vs. nontreaty countries

Tax treaties are one of the primary reasons behind relatively low withholding tax rates on payments of U.S.-source income to foreign persons. Some 66 countries had treaties in force with the United States (Table 1) in 2015. Nearly 75.2 percent of all payments reported on Form 1042-S went to recipients in treaty countries during 2015. Foreign recipients from tax treaty countries received 70.2 percent of total U.S. income paid to foreign persons and paid 61.4 percent of all withholding taxes. Canadian recipients had the largest amount of U.S.-source income subject to tax among all treaty countries and paid 8.7 percent of total withholding taxes. Recipients from the United Kingdom paid \$1.2 billion in withholding taxes in 2015 (6.5 percent). Recipients of U.S. income payments subject to withholding from treaty countries had taxes withheld at an average rate of

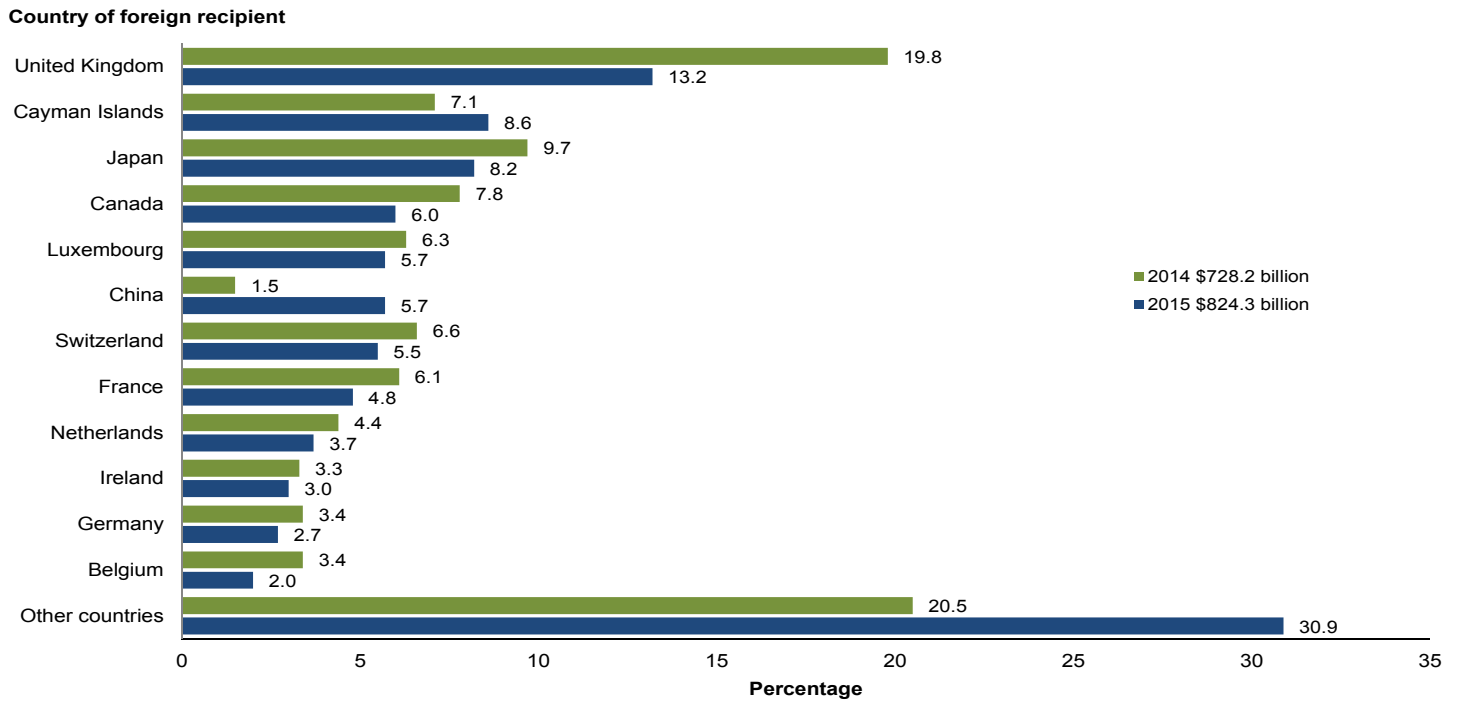
Highlights

- U.S.-source income paid to foreign persons, as reported on Form 1042-S, was \$824.3 billion for 2015.
- Nearly 86 percent of U.S. income paid to foreign persons was exempt from withholding tax.
- Taxes totaling \$18.4 billion were withheld on U.S. income paid to foreign persons in 2015, for an average effective withholding rate of 15.6 percent.
- Interest payments (49.6 percent) and dividends (24.9 percent) accounted for most of the U.S. income paid to foreign persons.
- Foreign persons in the United Kingdom received the most U.S.-source income (\$108.6 billion; 13.2 percent of the total).
- Foreign persons in the Cayman Islands paid more than \$2.6 billion in withholding taxes (14.0 percent of the total), the most of any country.
- Foreign partners received \$13.5 billion in income from U.S. partnerships from which \$4.6 billion in U.S. taxes were withheld.
- Sales of U.S. real property interests by foreign persons totaled \$10.5 billion; U.S. taxes withheld on that income totaled \$922 million.



Figure A1

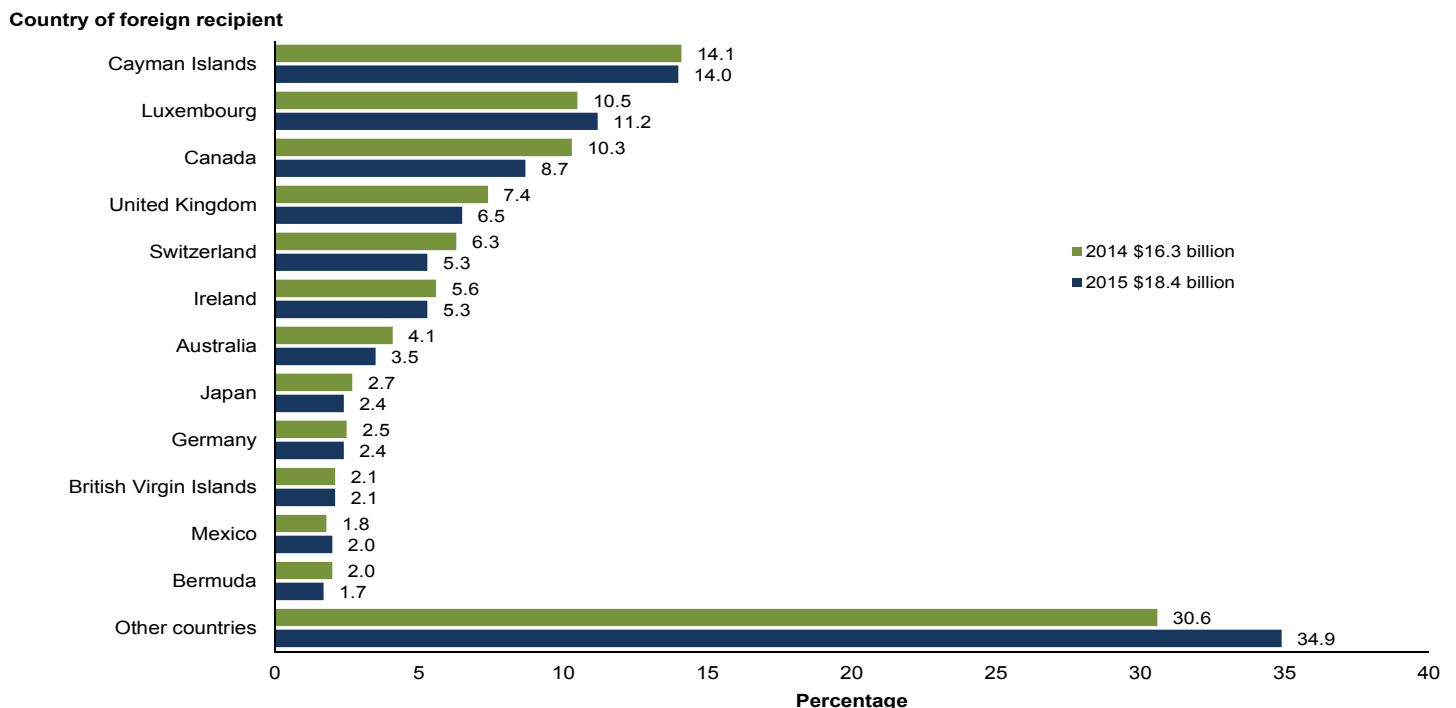
Percentage of Total U.S.-Source Income Paid to Foreign Persons Under Chapter 3, as Reported on Form 1042-S, by Country of Foreign Recipient, Calendar Years 2014 and 2015



NOTE: Form 1042-S, *Foreign Person's U.S.-Source Income Subject to Withholding*.
 SOURCE: IRS, Statistics of Income Division, Individuals, Withholding on Foreign Recipients of U.S. Income, October 2017.

Figure A2

Percentage of Total Taxes Withheld on U.S.-Source Income Paid to Foreign Persons Under Chapter 3, as Reported on Form 1042-S, by Country of Foreign Recipient, Calendar Years 2014 and 2015



NOTE: Form 1042-S, *Foreign Person's U.S.-Source Income Subject to Withholding*.
 SOURCE: IRS, Statistics of Income Division, Individuals, Withholding on Foreign Recipients of U.S. Income, October 2017.

15.1 percent, compared to 15.6 percent on payments made to residents of nontreaty countries.

Residents in 14 nontreaty jurisdictions received more than \$1 billion of U.S.-source income in 2015: the Bahamas, Bermuda, Brazil, the British Virgin Islands, the Cayman Islands, Chile, Guernsey, Hong Kong, Jersey, Kuwait, Saudi Arabia, Singapore, Taiwan, and the United Arab Emirates. Nontreaty countries combined to account for \$245.8 billion of total U.S.-source income and \$7.1 billion of total tax withheld.

Types of U.S.-source income

The primary types of U.S.-source income paid to foreign recipients as reported on Form 1042-S in 2015 remained consistent with previous years (Figure B). Interest payments totaled \$408.7 billion, which was an increase of 36.4 percent from 2014, and accounted for 49.6 percent of total gross income, an increase of 8.4 percentage points from the previous year. Dividends paid to foreign persons rose by 2.6 percent to \$205.2 billion, and they accounted for 24.9 percent of total gross income. Payments of rents and royalties to foreign persons totaled \$50.7 billion or 6.2 percent of total gross income. Notional principal contract income fell by 29.7 percent to \$47.2 billion in 2015, and it was the only major income category that declined from 2014. (See the Explanation of Selected Terms section of this article for a definition of notional principal contract.)

Income subject to withholding

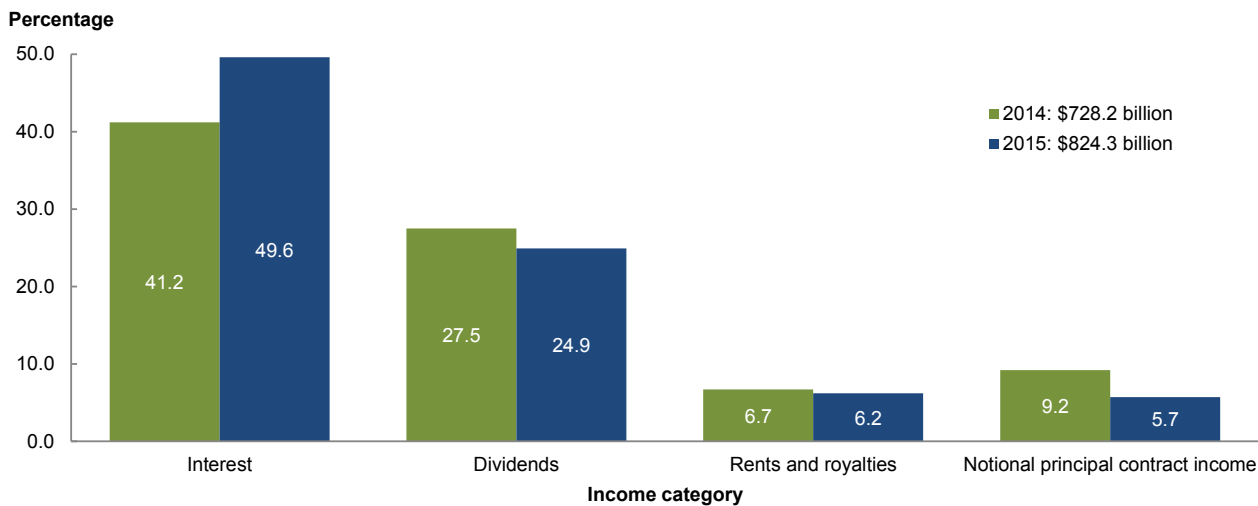
U.S.-source payments to foreign persons are commonly exempt from withholding tax. The primary reasons for withholding

exemptions are either due to a tax treaty between the United States and the recipient's country of residence, or the fact that the specific type of income (portfolio or bank deposit interest, for instance) is exempt under an Internal Revenue Code section. Income effectively connected with a U.S. trade or business is also exempt from withholding. However, over \$118.2 billion (14.3 percent) of total U.S.-source income payments to foreign persons was subject to tax in 2015.

Figure C presents the percentages of U.S.-source income paid to foreign persons and income subject to withholding by income category in 2015. This figure illustrates the differences that exist with respect to the taxation of certain types of income reported on Form 1042-S. For example, dividends comprised a majority (78.3 percent) of income subject to tax, despite accounting for only 24.9 percent of total income. Dividend income subject to withholding was taxed at an average effective rate of 15.9 percent. While dividends are taxed at comparatively high rates, interest is much more likely to be exempt from withholding. For 2015, interest payments constituted the largest share of total income (49.6 percent) but made up only 6.3 percent of all U.S.-source income subject to withholding. Furthermore, a mere 1.8 percent of interest income was subject to withholding; it was taxed at an average rate of 11.1 percent. As mentioned previously, notional principal contract income accounts for 5.7 percent of U.S.-source income paid to foreign persons; however, it is not generally subject to withholding tax. Rents and royalty payments are more likely to be taxed, and they accounted for 6.2 percent of all income and 5.1 percent of income subject to withholding.

Figure B

Percentage of Total U.S.-Source Income Paid to Foreign Persons Under Chapter 3, as Reported on Form 1042-S, by Selected Income Category, Calendar Years 2014 and 2015

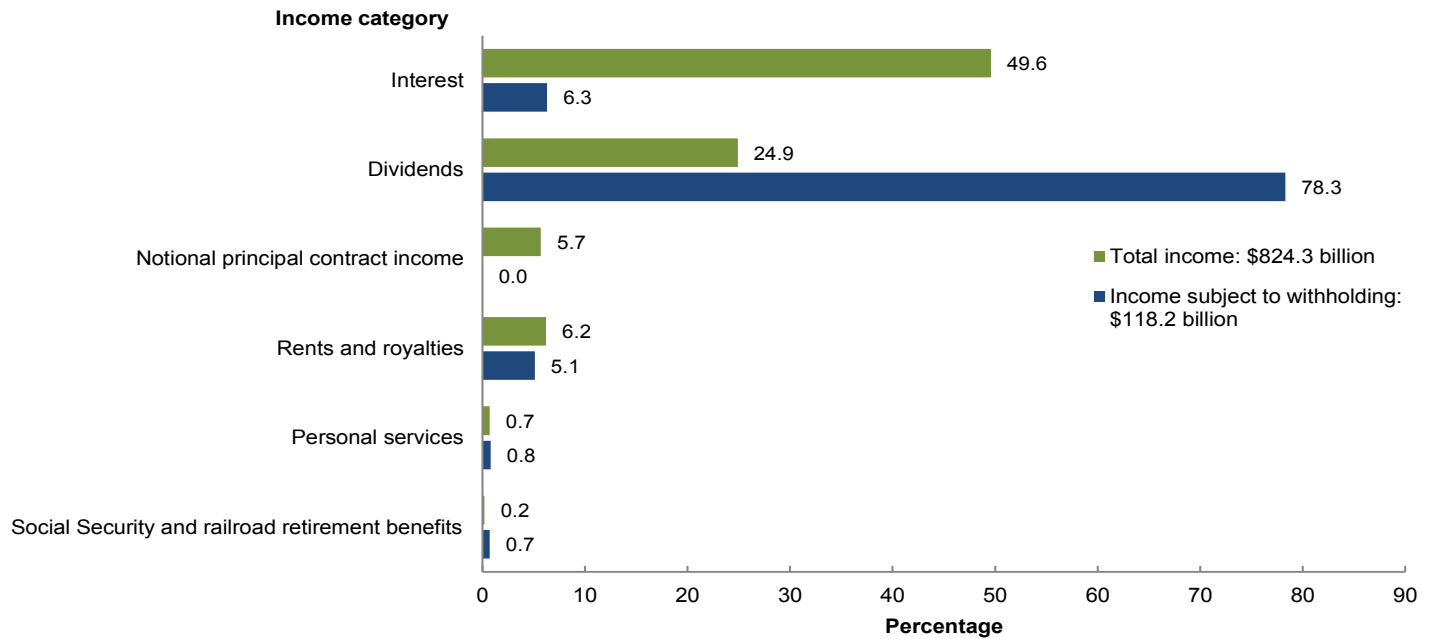


NOTE: Form 1042-S, Foreign Person's U.S.-Source Income Subject to Withholding.

SOURCE: IRS, Statistics of Income Division, Individuals, Withholding on Foreign Recipients of U.S. Income, October 2017.

Figure C

Percentage of Total U.S.-Source Income Paid to Foreign Persons and Income Subject to Withholding Under Chapter 3, as Reported on Form 1042-S, by Selected Income Category, Calendar Year 2015



NOTE: Form 1042-S, *Foreign Person's U.S.-Source Income Subject to Withholding*.

SOURCE: IRS, Statistics of Income Division, Individuals, Withholding on Foreign Recipients of U.S. Income, October 2017.

Additional Foreign Income and Withholding Data

While the majority of U.S. income paid to foreign recipients is subject to withholding under Chapter 3 of the IRC and is reported on Form 1042-S, information from other tax forms is useful for providing a comprehensive look at withholding tax of foreign persons' U.S. income.

Foreign partner's partnership income

U.S. partnership income that is allocable to foreign partners is reported on Form 8805, *Foreign Partner's Information Statement of Section 1446 Withholding Tax*. Partnerships are required to withhold income tax on effectively connected taxable income deemed allocable to foreign partners. A U.S. or foreign partnership files a Form 8805 to show the amount of taxable income and total tax allocable to the foreign partner for the partnership's tax year. The statutory withholding rate for partnership income allocable to foreign partners is 35 percent. Reduced withholding rates may apply if the foreign partner is an individual and the specific type of income is among those subject to preferential rates. These types of income include capital gains, depreciation recapture, and collectibles gains.

Sales of U.S. real property

Another tax form that provides information about withholding on foreign persons' U.S. income is Form 8288-A, *Statement of Withholding on Dispositions by Foreign Persons of U.S. Real Property Interests*. The Foreign Investment in Real Property Tax Act of 1980 (FIRPTA) was introduced to ensure that the

United State collected a portion of the capital gains realized by foreigners from the sales of U.S. real property interests. Form 8288-A is used to report the sales price of U.S. real property sold by the foreign person and the tax withheld on that sales price. Typically, the sales price is subject to 10-percent withholding, although corporations may be taxed at rates up to 35 percent in certain circumstances.¹ In some instances, the seller may elect to pay a 35-percent tax on the capital gain rather than a 10-percent withholding tax on the sales price. When a foreign person sells real property interests in the United States, the buyer of the property is responsible for collecting and remitting to the IRS the appropriate amount of withholding and filing the necessary tax forms.

Branch profits tax

A withholding tax equivalent on a foreign person's U.S. income in the form of a branch profits tax is reported on Form 1120-F, *U.S. Income Tax Return of a Foreign Corporation*. The branch profits tax was created to achieve neutrality for foreign investments in the United States through a U.S. branch or a U.S. subsidiary of a foreign parent corporation. While dividends paid by a U.S. subsidiary to its foreign parent corporation are subject to a 30-percent (or lower) withholding tax, profits of a U.S. branch of a foreign parent would not be subject to an equivalent tax absent the branch profits tax. The amount of income remitted from the U.S. branch to its foreign owner, known as the dividend equivalent amount, is reported on Form 1120-F, along with the associated tax on that amount (i.e., branch profits tax).

¹ The withholding rate has been increased from 10 percent to 15 percent for sales occurring on or after February 16, 2016.

Effective withholding tax rates

The combined withholding tax on U.S.-source income paid to foreign persons for 2015 was nearly \$24.1 billion, with an average effective tax rate of 16.8 percent (Figure D). The effective withholding rates vary widely among the various tax forms. U.S. partnership income allocable to foreign partners is subject to significantly higher rates of withholding than other types of U.S. income because it is not typically reduced by tax

treaties and is far more likely to be taxed near the statutory 35-percent tax rate. For 2015, the average effective withholding rate on U.S. partnership distributions to foreign partners was 34.1 percent. The 8.8-percent withholding rate on income from the sale of U.S. real property interests is comparatively low because the statutory rate for this type of income is just 10 percent. The average effective rate on foreign branch profits (13.2 percent) reported on Form 1120-F was less than the 30-percent

Figure D

U.S.-Source Income Payments to Foreign Persons: Number of Forms, Income, Tax Withheld, and Effective Tax Rate, by Form Type and Selected Country of Foreign Recipient, Calendar Year 2015

[Money amounts are in thousands of dollars]

Form type and selected country	All payments		Payments subject to withholding tax			
	Total number of forms	Income (less loss)	Number of forms [1]	Income [2]	U.S. tax withheld	Effective tax rate [3]
	(1)	(2)	(3)	(4)	(5)	(6)
All forms	5,482,134	849,599,048	3,370,663	143,542,245	24,086,993	16.8
Form 1042-S: All countries [4]	5,291,778	824,296,819	3,192,701	118,203,479	18,383,639	15.6
United Kingdom	543,026	108,585,916	370,379	9,103,932	1,189,289	13.1
Cayman Islands	117,307	71,242,438	35,805	13,615,537	2,566,652	18.9
Japan	192,669	67,894,317	64,166	4,433,159	441,732	10.0
Canada	599,565	49,276,346	376,623	14,515,532	1,593,078	11.0
Luxembourg	20,317	47,114,896	7,449	7,546,268	2,066,322	27.4
China	225,561	46,739,096	77,888	558,016	80,574	14.4
Switzerland	72,147	45,050,005	38,291	7,322,275	975,902	13.3
France	87,210	39,354,665	55,172	1,542,718	331,810	21.5
Netherlands	69,560	30,270,556	39,407	1,584,243	233,313	14.7
Ireland	271,079	25,098,685	244,133	4,550,928	968,247	21.3
Germany	359,288	21,876,693	167,143	3,104,787	438,859	14.1
Belgium	31,836	16,734,389	23,004	1,585,976	315,426	19.9
Taiwan	113,326	15,510,854	72,046	692,454	193,968	28.0
Australia	303,261	11,975,657	268,410	4,613,719	647,663	14.0
Singapore	98,051	9,546,063	79,435	568,987	159,848	28.1
Norway	22,474	9,473,014	18,082	406,481	66,023	16.2
Bermuda	19,158	7,761,419	7,935	1,160,514	312,466	26.9
South Korea	44,659	6,357,447	28,336	1,063,013	160,987	15.1
Mexico	254,458	6,076,085	142,117	2,197,402	359,363	16.4
Form 8805: All countries [5]	161,329	12,087,215	149,812	13,499,640	4,605,974	34.1
Germany	68,592	1,294,500	67,477	1,363,765	468,291	34.3
United Kingdom	8,653	1,113,547	6,750	1,281,633	456,859	35.6
Canada	12,792	890,608	11,458	1,089,140	346,492	31.8
Sweden	182	730,542	135	738,629	278,017	37.6
Netherlands	1,393	502,769	1,099	556,550	141,660	25.5
Cayman Islands	1,399	237,371	954	375,918	130,091	34.6
Norway	132	216,369	118	218,307	76,309	35.0
Form 8288-A: All countries	26,137	10,515,458	26,137	10,515,458	922,292	8.8
Canada	8,781	2,886,598	8,781	2,886,598	254,327	8.8
Germany	2,823	910,250	2,823	910,250	64,479	7.1
United Kingdom	2,160	676,825	2,160	676,825	59,411	8.8
Japan	1,241	393,611	1,241	393,611	38,858	9.9
Italy	285	313,327	285	313,327	29,639	9.5
Form 1120-F: Reporting branch profits tax	2,890	2,699,556	2,013	1,323,668	175,088	13.2

[1] Number of forms in this column includes returns with income subject to taxation for Form 1042-S; positive income (excluding losses) for Form 8805; sales revenue for Form 8288-A; and branch profits tax for Form 1120-F.

[2] Amounts in this column represent income subject to taxation for Form 1042-S; positive income (excluding losses) for Form 8805; sales revenue for Form 8288-A; and dividend equivalent amount subject to taxation for Form 1120-F.

[3] U.S. tax withheld (column 5) divided by income (column 4).

[4] Amounts shown are subject to withholding under Chapter 3; Chapter 4 amounts are shown separately in Table 3.

[5] Income (less loss) for all payments (column 2) is less than income on payments subject to tax (column 4) because column 2 includes forms with losses.

NOTE: The titles of the forms are: Form 1042-S, *Foreign Person's U.S.-Source Income Subject to Withholding*; Form 8805, *Foreign Partner's Information Statement of Section 1446 Withholding Tax*; Form 8288-A, *Statement of Withholding on Dispositions by Foreign Persons of U.S. Real Property Interests*; and Form 1120-F, *U.S. Income Tax Return of a Foreign Corporation*.

SOURCE: IRS, Statistics of Income Division, Foreign Recipients of U.S. Income, August 2018.

statutory rate because recipients frequently qualify for reduced rates through tax treaties.

Real property sales

The eight States with the most U.S. real property interest sales in 2015 made up 75.4 percent of all transactions, 68.9 percent of the total sales revenue, and 69.4 percent of taxes withheld (Figure E). The largest number of real property sales occurred in Florida. In fact, Florida had more than the other top seven States combined in 2015. New York had the highest sales revenue (nearly \$1.2 million) per transaction. Many real property sales could not be assigned to a specific State for reasons including: the real property transaction involved the transfer of stock in a portfolio of real estate holdings not specific to a geographic area; or the transaction involved the sale of an ownership interest in an entity that controlled real estate in multiple locations in the United States.

Withholding Under Chapter 4

The Foreign Account Tax Compliance Act (FATCA) became U.S. Federal law in 2010 as part of the Hiring Incentives to Restore Employment (HIRE) Act. Under FATCA, foreign financial institutions and certain other nonfinancial foreign entities are required to report on the foreign assets held by their U.S. account holders or be subject to withholding on withholdable payments. FATCA requires U.S. withholding agents to withhold tax on certain payments to foreign financial institutions (FFIs) that do not agree to report certain information to the IRS regarding their U.S. account, and on certain payments to certain nonfinancial foreign entities (NFFE) that do not provide information on their substantial U.S. owners to withholding agents.

Figure E
U.S. Real Property Interests Sold by Foreign Persons: Number of Forms 8288-A Filed, Total Sales Revenue, and Tax Withheld, by State Location of the Property, Calendar Year 2015

[Money amounts are in thousands of dollars]

State location of real property	Total number of forms	Total sales revenue	U.S. tax withheld
	(1)	(2)	(3)
Total	26,137	10,515,458	922,292
Florida	11,368	2,832,671	232,649
California	2,565	1,705,839	159,544
Hawaii	1,492	467,320	44,829
Arizona	1,398	285,790	25,840
New York	1,066	1,261,273	110,572
Texas	899	212,041	20,761
Washington	647	185,078	17,939
Massachusetts	253	290,688	27,588
All others and nonallocable	6,449	3,274,758	282,570

NOTE: Form 8288-A, *Statement of Withholding on Dispositions by Foreign Persons of U.S. Real Property Interests*, is filed by the buyer of U.S. real property sold by foreign persons. The buyer must withhold tax in accordance with Internal Revenue Code section 1445.
SOURCE: IRS, Statistics of Income Division, Foreign Recipients of U.S. Income, August 2018. These data were not previously available on the IRS Tax Statistics Web site.

Payments subject to withholding under FATCA are now subject to the laws of Chapter 4 of the IRC, which were implemented beginning July 1, 2014. As a result, the Tax Year 2015 data presented in Table 3 represent the first full year of data under the new provisions.²

Some 20.4 percent of the U.S.-source income reported under Chapter 4 was subject to withholding (Table 3), and the average withholding rate for these payments was 12.7 percent. Interest was the largest category of Chapter 4 income (\$1.3 billion), and most of that (76.1 percent) was exempt from withholding. Dividends accounted for 48.0 percent of Chapter 4 income subject to withholding while interest payments accounted for 41.3 percent. Tax withheld on dividends (45.8 percent) and interest (36.0 percent) comprised a majority of the tax withheld on Chapter 4 payments.

Data Sources and Limitations

The statistics in this data release were tabulated by calendar year using information from the following four forms and are subject to nonsampling error :

Form 1042-S

Payers (or their authorized withholding agents) of most U.S.-source income to foreign persons must withhold tax in accordance with Internal Revenue Code section 1441. Form 1042-S, *Foreign Person's U.S.-Source Income Subject to Withholding*, is filed by the payer to report this income and the U.S. tax withheld. Often a financial institution acts as the payer's withholding agent. The statistics in this data release were tabulated by calendar year, using all Forms 1042-S filed with the Internal Revenue Service during 2015. The data reflect the income that was paid and U.S. tax that was withheld for 2015.

Form 8805

Domestic partnerships (or their authorized withholding agents) must withhold tax in accordance with Internal Revenue Code section 1446 on distributions made to foreign partners. Form 8805, *Foreign Partner's Information Statement of Section 1446 Withholding Tax*, is filed by the payer to report income paid by U.S. partnerships to their foreign partners and the U.S. tax withheld. The statistics in this data release were tabulated by calendar year, using all Forms 8805 filed with the Internal Revenue Service during 2015. The data reflect the income that was paid and U.S. tax that was withheld for 2015.

Form 8288-A

Purchasers of U.S. real property held by foreign persons must withhold tax in accordance with Internal Revenue Code section 1445. Form 8288-A, *Statement of Withholding on Dispositions by Foreign Persons of U.S. Real Property Interests*, is filed by the buyer of U.S. real property sold by foreign persons. The statistics in this data release were tabulated by calendar year using all Forms 8288-A filed with the Internal Revenue Service with a date of transfer occurring during 2015.

² SOI also published 2014 data for Chapter 4, but because the new laws went into effect in mid-2014, the 2014 data only cover that last 6 months of that year. See Table 3 for Tax Year 2014 at <https://www.irs.gov/statistics/soi-tax-stats-form-1042s-table-3>.

Form 1120-F

In accordance with section 884(a), the Internal Revenue Code imposes a 30-percent branch-profits tax on after-tax earnings of a foreign corporation's U.S. trade or business that are not reinvested in a U.S. trade or business by the close of the tax year or are disinvested in a later tax year. Form 1120-F, *U.S. Income Tax Return of a Foreign Corporation*, is filed by the foreign corporation. The statistics in this data release were tabulated based upon all Forms 1120-F included in the Tax Year 2015 SOI Corporation sample.

Nonsampling error

Because the populations of Forms 1042-S, Forms 8805, and Forms 8288-A were used for the statistics, the data are not subject to sampling error. However, the data are subject to nonsampling error, including data entry and taxpayer reporting errors. Because the data were tested and adjusted to ensure that certain basic mathematical relationships held, including the calculation of the correct tax withheld, the possibility of error cannot be completely eliminated.

Explanation of Selected Terms

Foreign persons—For purposes of this data release, foreign persons include: (a) individuals whose residence is not within the United States and who are not U.S. citizens (i.e., nonresident aliens); and (b) corporations and other organizations (including partnerships, private foundations, estates, and trusts) created or organized outside the United States. Individuals residing, and organizations created or organized, in Puerto Rico and U.S. possessions are also considered foreign persons.

Notional principal contract income—Notional principal contracts involve two parties who agree contractually to pay each

other amounts at specified times based on the underlying notional amount. The underlying amount is notional because neither party to the notional principal contract is required to actually hold the property comprising the underlying amount. It is an amount specified in the contract, and, based on that amount, certain calculations are made. Generally, when amounts under the contract are due at the same time, they are netted and only one payment is made. Notional principal contract income is not subject to withholding but must be reported on Form 1042-S, if the income was effectively connected with the conduct of a trade or business in the United States. Notional principal contracts are used by financial institutions to reduce the risk of changes in interest rates, commodity prices, and currency exchange rates. Interest rate swaps, currency swaps, and equity swaps are examples of notional principal contracts.

Withholding rate pool—A withholding rate pool is a payment of a single type of income, determined in accordance with the categories of income reported on Form 1042-S that is subject to a single rate of withholding.

U.S. branch treated as U.S. person—The following types of U.S. branches (of foreign entities) may reach an agreement with a withholding agent to treat a branch as a U.S. person: (a) a U.S. branch of a foreign bank subject to regulatory supervision by the Federal Reserve Board; or (b) a U.S. branch of a foreign insurance company required to file an annual statement on a form approved by the National Association of Insurance Commissioners with the Insurance Department of a State, Territory, or the District of Columbia.

Scott Luttrell is an economist with the International Returns Analysis Section, Corporation, Partnership, & International Branch. This data release was prepared under the direction of Chris Carson, Chief.

Foreign Recipients of U.S. Income, Calendar Year 2015

Table 1. Foreign Recipients of U.S. Income Under Chapter 3 Withholding Filing Forms 1042-S: Number, Total U.S.-Source Income, and U.S. Tax Withheld, by Tax Treaty Countries and Total Nontreaty Countries, Calendar Year 2015

(Money amounts are in thousands of dollars)

Treaty status and country	Number of Forms 1042-S	U.S.-source income			U.S. tax withheld
		Total	Exempt from withholding	Subject to withholding	
	(1)	(2)	(3)	(4)	(5)
Total	5,291,778	824,296,819	706,093,337	118,203,483	18,383,639
Tax treaty countries, total	3,979,785	578,459,158	503,812,559	74,646,609	11,293,358
Armenia	656	3,732	2,848	884	175
Australia [1]	303,717	11,986,877	7,368,060	4,618,817	648,094
Austria	24,233	1,176,957	808,930	368,028	71,672
Azerbaijan	399	2,902	2,145	758	146
Bangladesh	4,548	34,176	31,342	2,834	410
Barbados	3,189	5,735,080	5,696,536	38,545	8,198
Belarus	1,736	9,593	6,883	2,710	707
Belgium	31,836	16,734,389	15,148,413	1,585,976	315,426
Bulgaria	4,122	22,557	12,251	10,307	1,222
Canada	599,565	49,276,346	34,760,814	14,515,532	1,593,078
China	225,561	46,739,096	46,181,081	558,016	80,574
Cyprus	2,639	106,510	84,918	21,591	4,585
Czech Republic	10,943	283,862	238,110	45,752	7,528
Denmark	21,346	5,443,418	4,273,956	1,169,462	147,798
Egypt	7,347	79,840	50,385	29,455	4,280
Estonia	3,293	28,680	17,978	10,701	2,287
Finland	11,307	1,925,867	1,746,854	179,014	29,892
France [2]	87,418	39,356,136	37,812,848	1,543,288	331,957
Georgia	762	10,135	7,949	2,186	502
Germany	359,288	21,876,693	18,771,907	3,104,787	438,859
Greece	21,188	129,580	74,004	55,577	14,268
Hungary	6,826	1,957,454	1,750,604	206,850	13,613
Iceland	2,557	47,896	37,491	10,406	2,049
India	111,218	4,316,028	3,931,510	384,517	66,741
Indonesia	11,248	536,104	520,745	15,360	2,922
Ireland	271,079	25,098,685	20,547,757	4,550,928	968,247
Israel	54,993	2,191,165	1,172,396	1,018,769	206,441
Italy	77,460	2,600,944	1,709,397	891,547	110,634
Jamaica	5,542	260,456	244,754	15,701	3,279
Japan	192,669	67,894,317	63,461,158	4,433,159	441,732
Kazakhstan	1,864	60,594	58,185	2,409	478
Korea, Republic of (South)	44,659	6,357,447	5,294,434	1,063,013	160,987
Kyrgyzstan	311	977	508	469	73
Latvia	2,134	55,293	50,197	5,096	1,307
Lithuania	2,225	126,777	122,987	3,791	723
Luxembourg	20,317	47,114,896	39,568,628	7,546,268	2,066,322
Malta	3,469	247,223	129,431	117,792	28,029
Mexico	254,458	6,076,085	3,878,682	2,197,402	359,363
Moldova	676	5,950	4,881	1,070	249
Morocco	1,515	62,592	60,069	2,523	473
Netherlands	69,560	30,270,556	28,686,313	1,584,243	233,313
New Zealand	43,984	533,967	347,822	186,146	35,740
Norway	22,474	9,473,014	9,066,533	406,481	66,023
Pakistan	6,283	26,515	16,817	9,698	1,812
Philippines	28,117	1,117,099	939,278	177,821	49,500
Poland	36,983	516,244	352,538	163,707	28,175
Portugal	12,104	1,470,072	1,401,500	68,572	10,536
Romania	7,061	64,609	55,312	9,297	2,023
Russia	28,670	1,608,112	1,553,643	54,470	11,500

Footnotes at end of table.

Table 1. Foreign Recipients of U.S. Income Under Chapter 3 Withholding Filing Forms 1042-S: Number, Total U.S.-Source Income, and U.S. Tax Withheld, by Tax Treaty Countries and Total Nontreaty Countries, Calendar Year 2015—Continued

[Money amounts are in thousands of dollars]

Treaty status and country	Number of Forms 1042-S	U.S.-source income			U.S. tax withheld
		Total	Exempt from withholding	Subject to withholding	
	(1)	(2)	(3)	(4)	(5)
Slovak Republic	3,623	52,244	40,379	11,865	2,525
Slovenia	5,510	32,848	11,998	20,851	4,991
South Africa	26,523	480,948	251,554	229,393	39,747
Spain	82,356	3,626,855	2,943,060	683,795	84,596
Sri Lanka	1,355	19,006	14,238	4,768	793
Sweden	28,749	5,741,113	4,226,981	1,514,133	254,955
Switzerland	72,147	45,050,005	37,727,731	7,322,275	975,902
Tajikistan	229	549	197	351	53
Thailand	21,396	416,185	374,556	41,629	7,812
Trinidad and Tobago	6,793	250,165	225,704	24,461	7,126
Tunisia	1,122	12,751	11,123	1,627	305
Turkey	11,369	265,742	228,852	36,890	6,664
Turkmenistan	127	562	285	277	38
Ukraine	9,971	29,607	18,835	10,773	2,078
United Kingdom	543,026	108,585,916	99,481,983	9,103,932	1,189,289
Uzbekistan	462	1,798	483	1,315	287
Venezuela	119,478	2,839,367	192,818	2,646,549	142,255
Nontreaty countries, total [3]	1,311,993	245,837,661	202,280,778	43,556,874	7,090,281

[1] Includes Ashmore and Cartier Islands, Christmas Island, Cocos (Keeling) Islands, Coral Sea Islands Territory, and Norfolk Island. These countries are included with Australia in this table because they are included under the tax treaty agreement with Australia. Please note that these countries are not included with Australia in Table 2.

[2] Includes Guadeloupe, French Guiana, Martinique, and Reunion. These countries are included with France in this table because they are included under the tax treaty agreement with France. Please note that these countries are not included with France in Table 2.

[3] Includes Puerto Rico and U.S. possessions. The U.S. and Bermuda have had a tax treaty in effect since 1986, however, this treaty provides no reduction of withholding rates.

NOTES: Detail may not add to totals because of rounding. Form 1042-S is entitled *Foreign Person's U.S.-Source Income Subject to Withholding*.

SOURCE: IRS, Statistics of Income Division, Foreign Recipients of U.S. Income, October 2017.

Table 2. Foreign Recipients of U. S. Income Under Chapter 3 Withholding Filing Forms 1042-S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Types of Income, Selected Recipient Types, and Selected Countries of Recipients, Calendar Year 2015

[Money amounts are in thousands of dollars]

Selected country and selected recipient type	Number of Forms 1042-S	U.S. tax withheld	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and railroad retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Total	5,291,778	18,383,639	824,296,819	408,661,752	205,167,036	50,716,067	1,928,987	5,979,793	47,233,239
RECIPIENT TYPES									
Individuals	3,870,025	1,221,250	13,357,905	1,898,087	2,589,078	1,829,460	1,928,987	1,553,820	4,916
Corporations	619,412	9,919,577	435,937,400	205,142,336	89,710,948	34,136,414	0	3,966,774	36,566,117
Partnerships and trusts	175,300	726,216	21,992,305	7,302,467	9,536,435	1,799,310	0	34,762	0
U.S. branches treated as U.S. persons	2,241	22,283	14,017,617	6,988,793	2,839,852	14,029	0	2,823	2,747,578
Governments and international organizations	254,639	150,437	126,325,596	91,648,190	25,948,278	472,106	0	56,864	0
Tax-exempt organizations [1]	12,965	54,197	1,516,437	342,078	689,398	149,416	0	15,146	0
Withholding foreign partnerships and trusts	3,052	9,356	2,301,429	1,010,758	343,520	15,186	0	1,813	709,931
Artists and athletes	29,984	250,350	1,066,770	42,248	6,142	78,286	0	1,767	0
Withholding rate pools (general)	35,724	4,724,935	86,960,654	42,111,617	35,632,878	191,911	0	438	0
Withholding rate pools (tax-exempt)	1,092	4,098	19,279,065	12,027,563	7,056,675	1,926	0	5	0
Other and unknown	287,344	1,300,939	101,541,642	40,147,614	30,813,832	12,028,023	0	345,581	7,204,698
SELECTED COUNTRIES AND RECIPIENT TYPES									
Argentina	73,002	23,688	252,833	143,652	61,525	5,921	8,243	5,691	0
Individuals	68,903	16,853	194,458	119,441	46,249	2,050	8,243	2,709	0
Corporations	1,537	2,067	28,755	15,027	6,714	1,426	0	512	0
Withholding rate pools (general)	55	2,340	11,810	3,980	7,815	d	0	0	0
Australia	303,261	647,663	11,975,657	4,828,746	4,080,251	522,422	35,132	24,519	977,153
Individuals	135,290	33,406	242,342	12,613	92,051	34,805	35,132	5,144	0
Corporations	17,523	364,911	6,173,334	2,017,379	2,084,642	364,647	0	15,610	972,082
Withholding rate pools (general)	143	3,887	86,654	59,904	24,851	150	0	0	0
Austria	24,233	71,672	1,176,957	585,210	314,754	148,829	9,616	5,615	0
Individuals	16,373	5,445	45,267	2,028	11,192	4,921	9,616	826	0
Corporations	1,707	7,673	326,085	181,331	56,146	27,051	0	3,298	0
Withholding rate pools (general)	1,882	47,862	468,057	250,141	209,370	187	0	0	0
Bahamas	21,004	118,955	1,184,402	616,888	376,288	4,029	771	6,316	0
Individuals	2,459	3,385	17,695	4,157	5,607	236	771	315	0
Corporations	16,508	82,328	859,898	448,002	264,038	300	0	d	0
Withholding rate pools (general)	295	18,715	136,124	65,185	65,365	11	0	0	0
Barbados	3,189	8,198	5,735,080	302,653	28,494	6,615	1,266	206	5
Individuals	1,459	604	3,866	549	723	101	1,266	201	0
Corporations	1,376	6,441	5,681,467	258,599	23,438	6,414	0	d	5
Withholding rate pools (general)	25	85	7,873	6,250	1,149	0	0	0	0
Belgium	31,836	315,426	16,734,389	11,425,085	3,732,892	252,506	7,911	18,839	8,063
Individuals	25,150	9,172	81,930	5,665	32,612	3,604	7,911	7,923	0
Corporations	2,382	58,458	2,192,640	1,230,623	150,795	240,437	0	9,593	33
Withholding rate pools (general)	468	244,473	8,085,013	4,334,792	3,104,802	127	0	0	0
Bermuda	19,158	312,466	7,761,419	6,160,395	1,006,396	19,604	1,365	11,514	0
Individuals	5,809	3,625	180,778	163,735	10,305	1,552	1,365	488	0
Corporations	10,451	201,715	6,757,445	5,700,642	611,643	13,989	0	8,128	0
Withholding rate pools (general)	79	7,054	134,520	101,785	23,342	d	0	0	0
Brazil	76,674	96,766	3,477,363	3,037,933	162,739	67,319	5,370	10,480	0
Individuals	52,799	21,847	172,091	51,526	36,120	34,675	5,370	7,149	0
Corporations	1,850	66,126	447,576	181,946	108,953	21,813	0	1,609	0
Withholding rate pools (general)	49	16	316	284	30	d	0	0	0
British Virgin Islands	98,460	382,600	3,932,061	1,915,417	1,375,937	15,597	199	221	0
Individuals	2,363	5,138	35,318	15,917	16,877	170	199	45	0
Corporations	92,750	361,373	3,678,208	1,833,205	1,248,638	11,986	0	173	0
Withholding rate pools (general)	9	d	64	59	4	d	0	0	0

Footnotes at end of table.

Table 2. Foreign Recipients of U. S. Income Under Chapter 3 Withholding Filing Forms 1042-S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Types of Income, Selected Recipient Types, and Selected Countries of Recipients, Calendar Year 2015—Continued

[Money amounts are in thousands of dollars]

Selected country and selected recipient type	Number of Forms 1042-S	U.S. tax withheld	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and railroad retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Brunei	693	1,853	119,204	43,074	65,193	59	0	d	0
Individuals	414	28	173	33	64	4	0	d	0
Corporations	33	25	1,104	884	149	0	0	0	0
Withholding rate pools (general)	d	d	d	d	d	d	d	d	d
Canada	599,565	1,593,078	49,276,346	14,148,939	18,903,370	1,563,600	410,873	542,764	2,718,515
Individuals	425,624	120,626	1,566,107	29,613	149,205	191,504	410,873	128,900	0
Corporations	46,100	471,173	21,581,656	6,365,234	5,236,212	1,111,936	0	390,638	2,123,840
Withholding rate pools (general)	972	811,330	11,920,811	3,512,421	6,946,786	1,148	0	0	0
Cayman Islands	117,307	2,566,652	71,242,438	48,100,047	12,004,739	218,190	626	1,429	3,129,356
Individuals	1,505	14,091	270,790	256,263	12,121	149	626	d	0
Corporations	106,553	2,426,661	58,966,566	44,590,219	6,728,571	199,009	0	49	277
Withholding rate pools (general)	180	2,083	98,619	89,275	5,762	2,744	0	0	0
Chile	31,105	163,052	1,281,345	482,584	550,849	3,292	7,211	2,488	2,886
Individuals	19,534	7,409	59,349	25,396	15,026	461	7,211	958	0
Corporations	9,987	152,502	911,056	188,898	502,654	2,401	0	96	353
Withholding rate pools (general)	10	4	35	21	14	d	0	0	0
China	225,561	80,574	46,739,096	38,289,719	6,366,027	279,615	416	386,425	0
Individuals	207,200	20,801	576,421	34,639	49,707	16,441	416	321,471	0
Corporations	2,109	45,426	1,364,772	540,991	77,276	213,042	0	35,761	0
Withholding rate pools (general)	136	3	48	17	25	6	0	0	0
Colombia	32,773	84,886	674,443	336,126	239,808	11,360	9,763	3,335	0
Individuals	25,234	8,248	51,760	12,904	8,485	3,005	9,763	2,573	0
Corporations	3,200	74,788	367,095	82,233	224,500	5,669	0	556	0
Withholding rate pools (general)	24	4	35	20	9	6	0	0	0
Cyprus	2,639	4,585	106,510	35,090	12,828	16,420	798	11,617	0
Individuals	1,535	569	4,276	309	1,485	516	798	169	0
Corporations	775	3,652	92,862	27,823	10,125	15,327	0	11,353	0
Withholding rate pools (general)	8	d	15	0	5	9	0	0	0
Czech Republic	10,943	7,528	283,862	87,166	58,147	15,789	1,358	107,611	0
Individuals	9,491	1,803	15,058	716	4,444	641	1,358	2,330	0
Corporations	395	1,857	129,713	6,928	3,969	12,218	0	105,218	0
Withholding rate pools (general)	151	1,833	27,139	13,608	11,832	8	0	0	0
Denmark	21,346	147,798	5,443,418	1,544,072	2,650,055	499,674	6,554	6,793	0
Individuals	10,198	4,470	32,151	755	5,321	6,970	6,554	2,008	0
Corporations	4,428	81,195	3,251,739	751,097	1,895,068	213,986	0	4,491	0
Withholding rate pools (general)	230	45,355	732,941	273,551	296,567	37	0	0	0
East Timor	413	351	209,569	124,015	83,519	49	0	0	0
Individuals	157	89	683	49	35	14	0	0	0
Corporations	229	255	8,359	6,177	788	0	0	0	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Finland	11,307	29,892	1,925,867	1,155,410	586,814	73,575	3,338	3,107	0
Individuals	8,681	1,944	14,941	198	2,435	1,273	3,338	742	0
Corporations	1,495	22,956	705,949	195,521	398,259	44,788	0	1,831	0
Withholding rate pools (general)	202	2,185	26,606	2,398	23,816	d	0	0	0
France	87,210	331,810	39,354,665	16,219,219	6,806,081	1,985,534	39,851	76,204	10,599,273
Individuals	67,936	30,967	247,058	7,187	65,549	26,732	39,851	42,543	0
Corporations	8,244	94,472	21,848,210	4,562,754	2,808,239	1,762,545	0	25,085	9,921,557
Withholding rate pools (general)	1,182	139,439	2,797,341	1,957,160	548,928	272	0	0	0
Gabon	1,894	2,580	180,295	40,550	1,417	52,850	0	7,943	0
Individuals	612	349	3,058	74	256	632	0	165	0
Corporations	238	56	118,606	22,038	52	28,281	0	7,578	0
Withholding rate pools (general)	d	d	d	d	d	d	d	d	d

Footnotes at end of table.

Table 2. Foreign Recipients of U. S. Income Under Chapter 3 Withholding Filing Forms 1042-S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Types of Income, Selected Recipient Types, and Selected Countries of Recipients, Calendar Year 2015—Continued

[Money amounts are in thousands of dollars]

Selected country and selected recipient type	Number of Forms 1042-S	U.S. tax withheld	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and railroad retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Germany	359,288	438,859	21,876,693	8,247,883	4,826,058	4,684,306	137,475	113,268	1,362,445
Individuals	307,681	46,337	780,961	170,145	182,259	66,370	137,475	48,612	0
Corporations	20,672	172,570	13,782,616	4,270,879	2,612,282	4,143,676	0	59,238	1,261,687
Withholding rate pools (general)	9,661	171,390	3,764,321	2,173,215	1,101,375	1,117	0	0	0
Gibraltar	611	4,982	239,097	20,232	214,955	73	10	55	0
Individuals	185	181	768	102	536	14	10	0	0
Corporations	300	1,643	216,759	10,343	203,205	7	0	55	0
Withholding rate pools (general)	39	1,702	13,192	6,747	6,179	d	0	0	0
Greece	21,188	14,268	129,580	16,805	11,292	5,681	35,886	3,647	0
Individuals	19,098	12,449	61,488	4,242	7,970	713	35,886	3,210	0
Corporations	617	722	51,542	3,588	2,188	3,799	0	4	0
Withholding rate pools (general)	30	8	7,622	7,595	24	d	0	0	0
Guernsey	10,659	134,274	1,521,257	681,923	478,304	530	161	0	0
Individuals	258	1,560	9,410	4,127	5,082	18	161	0	0
Corporations	8,183	87,630	1,085,985	574,062	282,796	334	0	0	0
Withholding rate pools (general)	234	33,026	185,223	33,217	130,751	169	0	0	0
Hong Kong	66,009	232,247	5,048,680	2,954,673	1,518,590	91,152	1,845	3,484	0
Individuals	57,420	32,922	160,102	30,285	95,404	11,439	1,845	2,238	0
Corporations	3,768	47,625	777,242	534,268	86,012	35,443	0	1,082	0
Withholding rate pools (general)	446	121,321	1,486,605	811,709	452,693	115	0	0	0
Hungary	6,826	13,613	1,957,454	933,421	199,593	33,798	1,267	3,896	0
Individuals	5,279	1,337	12,703	381	1,877	1,082	1,267	2,727	0
Corporations	517	2,648	1,658,836	839,428	16,451	30,965	0	980	0
Withholding rate pools (general)	43	d	1,271	1,257	d	13	0	0	0
India	111,218	66,741	4,316,028	1,217,349	100,799	128,652	4,082	1,271,949	24,192
Individuals	98,813	17,211	278,166	3,640	20,713	4,551	4,082	19,857	0
Corporations	1,535	32,929	2,704,304	60,002	77,045	86,430	0	1,246,089	21,874
Withholding rate pools (general)	81	7	71	0	4	41	0	0	0
Indonesia	11,248	2,922	536,104	471,508	5,593	2,439	393	1,317	0
Individuals	9,886	2,164	21,315	1,993	4,182	1,773	393	1,220	0
Corporations	205	339	8,458	7,114	503	114	0	63	0
Withholding rate pools (general)	116	7	46	0	36	10	0	0	0
Ireland	271,079	968,247	25,098,685	14,742,007	4,367,421	4,586,329	26,553	89,060	3,694
Individuals	252,294	9,516	101,798	3,628	41,594	14,665	26,553	1,523	0
Corporations	13,976	919,553	20,322,759	13,903,122	4,143,486	1,027,851	0	86,174	3,694
Withholding rate pools (general)	54	222	2,588	400	1,961	137	0	0	0
Israel	54,993	206,441	2,191,165	1,132,349	615,584	204,615	13,246	23,241	1,198
Individuals	44,701	16,951	159,265	41,953	42,903	7,153	13,246	16,888	0
Corporations	4,855	46,001	513,352	280,800	43,398	123,056	0	3,482	0
Withholding rate pools (general)	371	108,481	847,713	326,002	443,360	34	0	0	0
Italy	77,460	110,634	2,600,944	1,198,497	554,282	277,077	98,577	34,939	91
Individuals	64,283	10,425	362,722	12,759	25,077	7,511	98,577	20,668	0
Corporations	3,157	33,528	735,422	275,038	132,380	187,221	0	10,230	36
Withholding rate pools (general)	1,701	43,047	710,426	358,426	287,245	58	0	0	0
Jamaica	5,542	3,279	260,456	241,671	3,229	2,408	4,211	2,130	0
Individuals	4,295	2,253	13,937	779	1,156	1,119	4,211	2,106	0
Corporations	479	364	237,673	235,696	1,603	116	0	d	0
Withholding rate pools (general)	d	d	d	d	d	d	d	d	d
Japan	192,669	441,732	67,894,317	35,158,401	11,487,347	5,751,959	292,060	178,774	4,177,933
Individuals	175,835	18,224	795,682	26,224	94,974	267,310	292,060	31,710	0
Corporations	8,160	92,543	29,657,990	13,035,120	2,377,658	4,946,783	0	141,623	1,190,214
Withholding rate pools (general)	962	316,693	13,451,772	5,700,241	6,676,892	9	0	0	0

Footnotes at end of table.

Table 2. Foreign Recipients of U. S. Income Under Chapter 3 Withholding Filing Forms 1042-S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Types of Income, Selected Recipient Types, and Selected Countries of Recipients, Calendar Year 2015—Continued

[Money amounts are in thousands of dollars]

Selected country and selected recipient type	Number of Forms 1042-S	U.S. tax withheld	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and railroad retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Jersey	6,597	97,384	2,660,391	2,052,244	347,660	2,510	215	291	0
Individuals	413	1,949	7,418	757	6,016	51	215	220	0
Corporations	4,063	64,112	2,416,981	1,987,858	202,714	2,377	0	72	0
Withholding rate pools (general)	220	17,598	135,122	50,587	67,699	5	0	0	0
Korea, Republic of (South)	44,659	160,987	6,357,447	3,306,408	1,465,595	408,992	12,750	58,365	0
Individuals	36,606	11,374	104,041	3,355	12,052	10,458	12,750	25,769	0
Corporations	1,447	114,215	1,177,615	422,963	266,783	330,077	0	27,431	0
Withholding rate pools (general)	273	5,743	219,050	163,732	49,710	25	0	0	0
Kuwait	3,839	3,990	4,069,947	955,797	2,584,070	271	0	d	0
Individuals	2,025	998	4,342	467	2,688	235	0	d	0
Corporations	609	1,663	23,489	14,459	5,317	d	0	0	0
Withholding rate pools (general)	d	d	d	d	d	d	d	d	d
Libya	231	2,912	110,358	19,324	90,252	0	0	7	0
Individuals	196	108	778	14	8	0	0	7	0
Corporations	11	2,803	27,450	18,106	9,320	0	0	0	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Liechtenstein	1,116	49,698	374,404	149,509	168,360	865	33	41	0
Individuals	117	102	433	65	257	0	33	41	0
Corporations	539	6,321	46,756	3,900	19,596	655	0	0	0
Withholding rate pools (general)	134	24,033	201,393	87,523	83,212	45	0	0	0
Lithuania	2,225	723	126,777	117,715	862	1,497	99	629	0
Individuals	1,869	318	2,890	58	606	184	99	449	0
Corporations	131	175	119,269	116,464	168	1,252	0	165	0
Withholding rate pools (general)	51	d	7	0	0	7	0	0	0
Luxembourg	20,317	2,066,322	47,114,896	33,438,217	9,456,409	810,654	607	3,047	0
Individuals	2,064	2,965	40,703	3,101	18,321	15,076	607	380	0
Corporations	16,249	1,182,557	30,296,091	23,445,986	4,075,972	327,503	0	2,640	0
Withholding rate pools (general)	1,081	854,597	9,437,075	5,665,375	2,928,364	321	0	0	0
Malaysia	48,882	11,830	998,496	821,007	142,362	2,541	453	586	0
Individuals	44,961	5,342	26,466	5,323	13,895	1,257	453	265	0
Corporations	294	1,524	25,177	4,455	2,331	1,123	0	318	0
Withholding rate pools (general)	83	13	42	0	37	6	0	0	0
Malta	3,469	28,029	247,223	53,383	15,974	26,129	2,502	983	0
Individuals	2,467	22,173	79,725	1,058	1,329	90	2,502	429	0
Corporations	770	4,506	151,550	43,221	9,352	25,826	0	553	0
Withholding rate pools (general)	27	458	6,650	3,713	2,794	0	0	0	0
Mauritius	971	7,604	112,204	57,608	18,362	1,117	76	14,934	0
Individuals	447	199	1,246	91	323	16	76	6	0
Corporations	349	7,181	100,297	49,358	17,705	1,091	0	14,928	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Mexico	254,458	359,363	6,076,085	1,461,002	812,245	1,020,624	241,775	530,953	20
Individuals	220,510	107,199	1,097,243	148,515	125,566	14,526	241,775	466,296	0
Corporations	6,270	144,350	3,146,091	322,653	322,708	973,169	0	51,725	0
Withholding rate pools (general)	44	14	165	59	92	4	0	0	0
Monaco	1,380	32,766	257,503	126,315	89,705	13,444	542	103	0
Individuals	910	4,377	20,806	2,849	8,146	5,166	542	103	0
Corporations	87	2,676	11,782	2,717	777	7,887	0	0	0
Withholding rate pools (general)	261	22,576	211,278	119,581	79,284	31	0	0	0
Netherlands	69,560	233,313	30,270,556	9,202,114	15,693,325	1,562,229	20,417	344,395	197,191
Individuals	44,498	15,013	124,753	21,229	38,983	5,291	20,417	9,157	0
Corporations	9,495	90,780	17,129,090	5,503,091	8,034,082	1,166,056	0	235,149	46,310
Withholding rate pools (general)	375	61,320	1,205,933	264,403	721,630	58,128	0	0	0

Footnotes at end of table.

Table 2. Foreign Recipients of U. S. Income Under Chapter 3 Withholding Filing Forms 1042-S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Types of Income, Selected Recipient Types, and Selected Countries of Recipients, Calendar Year 2015—Continued

[Money amounts are in thousands of dollars]

Selected country and selected recipient type	Number of Forms 1042-S	U.S. tax withheld	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and railroad retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
New Zealand	43,984	35,740	533,967	168,176	271,986	23,911	1,704	14,229	0
Individuals	26,758	6,671	48,277	1,922	17,941	8,393	1,704	769	0
Corporations	3,071	10,131	99,605	20,816	45,513	9,888	0	12,940	0
Withholding rate pools (general)	22	d	21	4	0	17	0	0	0
Norway	22,474	66,023	9,473,014	3,611,877	4,954,038	50,011	21,515	78,023	5,482
Individuals	19,102	10,031	69,873	579	13,866	8,226	21,515	17,838	0
Corporations	1,652	38,667	845,654	313,792	248,493	37,523	0	38,678	3,787
Withholding rate pools (general)	24	9,677	184,242	46,282	62,611	37	0	0	0
Oman	828	3,178	344,729	221,453	86,709	16	0	92	0
Individuals	556	185	1,406	501	470	15	0	0	0
Corporations	39	28	27,826	574	45	0	0	92	0
Withholding rate pools (general)	d	d	d	d	d	d	d	d	d
Panama	30,047	47,062	572,784	395,212	139,468	1,483	2,414	1,614	0
Individuals	5,162	3,103	24,312	9,087	4,134	257	2,414	1,531	0
Corporations	22,347	38,807	449,914	309,888	119,634	951	0	13	0
Withholding rate pools (general)	73	1,653	15,396	8,798	5,451	9	0	0	0
Peru	17,267	54,247	512,011	307,448	173,546	943	2,279	894	0
Individuals	9,307	2,570	21,787	9,214	3,635	424	2,279	487	0
Corporations	799	51,133	262,771	75,886	169,176	273	0	278	0
Withholding rate pools (general)	11	8	36	6	26	0	0	0	0
Philippines	28,117	49,500	1,117,099	819,317	15,891	12,761	32,877	2,757	0
Individuals	23,041	14,059	64,830	4,569	8,652	1,139	32,877	1,536	0
Corporations	496	3,034	103,151	33,189	4,150	5,965	0	881	0
Withholding rate pools (general)	15	0	3	0	0	3	0	0	0
Poland	36,983	28,175	516,244	327,739	23,106	56,740	63,273	10,736	0
Individuals	33,120	19,217	90,917	3,811	4,220	7,550	63,273	4,738	0
Corporations	552	5,326	67,851	4,404	9,232	29,108	0	5,525	0
Withholding rate pools (general)	325	6	49	0	d	49	0	0	0
Portugal	12,104	10,536	1,470,072	1,357,925	41,453	4,892	19,366	4,693	0
Individuals	10,511	6,516	37,807	1,717	6,260	500	19,366	3,840	0
Corporations	487	1,371	1,363,525	1,342,418	4,359	1,344	0	146	0
Withholding rate pools (general)	106	183	3,016	1,675	1,245	18	0	0	0
Puerto Rico	9,736	8,307	994,618	882,871	78,594	664	541	814	0
Individuals	725	572	2,733	455	272	37	541	21	0
Corporations	6,409	6,140	626,558	563,797	40,893	185	0	747	0
Withholding rate pools (general)	d	d	d	d	d	d	d	d	d
Russia	28,670	11,500	1,608,112	1,353,337	23,147	24,323	77	17,811	0
Individuals	22,910	3,349	69,728	10,466	12,831	12,645	77	11,501	0
Corporations	573	5,353	207,110	39,037	7,631	6,293	0	6,080	0
Withholding rate pools (general)	721	207	12,859	12,573	245	41	0	0	0
Saudi Arabia	7,743	14,850	2,484,380	1,552,445	737,625	1,078	19	535	0
Individuals	5,964	2,870	16,063	3,787	6,523	363	19	486	0
Corporations	463	8,029	218,993	137,532	28,175	344	0	45	0
Withholding rate pools (general)	5	0	4,069	d	d	d	d	d	d
Senegal	1,940	3,389	512,771	22,549	6,951	2,746	22	2,090	0
Individuals	1,339	666	3,904	535	1,556	25	22	157	0
Corporations	222	1,852	487,921	16,119	2,410	14	0	1,858	0
Withholding rate pools (general)	13	815	5,576	2,261	2,862	d	0	0	0
Singapore	98,051	159,848	9,546,063	4,832,471	3,266,576	33,140	563	5,378	4,916
Individuals	85,217	26,510	109,836	10,621	74,477	3,223	563	1,213	4,916
Corporations	4,373	55,235	1,369,052	1,071,725	156,923	22,504	0	3,107	0
Withholding rate pools (general)	440	59,734	393,222	170,367	202,529	198	0	0	0

Footnotes at end of table.

Foreign Recipients of U.S. Income, Calendar Year 2015

Table 2. Foreign Recipients of U. S. Income Under Chapter 3 Withholding Filing Forms 1042-S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Types of Income, Selected Recipient Types, and Selected Countries of Recipients, Calendar Year 2015—Continued

[Money amounts are in thousands of dollars]

Selected country and selected recipient type	Number of Forms 1042-S	U.S. tax withheld	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and railroad retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
South Africa	26,523	39,747	480,948	186,198	214,121	9,447	1,418	1,327	0
Individuals	21,152	5,489	36,907	2,240	18,775	3,144	1,418	979	0
Corporations	1,816	16,730	225,570	92,092	102,399	5,198	0	111	0
Withholding rate pools (general)	31	18	136	17	116	d	0	0	0
Spain	82,356	84,596	3,626,855	1,364,755	338,659	232,622	29,979	229,582	1,014,022
Individuals	68,405	19,028	136,555	19,439	47,723	8,705	29,979	6,456	0
Corporations	7,052	33,460	1,454,464	231,186	158,283	108,858	0	220,021	387,600
Withholding rate pools (general)	453	16,652	225,201	103,148	107,078	61	0	0	0
Swaziland	313	38,390	270,028	101,664	121,745	2,728	17	d	0
Individuals	199	164	2,713	24	80	1,562	17	d	0
Corporations	13	62	4,722	3,421	1,227	0	0	0	0
Withholding rate pools (general)	71	38,127	260,708	97,635	120,439	39	0	0	0
Sweden	28,749	254,955	5,741,113	1,628,993	2,295,073	1,157,236	17,633	10,045	0
Individuals	22,877	8,734	55,533	2,258	10,743	6,241	17,633	3,239	0
Corporations	2,953	105,454	3,028,667	601,722	1,116,544	866,986	0	5,560	0
Withholding rate pools (general)	172	132,428	918,482	102,505	810,456	10	0	0	0
Switzerland	72,147	975,902	45,050,005	20,664,743	10,890,385	5,398,342	22,012	396,803	1,368,770
Individuals	39,659	25,768	649,315	20,502	128,437	431,588	22,012	7,531	0
Corporations	11,599	250,516	23,873,314	9,889,122	4,812,156	2,511,419	0	386,742	1,073,785
Withholding rate pools (general)	3,773	684,337	7,853,366	3,453,241	4,103,644	890	0	95	0
Taiwan	113,326	193,968	15,510,854	13,941,274	884,194	17,367	736	23,538	15,956
Individuals	105,469	27,983	153,761	39,094	72,768	1,656	736	953	0
Corporations	4,695	147,038	2,887,563	2,189,351	461,150	2,912	0	22,203	15,956
Withholding rate pools (general)	54	1,445	53,337	46,499	4,778	6	0	0	0
Thailand	21,396	7,812	416,185	342,348	40,906	3,816	5,940	4,003	0
Individuals	16,510	4,320	33,485	3,537	8,900	1,869	5,940	3,556	0
Corporations	533	1,654	28,290	15,534	9,743	468	0	366	0
Withholding rate pools (general)	1,226	7	67	3	0	63	0	0	0
Trinidad and Tobago	6,793	7,126	250,165	198,032	41,823	348	1,878	655	0
Individuals	5,320	1,801	11,474	2,425	2,891	161	1,878	604	0
Corporations	890	4,652	92,215	74,046	16,008	34	0	5	0
Withholding rate pools (general)	d	d	d	d	d	d	d	d	d
Turkey	11,369	6,664	265,742	210,222	10,179	7,858	1,544	752	0
Individuals	9,704	4,410	31,167	2,018	5,776	1,269	1,544	705	0
Corporations	322	1,655	47,249	27,477	3,647	3,328	0	6	0
Withholding rate pools (general)	124	4	23	0	15	9	0	0	0
United Arab Emirates	12,547	29,859	2,758,533	904,085	1,324,280	4,518	83	10,804	0
Individuals	10,263	4,803	21,190	1,804	11,092	1,343	83	172	0
Corporations	871	18,704	294,241	74,685	64,483	1,703	0	3,288	0
Withholding rate pools (general)	11	25	86	d	84	d	0	0	0
United Kingdom	543,026	1,189,289	108,585,916	45,941,718	24,705,043	3,554,310	133,220	403,305	21,342,196
Individuals	435,042	111,407	1,229,642	108,110	465,393	205,149	133,220	50,226	0
Corporations	36,777	492,112	71,739,842	31,453,811	10,755,055	2,447,837	0	317,745	19,394,142
Withholding rate pools (general)	1,734	330,383	11,552,986	5,083,167	3,789,816	122,639	0	0	0
Uruguay	13,058	8,130	176,221	139,653	24,096	875	1,016	3,403	0
Individuals	9,349	2,405	39,062	27,177	7,058	371	1,016	1,125	0
Corporations	2,526	3,884	64,172	47,473	12,261	210	0	2,259	0
Withholding rate pools (general)	183	893	22,685	19,138	3,149	3	0	0	0
Venezuela	119,478	142,255	2,839,367	176,347	45,469	4,058	1,010	5,445	0
Individuals	105,071	10,646	194,675	134,636	38,275	2,739	1,010	3,915	0
Corporations	4,072	1,465	46,022	36,288	6,027	750	0	17	0
Withholding rate pools (general)	19	15	259	162	93	0	0	0	0
Vietnam	4,264	1,670	102,145	92,271	559	247	33	377	0
Individuals	3,845	1,382	8,751	211	404	193	33	237	0
Corporations	61	30	141	9	53	27	0	24	0
Withholding rate pools (general)	13	d	6	0	5	d	0	0	0

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

[1] Unrelated business income paid to foreign tax-exempt organizations is subject to U.S. withholding tax.

NOTES: Detail may not add to totals because of rounding. Form 1042-S is entitled *Foreign Person's U.S.-Source Income Subject to Withholding*. All countries with total U.S.-source income over \$100 million for Calendar Year 2015 were selected for this table.

SOURCE: IRS, Statistics of Income Division, Foreign Recipients of U.S. Income, October 2017.

Table 3. Recipients of U.S. Income Under Chapter 4 Withholding Filing Forms 1042-S: Number, Total U.S.-Source Income, and U.S. Tax Withheld, by Selected Income Types, Calendar Year 2015

[Money amounts are in thousands of dollars]

Income types	Number of Forms 1042-S [1]	U.S.-source income			U.S. tax withheld
		Total	Exempt from withholding	Subject to withholding	
	(1)	(2)	(3)	(4)	(5)
Total	72,350	3,670,206	2,922,205	748,001	95,006
Dividends	37,083	579,699	220,353	359,346	43,469
Interest	27,803	1,291,907	983,337	308,569	34,223
Rents and royalties	1,475	601,065	557,979	43,086	6,735
Return on capital	520	52,435	46,838	5,597	1,512
Compensation for independent personal services	498	48,356	45,509	2,847	785
Pensions, annuities, alimony, and/or insurance premiums	105	23,589	21,670	1,919	525
Notional principal contract income	22	758,160	758,160	0	0
Scholarship or fellowship grants	16	12,601	2,131	10,470	3,493
All other income types	4,828	302,394	286,226	16,168	4,264

[1] Data in this table are based on returns filed pursuant to Chapter 4 of the Internal Revenue Code. Returns that were filed pursuant to Chapter 3 of the Code are not included in this table; however, they are included in Tables 1 and 2.

NOTES: Detail may not add to totals because of rounding. Form 1042-S is entitled *Foreign Person's U.S.-Source Income Subject to Withholding*.

SOURCE: IRS, Statistics of Income Division, Foreign Recipients of U.S. Income, October 2017.

Controlled Foreign Corporations, Tax Year 2012

by Jason Wenrich

For Tax Year 2012, foreign corporations controlled by U.S. multinational corporations held \$18.6 trillion in assets and reported receipts of \$6.9 trillion. These controlled foreign corporations (CFCs) paid \$130.8 billion in foreign income taxes on \$924.1 billion of earnings and profits (E&P) (less deficit) before income taxes. While the number of CFCs increased by only 4.5 percent from Tax Year 2010, CFC assets, receipts, foreign taxes paid, and E&P (less deficit) before income taxes all increased by more than 10 percent.

Almost 80 percent, or 70,268, of CFCs for Tax Year 2012 were concentrated in three major industrial sectors: (1) services; (2) goods production; and (3) distribution and transportation of goods. These three industrial sectors accounted for 84.1 percent of receipts (\$5.8 trillion), 78.3 percent of E&P (less deficit) before income taxes (\$724.0 billion), and 65.1 percent of income taxes (\$85.1 billion). Foreign corporations in the finance, insurance, real estate, and rental and leasing sector held 33.9 percent of total CFC assets (\$6.3 trillion) while generating only 8.2 percent of total CFC receipts (\$560.2 billion) and 11.6 percent of total CFC E&P (less deficit) before income taxes (\$107.6 billion).

For Tax Year 2012, some 88,038 CFCs were incorporated in 192 different countries.¹ Almost 41 percent, or 35,823, of these CFCs were incorporated in Europe. Nearly 91 percent of these European CFCs were located in European Union countries. Asian CFCs accounted for 25.7 percent of all CFCs; 14.0 percent were incorporated in Latin America.

Controlled Foreign Corporations as Vehicles for Direct Foreign Investment

Direct foreign investment by U.S. persons may take several forms, including foreign branches, partnerships, and separate corporations. This article deals with the use of the corporation as a vehicle for direct foreign investment. For U.S. income tax purposes, a foreign corporation is “controlled” if U.S. shareholders own more than 50 percent of its outstanding voting stock, or more than 50 percent of the value of all its outstanding stock (directly, indirectly, or constructively) on any day during the foreign corporation’s tax year. A “noncontrolled” foreign corporation is any foreign corporation that fails to meet either of the above requirements for control. For purposes of determining

control, a U.S. shareholder is defined as a U.S. person who owns 10 percent or more of the foreign corporation’s total combined voting stock.² However, for Statistics of Income purposes, a foreign corporation is controlled only if one U.S. corporation satisfies either of the above 50 percent ownership requirements for an uninterrupted period of at least 30 days during the foreign corporation’s tax year.³ For Tax Year 2012, there were 14,039 U.S. corporations that held such control over 88,038 CFCs. All statistics in this article pertaining to CFCs meet this definition.

In general, the income of a CFC is not taxable to the U.S. shareholders until repatriated in the form of a dividend. Prior to 1962, U.S. taxpayers could defer U.S. tax on such income indefinitely by accumulating this income in a CFC. To address the potential for tax avoidance, Congress enacted the Subpart F provision of the Internal Revenue Code in 1962.⁴ These provisions require certain items of income to be treated as dividends

Highlights

- Controlled foreign corporations (CFC) held \$18.6 trillion in assets, reported \$6.9 trillion in receipts, and paid \$130.8 billion in foreign income taxes on \$924.1 billion of earnings and profits (E&P) (less deficit) before income taxes.
- Over 88,000 CFCs were incorporated in 192 different countries with over 40 percent of these CFCs incorporated in Europe.
- More than 70,000 CFCs were concentrated in the services, goods production, and distribution and transportation of goods sectors and account for 84.1 percent of receipts, 78.3 percent of E&P (less deficit) before income taxes, and 65.1 percent of foreign income taxes paid.
- CFCs reported a total of \$63.1 billion of Subpart F income.
- CFCs distributed \$475.8 billion of E&P to U.S. and foreign shareholders. More than \$93 billion of these distributions represented taxable dividends to the U.S. parent corporation.
- CFCs had more than \$2.5 trillion in end-of-year accumulated E&P. Almost 90 percent of the accumulated E&P was not previously taxed E&P.
- CFCs were the tax owners of 23,538 foreign disregarded entities (FDE). These FDEs held \$7.2 trillion in assets and reported \$278.5 billion in E&P (less deficit).

¹ Based on unpublished data.

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

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

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



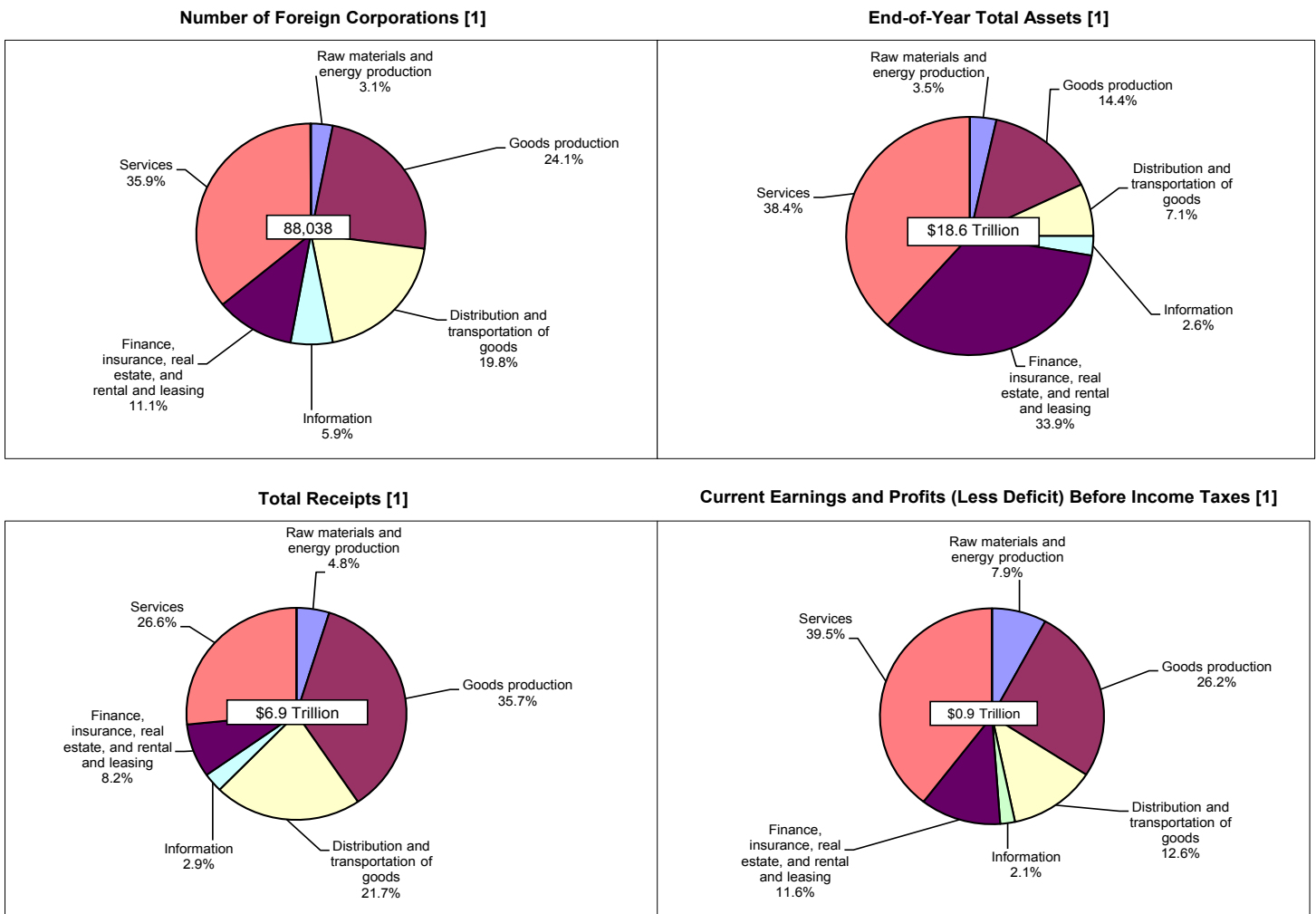
deemed paid to the U.S. shareholders and, therefore, subject to current-year U.S. taxation. A U.S. shareholder of a CFC may be required to include in gross income the shareholder's ratable share of the CFC's: (1) Subpart F income;⁵ (2) earnings invested in U.S. property; (3) previously excluded Subpart F income withdrawn from "qualified investments" in less developed countries; (4) previously excluded export trade income withdrawn from investment in export trade assets; and (5) factoring income (income derived from the acquisition of a trade or service receivable). For Tax Year 2012, CFCs reported a total of \$63.1 billion of Subpart F income.

Assets, Receipts, and Earnings and Profits for CFCs by Industrial Sector

For Tax Year 2012, goods producers accounted for 14.4 percent of end-of-year assets and 35.7 percent of total receipts (see Figure A). CFCs in this industrial sector earned 26.2 percent

of the E&P (less deficit) before income taxes for all corporate-owned CFCs. Goods producers paid \$28.3 billion of foreign taxes, representing 21.6 percent of all foreign taxes paid by CFCs. Food, beverage and tobacco, chemical, computer and electronic product, and transportation equipment manufacturers collectively reported 65.2 percent of end-of-year assets, 61.2 percent of total receipts, and 72.2 percent of E&P (less deficit) before income taxes for all CFCs in the goods production sector. Computer and electronic product manufacturers alone generated 39.6 percent of the E&P (less deficit) before income taxes but paid only 8.7 percent of the foreign income taxes reported by all goods producers. Within the goods production sector, semiconductor and other electronic component manufacturers and medical equipment and supplies manufacturers experienced significant increases in profitability. Semiconductor and other electronic component manufacturers reported \$82.1 billion in E&P (less deficit) before income taxes for Tax Year 2012, after

Figure A
U.S. Corporations and Their Controlled Foreign Corporations: Number, End-of-Year Total Assets, Total Receipts, and Current Earnings and Profits (Less Deficit) Before Income Taxes by Industrial Sector of Controlled Foreign Corporation, Tax Year 2012



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

⁵ See Subpart F income in the Explanation of Selected Terms section of this article.

having reported only \$41.4 billion in earnings for Tax Year 2010. Medical equipment and supplies manufacturers reported an increase in E&P (less deficit) before income taxes from \$9.8 billion for Tax Year 2010 to \$21.2 billion for Tax Year 2012.

For Tax Year 2012, CFCs engaged in finance, insurance, real estate, and rental and leasing held 33.9 percent of all assets while generating only 8.2 percent of the total receipts and 11.6 percent of the E&P (less deficit) before income taxes reported by all CFCs. Although the number of CFCs in this sector decreased by 1.6 percent from 2010, E&P (less deficit) before income taxes increased by 27.2 percent from Tax Year 2010. More than \$5.3 trillion, or more than 85.0 percent of the assets reported for this industrial sector were attributable to finance corporations, which also generated 67.4 percent of the total receipts and 82.6 percent of the E&P (less deficit) before income taxes for this industrial sector. Insurance CFCs reported more than \$0.7 trillion in end-of-year assets (11.9 percent of the total for the sector) and over \$0.1 trillion in receipts (25.7 percent of the total for the sector).

There were more CFCs in the services sector than any other industrial sector. For Tax Year 2012, some 35.9 percent of all CFCs were classified as service corporations. Service providers

reported \$7.1 trillion in end-of-year assets and \$1.8 trillion in receipts. However, excluding management and holding companies, CFCs classified in the services sector reported only \$1.1 trillion in end-of-year assets and \$0.6 trillion in receipts.

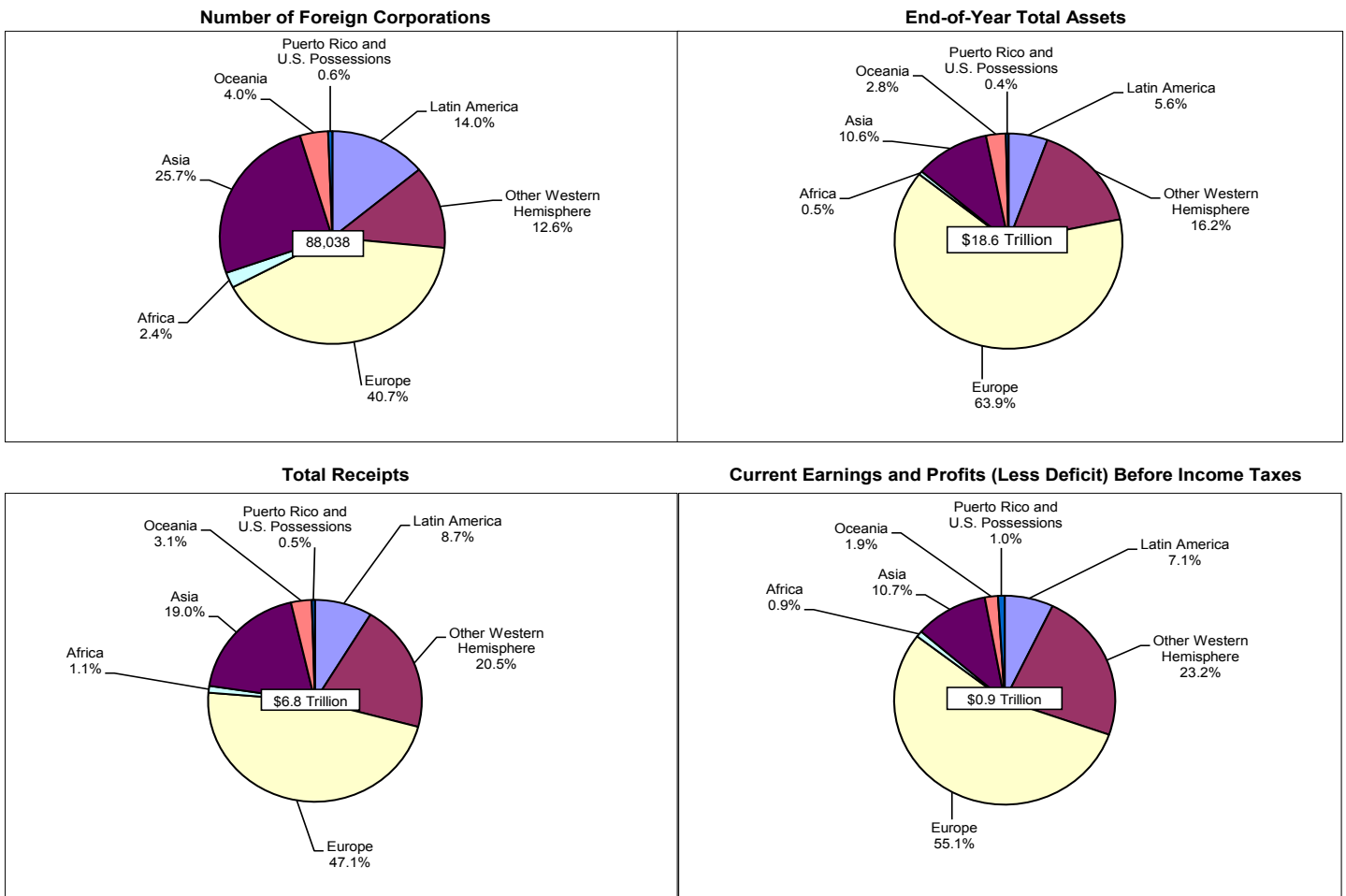
Every major industrial sector, except for the information sector, showed increases in E&P (less deficit) before income taxes between Tax Year 2010 and Tax Year 2012. CFCs engaged in the distribution and transportation of goods reported a 34.8-percent increase, the largest of any major industrial sector. CFCs in the finance, insurance, real estate, and rental and leasing sector reported an increase of 27.2 percent in E&P (less deficit) before income taxes. The information sector reported a 23.8-percent decrease despite a 33.5-percent increase in total receipts for the sector.

Assets, Receipts, and Earnings and Profits for CFCs by Geographic Distribution

The geographic distribution of CFCs by major region of incorporation shows that for Tax Year 2012, Europe remained the most significant region for CFC activity (Figure B). Europe alone accounted for 63.9 percent of end-of-year assets, 47.1

Figure B

U.S. Corporations and Their Controlled Foreign Corporations: Number, End-of-Year Assets, Receipts, and Earnings by Geographic Region of Incorporation of Controlled Foreign Corporation, Tax Year 2012



NOTE: Detail may not add to 100 percent because of rounding.
SOURCE: IRS, Statistics of Income Division, Controlled Foreign Corporations, August 2018.

percent of total receipts, and 55.1 percent of E&P (less deficit) before income taxes for all CFCs. European CFCs paid 38.6 percent of the \$130.8 billion of foreign income taxes reported by all CFCs for Tax Year 2012. Within Europe, most CFC activity was concentrated in European Union (EU) countries. More than 90 percent of European CFCs were incorporated in EU countries. These CFCs reported 93.5 percent of ending assets, 86.4 percent of total receipts, and 89.9 percent of E&P (less deficit) before income taxes for all European CFCs. More than 46 percent of European CFCs not incorporated in EU countries were incorporated in Switzerland. These Swiss CFCs accounted for 80.1 percent of ending assets, 83.1 percent of receipts, and 80.5 percent of E&P (less deficit) before income taxes for non-EU European CFCs.

Other Western Hemisphere countries (which include Canada and Caribbean countries but exclude Central and South America) and Asia were also significant regions of CFC activity. CFCs conducting business in Other Western Hemisphere countries held 16.2 percent of all CFC end-of-year assets and reported 20.5 percent of all CFC receipts. These CFCs reported 23.2 percent of the E&P (less deficit) before income taxes and paid 25.5 percent of the foreign income taxes paid by all CFCs. Within the Other Western Hemisphere region, Canada was home to the largest amount of CFC activity. Canadian CFCs generated 46.3 percent of the total receipts for this region. Canadian CFCs accounted for 21.5 percent of the E&P (less deficit) before income taxes and 27.7 percent of the foreign income taxes for CFCs in this region. With 7,195 CFCs, Canada had more CFCs than any other country except the United Kingdom (9,025).

CFCs in Asia reported 10.6 percent of ending assets, 19.0 percent of the total receipts, and 10.7 percent of the E&P (less deficit) before income taxes for all CFCs. More activity was reported for CFCs in Japan than any other Asian country. Japanese CFCs accounted for 37.9 percent of the ending assets, 23.9 percent of the total receipts, and 15.3 percent of the E&P (less deficit) before income taxes reported by all Asian CFCs. For Tax Year 2012, there were more CFCs incorporated in China (5,988) than any other Asian country, including Japan (2,381). In fact, for Tax Year 2012, only two countries had more CFCs than China.⁶ For Tax Year 2012, Japan (\$311.4 billion) was the only Asian country that accounted for more CFC receipts than China (\$242.1 billion).

The two geographic groupings with the smallest CFC representation were Africa and U.S. Possessions (including Puerto Rico). Only 3.0 percent of all CFCs were incorporated in these two regions. Collectively, they accounted for 0.9 percent of the end-of-year assets, 1.6 percent of total receipts, and 1.9 percent of E&P (less deficit) before income taxes for all CFCs. Within Africa, most CFC activity was concentrated in five countries.

Egypt, Liberia, Mauritius, Nigeria, and South Africa collectively accounted for 88.3 percent of ending assets, 85.6 percent of the total receipts, and 92.1 percent of the E&P (less deficit) before income taxes for all African CFCs.⁷ More than 40 percent of the African CFCs were incorporated in South Africa alone and these South African CFCs reported 30.4 percent of the ending assets, 55.9 percent of the total receipts, and 27.6 percent of the E&P (less deficit) before income taxes reported by all African CFCs.⁸

Most CFC activity in the U.S. Possessions is attributable to Puerto Rico. Puerto Rican CFCs held 94.4 percent of ending assets and generated 94.7 percent of the total receipts reported by all CFCs operating in the U.S. Possessions.⁹ For Tax Year 2012, the average tax rate for CFCs incorporated in Puerto Rico and U.S. Possessions was 2.8 percent compared to the average tax rate of 14.3 percent for all other CFCs.¹⁰ CFCs incorporated in African countries had the highest average rate of any region at 32.2 percent.

Between Tax Year 2010 and Tax Year 2012, the number of CFCs increased by 4.5 percent. CFC assets increased by 17.0 percent and E&P (less deficit) before income taxes increased by 12.4 percent. Despite only a 4.4-percent increase in the number of European CFCs between Tax Year 2010 and Tax Year 2012, end-of-year assets increased by 19.2 percent and E&P (less deficit) before income taxes increased by 20.6 percent. Africa experienced the largest percentage increase of any major geographic region in the number of CFCs between Tax Year 2010 and Tax Year 2012 (13.3 percent). African CFCs also reported an 18.3-percent increase in end-of-year assets and a 48.2-percent increase in total receipts between those same 2 years. This increase is largely attributable to the 19.8-percent increase in South African CFCs.¹¹ South African CFCs reported a 55.9-percent increase in end-of-year assets and a 73.8-percent increase in total receipts between Tax Year 2010 and Tax Year 2012.¹²

CFC Profitability

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

For Tax Year 2012, profitability measures varied among the six major industrial sectors. CFCs engaged in raw materials and energy production reported both the highest rate of return (11.3 percent) and the highest profit margin (22.0 percent). The high profitability of this sector is largely attributable to CFCs in the mining, quarrying, and oil and gas extraction subsector. The return on assets for this subsector was 12.4 percent and the

⁶ The countries with the most CFCs are: United Kingdom (9,025), Canada (7,195), China (5,988), Mexico (5,074), Germany (3,859), Netherlands (3,690), France (3,116), Australia (2,779), India (2,682), and Hong Kong (2,630).

⁷ Based on unpublished data.

⁸ Based on unpublished data.

⁹ Based on unpublished data.

¹⁰ See "Average tax rate" in the Explanation of Selected Terms at the end of this article.

¹¹ Based on unpublished data.

¹² Based on unpublished data.

profit margin was 24.2 percent. CFCs in the utilities subsector reported a 5.7-percent return on assets and a 15.0-percent profit margin, while CFCs engaged in agriculture, forestry, fishing, and hunting reported a 6.9-percent return on assets and a 7.2-percent profit margin.

The next highest return on assets was for CFCs engaged in the goods production sector (9.0 percent) and in the distribution and transportation of goods sector (8.8 percent). These CFCs, however, also reported two of the lowest profit margins of any sector (9.9 percent in the goods production sector, and 7.8 percent in the distribution and transportation of goods sector). CFCs in the finance, insurance, real estate, and rental and leasing sector reported the lowest return on assets (1.7 percent). CFCs in the services sector reported the second highest profit margin (20.0 percent).

Distribution of Earnings and Profits by CFCs

For Tax Year 2012, CFCs distributed \$475.8 billion of E&P to U.S. and foreign shareholders. More than 73 percent of distributions of E&P were from not previously taxed E&P (\$349.5 billion), while the remainder was distributed from previously taxed E&P (\$126.3 billion). More than 19 percent of CFC distributions (or \$93.5 billion) represented taxable dividends to the U.S. parent corporation.

The majority of distributions of E&P are attributed to CFCs doing business in the goods production and services sectors. These two industrial sectors distributed \$327.1 billion of E&P or 68.7 percent of total distributions. Of this total, \$247.7 billion were from not previously taxed E&P, with the remaining \$79.4 billion coming from previously taxed E&P. More than 26 percent of the distributions by goods producers were attributable to chemical manufacturers. Manufacturers of computers and electronic products and manufacturers of beverage and tobacco products accounted for an additional 15.9 percent and 16.1 percent of all distributions by CFCs in the goods production sector. CFCs classified as management companies reported

84.0 percent of the distributions to shareholders reported by all services CFCs. CFCs engaged in oil and gas extraction accounted for 79.7 percent of all distributions from the raw materials and energy production sector.

European-based CFCs accounted for 51.6 percent (\$245.4 billion) of all distributions of E&P. Nearly 64 percent of these distributions were from not previously taxed E&P (\$156.1 billion), with the remainder distributed from previously taxed E&P (\$89.3 billion). CFCs incorporated in European Union countries made 92.0 percent of all shareholder distributions by European CFCs. CFCs in the Other Western Hemisphere region distributed \$116.1 billion of E&P in Tax Year 2012 or 24.4 percent of all distributions. Bermudian CFCs accounted for 54.3 percent of these distributions; CFCs in Canada accounted for 20.3 percent and the Cayman Islands accounted for 16.0 percent.

Figure C displays taxable payout ratios by industrial sector. The taxable payout ratio is defined as taxable dividends paid to a U.S. person by a CFC with positive current E&P net of current-year Subpart F income divided by positive current E&P net of current-year Subpart F income (see definitions of “U.S. person,” “Current earnings and profits,” and “Subpart F income” in the Explanation of Selected Terms at the end of this article). For Tax Year 2012, CFCs reported a taxable payout ratio of 8.3 percent. CFCs in the raw materials and energy production sector reported the largest taxable payout ratio (21.7 percent). The information sector reported the lowest payout ratio (3.6 percent).

Accumulated Earnings and Profits by Industrial Sector and Geographic Region

For Tax Year 2012, CFCs had more than \$2.5 trillion in end-of-year accumulated E&P. This is an increase of 28.9 percent over Tax Year 2010 end-of-year accumulated E&P. Almost 90 percent of accumulated E&P was not previously taxed (\$2.3 trillion) while the remainder was previously taxed E&P (\$255.3 billion).¹³

Figure C

U.S. Corporations and Their Controlled Foreign Corporations: Number of Foreign Corporations with Positive Current Earnings and Profits Net of Current Year Subpart F Income and Amounts, and Taxable Payout Ratios, by Industrial Sector of Controlled Foreign Corporation, Tax Year 2012

Industrial sector of controlled foreign corporation	Number of foreign corporations with positive current earnings and profits net of current year Subpart F income	Positive current earnings and profits net of current year Subpart F income [1]	Taxable payout ratio (percentage)
	(1)	(2)	(3)
All industries [2]	48,361	786,794,161,138	8.3
Raw materials and energy production	1,038	53,644,799,136	21.7
Goods production	12,676	221,753,560,711	4.9
Distribution and transportation of goods	10,484	83,777,554,793	5.1
Information	2,792	26,802,594,960	3.6
Finance, insurance, real estate, and rental and leasing	4,669	96,450,673,863	7.6
Services	16,690	304,363,909,756	10.0

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

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

SOURCE: IRS, Statistics of Income Division, Controlled Foreign Corporations, August 2018.

¹³ See “Previously taxed earnings and profits” in the Explanation of Selected Terms section of this article.

CFCs doing business in the goods production and services sectors accounted for the majority of end-of-year accumulated E&P. These two industrial sectors held \$1.6 trillion, or 65.0 percent, of the total end-of-year accumulated E&P, \$1.5 trillion, or 65.8 percent, of not previously taxed E&P, and \$146.7 billion, or 57.4 percent, of the previously taxed E&P reported by all CFCs. More than 30 percent of the total end-of-year accumulated E&P of goods producers was attributable to computer and electronic product manufacturers. These CFCs held 31.9 percent (\$207.5 billion) of not previously taxed E&P reported by all goods producers.

Chemical manufacturers accounted for an additional 22.6 percent of the total end-of-year accumulated E&P for goods producers. CFCs classified as management companies reported 76.4 percent (\$718.6 billion) of total end-of-year accumulated E&P and 75.4 percent (\$631.0 billion) of the not previously taxed E&P reported by all services CFCs.

European-based CFCs accounted for 56.8 percent (\$1.4 trillion) of total end-of-year accumulated E&P and 55.8 percent (\$1.3 trillion) of not previously taxed E&P. CFCs incorporated in European Union countries reported 83.2 percent of total end-of-year accumulated E&P and 82.7 percent of the not previously taxed E&P reported by all European CFCs. Switzerland reported the majority of the remaining European total end-of-year accumulated E&P (\$218.8 billion). CFCs in the Other Western Hemisphere region reported \$566.3 billion or 22.5 percent of total end-of-year accumulated E&P. Bermuda accounted for 43.2 percent of this total accumulated E&P; CFCs in Canada accounted for 29.0 percent and the Cayman Islands accounted for 14.2 percent.

CFCs and Foreign Disregarded Entities

A foreign disregarded entity (FDE) is an entity that is created or organized outside the United States and is disregarded as a separate entity from its tax owner for U.S. income tax purposes. The tax owner is treated as owning all the FDE's assets and liabilities. The tax owner is typically a U.S. or foreign corporation or partnership. FDEs are created for various international tax planning reasons, including Subpart F and foreign tax credit planning. The statistics presented below pertain only to FDEs with tax owners that are controlled foreign corporations.

For Tax Year 2012, controlled foreign corporations were tax owners of 23,538 FDEs. These foreign disregarded entities reported \$7.2 trillion in assets and \$278.5 billion in E&P (less deficit) after taxes. Foreign disregarded entities owned by controlled foreign corporations operated in 161 different countries.¹⁴ Figure D displays foreign disregarded entity data by geographic region and selected country of incorporation. For Tax Year 2012, some 61.3 percent of foreign disregarded entities owned by CFCs were incorporated in European countries.

European FDEs accounted for 78.4 percent of the ending assets and 72.3 percent of the E&P (less deficit) after income taxes reported for all FDEs.¹⁵ Almost 93 percent of European FDEs were incorporated in European Union countries. European Union FDEs accounted for 94.4 percent of the ending assets and 89.0 percent of the E&P (less deficit) after taxes reported for all European FDEs. The United Kingdom domiciled 14.0 percent of all FDEs for Tax Year 2012, far more than any other country. United Kingdom FDEs reported more than \$2.1 trillion in end-of-year assets, more than 29 percent of all FDE assets. FDEs organized in Ireland generated more E&P (less deficit) after taxes (\$77.8 billion) than any other country. FDEs organized in the Netherlands reported \$34.3 billion of E&P (less deficit) after income taxes, third only to Irish FDEs and FDEs organized in the United Kingdom (\$36.9 billion).

Figure E presents FDE data by industrial sector. For Tax Year 2012, more than 35 percent of FDEs operated in the services sector. These service FDEs reported \$3.0 trillion in end-of-year assets. Finance, insurance, real estate, and rental and leasing sector FDEs reported \$2.3 trillion in end-of-year-assets. FDEs engaged in services and the distribution and transportation of goods reported the most E&P (less deficit) after income taxes, reporting \$101.1 billion and \$76.7 billion, respectively. Together these sectors accounted for 63.9 percent of all FDE earnings.

Data Sources and Limitations

The statistics presented in this article are based on information collected from corporate income tax returns (Form(s) 1120) with accounting periods ending July 2012 through June 2013 and their attached Form(s) 5471, *Information Return of U.S. Persons With Respect to Certain Foreign Corporations*. A U.S. corporation is required by Internal Revenue Service regulations to submit Form 5471 for any Controlled Foreign Corporation (CFC) with an accounting period ending with or within the U.S. parent's accounting period. Thus, the accounting periods for Tax Year 2012 CFCs may have ended as early as July 2011 and as late as June 2013. However, most CFC activity occurred in Calendar Year 2012. These statistics report data for active foreign corporations controlled by U.S. corporations.¹⁶

Coefficient of variation (CV) tables are not provided because these data are not subject to significant sampling error. For example, CFCs sampled at a 100-percent rate accounted for 96.4 percent of the sampled population and 86.4 percent of the estimated population. Furthermore, CFCs sampled at a 100-percent rate accounted for 99.6 percent of the total ending assets for all CFCs.¹⁷ However, these data may be subject to nonsampling error.

Several limitations apply when making comparisons to prior-year statistics. First, the data in this article are based on a sample

¹⁴ Based on unpublished data.

¹⁵ Taxpayers use IRS Form 8858, *Information Return of U.S. Persons With Respect to Foreign Disregarded Entities*, to report information about FDEs. Unlike Form 5471 which is used to collect CFC data, taxpayers do not report foreign income tax paid on Form 8858. As a result, this article does not include FDE data for E&P (less deficit) before income taxes.

¹⁶ See definition of "Active versus inactive Controlled Foreign Corporations" in the Explanation of Selected Terms section.

¹⁷ Based on unpublished data.

Figure D
Foreign Disregarded Entities Owned by Controlled Foreign Corporations: Number of Foreign Disregarded Entities, End-of-Year Total Assets, and Current Earnings and Profits (Less Deficit) After Income Taxes, by Selected Country of Incorporation of Foreign Disregarded Entity, Tax Year 2012

[Money amounts in thousands of dollars]

Selected country of incorporation of foreign disregarded entity	Number of foreign disregarded entities	End-of-year total assets	Current earnings and profits (less deficit) after income taxes
	(1)	(2)	(3)
All geographic regions	23,538	7,277,316,988	278,499,176
Latin America, total	1,307	165,071,852	8,621,061
Brazil	358	52,789,716	2,159,922
Mexico	470	73,327,426	4,017,071
Other Western Hemisphere, total	1,873	702,364,733	34,269,160
Bermuda	285	183,692,860	2,224,558
Canada	595	254,543,460	6,767,719
Cayman Islands	656	195,800,124	21,522,063
Europe, total	14,421	5,705,035,630	201,456,361
European Union, total	13,400	5,386,279,959	179,372,031
Belgium	347	76,822,529	817,096
France (including Corsica, Guadeloupe, Martinique, and Reunion)	1,217	165,630,221	652,955
Germany	1,588	304,075,425	6,842,331
Ireland	741	640,192,674	77,757,362
Italy	574	57,678,326	919,587
Luxembourg	702	766,568,370	17,447,694
Netherlands	2,091	914,607,804	34,270,079
Spain (including Canary Isles)	703	62,109,080	-832,336
Sweden	468	73,214,616	1,719,721
United Kingdom and Northern Ireland (including Gibraltar)	3,297	2,145,087,695	36,873,813
Other European countries, total	1,021	318,755,670	22,084,330
Switzerland	415	226,321,625	18,229,274
Africa, total	444	36,106,082	4,203,661
Asia, total	4,267	324,006,472	26,127,320
China	1,498	66,932,459	3,637,915
Hong Kong	909	75,433,454	4,576,957
Singapore	597	96,652,636	8,428,600
Oceania, total	1,203	343,321,046	2,771,330
Australia	977	336,344,771	2,801,800
Puerto Rico and U.S. Possessions, total	23	1,411,173	1,050,284

SOURCE: IRS, Statistics of Income Division, Controlled Foreign Corporations, August 2018.

Figure E
Foreign Disregarded Entities Owned by Controlled Foreign Corporations: Number of Foreign Disregarded Entities, End-of-Year Total Assets, and Current Earnings and Profits (Less Deficit) After Income Taxes, by Industrial Sector of Foreign Disregarded Entity, Tax Year 2012

[Money amounts in thousands of dollars]

Industrial sector of "Category of Filer 4" foreign disregarded entity	Number of foreign disregarded entities	End-of-year total assets	Current earnings and profits (less deficit) after income taxes
	(1)	(2)	(3)
All industries	23,538	7,277,316,988	278,499,176
Raw materials and energy production	1,529	308,725,276	23,864,211
Goods production	4,960	784,375,792	53,123,751
Distribution and transportation of goods	4,123	542,183,948	76,724,393
Information	1,563	336,614,464	2,438,211
Finance, insurance, real estate, and rental and leasing	2,640	2,273,294,108	20,172,210
Services	8,340	3,018,437,434	101,133,980
Nature of business not allocable	382	13,685,966	1,042,420

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

SOURCE: IRS, Statistics of Income Division, Controlled Foreign Corporations, August 2018.

of U.S. corporations. For Tax Year 2012, this sample generally includes all CFCs controlled by U.S. corporations with \$50 million or more in total assets or \$10 million or more in “proceeds” and all CFCs controlled by U.S. corporations with less than \$50 million in total assets in the SOI corporate sample.¹⁸ The sample for the Tax Year 2012 CFC statistics is far more inclusive than studies conducted before Tax Year 2004, which included only the 7,500 largest CFCs controlled by U.S. corporations with \$500 million or more in total assets.

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

Finally, fluctuations in exchange rates can have significant effects on the reported statistics. Financial statistics that are translated using current (as opposed to historical) rates of exchange can be distorted by large exchange rate fluctuations. For example, weakening of the U.S. dollar against many currencies from Tax Year 2002 to Tax Year 2004 certainly contributed to the large increases in some statistics over that period. The U.S. dollar generally fluctuated far less against most major currencies between Tax Year 2010 and Tax Year 2012 than it had between Tax Year 2002 and Tax Year 2004.

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

The data reported on Form 5471 generally represent the financial information of each foreign corporation and not the amounts attributable to the U.S. shareholder filing the Form 5471. Data reported on Form 5471, Schedule I, are the exception to this general rule. The Subpart F income and dividends received reported on the Schedule I represent the amount of foreign dividends taxable to the U.S. shareholder filing the Form 5471.

U.S. shareholders do not prepare consolidated Form 5471 filings as they typically do for Forms 1120 that are filed for

domestic corporations. U.S. shareholders file a separate Form 5471 for each foreign corporation for which this form is required. As a result, the Form 5471 data presented in this article contain inherent double counting to the extent intercompany transactions occur.

The foreign disregarded entity data cited in this article are reported on Form 8858, *Information Return of U.S. Persons With Respect to Foreign Disregarded Entities*. The FDE data in this article pertain only to active FDEs that are owned by controlled foreign corporations. Data attributable to inactive FDEs and FDEs that are owned by foreign partnerships or U.S. entities are excluded from the statistics in this article. The sampling procedures used for Forms 8858 mirror those described above for Forms 5471.

As mentioned above, the tax owners of FDEs are treated as owning all FDE assets and liabilities. Consequently, CFCs that are tax owners of FDEs include the earnings and profits of their FDEs in their current E&P. To the extent that FDEs are incorporated in countries different from their tax owners, geographic statistics for CFCs presented in this article may misrepresent, to some degree, the true geographic source of these earnings and profits. For Tax Year 2012, some 70.0 percent of FDEs owned by CFCs were incorporated in a country different from their tax owner. These FDEs accounted for 45.1 percent of the end-of-year assets and 37.6 percent of the E&P (less deficit) after income taxes reported by FDEs with tax owners that are CFCs. Figure F presents selected geographic data for FDEs incorporated in countries different from their tax owners. For Tax Year 2012, \$104.7 billion of E&P (less deficit) after income taxes reported by CFCs were earned by FDEs outside of the CFCs country of incorporation. Table 3 shows CFC data attributable to FDEs by FDE country within CFC country.

The industrial data presented in this article also may be somewhat distorted because FDEs may have industry codes different from the CFCs that own them. Table 4 shows CFC data attributable to FDEs by FDE industrial sector within CFC industrial sector. For Tax Year 2012, some 46.6 percent of FDEs operated in an industrial sector different from their CFC owners. These FDEs accounted for 37.0 percent of the assets and 59.6 percent of the E&P (less deficit) after income taxes reported by all CFC-owned foreign disregarded entities. For Tax Year 2012, some 36.6 percent of the E&P (less deficit) after income taxes for CFCs in the goods production sector were attributable to FDEs operating in a different industrial sector. Similarly, the E&P (less deficit) after income taxes reported by CFCs in the distribution and transportation of goods sector (24.6 percent) and information sector (15.4 percent) were attributable to FDEs classified in a different industrial sector.

Explanation of Selected Terms

Active versus inactive Controlled Foreign Corporations—In general, a foreign corporation was considered “active” if earnings and profits, income taxes, receipts, expenses, distributions of E&P, or certain transactions between the foreign corporation

¹⁸ See Statistics of Income – 2012, Corporation Income Tax Returns, for a more complete description of the SOI Corporate sample. The SOI Corporate sample is the basis for the SOI Controlled Foreign Corporation sample. In other words, the Controlled Foreign Corporation sample includes every Form 5471 filed by each corporation in the SOI Corporate sample.

Figure F
Foreign Disregarded Entities Incorporated in Different Countries From Their Controlled Foreign Corporation Tax Owners: Number of Foreign Disregarded Entities and Current Earnings and Profits (Less Deficit) After Income Taxes, by Selected Country of Incorporation of Foreign Disregarded Entity, Tax Year 2012

[Money amounts in thousands of dollars]

Selected country of incorporation of foreign disregarded entity	Number of foreign disregarded entities	Current earnings and profits (less deficit) after income taxes
All geographic regions	16,374	104,748,905
Selected countries, total	13,202	87,525,757
Luxembourg	409	15,234,701
United Kingdom and Northern Ireland (including Gibraltar)	1,714	14,945,043
Netherlands	1,018	11,566,345
Switzerland	311	10,969,870
Cayman Islands	323	9,859,027
Ireland	394	7,507,633
Germany	1,114	4,447,312
Hong Kong	775	4,083,046
Singapore	493	3,835,342
China	1,301	2,507,792
Thailand	61	2,484,483
Canada	246	2,353,905
Sweden	316	1,696,921
Malaysia	198	1,445,824
Mexico	303	1,266,472
Denmark	186	1,253,092
British Virgin Islands	97	1,006,277
Belgium	318	847,497
Australia	462	655,627
Bahamas	33	606,264
Brazil	294	509,335
Jersey	47	310,684
Italy	520	279,917
Venezuela	22	214,706
Hungary	137	180,218
Portugal	113	160,919
Barbados	27	133,648
France (including Corsica, Guadeloupe, Martinique, and Reunion)	910	75,960
Austria	215	-4,743
Malta	62	-12,333
Spain	647	-910,651
Bermuda	136	-11,984,375

SOURCE: IRS, Statistics of Income Division, Controlled Foreign Corporations, August 2018.

and its subsidiaries or majority shareholder were reported on Form 5471, *Information Return of U.S. Persons with Respect to Certain Foreign Corporations*. The filing of Form 5471 was required even if a CFC was dormant or inactive for Tax Year 2012. However, only data from active CFCs are included in the statistics in this article, unless otherwise noted.

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

Controlled Foreign Corporation—Section 957 of the Internal Revenue Code defines a foreign corporation as being “controlled” if more than 50 percent of the total combined voting power of all classes of stock of such corporation entitled to vote, or more than 50 percent of the value of all its outstanding stock,

is owned (directly, indirectly, or constructively) by U.S. shareholders on any day during the foreign corporation’s tax year. A U.S. shareholder for purposes of determining control is defined as a “U.S. person”¹⁹ owning 10 percent or more of the foreign corporation’s voting stock. For purposes of these statistics, a foreign corporation was “controlled” only if a single U.S. corporation satisfied the ownership requirements for an uninterrupted period of at least 30 days. These are the only foreign corporations for which complete Form 5471 filings were required. U.S. corporations may also control a CFC through a partnership where the U.S. corporation is the controlling partner. To the extent possible, these CFCs have also been included in these statistics.

Country of incorporation—The country of incorporation is the country under whose laws the CFC is legally created. The CFC’s country of incorporation is not necessarily the principal place of business. For Tax Year 2012, there were 1,504 CFCs (1.7 percent) that reported a principal place of business that differed from the reported country of incorporation. Table 2 provides data by country of incorporation; data by principal place of business are not included in these statistics.

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

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

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

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

OPEC countries—The member countries of the Organization of Petroleum Exporting Countries for Tax Year 2012 were: Algeria, Angola, Ecuador, Iran, Iraq, Kuwait, Libya, Nigeria, Qatar, Saudi Arabia, United Arab Emirates, and Venezuela. (Although OPEC countries are not discussed in the text, they are included in Table 2.)

Previously taxed earnings and profits—This includes any earnings and profit amounts that were subject to U.S. tax in the current year or in a prior year, but not distributed. Previously taxed earnings and profits include amounts related to Subpart F income (see definition below), earnings related to investments

¹⁹ See definition of “U.S. person” elsewhere in this section.

in certain U.S. property, previously excluded Subpart F income withdrawn from qualified investments, previously excluded export trade income withdrawn from investment in export trade assets, factoring income, and earnings invested in excess passive assets.

Subpart F Income—Internal Revenue Code sections 951 and 952 stipulate specific cases in which earnings and profits are deemed to have been paid by a CFC to a U.S. shareholder. Such income is subject to U.S. tax whether or not it is repatriated to U.S. shareholders in the form of an actual dividend. Internal Revenue Code section 951 requires that U.S. shareholders include in their gross incomes certain undistributed profits of foreign corporations controlled by U.S. shareholders. Subpart F income from a CFC includes certain insurance income of U.S. risks, “foreign base company” income, international boycott participation income, bribes and other illegal payments to foreign government officials, and income from any country that the United States does not recognize or from which it has severed relations, or which repeatedly provides support for acts of international terrorism.

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

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

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2012

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

Industrial sector and selected industrial subsector of controlled foreign corporation [1]	Number of U.S. corporation returns [2]	Controlled foreign corporations						
		Number of foreign corporations	Total assets		Total receipts	Dividend income	Current earnings and profits (less deficit) before income taxes	Income taxes
			Beginning of year	End of year				
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
All industries	14,039	88,038	17,282,107,662	18,596,353,104	6,857,571,434	449,025,762	924,126,084	130,814,745
Raw materials and energy production	518	2,708	632,958,560	646,380,925	330,873,691	14,163,993	72,921,215	25,574,653
Agriculture, forestry, fishing, and hunting	143	564	20,506,100	24,035,135	23,118,184	84,085	1,657,933	365,219
Mining, quarrying, and oil and gas extraction	322	1,641	520,071,817	531,445,628	273,311,080	13,325,092	66,093,158	24,270,905
Oil and gas extraction	119	957	424,451,697	392,474,102	220,786,442	13,199,633	58,016,345	21,709,556
Other mining, quarrying, and oil and gas extraction	221	684	95,620,121	138,971,527	52,524,638	125,459	8,076,813	2,561,349
Utilities	78	503	92,380,642	90,900,161	34,444,427	* 754,816	5,170,124	938,529
Goods production	5,014	21,182	2,494,637,950	2,681,463,250	2,451,151,561	110,186,202	242,201,556	28,276,552
Construction	339	858	19,486,008	22,348,918	31,261,114	80,437	3,084,156	747,986
Manufacturing	4,722	20,324	2,475,151,942	2,659,114,332	2,419,890,447	110,105,764	239,117,400	27,528,566
Food manufacturing	188	1,033	194,793,404	242,895,438	180,562,600	281,864	8,473,522	2,098,525
Grain and oilseed milling	16	101	18,308,312	19,205,079	33,597,124	* 9,005	1,352,272	394,930
Other food manufacturing	179	933	176,485,093	223,690,359	146,965,475	272,859	7,121,250	1,703,595
Beverage and tobacco product manufacturing	45	370	210,186,900	217,437,192	153,039,795	1,939,688	24,268,324	4,258,469
Beverage manufacturing	38	310	167,092,315	170,960,914	86,140,589	1,304,853	12,705,032	2,012,574
Tobacco manufacturing	7	60	43,094,585	46,476,278	66,899,206	* 634,834	11,563,292	2,245,895
Paper manufacturing	86	399	35,425,923	37,375,446	35,394,800	* 206,117	1,482,085	361,103
Petroleum and coal products manufacturing	38	131	97,437,111	98,281,146	295,440,983	267,106	5,683,468	977,966
Chemical manufacturing	439	3,012	621,119,144	602,289,297	358,120,354	47,858,927	42,278,781	6,206,722
Basic chemical manufacturing	90	603	58,557,203	56,913,396	43,220,393	308,188	3,671,949	1,085,196
Pharmaceutical and medicine manufacturing	111	591	395,613,771	365,510,535	192,211,842	46,084,488	25,380,516	2,469,944
Paint, coating, and adhesive manufacturing	46	399	19,020,287	20,371,454	17,087,777	173,483	1,190,865	253,807
Soap, cleaning compound, and toilet preparation manufacturing	36	264	13,882,550	13,967,350	23,017,929	* 71,415	2,449,803	607,713
Other chemical manufacturing	228	1,155	134,045,333	145,526,562	82,582,413	1,221,352	9,585,648	1,790,061
Plastics and rubber products manufacturing	333	881	53,995,401	56,129,545	51,789,164	233,364	3,038,650	479,601
Nonmetallic mineral product manufacturing	85	269	58,813,269	64,000,823	28,071,061	130,619	4,374,516	907,631
Primary metal manufacturing	139	303	53,410,806	53,589,222	36,281,592	* 12,760	-898,046	227,541
Fabricated metal product manufacturing	432	1,441	78,292,802	82,418,461	54,319,217	324,085	3,918,261	894,493
Machinery manufacturing	1,029	2,649	113,990,598	124,853,355	105,078,951	655,532	7,340,224	1,737,404
Agriculture, construction, and mining machinery manufacturing	45	308	33,618,721	47,537,776	38,834,009	* 114,876	2,050,604	629,830
Industrial machinery manufacturing	472	848	19,231,680	20,171,981	14,121,784	86,808	1,256,483	283,688
Ventilation, heating, air-conditioning, and commercial refrigeration equipment manufacturing	45	284	14,173,491	14,669,573	17,846,038	90,556	1,279,040	295,459
Other machinery manufacturing	534	1,209	46,966,707	42,474,025	34,277,120	363,292	2,754,097	528,427
Computer and electronic product manufacturing	624	2,240	366,069,174	439,398,019	482,403,250	31,395,312	95,933,613	2,451,712
Computer and peripheral equipment manufacturing	144	327	120,663,263	147,298,666	107,146,422	310,537	10,846,930	767,839
Communications equipment manufacturing	120	581	29,057,362	33,087,138	30,701,304	73,899	884,647	370,135
Semiconductor and other electronic component manufacturing	277	896	173,378,850	209,370,996	314,148,645	30,931,785	82,102,258	993,298
Other computer and electronic manufacturing	143	437	42,969,699	49,641,219	30,406,878	79,091	2,099,779	320,440
Electric equipment, appliance, and component manufacturing	517	1,582	100,332,502	99,800,021	79,372,664	901,196	6,841,836	1,022,627
Transportation equipment manufacturing	371	1,580	232,537,153	246,260,663	325,886,389	1,242,525	3,846,404	2,278,320
Motor vehicle, vehicle body and trailer, and vehicle parts manufacturing	277	1,188	193,052,963	203,649,297	290,607,365	874,686	1,304,649	1,908,792
Other transportation equipment manufacturing	118	392	39,484,191	42,611,366	35,279,024	* 367,838	2,541,755	369,527

Footnotes at end of table.

Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2012—Continued

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

Industrial sector and selected industrial subsector of controlled foreign corporation [1]	Number of U.S. corporation returns [2]	Controlled foreign corporations						
		Number of foreign corporations	Total assets		Total receipts	Dividend income	Current earnings and profits (less deficit) before income taxes	Income taxes
			Beginning of year	End of year				
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
Miscellaneous manufacturing	996	3,417	230,305,907	266,260,609	199,851,317	24,621,994	30,660,888	3,230,839
Medical equipment and supplies manufacturing	293	955	96,328,628	118,226,429	94,187,181	23,093,357	21,214,181	987,872
Other miscellaneous manufacturing	735	2,463	133,977,280	148,034,180	105,664,136	1,528,637	9,446,707	2,242,967
Other manufacturing	376	1,017	28,441,846	28,125,096	34,278,313	34,676	1,874,873	395,613
Distribution and transportation of goods	3,470	17,437	1,222,607,882	1,321,903,932	1,491,407,995	13,556,384	116,412,890	17,108,702
Wholesale and retail trade	3,138	15,562	1,147,125,616	1,241,959,344	1,408,626,928	12,906,778	113,540,105	16,119,816
Wholesale trade	2,641	13,329	936,281,331	1,007,249,416	1,080,179,322	10,983,207	98,140,340	12,539,796
Motor vehicle and motor vehicle parts and supplies merchant wholesalers	114	372	24,435,644	25,011,078	42,353,032	* 14,347	1,961,366	548,646
Professional and commercial equipment and supplies merchant wholesalers	136	540	18,762,112	18,607,625	28,715,757	106,602	2,557,312	453,070
Household appliances and electrical and electronic goods merchant wholesalers	432	1,691	56,746,519	56,581,946	99,695,764	366,268	3,300,751	766,403
Machinery, equipment, and suppliers merchant wholesalers	443	1,849	73,137,079	82,513,229	78,754,718	1,623,945	5,794,513	1,079,887
Drugs and druggists' sundries merchant wholesalers	92	751	345,731,195	382,449,961	149,325,286	5,829,461	48,841,069	2,619,362
Grocery and related products merchant wholesalers	84	390	19,347,912	22,658,253	29,127,403	* 44,524	1,435,618	337,545
Farm product raw materials merchant wholesalers	50	244	31,051,215	29,346,994	79,197,988	* 8,840	1,350,800	328,092
Chemical and allied products merchant wholesalers	155	832	35,961,871	39,173,344	55,880,376	443,688	2,326,674	527,079
Petroleum and petroleum products merchant wholesalers	57	232	27,084,829	22,616,018	135,378,319	199,490	1,496,703	235,150
Tobacco and tobacco products merchant wholesalers	6	109	14,266,872	13,753,200	40,821,091	* 453,819	2,106,040	634,678
Wholesale trade agents and brokers	148	270	4,775,850	5,094,966	5,509,416	* 11,250	795,190	49,503
Other wholesale trade	1,318	6,050	284,980,232	309,442,801	335,420,169	1,880,973	26,174,302	4,960,382
Retail trade	681	2,233	210,844,285	234,709,928	328,447,606	1,923,571	15,399,765	3,580,020
Nonstore retailers	266	1,006	80,854,454	97,486,152	91,303,978	15,113	5,530,589	924,920
Other retailers	433	1,227	129,989,831	137,223,776	237,143,628	1,908,458	9,869,176	2,655,100
Transportation and warehousing	443	1,874	75,482,266	79,944,588	82,781,067	649,606	2,872,786	988,886
Support activities for transportation	222	909	25,206,377	32,743,329	34,278,999	547,591	1,777,396	401,899
Warehousing and storage	108	292	12,261,965	10,469,802	7,205,109	* 6,024	398,885	128,138
Other transportation and warehousing	187	674	38,013,925	36,731,457	41,296,960	95,990	696,505	458,849
Information	1,030	5,215	480,946,233	489,358,279	199,484,745	3,146,610	19,700,005	2,684,695
Publishing industries (except internet)	304	1,251	112,780,512	97,277,781	56,143,805	240,942	6,143,148	679,996
Periodical publishers	30	202	5,504,672	5,105,158	3,362,380	* 18,833	292,498	92,324
Other publishing industries (except internet)	287	1,049	107,275,840	92,172,624	52,781,426	222,109	5,850,651	587,672
Motion picture and sound recording industries	55	808	43,746,757	37,001,817	20,411,179	726,140	-2,235,348	376,941
Motion picture and video industries	41	490	16,337,262	15,378,204	12,956,015	58,419	1,107,624	300,636
Sound recording industries	21	318	27,409,495	21,623,613	7,455,164	667,721	-3,342,972	76,305
Broadcasting (except internet)	28	271	13,980,767	13,430,963	7,073,290	1,663,970	560,655	172,747
Telecommunications	274	1,150	234,168,690	251,372,427	55,437,895	328,081	3,245,171	576,556
Data processing, hosting, and related services	181	542	10,132,454	11,422,214	8,478,153	27,604	584,214	258,171
Other information services	313	1,192	66,137,053	78,853,076	51,940,422	159,873	11,402,165	620,284
Finance, insurance, real estate, and rental and leasing	1,864	9,797	5,808,202,813	6,313,205,638	560,179,060	23,540,623	107,574,263	17,440,181
Finance and insurance	1,369	7,146	5,638,297,773	6,143,938,216	521,071,419	22,092,939	102,808,509	16,450,066
Credit intermediation and related activities	280	1,189	1,087,952,075	1,126,781,346	107,753,382	3,679,545	16,359,349	3,628,048
Depository credit intermediation	40	126	511,333,923	542,784,814	30,505,934	77,283	5,760,774	1,678,946
Nondepository credit intermediation	197	771	488,691,822	487,998,282	63,949,181	2,937,146	8,723,883	1,676,048
Activities related to credit intermediation	79	291	87,926,330	95,998,250	13,298,267	665,116	1,874,692	273,053

Footnotes at end of table.

Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2012—Continued

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

Industrial sector and selected industrial subsector of controlled foreign corporation [1]	Number of U.S. corporation returns [2]	Controlled foreign corporations						
		Number of foreign corporations	Total assets		Total receipts	Dividend income	Current earnings and profits (less deficit) before income taxes	Income taxes
			Beginning of year	End of year				
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Securities, commodity contracts, and other financial investments and related activities	730	3,235	3,343,947,818	3,668,927,794	231,104,127	15,000,434	66,731,775	9,133,223
Investment banking and securities dealing	40	200	1,699,786,847	1,602,922,722	49,639,443	697,365	10,630,955	1,392,916
Securities brokerage	41	147	130,397,694	475,358,391	8,805,932	111,364	10,383,490	2,201,398
Other securities, commodity contracts, and other financial investments and related activities	696	2,888	1,513,763,277	1,590,646,681	172,658,751	14,191,705	45,717,330	5,538,909
Insurance carriers and related activities	419	1,963	584,460,766	751,000,417	143,741,486	1,252,122	13,956,692	3,147,426
Insurance carriers	175	480	412,980,904	538,911,626	101,488,433	626,515	5,416,806	1,495,943
Agencies, brokerages, and other insurance related activities	306	1,483	171,479,862	212,088,791	42,253,054	625,607	8,539,886	1,651,483
Funds, trusts, and other financial vehicles	232	759	621,937,115	597,228,659	38,472,424	2,160,838	5,760,693	541,369
Real estate and rental and leasing	687	2,651	169,905,040	169,267,421	39,107,641	1,447,683	4,765,754	990,115
Real estate	494	1,895	73,277,049	75,337,774	15,852,290	693,287	2,717,435	577,521
Other real estate and rental and leasing	233	757	96,627,991	93,929,647	23,255,352	754,396	2,048,319	412,594
Services	6,824	31,649	6,642,734,688	7,143,977,619	1,824,463,288	284,431,951	365,327,347	39,729,997
Professional, scientific, and technical services	4,628	18,106	774,853,579	907,837,167	434,515,115	16,504,913	60,099,356	9,348,319
Architectural, engineering, and related services	433	1,355	25,271,232	30,436,138	27,029,401	49,735	1,961,828	409,444
Computer system design and related services	1,647	5,694	473,278,283	554,577,783	228,363,253	14,587,476	40,470,056	4,766,943
Computer system design services	333	705	14,863,304	16,498,695	13,882,401	65,091	1,946,997	299,744
Other computer system design and related services	1,393	4,989	458,414,979	538,079,088	214,480,852	14,522,386	38,523,059	4,467,199
Management, scientific, and technical consulting services	830	1,798	27,753,132	34,213,584	19,757,960	530,086	800,436	426,739
Scientific research and development services	615	1,293	18,820,387	26,278,715	16,016,687	* 20,357	623,597	286,496
Advertising, public relations, and related services	325	2,715	44,379,891	47,406,022	28,085,906	735,380	3,178,505	867,197
Other professional, scientific, and technical services	1,581	5,251	185,350,654	214,924,924	115,261,908	581,879	13,064,935	2,591,500
Management of companies and enterprises	2,290	8,271	5,656,382,272	6,004,412,758	1,249,214,420	267,086,612	291,062,878	26,085,760
Offices of bank holding companies	38	77	187,697,680	148,427,308	10,404,825	* 828,243	2,737,394	50,861
Offices of other holding companies	2,279	8,194	5,468,684,592	5,855,985,450	1,238,809,595	266,258,370	288,325,484	26,034,899
Administration and support and waste management and remediation services	920	2,292	61,745,560	61,133,756	53,781,311	297,208	3,193,991	856,925
Arts, entertainment, and recreation	137	508	12,016,923	13,790,761	6,929,451	40,377	238,759	84,999
Accommodation and food services	78	671	84,307,668	91,630,898	48,169,562	335,731	8,024,471	2,720,794
Accommodation	42	339	47,326,808	55,004,571	14,538,784	* 38,559	3,978,730	1,673,931
Food services and drinking places	39	332	36,980,860	36,626,327	33,630,778	* 297,172	4,045,741	1,046,863
Repair and maintenance	152	527	23,186,816	23,860,654	14,494,219	87,238	1,428,158	290,783
Other services (except public administration)	306	1,274	30,241,870	41,311,626	17,359,209	79,871	1,279,734	342,418

Footnotes at end of table.

Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2012—Continued

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

Industrial sector and selected industrial subsector of controlled foreign corporation [1]	Controlled foreign corporations—continued							
	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes			Distributions out of earnings and profits			Dividends paid to controlling U.S. corporation
		Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes	Total	Not previously taxed earnings and profits	Previously taxed earnings and profits	
(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	
All industries	793,311,339	1,052,881,217	127,431,344	925,449,873	475,832,007	349,549,972	126,282,035	93,482,519
Raw materials and energy production	47,346,562	84,546,127	25,415,293	59,130,835	32,612,311	31,319,018	1,293,293	14,464,081
Agriculture, forestry, fishing, and hunting	1,292,713	1,992,353	355,385	1,636,968	386,034	338,944	47,090	138,922
Mining, quarrying, and oil and gas extraction	41,822,253	76,874,213	24,123,388	52,750,825	28,667,325	27,600,383	1,066,942	14,214,776
Oil and gas extraction	36,306,789	65,744,584	21,697,183	44,047,401	25,994,538	25,023,089	971,449	13,754,813
Other mining, quarrying, and oil and gas extraction	5,515,464	11,129,629	2,426,204	8,703,424	2,672,786	2,577,294	95,493	459,963
Utilities	4,231,595	5,679,562	936,520	4,743,042	3,558,952	3,379,691	179,261	110,383
Goods production	213,925,005	273,052,773	27,606,080	245,446,694	98,302,505	80,445,306	17,857,199	17,882,969
Construction	2,336,170	3,461,146	725,433	2,735,713	1,313,974	1,036,663	277,311	177,434
Manufacturing	211,588,835	269,591,628	26,880,646	242,710,981	96,988,531	79,408,644	17,579,888	17,705,535
Food manufacturing	6,374,997	9,744,394	2,040,995	7,703,400	4,988,502	4,352,752	635,750	1,025,470
Grain and oilseed milling	957,341	1,493,296	385,243	1,108,053	403,863	346,212	57,651	167,288
Other food manufacturing	5,417,656	8,251,098	1,655,752	6,595,347	4,584,638	4,006,540	578,099	858,181
Beverage and tobacco product manufacturing	20,009,856	25,835,579	4,196,906	21,638,673	15,801,543	11,004,287	4,797,256	2,887,273
Beverage manufacturing	10,692,458	14,159,318	1,953,273	12,206,045	8,758,757	7,638,218	1,120,539	1,794,488
Tobacco manufacturing	9,317,397	11,676,261	2,243,633	9,432,628	7,042,785	3,366,069	3,676,717	1,092,785
Paper manufacturing	1,120,981	1,982,422	355,579	1,626,843	749,087	630,489	118,599	58,943
Petroleum and coal products manufacturing	4,705,502	5,893,203	979,899	4,913,305	2,578,016	1,637,990	940,026	1,096,939
Chemical manufacturing	36,072,059	46,344,341	6,072,430	40,271,911	25,963,625	22,070,821	3,892,803	3,966,744
Basic chemical manufacturing	2,586,753	4,379,796	1,056,936	3,322,860	1,662,551	1,359,996	302,555	188,531
Pharmaceutical and medicine manufacturing	22,910,572	27,545,056	2,437,161	25,107,895	18,134,743	15,462,065	2,672,678	923,312
Paint, coating, and adhesive manufacturing	937,058	1,345,618	210,597	1,135,022	630,261	554,019	76,242	366,126
Soap, cleaning compound, and toilet preparation manufacturing	1,842,090	2,516,169	607,739	1,908,430	1,121,991	1,086,033	35,958	825,372
Other chemical manufacturing	7,795,586	10,557,702	1,759,997	8,797,705	4,414,079	3,608,709	805,371	1,663,404
Plastics and rubber products manufacturing	2,559,050	3,787,161	481,183	3,305,978	865,369	721,307	144,063	242,274
Nonmetallic mineral product manufacturing	3,466,884	4,954,647	894,561	4,060,085	7,907,115	7,807,407	99,708	169,826
Primary metal manufacturing	-1,125,587	1,034,202	213,165	821,037	756,205	399,867	356,339	* 21,822
Fabricated metal product manufacturing	3,023,768	4,668,080	885,311	3,782,769	1,402,818	1,245,978	156,840	336,134
Machinery manufacturing	5,602,821	9,011,297	1,720,933	7,290,365	3,996,251	3,551,911	444,340	781,934
Agriculture, construction, and mining machinery manufacturing	1,420,774	2,688,233	587,821	2,100,412	306,713	249,176	57,538	* 16,083
Industrial machinery manufacturing	972,795	1,423,484	278,173	1,145,311	1,485,983	1,383,397	102,586	73,538
Ventilation, heating, air-conditioning, and commercial refrigeration equipment manufacturing	983,581	1,425,199	294,218	1,130,981	481,788	452,745	* 29,043	29,956
Other machinery manufacturing	2,225,670	3,474,382	560,720	2,913,661	1,721,767	1,466,594	255,173	662,357
Computer and electronic product manufacturing	93,481,901	100,040,040	2,368,991	97,671,049	15,660,128	12,443,682	3,216,446	3,401,657
Computer and peripheral equipment manufacturing	10,079,091	11,987,570	743,356	11,244,214	8,849,132	6,960,174	1,888,957	190,209
Communications equipment manufacturing	514,512	1,961,271	345,855	1,615,416	1,212,866	1,128,711	84,155	949,391
Semiconductor and other electronic component manufacturing	81,108,960	83,656,473	968,849	82,687,624	4,069,694	2,989,451	1,080,243	2,016,234
Other computer and electronic manufacturing	1,779,338	2,434,727	310,931	2,123,796	1,528,437	1,365,346	163,092	245,823
Electric equipment, appliance, and component manufacturing	5,819,210	8,013,801	973,622	7,040,179	3,992,197	3,206,803	785,394	632,220
Transportation equipment manufacturing	1,568,085	12,411,294	2,130,162	10,281,132	3,781,957	3,068,492	713,465	604,592
Motor vehicle, vehicle body and trailer, and vehicle parts manufacturing	-604,143	9,651,369	1,756,485	7,894,883	3,342,933	2,665,287	677,646	551,074
Other transportation equipment manufacturing	2,172,228	2,759,925	373,676	2,386,249	439,025	403,205	35,819	53,518

Footnotes at end of table.

Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2012—Continued

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

Industrial sector and selected industrial subsector of controlled foreign corporation [1]	Controlled foreign corporations—continued							
	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes			Distributions out of earnings and profits			Dividends paid to controlling U.S. corporation
		Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes	Total	Not previously taxed earnings and profits	Previously taxed earnings and profits	
(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	
Miscellaneous manufacturing	27,430,049	33,318,000	3,185,674	30,132,326	7,837,688	6,644,389	1,193,299	2,105,553
Medical equipment and supplies manufacturing	20,226,310	22,119,678	972,294	21,147,384	3,437,876	2,578,619	859,257	690,731
Other miscellaneous manufacturing	7,203,740	11,198,322	2,213,380	8,984,942	4,399,812	4,065,769	334,042	1,414,823
Other manufacturing	1,479,260	2,553,167	381,237	2,171,930	708,030	622,470	85,560	374,154
Distribution and transportation of goods	99,304,188	128,732,802	16,695,283	112,037,519	50,530,734	22,322,883	28,207,851	6,958,184
Wholesale and retail trade	97,420,288	123,952,939	15,749,983	108,202,956	49,239,643	21,278,071	27,961,572	6,632,830
Wholesale trade	85,600,544	105,868,255	12,231,674	93,636,581	44,748,886	17,236,433	27,512,453	5,436,565
Motor vehicle and motor vehicle parts and supplies merchant wholesalers	1,412,720	2,354,743	497,853	1,856,890	898,748	847,336	51,412	146,771
Professional and commercial equipment and supplies merchant wholesalers	2,104,242	2,690,443	445,613	2,244,830	826,134	672,441	153,693	454,851
Household appliances and electrical and electronic goods merchant wholesalers	2,534,348	4,392,473	733,275	3,659,198	1,395,830	1,083,061	312,769	418,672
Machinery, equipment, and suppliers merchant wholesalers	4,714,626	6,469,977	1,040,129	5,429,847	570,794	432,997	137,797	130,875
Drugs and druggists' sundries merchant wholesalers	46,221,708	50,201,961	2,565,044	47,636,917	23,071,648	1,624,844	21,446,804	142,471
Grocery and related products merchant wholesalers	1,098,073	1,681,000	325,924	1,355,077	931,047	586,419	344,628	303,860
Farm product raw materials merchant wholesalers	1,022,708	1,450,162	322,613	1,127,549	1,051,060	34,798	* 1,016,262	* 6,492
Chemical and allied products merchant wholesalers	1,799,595	3,034,923	510,483	2,524,440	900,862	445,558	455,304	263,466
Petroleum and petroleum products merchant wholesalers	1,261,553	1,714,438	228,866	1,485,571	722,774	520,288	202,485	368,107
Tobacco and tobacco products merchant wholesalers	1,471,362	2,149,794	632,627	1,517,168	1,384,051	742,498	* 641,553	55,562
Wholesale trade agents and brokers	745,687	820,529	47,023	773,505	334,807	151,008	* 183,799	* 18,282
Other wholesale trade	21,213,920	28,907,814	4,882,224	24,025,589	12,661,132	10,095,185	2,565,948	3,127,157
Retail trade	11,819,744	18,084,684	3,518,309	14,566,374	4,490,756	4,041,638	449,119	1,196,264
Nonstore retailers	4,605,669	6,718,116	895,630	5,822,486	1,224,065	1,074,810	149,255	394,612
Other retailers	7,214,075	11,366,568	2,622,679	8,743,889	3,266,691	2,966,827	299,864	801,653
Transportation and warehousing	1,883,900	4,779,863	945,300	3,834,563	1,291,091	1,044,813	246,278	325,354
Support activities for transportation	1,375,497	2,358,274	373,832	1,984,442	554,301	490,850	63,451	201,677
Warehousing and storage	270,747	517,059	113,492	403,567	150,388	142,565	* 7,823	* 10,390
Other transportation and warehousing	237,656	1,904,530	457,976	1,446,554	586,402	411,398	175,004	113,287
Information	17,015,310	31,786,847	2,548,802	29,238,045	5,403,807	3,593,216	1,810,591	1,420,744
Publishing industries (except internet)	5,463,153	8,205,315	661,103	7,544,212	512,521	394,687	117,833	271,119
Periodical publishers	200,174	359,970	84,322	275,647	129,088	124,941	* 4,148	66,843
Other publishing industries (except internet)	5,262,979	7,845,346	576,781	7,268,565	383,432	269,747	113,686	204,276
Motion picture and sound recording industries	-2,612,289	3,323,351	398,242	2,925,110	541,637	482,983	58,654	263,530
Motion picture and video industries	806,988	1,512,061	330,467	1,181,595	434,701	389,371	45,331	263,530
Sound recording industries	-3,419,277	1,811,290	67,775	1,743,515	106,936	93,612	* 13,323	0
Broadcasting (except internet)	387,907	892,231	156,904	735,327	143,124	120,699	* 22,425	32,857
Telecommunications	2,668,614	6,425,229	506,870	5,918,359	1,830,089	1,538,250	291,839	440,618
Data processing, hosting, and related services	326,043	896,051	237,244	658,807	443,531	343,580	99,951	268,347
Other information services	10,781,881	12,044,670	588,439	11,456,231	1,932,905	713,017	1,219,888	144,274
Finance, insurance, real estate, and rental and leasing	90,134,082	133,249,519	16,508,520	116,740,999	60,181,301	44,644,940	15,536,361	9,780,099
Finance and insurance	86,358,443	126,697,744	15,639,045	111,058,700	57,707,436	42,365,572	15,341,864	9,422,709
Credit intermediation and related activities	12,731,301	22,040,890	3,478,687	18,562,203	13,266,089	11,706,948	1,559,141	2,465,507
Depository credit intermediation	4,081,828	7,398,466	1,604,703	5,793,763	4,440,193	4,415,399	24,795	459,148
Nondepository credit intermediation	7,047,835	12,472,576	1,615,116	10,857,460	8,355,250	6,928,642	1,426,608	1,794,847
Activities related to credit intermediation	1,601,638	2,169,848	258,868	1,910,980	470,646	362,907	107,739	211,511

Footnotes at end of table.

Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2012—Continued

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

Industrial sector and selected industrial subsector of controlled foreign corporation [1]	Controlled foreign corporations—continued							Dividends paid to controlling U.S. corporation
	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes			Distributions out of earnings and profits			
		Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes	Total	Not previously taxed earnings and profits	Previously taxed earnings and profits	
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
Securities, commodity contracts, and other financial investments and related activities	57,598,552	75,052,223	8,911,977	66,140,247	30,240,641	21,450,814	8,789,828	4,700,942
Investment banking and securities dealing	9,238,039	11,260,731	1,375,689	9,885,042	2,798,683	1,979,861	818,822	* 184,491
Securities brokerage	8,182,092	10,830,946	2,139,462	8,691,484	4,104,825	2,777,629	1,327,196	* 111,487
Other securities, commodity contracts, and other financial investments and related activities	40,178,421	52,960,546	5,396,825	47,563,721	23,337,134	16,693,324	6,643,810	4,404,964
Insurance carriers and related activities	10,809,265	18,302,778	2,743,617	15,559,161	7,709,302	5,764,554	1,944,748	1,397,336
Insurance carriers	3,920,863	8,858,532	1,175,273	7,683,260	3,435,598	2,475,873	959,725	504,071
Agencies, brokerages, and other insurance related activities	6,888,402	9,444,245	1,568,344	7,875,901	4,273,704	3,288,681	985,023	893,265
Funds, trusts, and other financial vehicles	5,219,324	11,301,853	504,764	10,797,089	6,491,404	3,443,256	3,048,147	858,925
Real estate and rental and leasing	3,775,638	6,551,774	869,475	5,682,299	2,473,864	2,279,368	194,496	357,389
Real estate	2,139,914	3,774,265	513,434	3,260,830	1,887,880	1,754,307	133,573	252,802
Other real estate and rental and leasing	1,635,725	2,777,510	356,041	2,421,469	585,984	525,061	60,923	104,588
Services	325,597,349	401,511,497	38,657,115	362,854,382	228,801,071	167,224,607	61,576,464	42,976,442
Professional, scientific, and technical services	50,751,038	69,861,959	8,870,172	60,991,787	28,246,800	21,260,113	6,986,688	3,992,289
Architectural, engineering, and related services	1,552,385	2,504,330	371,909	2,132,421	560,736	517,967	42,769	117,304
Computer system design and related services	35,703,113	43,429,712	4,649,394	38,780,317	11,134,339	6,166,715	4,967,624	2,091,743
Computer system design services	1,647,253	2,214,693	282,951	1,931,742	93,621	76,212	* 17,409	26,241
Other computer system design and related services	34,055,859	41,215,019	4,366,443	36,848,575	11,040,718	6,090,502	4,950,216	2,065,502
Management, scientific, and technical consulting services	373,697	1,780,750	365,970	1,414,780	586,599	525,594	61,004	246,151
Scientific research and development services	337,101	1,902,556	274,938	1,627,618	146,636	104,097	42,539	44,475
Advertising, public relations, and related services	2,311,308	4,653,855	834,455	3,819,400	2,114,338	1,930,877	183,461	215,662
Other professional, scientific, and technical services	10,473,435	15,590,756	2,373,505	13,217,251	13,704,152	12,014,863	1,689,290	1,276,955
Management of companies and enterprises	264,977,118	314,794,792	25,566,447	289,228,344	192,149,245	138,047,949	54,101,296	37,951,801
Offices of bank holding companies	2,686,532	3,542,737	50,054	3,492,684	8,411,792	6,888,398	1,523,394	* 596,673
Offices of other holding companies	262,290,585	311,252,054	25,516,394	285,735,661	183,737,452	131,159,550	52,577,902	37,355,127
Administration and support and waste management and remediation services	2,337,066	4,062,712	825,412	3,237,300	1,442,584	1,309,124	133,460	236,203
Arts, entertainment, and recreation	153,760	602,374	76,583	525,791	153,447	142,125	* 11,322	37,737
Accommodation and food services	5,303,677	8,352,952	2,703,038	5,649,914	5,780,839	5,608,731	172,107	546,388
Accommodation	2,304,799	4,145,843	1,667,845	2,477,998	1,739,057	1,723,636	15,421	22,423
Food services and drinking places	2,998,878	4,207,109	1,035,193	3,171,916	4,041,781	3,885,095	156,686	523,965
Repair and maintenance	1,137,375	1,733,967	283,358	1,450,609	675,910	563,333	112,577	93,355
Other services (except public administration)	937,316	2,102,742	332,106	1,770,636	352,246	293,232	59,014	118,669

Footnotes at end of table.

Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2012—Continued

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

Industrial sector and selected industrial subsector of controlled foreign corporation [1]	Controlled foreign corporations—continued							
	Total Subpart F income	End of year accumulated earnings and profits (E&P)			Receipts by foreign corporations from			
		Total section 964(a) E&P	Total not previously taxed E&P (post-86 & pre-87 section 959(c)(3) balances)	Total previously taxed E&P (sections 959(c)(1) & (2) balances)	All sources	All related parties, total	Any foreign corporations controlled by U.S. corporation filing return	Unrelated parties
(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)	
Securities, commodity contracts, and other financial investments and related activities	7,562,549	129,189,558	100,287,402	28,902,156	231,104,127	90,286,368	54,913,931	162,155,221
Investment banking and securities dealing	504,150	56,443,678	52,310,778	4,132,900	49,639,443	12,981,399	3,513,688	37,690,604
Securities brokerage	43,659	-30,137,209	-30,466,183	328,974	8,805,932	6,229,214	5,722,999	5,373,122
Other securities, commodity contracts, and other financial investments and related activities	7,014,741	102,883,090	78,442,807	24,440,282	172,658,751	71,075,755	45,677,243	119,091,495
Insurance carriers and related activities	2,578,013	50,382,560	40,628,523	9,754,037	143,741,486	11,151,968	7,177,941	134,075,219
Insurance carriers	1,700,733	32,606,174	25,863,106	6,743,067	101,488,433	4,369,585	2,581,752	97,508,855
Agencies, brokerages, and other insurance related activities	877,280	17,776,386	14,765,417	3,010,969	42,253,054	6,782,383	4,596,189	36,566,363
Funds, trusts, and other financial vehicles	2,208,481	28,733,782	14,578,593	14,155,189	38,472,424	13,686,756	10,945,543	26,887,292
Real estate and rental and leasing	441,598	13,115,586	9,934,767	3,180,820	39,107,641	7,182,647	6,062,345	32,373,906
Real estate	305,977	7,196,540	4,894,908	2,301,631	15,852,290	4,564,423	4,247,767	11,413,160
Other real estate and rental and leasing	135,621	5,919,047	5,039,858	879,188	23,255,352	2,618,223	1,814,578	20,960,746
Services	21,334,835	940,002,470	837,171,584	102,830,887	1,824,463,288	578,897,461	393,077,012	1,313,824,607
Professional, scientific, and technical services	2,813,995	195,501,343	184,376,512	11,124,831	434,515,115	166,697,331	89,144,598	273,224,021
Architectural, engineering, and related services	150,701	5,194,643	4,563,256	631,387	27,029,401	4,355,603	3,078,275	22,821,495
Computer system design and related services	1,000,945	150,078,904	145,256,966	4,821,938	228,363,253	92,432,134	43,494,664	138,435,908
Computer system design services	186,303	5,023,575	3,994,490	1,029,085	13,882,401	3,890,588	1,227,993	10,093,918
Other computer system design and related services	814,642	145,055,329	141,262,476	3,792,853	214,480,852	88,541,546	42,266,671	128,341,990
Management, scientific, and technical consulting services	82,900	1,592,326	1,152,770	439,556	19,757,960	7,662,812	4,569,035	12,397,529
Scientific research and development services	199,368	-1,395,739	-2,195,999	800,260	16,016,687	10,654,824	5,499,577	5,763,432
Advertising, public relations, and related services	91,813	5,432,666	4,992,803	439,863	28,085,906	6,071,402	4,664,685	22,503,940
Other professional, scientific, and technical services	1,288,269	34,598,542	30,606,716	3,991,827	115,261,908	45,520,555	27,838,363	71,301,716
Management of companies and enterprises	17,799,298	718,592,783	631,017,251	87,575,532	1,249,214,420	387,326,438	287,606,312	922,817,302
Offices of bank holding companies	224,715	9,491,401	7,151,470	2,339,931	10,404,825	4,985,308	3,835,195	6,762,187
Offices of other holding companies	17,574,583	709,101,383	623,865,781	85,235,601	1,238,809,595	382,341,130	283,771,118	916,055,115
Administration and support and waste management and remediation services	307,621	6,808,662	5,491,098	1,317,563	53,781,311	13,911,931	8,834,702	41,457,233
Arts, entertainment, and recreation	36,263	-349,497	-555,363	205,865	6,929,451	749,525	499,219	6,201,985
Accommodation and food services	227,737	10,998,196	9,308,250	1,689,946	48,169,562	3,415,143	2,839,549	44,968,586
Accommodation	107,664	4,940,126	3,383,081	1,557,045	14,538,784	760,674	433,259	13,780,875
Food services and drinking places	120,073	6,058,070	5,925,169	132,901	33,630,778	2,654,469	2,406,290	31,187,711
Repair and maintenance	92,751	4,846,434	4,341,329	505,105	14,494,219	3,984,773	2,000,236	10,542,486
Other services (except public administration)	57,170	3,604,550	3,192,506	412,044	17,359,209	2,812,319	2,152,395	14,612,994

Footnotes at end of table.

Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2012—Continued

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

Industrial sector and selected industrial subsector of controlled foreign corporation [1]	Controlled foreign corporations—continued					
	Payments by foreign corporations to				Dividends received from foreign corporations or partnerships controlled by U.S. corporation filing return	Dividends paid to foreign corporations or partnerships controlled by U.S. corporation filing return
	All recipients	All related parties, total	Any foreign corporations controlled by U.S. corporation filing return	Unrelated parties		
(25)	(26)	(27)	(28)	(29)	(30)	
All industries	6,393,043,660	2,077,281,324	1,250,804,663	4,355,052,140	253,793,092	313,153,682
Raw materials and energy production	287,210,934	69,515,793	43,427,330	218,183,182	1,682,946	15,820,625
Agriculture, forestry, fishing, and hunting	21,589,077	4,580,362	3,247,600	17,077,069	* 53,889	192,577
Mining, quarrying, and oil and gas extraction	232,884,755	59,655,394	35,427,954	173,513,028	627,908	12,868,525
Oil and gas extraction	185,360,183	47,291,876	26,369,527	138,285,846	580,831	11,193,018
Other mining, quarrying, and oil and gas extraction	47,524,571	12,363,518	9,058,427	35,227,182	* 47,076	1,675,507
Utilities	32,737,102	5,280,037	4,751,775	27,593,085	1,001,149	2,759,523
Goods production	2,272,141,866	659,814,337	396,685,510	1,619,210,137	24,072,562	67,543,105
Construction	30,111,029	4,054,245	2,611,479	26,159,900	154,876	860,409
Manufacturing	2,242,030,837	655,760,092	394,074,031	1,593,050,237	23,917,686	66,682,696
Food manufacturing	176,338,920	32,720,772	24,846,510	143,802,150	576,957	3,513,613
Grain and oilseed milling	32,520,599	9,343,320	7,349,306	23,186,247	* 33,528	137,002
Other food manufacturing	143,818,322	23,377,452	17,497,204	120,615,903	543,429	3,376,611
Beverage and tobacco product manufacturing	143,701,987	37,296,551	22,211,282	106,425,009	1,758,719	8,931,967
Beverage manufacturing	81,470,761	23,658,397	14,877,570	57,831,936	1,167,615	6,607,574
Tobacco manufacturing	62,231,226	13,638,154	7,333,712	48,593,072	* 591,104	2,324,393
Paper manufacturing	34,631,948	6,969,138	4,679,425	27,700,129	49,111	611,512
Petroleum and coal products manufacturing	289,354,022	95,851,405	58,597,995	193,642,782	* 480,553	544,418
Chemical manufacturing	302,303,906	127,917,494	83,046,230	176,611,280	2,198,226	20,409,793
Basic chemical manufacturing	41,265,238	13,423,461	8,269,299	27,933,380	255,300	1,178,581
Pharmaceutical and medicine manufacturing	143,477,111	73,025,489	50,222,040	70,541,568	854,588	16,344,297
Paint, coating, and adhesive manufacturing	16,501,706	5,496,999	3,974,095	11,034,114	148,848	223,028
Soap, cleaning compound, and toilet preparation manufacturing	21,555,457	6,687,925	4,046,262	14,984,187	* 53,258	213,614
Other chemical manufacturing	79,504,395	29,283,620	16,534,534	52,118,031	886,231	2,450,273
Plastics and rubber products manufacturing	49,923,968	19,833,411	13,297,407	30,381,171	279,637	495,012
Nonmetallic mineral product manufacturing	31,827,265	12,216,083	8,778,797	19,885,028	* 122,092	5,153,344
Primary metal manufacturing	37,902,509	7,037,220	2,918,922	30,884,841	* 35,190	633,620
Fabricated metal product manufacturing	52,061,408	14,188,503	10,072,857	38,041,583	606,609	926,591
Machinery manufacturing	101,644,628	27,280,116	15,953,283	74,451,068	765,084	2,821,224
Agriculture, construction, and mining machinery manufacturing	37,253,887	10,054,614	4,744,243	27,212,125	* 113,664	264,043
Industrial machinery manufacturing	14,405,732	4,400,424	3,123,764	10,013,219	86,669	1,359,746
Ventilation, heating, air-conditioning, and commercial refrigeration equipment manufacturing	17,036,690	3,721,423	2,975,832	13,318,455	107,036	421,410
Other machinery manufacturing	32,948,320	9,103,655	5,109,444	23,907,270	457,714	776,025
Computer and electronic product manufacturing	407,517,881	117,515,562	55,271,131	290,859,640	619,800	11,172,424
Computer and peripheral equipment manufacturing	108,542,136	41,295,716	24,024,036	67,721,095	295,503	8,579,441
Communications equipment manufacturing	30,501,297	9,569,243	3,347,832	20,947,115	78,696	173,006
Semiconductor and other electronic component manufacturing	240,256,840	56,346,087	21,157,375	184,269,041	226,153	1,207,283
Other computer and electronic manufacturing	28,217,608	10,304,515	6,741,888	17,922,389	19,447	1,212,693
Electric equipment, appliance, and component manufacturing	81,519,734	19,621,252	11,973,164	62,458,036	935,046	3,225,878
Transportation equipment manufacturing	332,296,826	62,629,086	35,795,747	270,541,323	393,499	2,592,439
Motor vehicle, vehicle body and trailer, and vehicle parts manufacturing	298,215,959	51,747,420	29,317,142	247,249,530	300,973	2,243,159
Other transportation equipment manufacturing	34,080,867	10,881,666	6,478,605	23,291,794	* 92,526	349,280

Footnotes at end of table.

Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2012—Continued

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

Industrial sector and selected industrial subsector of controlled foreign corporation [1]	Controlled foreign corporations—continued					
	Payments by foreign corporations to				Dividends received from foreign corporations or partnerships controlled by U.S. corporation filing return	Dividends paid to foreign corporations or partnerships controlled by U.S. corporation filing return
	All recipients	All related parties, total	Any foreign corporations controlled by U.S. corporation filing return	Unrelated parties		
(25)	(26)	(27)	(28)	(29)	(30)	
Miscellaneous manufacturing	167,819,665	67,617,644	42,386,213	101,214,912	15,043,817	5,378,411
Medical equipment and supplies manufacturing	68,116,143	29,844,974	17,130,705	38,928,211	13,232,844	2,575,184
Other miscellaneous manufacturing	99,703,522	37,772,670	25,255,508	62,286,701	1,810,974	2,803,227
Other manufacturing	33,186,170	7,065,855	4,245,069	26,151,284	53,347	272,451
Distribution and transportation of goods	1,461,534,485	562,758,578	334,892,311	902,411,998	35,905,035	28,358,253
Wholesale and retail trade	1,381,219,435	537,202,352	321,206,694	847,169,806	35,240,536	27,655,197
Wholesale trade	1,062,898,655	454,983,279	277,000,016	610,712,855	34,973,992	25,169,361
Motor vehicle and motor vehicle parts and supplies merchant wholesalers	41,445,928	16,987,867	7,774,799	24,520,370	* 20,608	580,473
Professional and commercial equipment and supplies merchant wholesalers	27,477,931	16,173,303	5,754,700	11,367,266	* 19,575	288,566
Household appliances and electrical and electronic goods merchant wholesalers	98,208,931	41,761,889	18,580,815	56,748,981	1,071,365	840,397
Machinery, equipment, and suppliers merchant wholesalers	72,530,312	37,767,341	22,214,296	34,823,681	104,646	385,577
Drugs and druggists' sundries merchant wholesalers	158,180,019	100,153,155	74,304,794	59,774,477	30,606,766	11,621,334
Grocery and related products merchant wholesalers	28,844,116	8,394,755	6,585,712	20,455,973	* 127,305	347,550
Farm product raw materials merchant wholesalers	78,908,785	24,749,735	13,187,375	54,205,303	* 11,000	932,301
Chemical and allied products merchant wholesalers	54,248,401	25,755,512	15,086,350	28,549,130	84,405	585,315
Petroleum and petroleum products merchant wholesalers	134,708,843	47,186,184	18,962,254	87,523,746	* 61,428	83,446
Tobacco and tobacco products merchant wholesalers	39,607,198	16,156,055	15,959,412	23,490,848	* 179,740	1,279,029
Wholesale trade agents and brokers	5,136,133	1,642,698	528,653	3,493,549	* 86,649	* 238,251
Other wholesale trade	323,602,059	118,254,785	78,060,857	205,759,532	2,600,504	7,987,123
Retail trade	318,320,780	82,219,074	44,206,679	236,456,951	266,544	2,485,836
Nonstore retailers	88,205,127	37,061,201	18,642,990	51,356,310	* 41,793	655,011
Other retailers	230,115,653	45,157,872	25,563,689	185,100,642	224,751	1,830,825
Transportation and warehousing	80,315,051	25,556,226	13,685,617	55,242,191	664,499	703,056
Support activities for transportation	32,567,877	14,809,649	10,095,931	18,210,973	603,766	283,099
Warehousing and storage	6,763,016	1,413,268	1,066,469	5,359,409	0	132,053
Other transportation and warehousing	40,984,158	9,333,309	2,523,217	31,671,809	* 60,733	287,904
Information	202,463,832	49,158,244	23,819,328	153,652,915	833,542	3,076,408
Publishing industries (except internet)	54,175,900	9,817,668	2,791,124	44,468,253	205,744	89,155
Periodical publishers	3,347,375	467,836	216,704	2,895,603	* 55,913	47,323
Other publishing industries (except internet)	50,828,525	9,349,832	2,574,420	41,572,650	149,831	41,832
Motion picture and sound recording industries	19,162,361	6,769,728	1,622,118	12,459,345	280,820	218,315
Motion picture and video industries	12,833,548	4,812,392	618,671	8,085,842	* 48,661	132,608
Sound recording industries	6,328,814	1,957,336	1,003,447	4,373,503	232,160	85,707
Broadcasting (except internet)	5,061,041	1,146,842	791,476	3,943,767	40,639	87,106
Telecommunications	73,296,967	14,595,495	10,990,203	58,774,216	49,437	1,031,072
Data processing, hosting, and related services	8,121,361	1,877,751	821,147	6,267,386	* 46,357	71,709
Other information services	42,646,202	14,950,761	6,803,259	27,739,947	210,545	1,579,051
Finance, insurance, real estate, and rental and leasing	513,105,924	154,061,546	88,049,035	363,357,664	40,706,801	40,431,048
Finance and insurance	476,132,886	145,750,371	82,845,697	334,384,552	40,117,312	38,466,577
Credit intermediation and related activities	97,951,370	27,006,575	18,943,382	72,378,791	3,612,555	9,858,653
Depository credit intermediation	29,295,131	8,827,059	6,249,235	21,137,831	1,236,140	3,922,053
Nondepository credit intermediation	57,274,945	16,106,948	11,441,676	41,650,880	2,333,847	5,717,121
Activities related to credit intermediation	11,381,295	2,072,568	1,252,471	9,590,079	* 42,568	219,480

Footnotes at end of table.

Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2012—Continued

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

Industrial sector and selected industrial subsector of controlled foreign corporation [1]	Controlled foreign corporations—continued					
	Payments by foreign corporations to				Dividends received from foreign corporations or partnerships controlled by U.S. corporation filing return	Dividends paid to foreign corporations or partnerships controlled by U.S. corporation filing return
	All recipients	All related parties, total	Any foreign corporations controlled by U.S. corporation filing return	Unrelated parties		
(25)	(26)	(27)	(28)	(29)	(30)	
Securities, commodity contracts, and other financial investments and related activities	201,720,451	89,849,402	46,280,475	113,075,499	30,367,239	19,581,669
Investment banking and securities dealing	40,818,443	15,445,934	8,839,406	25,394,314	* 1,251,680	1,878,433
Securities brokerage	10,936,413	6,157,559	4,201,430	4,788,852	5,040,024	3,332,566
Other securities, commodity contracts, and other financial investments and related activities	149,965,595	68,245,910	33,239,638	82,892,333	24,075,535	14,370,670
Insurance carriers and related activities	137,974,638	17,250,923	9,971,913	121,990,573	1,714,064	5,226,293
Insurance carriers	98,529,200	9,838,213	5,252,682	89,706,649	* 594,119	2,343,975
Agencies, brokerages, and other insurance related activities	39,445,438	7,412,711	4,719,231	32,283,924	1,119,945	2,882,317
Funds, trusts, and other financial vehicles	38,486,427	11,643,471	7,649,927	26,939,689	4,423,453	3,799,962
Real estate and rental and leasing	36,973,038	8,311,174	5,203,338	28,973,111	589,489	1,964,471
Real estate	15,982,864	4,919,795	3,523,218	11,300,525	159,815	1,536,523
Other real estate and rental and leasing	20,990,174	3,391,379	1,680,120	17,672,587	* 429,674	427,948
Services	1,656,567,443	581,971,169	363,930,525	1,098,218,726	150,592,206	157,923,965
Professional, scientific, and technical services	397,917,861	144,939,526	85,912,633	255,620,669	6,221,996	21,281,243
Architectural, engineering, and related services	25,761,259	5,310,867	3,072,050	20,486,046	49,266	309,327
Computer system design and related services	192,416,193	85,424,635	47,447,728	107,819,835	3,509,823	7,039,197
Computer system design services	12,101,849	3,336,053	1,498,094	8,779,622	* 30,029	62,152
Other computer system design and related services	180,314,344	82,088,582	45,949,635	99,040,213	3,479,794	6,977,045
Management, scientific, and technical consulting services	19,307,633	5,255,512	3,201,324	14,319,252	317,420	313,340
Scientific research and development services	15,889,705	3,996,934	2,761,500	12,167,539	* 8,594	67,201
Advertising, public relations, and related services	27,323,555	6,456,971	4,333,674	21,117,104	942,337	1,761,322
Other professional, scientific, and technical services	117,219,515	38,494,606	25,096,356	79,710,893	1,394,557	11,790,856
Management of companies and enterprises	1,121,148,335	410,707,021	260,572,506	730,861,298	143,147,517	129,689,498
Offices of bank holding companies	12,599,852	11,118,238	8,187,448	2,389,831	3,546,940	6,915,931
Offices of other holding companies	1,108,548,483	399,588,782	252,385,058	728,471,467	139,600,577	122,773,567
Administration and support and waste management and remediation services	52,472,528	7,203,827	4,224,803	45,429,123	314,147	1,116,959
Arts, entertainment, and recreation	6,831,589	1,068,991	614,509	5,895,794	* 41,004	115,101
Accommodation and food services	47,888,477	11,067,276	8,941,191	36,867,453	618,516	5,112,693
Accommodation	14,107,513	3,049,029	2,512,329	11,104,726	* 39,173	1,730,967
Food services and drinking places	33,780,965	8,018,247	6,428,863	25,762,727	579,343	3,381,726
Repair and maintenance	14,023,404	3,730,489	1,863,712	10,418,112	186,966	439,359
Other services (except public administration)	16,285,249	3,254,041	1,801,171	13,126,277	62,059	169,112

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

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

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

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

SOURCE: IRS, Statistics of Income Division, Controlled Foreign Corporations, September 2015.

Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2012

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

Selected country of incorporation of controlled foreign corporation	Number of U.S. corporation returns [1]	Controlled foreign corporations						
		Number of foreign corporations	Total assets		Total receipts	Dividend income	Current earnings and profits (less deficit) before income taxes	Income taxes
			Beginning of year	End of year				
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
All geographic regions	14,039	88,038	17,282,107,662	18,596,353,104	6,857,571,434	449,025,762	924,126,084	130,814,745
Latin America, total	3,647	12,319	947,108,160	1,032,526,819	596,883,878	5,922,219	65,954,750	16,366,135
Mexico	2,516	5,074	376,589,810	456,538,122	261,728,758	3,846,912	33,706,358	7,290,557
Central America and Caribbean countries, total	692	1,504	34,513,942	34,501,966	29,704,137	527,283	1,834,491	392,143
Panama (including Canal Zone)	253	366	13,404,797	12,674,098	7,640,103	484,388	794,049	103,062
Other Central American and Caribbean countries	531	1,138	21,109,145	21,827,869	22,064,034	42,895	1,040,443	289,081
South America, total	1,746	5,742	536,004,408	541,486,731	305,450,984	1,548,024	30,413,900	8,683,435
Argentina	553	845	29,123,497	31,723,959	39,560,863	32,678	3,210,359	1,469,727
Brazil	1,229	2,082	267,212,003	279,753,329	162,680,507	782,334	13,110,090	4,037,415
Chile	502	875	169,250,783	148,992,365	44,354,620	550,041	6,051,660	949,433
Colombia	434	614	29,605,776	32,728,549	18,630,776	56,917	1,555,857	545,570
Peru	326	420	14,472,487	16,961,408	10,657,397	* 20,096	2,607,887	718,005
Uruguay	156	220	5,201,648	5,830,993	3,577,241	0	247,344	29,667
Venezuela	241	381	15,891,443	19,846,239	18,160,806	106,449	2,940,862	770,710
Other South American countries	186	304	5,246,771	5,649,890	7,828,773	* -492	689,841	162,908
Other Western Hemisphere, total	4,874	11,068	2,872,817,846	3,012,537,911	1,402,675,690	107,518,317	214,673,998	33,399,007
Bahamas	69	336	153,857,528	174,256,436	59,180,903	20,140,240	21,679,853	1,488,172
Bermuda	403	863	754,718,196	822,029,326	307,852,583	74,222,393	102,734,606	12,308,322
British Virgin Islands	262	410	58,766,844	61,854,720	32,143,659	330,733	5,987,980	659,927
Canada	3,910	7,195	1,094,023,503	1,160,532,534	648,782,578	8,498,373	46,150,149	9,267,840
Cayman Islands	769	1,783	745,159,094	733,040,879	344,300,641	4,082,966	36,878,409	9,300,440
Other Western Hemisphere countries	298	480	66,292,680	60,824,015	10,415,327	243,612	1,243,001	374,305
Europe, total	6,913	35,823	11,017,607,722	11,885,113,734	3,232,010,075	310,157,651	509,152,693	50,522,293
European Union, total	6,441	32,261	10,281,015,060	11,114,781,581	2,791,738,578	296,812,578	457,567,768	42,929,388
Austria	336	508	18,359,862	18,503,117	13,244,003	108,251	747,079	212,999
Belgium	626	1,081	175,120,970	184,357,096	56,132,798	1,084,960	5,145,181	878,698
Cyprus	129	169	17,695,609	20,112,535	2,780,437	* 36,583	323,759	58,674
Czech Republic	353	533	21,476,053	21,836,282	17,157,265	* 14,415	1,166,261	218,437
Denmark	399	678	59,962,783	56,770,329	16,255,630	293,195	2,793,229	227,381
Finland	259	376	12,069,772	11,623,929	6,617,935	104,949	309,873	85,678
France (including Corsica, Guadeloupe, Martinique, and Reunion)	1,396	3,116	283,921,638	262,476,770	139,235,592	4,101,554	10,651,233	2,822,903
Germany	1,855	3,859	438,950,461	469,435,208	228,613,837	3,227,467	13,808,804	3,422,387
Greece	182	276	7,403,272	6,610,548	6,917,829	* 49,798	41,727	76,699
Hungary	290	426	83,724,478	68,583,500	19,797,932	2,538,917	4,123,495	181,008
Ireland	660	1,199	1,223,947,740	1,273,928,131	523,979,752	90,418,912	128,586,976	3,243,156
Italy	836	1,465	113,530,962	110,478,453	59,817,797	841,740	3,754,498	1,569,520
Luxembourg	525	1,195	1,705,225,292	1,883,419,368	385,154,591	44,595,204	63,003,774	5,486,496
Netherlands	1,600	3,690	2,337,513,794	2,456,586,231	524,455,849	89,473,343	154,706,010	13,920,792
Poland	508	814	48,603,839	50,987,159	27,989,911	89,077	965,181	404,746
Portugal (including Azores)	252	393	9,464,292	9,196,503	8,233,975	140,569	449,198	136,190
Romania	228	312	6,388,674	7,211,389	7,407,369	* 1,077	187,626	76,850

Footnotes at end of table.

Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2012—Continued

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

Selected country of incorporation of controlled foreign corporation	Number of U.S. corporation returns [1]	Controlled foreign corporations						
		Number of foreign corporations	Total assets		Total receipts	Dividend income	Current earnings and profits (less deficit) before income taxes	Income taxes
			Beginning of year	End of year				
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Spain (including Canary Isles)	824	1,567	122,227,811	122,055,006	73,480,882	1,950,630	5,204,868	1,269,487
Sweden	560	943	123,842,016	136,653,598	41,588,804	1,881,687	4,346,490	534,247
United Kingdom and Northern Ireland (including Gibraltar)	4,166	9,025	3,449,404,992	3,924,675,565	619,250,188	53,740,389	55,223,298	7,957,848
Other European Union countries	303	636	22,180,750	19,280,862	13,626,201	2,119,860	2,029,208	145,190
Other European countries, total	1,448	3,562	736,592,662	770,332,154	440,271,496	13,345,073	51,584,925	7,592,905
Norway	256	424	28,717,980	30,966,561	18,185,339	794,722	4,116,256	2,621,022
Russia	393	746	42,188,380	52,681,470	40,001,230	69,889	4,004,088	1,023,320
Switzerland	1,051	1,666	603,821,758	616,739,571	365,810,261	12,427,342	41,516,857	3,692,720
Other European countries	336	726	61,864,545	69,944,551	16,274,666	53,120	1,947,724	255,843
Africa, total	842	2,075	105,617,466	101,240,426	74,542,634	664,361	8,568,894	2,762,963
Eastern Africa, total	345	555	38,534,535	32,373,951	8,656,129	308,774	917,295	242,208
Southern Africa, total	490	910	29,225,000	31,217,660	43,274,068	342,171	2,434,308	575,341
Other African countries	258	610	37,857,931	37,648,815	22,612,437	* 13,416	5,217,292	1,945,414
Asia, total	5,987	22,667	1,794,926,547	1,973,687,042	1,303,369,613	10,774,728	98,988,497	23,033,151
Central, Western, and Southern Asia, total	2,452	4,972	137,625,790	173,081,988	151,557,485	238,526	13,480,872	3,305,241
India	1,778	2,682	65,177,925	74,049,269	69,854,297	60,578	6,877,853	2,296,964
Israel	599	846	35,983,890	55,586,513	21,651,753	147,567	2,999,910	316,414
Turkey	298	488	18,281,607	23,191,658	28,852,391	* 17,179	1,195,294	342,926
Other Central and Southern Asian countries	504	956	18,182,368	20,254,548	31,199,045	* 13,202	2,407,815	348,938
Eastern Asia, total	4,163	12,625	1,285,307,983	1,398,290,317	786,588,627	6,444,849	52,846,442	15,239,876
China, Peoples Republic of	2,810	5,988	221,047,191	243,460,611	242,116,319	1,106,759	15,874,359	4,073,970
Hong Kong	1,684	2,630	129,488,734	143,193,881	73,928,447	2,781,927	8,877,888	1,078,044
Japan (including Okinawa and Ryukyu Islands)	1,407	2,381	679,879,634	748,423,479	311,374,973	2,415,289	15,168,557	6,206,616
Korea, Republic of South	683	945	184,421,525	188,631,973	122,347,200	54,518	7,872,463	1,873,508
Other Eastern Asian countries	515	682	70,470,899	74,580,372	36,821,688	86,356	5,053,176	2,007,737
Southeastern Asia, total	1,929	5,069	371,992,774	402,314,737	365,223,501	4,091,353	32,661,182	4,488,035
Malaysia	581	963	40,888,351	38,159,280	36,453,777	76,326	3,069,550	459,451
Philippines	373	575	16,832,048	17,551,384	21,339,723	136,141	2,219,682	431,664
Singapore	1,393	2,111	273,796,001	301,429,064	240,831,808	3,846,068	20,826,270	1,398,894
Thailand	478	755	20,235,147	22,704,462	39,878,836	22,553	2,099,572	578,868
Other Southeastern Asian countries	393	665	20,241,226	22,470,547	26,719,356	* 10,265	4,446,109	1,619,157
Oceania, total	1,547	3,558	495,367,997	522,445,498	215,541,857	13,942,179	17,801,892	4,479,301
Australia	1,417	2,779	475,291,359	498,989,684	200,665,164	13,694,741	17,040,523	4,167,149
Other countries of Oceania	491	779	20,076,638	23,455,814	14,876,693	247,439	761,369	312,152
Puerto Rico and U.S. Possessions, total	375	529	48,661,924	68,801,675	32,547,687	* 46,307	8,985,360	251,895
OPEC countries, total (countries included above)	614	1,278	42,482,362	47,330,414	54,417,144	110,399	8,075,651	2,488,637

Footnotes at end of table.

Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2012—Continued

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

Selected country of incorporation of controlled foreign corporation	Controlled foreign corporations—continued							Dividends paid to controlling U.S. corporation
	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes			Distributions out of earnings and profits			
		Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes	Total	Not previously taxed earnings and profits	Previously taxed earnings and profits	
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
All geographic regions	793,311,339	1,052,881,217	127,431,344	925,449,873	475,832,007	349,549,972	126,282,035	93,482,519
Latin America, total	49,588,615	74,829,860	15,938,509	58,891,351	33,726,525	30,634,277	3,092,248	7,493,635
Mexico	26,415,802	35,287,134	7,165,136	28,121,997	17,475,758	15,759,642	1,716,115	3,028,728
Central America and Caribbean countries, total	1,442,348	2,514,444	338,640	2,175,804	1,211,557	997,947	213,611	659,298
Panama (including Canal Zone)	690,987	1,141,619	83,512	1,058,107	820,045	647,237	172,808	536,714
Other Central American and Caribbean countries	751,361	1,372,825	255,128	1,117,698	391,512	350,710	40,803	122,585
South America, total	21,730,465	37,028,282	8,434,733	28,593,549	15,039,210	13,876,688	1,162,522	3,805,609
Argentina	1,740,633	3,845,191	1,432,329	2,412,862	165,593	157,448	8,145	47,916
Brazil	9,072,674	17,428,249	3,889,182	13,539,067	10,058,028	9,185,174	872,854	2,746,210
Chile	5,102,227	6,972,199	929,264	6,042,935	3,204,000	3,040,672	163,328	549,095
Colombia	1,010,288	1,744,665	534,665	1,210,000	454,265	418,380	* 35,884	183,677
Peru	1,889,881	2,792,910	711,590	2,081,320	302,836	295,821	* 7,015	107,431
Uruguay	217,676	313,915	28,426	285,489	150,081	113,468	* 36,613	* 23,521
Venezuela	2,170,152	3,205,221	749,437	2,455,783	537,728	502,997	* 34,731	53,515
Other South American countries	526,934	725,932	159,839	566,093	166,680	162,729	* 3,951	94,244
Other Western Hemisphere, total	181,274,991	237,999,723	33,070,183	204,929,540	116,091,429	91,179,971	24,911,458	25,587,134
Bahamas	20,191,681	23,202,411	1,456,121	21,746,289	8,061,536	6,555,974	1,505,562	6,533,537
Bermuda	90,426,284	104,316,004	12,245,214	92,070,790	63,014,376	49,393,278	13,621,098	4,867,334
British Virgin Islands	5,328,052	6,834,629	645,469	6,189,160	2,187,931	1,313,565	874,366	1,122,048
Canada	36,882,309	56,402,831	9,154,062	47,248,769	23,597,644	20,246,797	3,350,848	7,752,720
Cayman Islands	27,577,969	45,607,252	9,203,833	36,403,419	18,567,059	13,411,091	5,155,968	5,069,460
Other Western Hemisphere countries	868,696	1,636,597	365,484	1,271,113	662,883	259,265	403,617	242,035
Europe, total	458,630,400	575,571,460	48,988,912	526,582,549	245,412,403	156,139,146	89,273,257	40,763,709
European Union, total	414,638,380	519,913,130	41,466,352	478,446,778	225,830,929	146,587,485	79,243,445	37,884,527
Austria	534,080	966,996	198,675	768,321	419,947	315,018	104,929	38,414
Belgium	4,266,483	5,890,122	851,619	5,038,503	2,347,198	1,780,346	566,852	162,770
Cyprus	265,085	441,212	57,204	384,008	297,796	220,048	* 77,747	* 159,214
Czech Republic	947,823	1,378,612	209,016	1,169,596	501,204	479,025	22,179	23,029
Denmark	2,565,848	3,315,053	213,431	3,101,622	368,747	324,407	44,340	179,364
Finland	224,195	480,277	80,125	400,152	257,794	237,075	20,719	42,483
France (including Corsica, Guadeloupe, Martinique, and Reunion)	7,828,330	13,524,092	2,706,298	10,817,794	7,803,286	6,638,251	1,165,035	912,576
Germany	10,386,417	22,201,676	3,223,730	18,977,946	10,793,568	7,952,660	2,840,908	1,245,092
Greece	-34,972	313,118	59,854	253,264	79,543	73,374	* 6,169	* 10,054
Hungary	3,942,487	4,309,908	156,531	4,153,376	4,492,366	2,789,715	1,702,650	31,246
Ireland	125,343,820	135,193,184	3,180,743	132,012,441	9,790,448	2,766,126	7,024,322	828,532
Italy	2,184,978	5,363,009	1,438,101	3,924,908	3,763,762	3,184,733	579,029	348,653
Luxembourg	57,517,278	67,749,757	5,369,379	62,380,379	48,606,207	26,493,399	22,112,808	8,796,210
Netherlands	140,785,217	164,649,479	13,570,278	151,079,201	88,315,505	54,577,415	33,738,090	17,410,387
Poland	560,435	2,145,197	355,985	1,789,213	670,547	635,220	35,327	160,019
Portugal (including Azores)	313,008	661,241	125,144	536,097	553,767	355,098	198,668	16,187
Romania	110,775	413,981	71,902	342,079	157,331	149,225	* 8,105	* 10,035

Footnotes at end of table.

Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2012—Continued

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

Selected country of incorporation of controlled foreign corporation	Controlled foreign corporations—continued							Dividends paid to controlling U.S. corporation
	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes			Distributions out of earnings and profits			
		Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes	Total	Not previously taxed earnings and profits	Previously taxed earnings and profits	
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
Spain (including Canary Isles)	3,935,381	6,932,724	1,230,057	5,702,668	4,124,871	3,707,174	417,697	1,407,150
Sweden	3,812,243	5,261,577	499,646	4,761,931	2,489,682	1,219,568	1,270,113	184,814
United Kingdom and Northern Ireland (including Gibraltar)	47,265,450	76,508,681	7,725,740	68,782,941	39,420,286	32,328,527	7,091,759	5,845,269
Other European Union countries	1,884,018	2,213,234	142,895	2,070,339	577,076	361,078	215,998	73,030
Other European countries, total	43,992,020	55,658,330	7,522,560	48,135,771	19,581,473	9,551,661	10,029,813	2,879,182
Norway	1,495,234	4,416,399	2,606,054	1,810,345	1,396,069	1,157,237	238,832	931,552
Russia	2,980,768	4,614,472	984,869	3,629,603	1,399,422	1,378,185	* 21,236	286,601
Switzerland	37,824,137	44,253,084	3,681,264	40,571,821	15,901,321	6,312,615	9,588,706	1,205,114
Other European countries	1,691,881	2,374,375	250,373	2,124,002	884,662	703,623	181,038	455,916
Africa, total	5,805,931	10,243,143	2,705,187	7,537,956	5,002,494	4,344,330	658,164	3,167,229
Eastern Africa, total	675,087	1,604,563	212,105	1,392,458	1,373,188	848,529	524,659	422,767
Southern Africa, total	1,858,967	2,877,230	554,054	2,323,176	919,289	885,792	33,497	280,488
Other African countries	3,271,878	5,761,350	1,939,028	3,822,322	2,710,017	2,610,008	100,009	2,463,974
Asia, total	75,955,346	119,203,918	22,049,870	97,154,048	63,898,159	57,181,328	6,716,831	12,844,227
Central, Western, and Southern Asia, total	10,175,632	17,433,810	3,188,419	14,245,391	11,609,137	10,723,988	885,149	1,219,714
India	4,580,889	8,590,945	2,202,537	6,388,408	1,248,755	1,101,780	146,975	528,477
Israel	2,683,497	4,282,054	316,266	3,965,788	8,473,014	7,959,728	* 513,286	429,836
Turkey	852,368	1,707,431	332,462	1,374,969	884,323	783,087	101,236	77,227
Other Central and Southern Asian countries	2,058,878	2,853,379	337,154	2,516,226	1,003,045	879,393	123,651	184,175
Eastern Asia, total	37,606,567	65,731,412	14,491,309	51,240,103	36,115,413	31,578,110	4,537,303	8,107,390
China, Peoples Republic of	11,800,388	20,658,607	3,950,100	16,708,507	8,437,796	7,963,436	474,360	2,504,682
Hong Kong	7,799,844	10,269,249	1,035,832	9,233,417	5,139,106	3,320,523	1,818,583	273,775
Japan (including Okinawa and Ryukyu Islands)	8,961,941	20,492,915	5,713,999	14,778,916	9,899,464	8,410,302	1,489,162	3,661,265
Korea, Republic of South	5,998,954	8,836,906	1,800,682	7,036,224	7,858,949	7,179,085	679,865	1,045,986
Other Eastern Asian countries	3,045,439	5,473,735	1,990,696	3,483,039	4,780,097	4,704,764	75,333	621,682
Southeastern Asia, total	28,173,148	36,038,696	4,370,142	31,668,554	16,173,609	14,879,230	1,294,379	3,517,123
Malaysia	2,610,099	3,694,454	449,150	3,245,304	1,679,272	1,585,076	94,196	754,196
Philippines	1,788,017	2,438,861	416,236	2,022,625	1,417,359	1,404,353	13,006	754,001
Singapore	19,427,376	22,752,163	1,336,404	21,415,759	9,506,272	8,442,605	1,063,667	1,164,365
Thailand	1,520,704	2,412,868	567,438	1,845,430	1,039,046	965,928	73,118	571,346
Other Southeastern Asian countries	2,826,952	4,740,350	1,600,914	3,139,436	2,531,660	2,481,267	50,393	273,215
Oceania, total	13,322,591	25,778,557	4,427,438	21,351,119	10,457,422	9,046,572	1,410,850	2,834,342
Australia	12,873,374	24,323,541	4,123,866	20,199,675	9,454,739	8,070,714	1,384,025	2,551,092
Other countries of Oceania	449,217	1,455,016	303,572	1,151,444	1,002,682	975,858	26,825	283,250
Puerto Rico and U.S. Possessions, total	8,733,465	9,254,556	251,245	9,003,310	1,243,576	1,024,349	219,227	792,243
OPEC countries, total (countries included above)	5,587,015	8,791,036	2,458,957	6,332,079	3,254,457	3,132,409	122,048	2,164,488

Footnotes at end of table.

Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2012—Continued

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

Selected country of incorporation of controlled foreign corporation	Controlled foreign corporations—continued							
	Total Subpart F income	End of year accumulated earnings and profits (E&P)			Receipts by foreign corporations from			
		Total section 964(a) E&P	Total not previously taxed E&P (post-86 & pre-87 section 959(c)(3) balances)	Total previously taxed E&P (sections 959(c)(1) & (2) balances)	All sources	All related parties, total	Any foreign corporations controlled by U.S. corporation filing return	Unrelated parties
(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)	
All geographic regions	63,108,740	2,514,520,364	2,259,189,816	255,330,548	6,857,571,434	1,932,789,962	1,242,619,338	5,048,966,954
Latin America, total	1,582,914	133,506,115	125,452,704	8,053,411	596,883,878	134,598,055	77,860,780	468,787,334
Mexico	609,960	61,319,947	57,750,091	3,569,856	261,728,758	72,146,998	38,075,268	193,980,058
Central America and Caribbean countries, total	108,882	4,455,777	3,537,766	918,011	29,704,137	9,835,191	4,940,118	20,074,906
Panama (including Canal Zone)	68,512	2,258,948	1,627,960	630,988	7,640,103	2,737,232	1,396,525	5,012,759
Other Central American and Caribbean countries	40,371	2,196,830	1,909,807	287,023	22,064,034	7,097,959	3,543,593	15,062,147
South America, total	864,072	67,730,391	64,164,847	3,565,544	305,450,984	52,615,867	34,845,394	254,732,369
Argentina	31,653	5,374,931	5,224,493	150,438	39,560,863	8,886,468	2,858,562	30,705,480
Brazil	414,376	24,331,407	22,940,068	1,391,339	162,680,507	27,939,499	22,197,848	135,963,144
Chile	224,019	17,053,180	16,144,373	908,807	44,354,620	7,532,614	4,901,633	37,061,562
Colombia	39,606	5,989,187	5,867,954	121,233	18,630,776	2,159,576	1,407,687	16,824,172
Peru	13,287	5,476,098	5,398,173	77,925	10,657,397	1,837,582	687,847	8,828,381
Uruguay	42,448	543,596	276,029	267,567	3,577,241	601,976	455,687	2,977,882
Venezuela	58,886	6,945,526	6,420,555	524,971	18,160,806	627,069	499,755	17,562,172
Other South American countries	* 39,798	2,016,467	1,893,203	123,264	7,828,773	3,031,083	1,836,374	4,809,577
Other Western Hemisphere, total	13,540,847	566,306,125	518,737,613	47,568,512	1,402,675,690	408,177,151	180,738,512	1,013,058,068
Bahamas	248,964	36,987,356	34,910,594	2,076,762	59,180,903	23,300,089	18,078,965	37,517,912
Bermuda	5,955,879	244,774,537	226,960,637	17,813,900	307,852,583	141,003,462	51,029,644	174,770,531
British Virgin Islands	933,406	34,910,795	33,927,211	983,585	32,143,659	11,790,709	8,128,998	21,339,267
Canada	2,542,016	164,268,537	150,918,058	13,350,479	648,782,578	148,588,739	61,628,410	501,741,068
Cayman Islands	3,711,583	80,255,786	68,130,369	12,125,417	344,300,641	80,836,087	41,099,383	269,645,244
Other Western Hemisphere countries	148,999	5,109,113	3,890,744	1,218,369	10,415,327	2,658,065	773,111	8,044,047
Europe, total	39,795,113	1,427,861,687	1,260,234,123	167,627,564	3,232,010,075	925,113,828	711,750,757	2,394,294,312
European Union, total	32,464,765	1,187,347,861	1,042,117,545	145,230,317	2,791,738,578	758,638,760	582,889,669	2,116,784,092
Austria	159,058	3,664,195	2,992,324	671,871	13,244,003	3,525,909	3,053,111	9,796,904
Belgium	265,214	10,438,300	8,472,203	1,966,098	56,132,798	22,535,061	18,610,337	33,916,992
Cyprus	48,799	1,220,304	942,870	277,434	2,780,437	436,129	314,304	2,396,685
Czech Republic	30,458	4,817,436	4,626,088	191,348	17,157,265	5,561,953	4,586,305	11,674,099
Denmark	259,817	5,626,478	4,771,687	854,792	16,255,630	4,372,140	3,613,980	11,948,251
Finland	28,400	741,535	619,085	122,450	6,617,935	1,932,744	1,427,949	4,712,967
France (including Corsica, Guadeloupe, Martinique, and Reunion)	861,536	32,898,921	27,625,365	5,273,556	139,235,592	43,210,972	37,208,635	96,895,795
Germany	1,295,960	31,313,639	25,098,228	6,215,410	228,613,837	51,498,674	43,191,055	182,281,141
Greece	9,436	-323,028	-394,560	71,532	6,917,829	602,635	575,207	6,352,390
Hungary	770,353	2,928,747	2,127,614	801,133	19,797,932	10,212,238	7,774,411	9,838,792
Ireland	4,691,974	390,511,821	376,586,216	13,925,605	523,979,752	97,944,622	50,184,798	428,586,697
Italy	194,128	6,059,149	4,562,821	1,496,327	59,817,797	17,416,270	14,976,383	42,926,769
Luxembourg	7,153,798	163,960,177	130,701,366	33,258,811	385,154,591	110,564,839	93,571,586	290,613,928
Netherlands	9,555,850	393,076,351	345,827,999	47,248,352	524,455,849	191,126,924	160,742,337	375,173,426
Poland	173,727	4,294,516	3,750,589	543,927	27,989,911	8,712,350	7,653,788	19,738,269
Portugal (including Azores)	70,607	801,332	633,321	168,011	8,233,975	2,152,717	1,450,060	6,119,918
Romania	15,460	-126,254	-169,187	42,933	7,407,369	2,757,082	2,418,239	4,667,498

Footnotes at end of table.

Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2012—Continued

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

Selected country of incorporation of controlled foreign corporation	Controlled foreign corporations—continued							
	Total Subpart F income	End of year accumulated earnings and profits (E&P)			Receipts by foreign corporations from			
		Total section 964(a) E&P	Total not previously taxed E&P (post-86 & pre-87 section 959(c)(3) balances)	Total previously taxed E&P (sections 959(c)(1) & (2) balances)	All sources	All related parties, total	Any foreign corporations controlled by U.S. corporation filing return	Unrelated parties
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
Spain (including Canary Isles)	241,487	16,102,489	14,196,638	1,905,850	73,480,882	22,398,871	18,595,623	51,296,528
Sweden	904,739	10,711,656	9,139,487	1,572,170	41,588,804	14,309,967	12,560,669	27,460,283
United Kingdom and Northern Ireland (including Gibraltar)	5,678,387	102,471,342	75,028,112	27,443,230	619,250,188	141,871,367	95,344,976	492,069,859
Other European Union countries	55,577	6,158,754	4,979,277	1,179,477	13,626,201	5,495,296	5,035,918	8,316,902
Other European countries, total	7,330,349	240,513,826	218,116,578	22,397,248	440,271,496	166,475,068	128,861,088	277,510,220
Norway	240,661	2,687,811	2,466,369	221,442	18,185,339	7,034,723	6,477,992	11,176,876
Russia	40,374	7,440,081	7,303,880	136,200	40,001,230	11,986,113	11,154,684	28,078,339
Switzerland	6,857,611	218,751,939	198,415,721	20,336,219	365,810,261	142,335,290	106,858,496	226,749,494
Other European countries	191,703	11,633,994	9,930,607	1,703,387	16,274,666	5,118,942	4,369,916	11,505,511
Africa, total	319,278	14,229,275	12,796,426	1,432,849	74,542,634	14,227,175	9,196,660	60,855,499
Eastern Africa, total	218,546	2,635,388	1,610,046	1,025,343	8,656,129	2,636,083	2,238,115	6,360,429
Southern Africa, total	64,771	5,046,917	4,815,077	231,840	43,274,068	4,453,916	2,993,990	38,972,724
Other African countries	35,960	6,546,970	6,371,304	175,666	22,612,437	7,137,175	3,964,556	15,522,346
Asia, total	6,111,352	271,647,290	247,165,974	24,481,316	1,303,369,613	405,391,208	236,481,751	907,422,880
Central, Western, and Southern Asia, total	1,082,901	34,662,380	31,436,133	3,226,247	151,557,485	62,535,076	24,446,429	90,065,499
India	358,304	21,549,238	20,161,265	1,387,973	69,854,297	28,042,932	9,743,419	42,318,817
Israel	242,453	4,829,016	3,891,353	937,662	21,651,753	12,451,137	3,664,374	9,604,957
Turkey	71,252	2,063,260	1,992,032	71,229	28,852,391	9,696,828	9,173,690	19,245,196
Other Central and Southern Asian countries	410,892	6,220,866	5,391,483	829,383	31,199,045	12,344,179	1,864,945	18,896,528
Eastern Asia, total	3,837,533	136,085,975	118,986,728	17,099,247	786,588,627	199,975,331	127,589,224	591,514,281
China, Peoples Republic of	464,621	37,901,195	36,003,140	1,898,056	242,116,319	84,804,276	49,332,261	159,606,995
Hong Kong	1,811,265	27,431,978	22,308,846	5,123,131	73,928,447	26,678,878	14,510,816	48,229,091
Japan (including Okinawa and Ryukyu Islands)	858,429	33,571,078	26,194,720	7,376,358	311,374,973	57,009,419	43,947,456	255,803,953
Korea, Republic of South	557,312	30,385,511	28,081,227	2,304,284	122,347,200	22,430,339	16,313,959	100,009,300
Other Eastern Asian countries	145,907	6,796,213	6,398,795	397,418	36,821,688	9,052,418	3,484,731	27,864,943
Southeastern Asia, total	1,190,918	100,898,935	96,743,113	4,155,822	365,223,501	142,880,801	84,446,098	225,843,100
Malaysia	89,147	11,382,875	11,056,093	326,782	36,453,777	17,328,255	7,493,153	19,765,361
Philippines	57,797	4,053,163	3,728,539	324,623	21,339,723	10,222,209	4,166,528	11,330,591
Singapore	949,634	72,045,369	69,002,361	3,043,007	240,831,808	95,921,654	61,968,198	147,230,745
Thailand	58,646	5,793,964	5,401,445	392,519	39,878,836	10,303,156	7,620,658	29,826,811
Other Southeastern Asian countries	35,694	7,623,565	7,554,674	68,891	26,719,356	9,105,527	3,197,560	17,689,593
Oceania, total	1,592,535	69,326,579	63,770,893	5,555,686	215,541,857	31,381,074	25,237,761	185,838,584
Australia	1,291,777	64,835,390	60,948,475	3,886,914	200,665,164	29,357,073	23,589,492	172,950,487
Other countries of Oceania	300,758	4,491,190	2,822,418	1,668,772	14,876,693	2,024,001	1,648,269	12,888,097
Puerto Rico and U.S. Possessions, total	166,701	31,643,293	31,032,084	611,210	32,547,687	13,901,470	1,353,117	18,710,277
OPEC countries, total (countries included above)	379,646	12,985,139	11,730,444	1,254,694	54,417,144	17,033,901	3,700,121	37,452,967

Footnotes at end of table.

Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2012—Continued

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

Selected country of incorporation of controlled foreign corporation	Controlled foreign corporations—continued					
	Payments by foreign corporations to				Dividends received from foreign corporations or partnerships controlled by U.S. corporation filing return	Dividends paid to foreign corporations or partnerships controlled by U.S. corporation filing return
	All recipients	All related parties, total	Any foreign corporations controlled by U.S. corporation filing return	Unrelated parties		
(25)	(26)	(27)	(28)	(29)	(30)	
All geographic regions	6,393,043,660	2,077,281,324	1,250,804,663	4,355,052,140	253,793,092	313,153,682
Latin America, total	571,643,008	140,982,221	77,411,992	432,357,033	13,982,718	21,025,362
Mexico	251,682,669	71,963,371	38,334,666	180,668,427	9,635,799	12,130,524
Central America and Caribbean countries, total	28,849,971	10,671,764	5,583,989	18,344,685	720,919	430,108
Panama (including Canal Zone)	7,641,561	4,029,362	1,492,129	3,663,377	618,386	197,627
Other Central American and Caribbean countries	21,208,410	6,642,402	4,091,860	14,681,308	102,533	232,481
South America, total	291,110,368	58,347,085	33,493,338	233,343,922	3,626,000	8,464,730
Argentina	36,697,432	5,437,821	2,017,707	31,277,748	41,527	108,406
Brazil	159,836,876	33,594,399	19,826,809	126,616,958	2,190,059	5,517,984
Chile	41,822,364	8,197,132	5,384,068	33,697,755	1,214,066	1,826,292
Colombia	17,662,479	3,205,115	1,536,617	14,484,707	76,200	198,863
Peru	8,809,601	2,164,830	1,354,579	6,692,425	* 77,619	171,035
Uruguay	3,419,575	955,655	544,355	2,489,051	0	* 126,167
Venezuela	15,529,036	3,587,232	2,084,654	11,956,083	* 26,157	453,656
Other South American countries	7,333,005	1,204,902	744,549	6,129,194	* 372	62,327
Other Western Hemisphere, total	1,275,968,789	391,974,555	188,572,932	898,779,465	51,723,212	77,949,908
Bahamas	41,440,119	21,021,855	8,118,494	20,504,936	* 13,885,267	* 325,545
Bermuda	235,922,870	123,375,504	75,556,080	125,073,264	21,906,393	54,162,161
British Virgin Islands	28,915,216	13,897,518	4,223,403	15,065,437	235,808	411,018
Canada	635,254,249	145,320,062	57,419,309	491,000,823	7,153,604	13,615,787
Cayman Islands	324,920,201	84,889,280	42,613,471	241,032,477	8,472,918	9,327,600
Other Western Hemisphere countries	9,516,134	3,470,337	642,176	6,102,529	69,222	107,797
Europe, total	2,973,251,087	1,019,254,381	669,394,187	1,970,708,310	167,205,263	162,756,163
European Union, total	2,569,143,481	831,870,082	550,434,171	1,752,220,112	160,235,370	150,799,679
Austria	12,944,850	4,214,841	3,326,514	8,770,438	137,285	327,435
Belgium	53,741,456	23,732,465	17,134,405	30,214,654	907,761	1,757,243
Cyprus	2,792,032	824,959	389,698	1,971,786	* 51,366	* 41,781
Czech Republic	16,459,883	4,735,345	3,923,439	11,772,046	* 14,934	433,509
Denmark	16,078,433	4,631,150	3,600,394	11,494,177	224,190	170,998
Finland	6,371,624	2,251,080	1,799,603	4,128,609	24,466	198,850
France (including Corsica, Guadeloupe, Martinique, and Reunion)	136,864,135	44,421,979	34,267,545	92,637,773	3,831,808	6,312,636
Germany	230,747,040	61,402,686	46,594,642	170,030,921	6,850,979	8,444,371
Greece	7,117,689	2,213,771	2,070,793	4,908,963	* 49,189	62,807
Hungary	25,091,148	9,536,552	8,115,940	15,847,528	1,805,677	4,060,210
Ireland	358,564,344	109,956,105	56,002,830	250,915,588	3,103,065	7,294,646
Italy	60,120,593	22,793,440	19,363,515	38,061,355	1,346,573	3,265,553
Luxembourg	365,678,907	140,010,288	95,234,085	229,003,717	32,026,024	35,762,009
Netherlands	513,563,469	191,900,033	120,539,772	325,529,096	83,854,749	48,562,309
Poland	27,304,186	7,909,481	6,422,224	20,222,718	91,853	448,162
Portugal (including Azores)	8,322,478	2,675,444	2,249,066	5,758,086	163,746	526,966
Romania	7,481,977	2,255,508	1,905,492	5,252,119	* 759	142,363

Footnotes at end of table.

Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2012—Continued

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

Selected country of incorporation of controlled foreign corporation	Controlled foreign corporations—continued					
	Payments by foreign corporations to				Dividends received from foreign corporations or partnerships controlled by U.S. corporation filing return	Dividends paid to foreign corporations or partnerships controlled by U.S. corporation filing return
	All recipients	All related parties, total	Any foreign corporations controlled by U.S. corporation filing return	Unrelated parties		
(25)	(26)	(27)	(28)	(29)	(30)	
Spain (including Canary Isles)	72,374,139	25,649,877	19,546,007	46,790,504	1,204,298	2,456,746
Sweden	39,358,455	16,988,634	13,136,741	22,461,898	779,833	1,793,131
United Kingdom and Northern Ireland (including Gibraltar)	596,724,711	150,219,635	91,616,163	448,386,374	22,493,670	28,269,621
Other European Union countries	11,441,932	3,546,810	3,195,304	8,061,762	1,273,145	468,333
Other European countries, total	404,107,606	187,384,298	118,960,017	218,488,198	6,969,893	11,956,483
Norway	13,990,398	5,033,959	2,813,999	8,969,265	* 48,156	268,196
Russia	37,899,557	13,647,474	11,964,169	24,437,562	* 21,276	1,071,947
Switzerland	336,768,618	163,723,784	100,834,609	174,584,684	6,636,538	10,280,633
Other European countries	15,449,034	4,979,080	3,347,239	10,496,688	263,923	335,707
Africa, total	70,829,572	19,271,474	9,224,366	51,798,065	1,033,803	1,162,783
Eastern Africa, total	8,167,137	2,681,878	1,394,701	5,620,976	651,038	499,484
Southern Africa, total	42,101,884	10,568,360	4,803,357	31,605,835	379,540	537,108
Other African countries	20,560,551	6,021,236	3,026,307	14,571,254	* 3,225	126,191
Asia, total	1,274,159,994	446,081,621	268,524,926	833,391,883	14,540,163	43,170,876
Central, Western, and Southern Asia, total	149,756,375	44,622,954	26,330,348	106,217,785	221,370	9,664,810
India	63,930,186	11,016,937	7,175,496	53,718,398	* 29,932	491,889
Israel	27,507,603	13,239,981	11,476,376	14,330,645	150,579	7,980,416
Turkey	28,540,978	5,136,558	4,219,146	23,524,704	* 19,331	627,840
Other Central and Southern Asian countries	29,777,608	15,229,478	3,459,331	14,644,038	* 21,528	564,666
Eastern Asia, total	775,347,137	255,488,359	161,923,597	521,486,948	8,816,195	21,794,956
China, Peoples Republic of	236,049,121	68,820,752	48,078,077	168,058,607	2,300,545	5,169,673
Hong Kong	72,701,626	29,279,891	15,620,480	43,586,505	3,348,785	3,684,864
Japan (including Okinawa and Ryukyu Islands)	306,412,614	98,092,095	58,253,392	208,907,897	2,615,239	5,116,159
Korea, Republic of South	122,349,212	44,385,144	30,802,693	77,985,233	467,587	3,776,976
Other Eastern Asian countries	37,834,564	14,910,478	9,168,955	22,948,706	84,039	4,047,285
Southeastern Asia, total	349,056,482	145,970,308	80,270,981	205,687,150	5,502,598	11,711,110
Malaysia	35,236,070	16,175,449	7,966,141	19,342,963	191,990	854,618
Philippines	20,959,516	8,341,812	2,504,696	12,683,391	224,045	552,867
Singapore	229,323,194	94,861,869	55,419,853	136,484,410	5,017,925	7,829,565
Thailand	38,731,348	18,730,247	7,521,898	20,134,055	39,532	273,845
Other Southeastern Asian countries	24,806,355	7,860,931	6,858,392	17,042,331	* 29,106	2,200,213
Oceania, total	202,184,233	50,915,749	36,601,474	151,797,041	5,119,182	6,811,972
Australia	186,772,546	46,281,616	33,013,312	140,986,969	4,839,071	6,204,010
Other countries of Oceania	15,411,687	4,634,133	3,588,162	10,810,072	280,111	607,961
Puerto Rico and U.S. Possessions, total	25,006,977	8,801,325	1,074,785	16,220,341	* 188,753	276,619
OPEC countries, total (countries included above)	49,474,352	20,787,600	5,400,519	28,787,237	43,206	822,705

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

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

SOURCE: IRS, Statistics of Income Division, Controlled Foreign Corporations, September 2015.

Table 3. Controlled Foreign Corporations and Their Foreign Disregarded Entities: Number, End-of-Year Total Assets, and Current Earnings and Profits (Less Deficit) After Income Taxes, by Selected Country of Incorporation, Tax Year 2012

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

Selected country of incorporation of controlled foreign corporation (CFC) and foreign disregarded entity (FDE)	Number of foreign entities	End-of-year total assets	Current earnings and profits (less deficit) after taxes
	(1)	(2)	(3)
Austria: CFCs	508	18,503,117	534,080
All FDEs	50	3,453,795	110,923
Austria	21	978,599	102,549
Other countries	29	2,475,196	8,375
Bahamas: CFCs	336	174,256,436	20,191,681
All FDEs	125	73,083,925	1,946,054
Bahamas	57	9,157,915	1,148,884
Other countries	68	63,926,011	797,169
Belgium: CFCs	1,081	184,357,096	4,266,483
All FDEs	120	23,483,235	1,058,896
Belgium	29	2,476,145	-30,402
Other countries	91	21,007,090	1,089,298
Bermuda: CFCs	863	822,029,326	90,426,284
All FDEs	1,749	555,132,064	36,358,787
Bermuda	149	141,839,707	14,208,933
Other countries	1,600	413,292,357	22,149,854
British Virgin Islands: CFCs	410	61,854,720	5,328,052
All FDEs	201	19,037,121	1,697,704
British Virgin Islands	29	942,789	-15,253
Other countries	172	18,094,332	1,712,957
Canada: CFCs	7,195	1,160,532,534	36,882,309
All FDEs	644	251,422,448	5,733,522
Canada	349	163,772,828	4,413,814
Other countries	295	87,649,620	1,319,709
Cayman Islands: CFCs	1,783	733,040,879	27,577,969
All FDEs	2,149	438,130,771	21,527,945
Cayman Islands	334	82,739,981	11,663,036
Other countries	1,815	355,390,790	9,864,909
China: CFCs	5,988	243,460,611	11,800,388
All FDEs	257	18,078,841	2,126,402
China	197	10,675,791	1,130,123
Other countries	60	7,403,050	996,280
Denmark: CFCs	678	56,770,329	2,565,848
All FDEs	108	23,467,802	333,269
Denmark	39	17,486,714	203,600
Other countries	68	5,981,088	129,669
France (including Corsica, Guadeloupe, Martinique, and Reunion): CFCs	3,116	262,476,770	7,828,330
All FDEs	392	58,770,778	795,197
France (including Corsica, Guadeloupe, Martinique, and Reunion)	307	49,822,160	576,995
Other countries	85	8,948,618	218,201
Hong Kong: CFCs	2,630	143,193,881	7,799,844
All FDEs	472	47,089,245	1,295,416
Hong Kong	135	15,606,848	493,910
Other countries	338	31,482,398	801,506
Ireland: CFCs	1,199	1,273,928,131	125,343,820
All FDEs	1,328	486,655,186	80,142,448
Ireland	347	350,118,992	70,249,729
Other countries	981	136,536,195	9,892,719
Israel: CFCs	846	55,586,513	2,683,497
All FDEs	35	10,441,860	221,275
Israel	20	6,691,745	216,868
Other countries	15	3,750,115	4,407
Italy: CFCs	1,465	110,478,453	2,184,978
All FDEs	73	15,907,073	633,034
Italy	54	14,371,464	639,670
Other countries	19	1,535,610	-6,636

Footnotes at end of table.

Table 3. Controlled Foreign Corporations and Their Foreign Disregarded Entities: Number, End-of-Year Total Assets, and Current Earnings and Profits (Less Deficit) After Income Taxes, by Selected Country of Incorporation, Tax Year 2012—Continued

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

Selected country of incorporation of controlled foreign corporation (CFC) and foreign disregarded entity (FDE)	Number of foreign entities	End-of-year total assets	Current earnings and profits (less deficit) after taxes
	(1)	(2)	(3)
Luxembourg: CFCs	1,195	1,883,419,368	57,517,278
All FDEs	3,061	1,038,000,265	31,233,278
Luxembourg	293	364,082,498	2,212,993
Other countries	2,767	673,917,767	29,020,285
Mauritius: CFCs	383	30,288,916	601,564
All FDEs	77	7,870,873	95,718
Mauritius	15	3,208,996	4,153
Other countries	62	4,661,877	91,565
Netherlands: CFCs	3,690	2,456,586,231	140,785,217
All FDEs	4,945	1,311,386,505	33,180,468
Netherlands	1,073	478,606,344	22,703,734
Other countries	3,873	832,780,161	10,476,734
Panama (including Canal Zone): CFCs	366	12,674,098	690,987
All FDEs	43	1,055,279	-41,479
Panama (including Canal Zone): CFCs	11	84,867	618
Other countries	32	970,412	-42,097
Portugal (including Azores): CFCs	393	9,196,503	313,008
All FDEs	24	170,028	-2,279
Portugal (including Azores)	16	56,920	-2,261
Other countries	8	113,108	-18
Singapore: CFCs	2,111	301,429,064	19,427,376
All FDEs	410	117,893,916	8,013,478
Singapore	104	49,291,095	4,593,258
Other countries	306	68,602,821	3,420,220
Spain (including Canary Isles): CFCs	1,567	122,055,006	3,935,381
All FDEs	230	19,612,695	872,709
Spain (including Canary Isles)	56	4,287,661	78,315
Other countries	174	15,325,034	794,393
Sweden: CFCs	943	136,653,598	3,812,243
All FDEs	269	25,630,180	326,740
Sweden	152	17,248,446	22,800
Other countries	117	8,381,734	303,940
Switzerland: CFCs	1,666	616,739,571	37,824,137
All FDEs	1,515	127,819,770	11,642,591
Switzerland	104	46,412,424	7,259,404
Other countries	1,411	81,407,346	4,383,186
United Kingdom and Northern Ireland (including Gibraltar): CFCs	9,025	3,924,675,565	47,265,450
All FDEs	2,651	2,024,762,707	27,236,617
United Kingdom and Northern Ireland (including Gibraltar)	1,596	1,726,533,778	21,960,294
Other countries	1,055	298,228,929	5,276,323

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

SOURCE: IRS, Statistics of Income Division, Controlled Foreign Corporations, August 2018.

Table 4. Controlled Foreign Corporations and Their Foreign Disregarded Entities: Number, End-of-Year Total Assets, and Current Earnings and Profits (Less Deficit) After Income Taxes, by Selected Industrial Sector, Tax Year 2012

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

Selected industrial sector of controlled foreign corporation (CFC) and foreign disregarded entity (FDE)	Number of foreign entities	End-of-year total assets	Current earnings and profits (less deficit) after taxes
	(1)	(2)	(3)
All industries: CFCs	88,038	18,596,353,104	793,311,339
All industries: FDEs	23,538	7,277,316,988	278,499,176
Raw materials and energy production	1,529	308,725,276	23,864,211
Goods production	4,960	784,375,792	53,123,751
Distribution and transportation of goods	4,123	542,183,948	76,724,393
Information	1,563	336,614,464	2,438,211
Finance, insurance, real estate, and rental and leasing	2,640	2,273,294,108	20,172,210
Services	8,340	3,018,437,434	101,133,980
Nature of business not allocable	382	13,685,966	1,042,420
Raw materials and energy production: CFCs	2,708	646,380,925	47,346,562
All industries: FDEs	1,164	211,010,569	19,136,901
Raw materials and energy production	1,027	176,542,162	14,605,599
Goods production	11	1,170,090	-16,477
Distribution and transportation of goods	d	d	d
Information	0	0	0
Finance, insurance, real estate, and rental and leasing	31	5,858,271	458,714
Services	82	24,004,026	3,286,305
Nature of business not allocable	d	d	d
Goods production: CFCs	21,182	2,681,463,250	213,925,005
All industries: FDEs	5,049	1,160,838,224	105,316,076
Raw materials and energy production	67	9,271,864	93,731
Goods production	2,431	365,690,500	26,952,829
Distribution and transportation of goods	876	156,150,213	60,717,972
Information	51	3,651,861	27,197
Finance, insurance, real estate, and rental and leasing	194	186,932,966	-93,873
Services	1,344	435,523,736	17,565,590
Nature of business not allocable	86	3,617,085	52,630
Distribution and transportation of goods: CFCs	17,437	1,321,903,932	99,304,188
All industries: FDEs	2,590	504,181,464	32,148,661
Raw materials and energy production	43	4,421,128	-24,479
Goods production	322	68,115,773	9,825,374
Distribution and transportation of goods	1,480	132,214,429	7,710,823
Information	26	2,807,849	917,820
Finance, insurance, real estate, and rental and leasing	117	123,711,912	1,215,972
Services	562	172,120,580	12,480,622
Nature of business not allocable	40	789,793	22,529
Information: CFCs	5,215	489,358,279	17,015,310
All industries: FDEs	1,039	320,504,765	2,453,068
Raw materials and energy production	0	0	0
Goods production	d	d	d
Distribution and transportation of goods	50	561,117	4,090
Information	658	236,244,772	-177,642
Finance, insurance, real estate, and rental and leasing	19	8,131,047	47,456
Services	277	67,247,657	2,330,735
Nature of business not allocable	d	d	d

Footnotes at end of table.

Table 4. Controlled Foreign Corporations and Their Foreign Disregarded Entities: Number, End-of-Year Total Assets, and Current Earnings and Profits (Less Deficit) After Income Taxes, by Selected Industrial Sector, Tax Year 2012—Continued

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

Selected industrial sector of controlled foreign corporation (CFC) and foreign disregarded entity (FDE)	Number of foreign entities	End-of-year total assets	Current earnings and profits (less deficit) after taxes
	(1)	(2)	(3)
Finance, insurance, real estate, and rental and leasing: CFCs	9,797	6,313,205,638	90,134,082
All industries: FDEs	2,017	1,710,001,436	20,771,411
Raw materials and energy production	36	6,239,264	188,227
Goods production	113	6,179,272	272,569
Distribution and transportation of goods	76	26,839,476	954,251
Information	58	5,344,757	-287,564
Finance, insurance, real estate, and rental and leasing	1,312	1,509,247,579	8,741,432
Services	408	156,123,627	10,893,784
Nature of business not allocable	14	27,461	8,711
Services: CFCs	31,649	7,143,977,619	325,597,349
All industries: FDEs	11,664	3,370,498,979	98,659,657
Raw materials and energy production	356	112,250,859	9,001,132
Goods production	2,076	335,279,943	15,829,264
Distribution and transportation of goods	1,637	225,250,194	6,513,772
Information	769	88,565,225	1,958,401
Finance, insurance, real estate, and rental and leasing	962	439,272,901	9,790,848
Services	5,661	2,163,347,583	54,594,444
Nature of business not allocable	203	6,532,275	971,797

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

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

SOURCE: IRS, Statistics of Income Division, Controlled Foreign Corporations, August 2018.

