

Supplemental
STATISTICS OF INCOME
1968-1972

International Income and Taxes

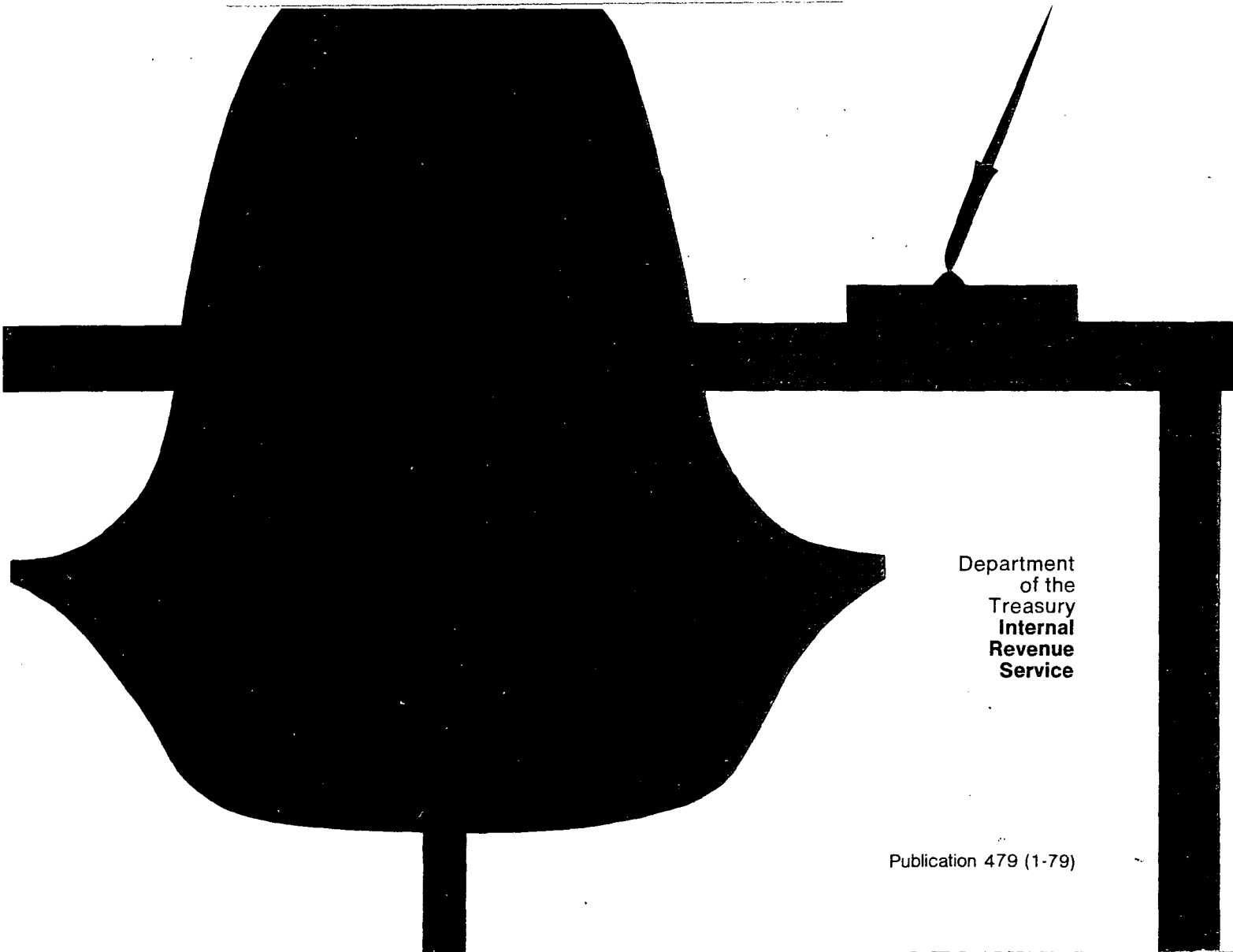
Foreign Tax Credit

Claimed on

CORPORATION
INCOME TAX
RETURNS

DO NOT

CUT SPINE



Department
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Treasury
Internal
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Service

Publication 479 (1-79)

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The procedures for sampling, processing and reviewing the data were developed by other branches of the Statistics Division. The returns were sampled at the ten Service Centers located at Covington, Kentucky; Philadelphia, Pennsylvania; Kansas City, Missouri; Andover, Massachusetts; Holtsville, New York; Chamblee, Georgia; Memphis, Tennessee; Austin, Texas; Fresno, California; and Ogden, Utah.

The Data Center at Detroit, Michigan performed the statistical abstracting of the data and designed and conducted the computer processing.

Supplemental
STATISTICS OF INCOME
1968-1972

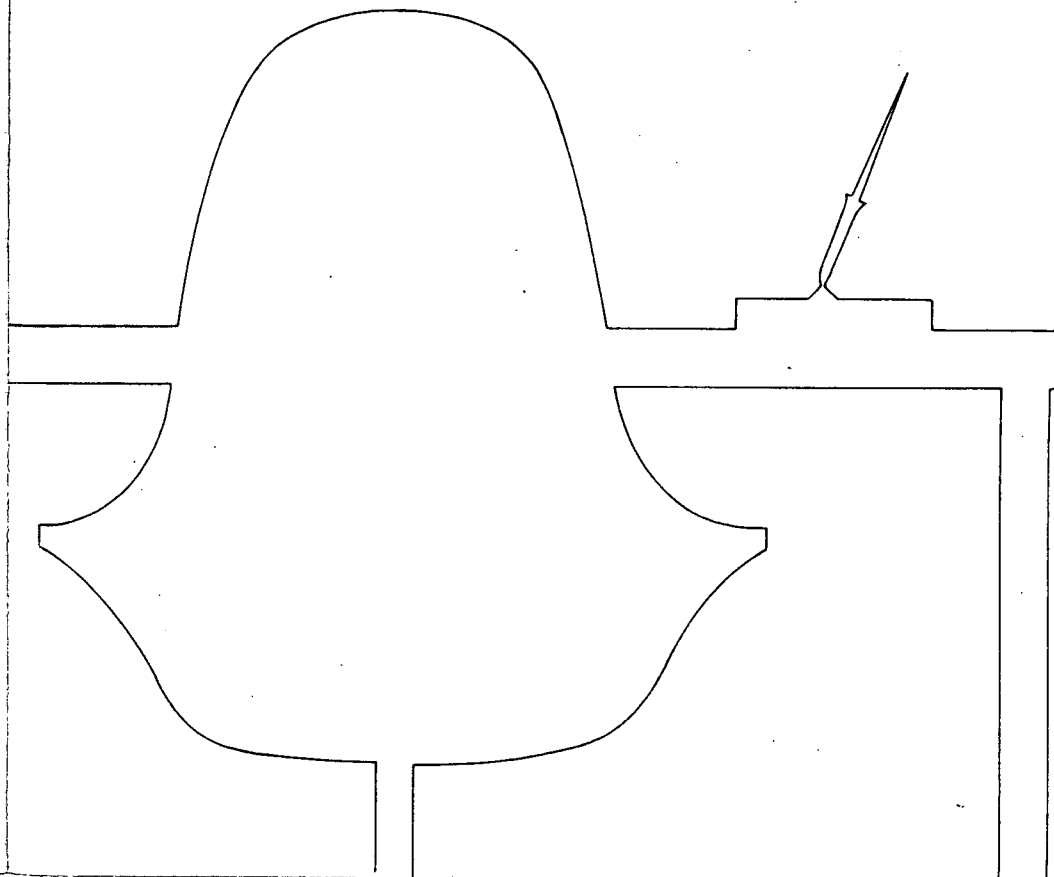
International Income and Taxes

Foreign Tax Credit

Claimed on

CORPORATION
INCOME TAX
RETURNS

Also includes data on
Western Hemisphere Trade Corporation Returns



COMMISSIONER OF INTERNAL REVENUE

Washington, DC 20224

December 19, 1978

The Honorable W. Michael Blumenthal
Secretary of the Treasury
Washington, DC 20220

Dear Mr. Secretary:

I am transmitting the Supplemental Report, Statistics of Income—1968-1972, International Income and Taxes, Foreign Tax Credit Claimed on Corporation Income Tax Returns. The statistics in this report are estimates derived from samples of unaudited corporation income tax returns for four income years, 1968 (accounting periods ended July 1968 through June 1969), 1969 (periods ended July 1969 through June 1970), 1970 (periods ended July 1970 through June 1971), and 1972 (periods ended July 1972 through June 1973).

This report provides comprehensive data on foreign income and taxes. The last report on this subject covered income years 1964, 1965, and 1966. The major emphasis of the foreign tax credit statistics is the classification of income and tax information by country and geographic area. In addition, data are also included on Western Hemisphere Trade Corporations.

With kind regards,

Sincerely,

Department of the Treasury Internal Revenue Service

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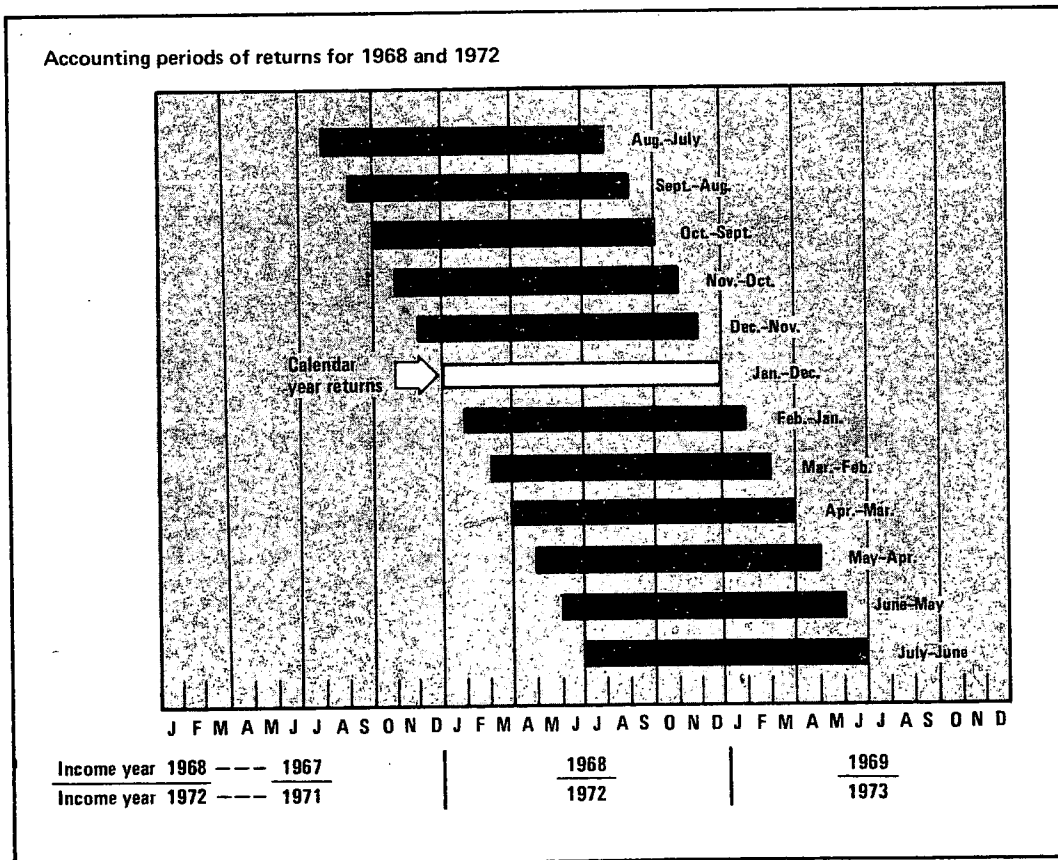
Introduction

This report, which is a part of the series on international income and taxes, is a supplement to the annual report Statistics of Income--Corporation Income Tax Returns, and presents data on two related subjects, the foreign tax credit and the Western Hemisphere Trade Corporation deduction. The data represent statistical estimates derived from the stratified samples of unaudited corporation income tax returns selected for Statistics of Income for the Income Years 1968, 1969, 1970, and 1972. These years are defined to include corporation accounting periods ended (1) July

1968 through June 1969, (2) July 1969 through June 1970, (3) July 1970 through June 1971, and (4) July 1972 through June 1973, respectively.

The span of months included in the accounting periods representing Income Years 1968 and 1972, the years to which most of the data relate, is shown in the accompanying chart. The other two years, 1969 and 1970, included in this report are similarly defined. However, most of the corporations covered by the statistics reported for a calendar year accounting period. For example, for 1972, about 93 per-

cent of both the foreign tax credit and Western Hemisphere Trade Corporation deduction were reported on calendar year returns. Since detailed statistics from the foreign tax credit computation schedule were previously published for 1966, law changes that occurred since that year and which were applicable during the span of years 1967 through 1972 are reflected in this report. Section I includes a detailed discussion of the major tax law changes affecting the foreign tax credit statistics. Other changes in the law are referred to in the Explanation of Terms section.



In addition to the data presented in this report, the regular annual series, Statistics of Income--Corporation Income Tax Returns also provides five items of data reported on the basic corporation income tax return forms which relate to the foreign activity of U.S. corporations:

- (1) foreign tax credit claimed,
- (2) foreign dividends received,
- (3) foreign dividend income resulting from foreign taxes deemed paid ("foreign dividend gross-up"),
- (4) includable income

of Controlled Foreign Corporations, and (5) the Western Hemisphere Trade Corporation deduction. In this supplemental report, detailed statistics by country are presented on the foreign operations of U.S. corporations as reported on the foreign tax credit computation schedule. The table below shows how the data presented in the foreign tax credit and Western Hemisphere Trade Corporation tables are classified.

Classification of Statistics Appearing in This Report

Classification	Tables on—	
	Foreign tax credit	Western Hemisphere Trade Corporation returns
Source, Corporation income tax return (Forms 1120, 1120F, 1120L, and 1120M):		
Business activity.....	X	X
Size of total assets.....	X	X
Size of net income.....	X	
Size of foreign tax credit claimed.....	X	
Source, Foreign tax credit computation schedule (Form 1118):		
Geographic area, subarea, and country to which foreign income was attributed and/or taxes were paid.....	X	
Limitation method used in computing foreign tax credit.....	X	
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INTRODUCTION

Corporations were subject to U.S. tax on foreign as well as domestic income. Their income from foreign sources also was taxable in the foreign country or U.S. possession (or Puerto Rico) in which the income was earned.¹ In order to alleviate the consequences of this double taxation, the Internal Revenue Code provided a credit against U.S. income tax, or an alternative deduction from gross income, for foreign taxes paid or accrued. Taxpayers typically chose the foreign tax credit rather than the deduction because it usually resulted in a lower combined total of U.S. and foreign taxes.

THE FOREIGN TAX CREDIT

A U.S. corporation could receive a credit for foreign income, war profits, and excess profits taxes paid (or accrued) or deemed paid during the taxable year to a foreign country or U.S. possession. Taxes "deemed paid" by the U.S. corporation were foreign income taxes considered to be indirectly borne by the U.S. corporation. In general, a U.S. corporation which owned 10 percent or more of the voting stock of a foreign corporation was, on receiving a dividend, deemed to have paid a certain proportion of the foreign corporation's own income, war profits, or excess profits taxes.

The amount of the credit was limited so that the corporation paid the higher of the U.S. or foreign tax rate on its "taxable income from foreign sources," which was, in general, taxable foreign income computed under provisions of the Internal Revenue Code. This was accomplished by various constraints which, for the most part, consisted of a limitation method elected by the taxpayer.

The limitation method, in general, permitted the tax credit up to the amount of U.S. tax liability and was based on the relationship between taxable income from foreign sources and total taxable income from all sources.

Under certain circumstances eligible foreign taxes which exceeded the credit limitation could be carried back or carried over to offset the U.S. tax liability of other years. When foreign income taxes taken as a percent of taxable income from foreign sources was less than the U.S. effective tax rate for a particular corporation, i.e., U.S. income tax before credits as a percent of income subject to U.S. tax, the entire amount of eligible foreign tax was used as a foreign tax credit. This left the corporation with the difference between its U.S. tax liability before credits and its foreign tax liability as its tax liability to the United States. When foreign taxes as a percent of taxable income from foreign sources was greater than the U.S. effective tax rate for the corporation, the foreign tax credit could offset the corporation's entire U.S. tax on taxable income from foreign sources and the corporation would be left with only the U.S. tax before credits on its U.S. source income and the liability to foreign jurisdictions.

Foreign Taxes Deemed Paid and "Foreign Dividend Gross-up"

In an attempt to equalize the overall tax burdens of foreign branch and subsidiary operations of U.S. corporations, the Revenue Act of 1962 added section 78 to the Internal Revenue Code. This required U.S. corporations to

increase their taxable income by "grossing-up" dividends received from related foreign corporations that were economically developed country corporations by the amount of foreign taxes deemed paid with respect to these dividends. The "gross-up" provision was also applicable to certain undistributed foreign profits only constructively received (see "Includable income of Controlled Foreign Corporations" in the Explanation of Terms). Prior to the 1962 Act, foreign taxes deemed paid with respect to dividends received from related foreign corporations were not included in the U.S. corporation's taxable income and the method of computing taxes deemed paid was different from that used after the 1962 Act when dividends were required to be "grossed-up" (see "Foreign taxes deemed paid" in the Explanation of Terms). However, the net profits of foreign branches, computed without any deduction for foreign income taxes paid on these profits, were included in the U.S. corporation's taxable income.

Limitations on the Credit

Taxpayers could use one of two alternative limitations in computing the foreign tax credit: (1) the per-country limitation, and (2) the overall limitation. However, only the per-country limitation method could be used when computing the separate credit for taxes on certain interest income (see "Interest for which separate credit was computed" in the Explanation of Terms). In addition, for dividends received from Domestic International Sales Corporations (DISC's), to the extent such dividends were treated as foreign source income, the limitation was computed separately

¹Subsequent references to U. S. possessions include Puerto Rico.

with respect to aggregate dividends received by a U.S. parent corporation from all of its DISC's.

The per-country limitation applied unless the taxpayer specifically elected to use the overall limitation (see "Credit limitation method" in the Explanation of Terms for a discussion of the rules for electing the overall limitation).

Under the overall limitation, the taxpayer's income was divided into two parts, U.S. and foreign. A foreign tax credit was allowed for foreign taxes up to the amount of the U.S. tax that would otherwise have been imposed on the taxpayer's total foreign income. The overall limitation was advantageous in the case of a taxpayer operating in several countries some of which imposed taxes at a higher rate than the United States and some of which imposed taxes at a lower rate. In effect, the higher and lower taxes of the different foreign countries were averaged out, and the total foreign tax credit allowable for all foreign taxes was thereby higher than if the taxpayer were to use the per-country limitation for each country. Thus, total foreign taxes were less likely to exceed the credit allowable, whereas under the per-country limitation foreign taxes exceeded the credit allowable for those countries where the foreign tax rate exceeded the U.S. tax rate.

On the other hand, the per-country limitation could be more advantageous for taxpayers operating at a profit in some foreign countries and at a loss in others. This was especially the case when a U.S. corporation began operations in foreign countries in which losses were likely to result at least at the outset. In such instances, the U.S. corporation could look at its operations in these countries as being separate from its more stable operations in other foreign countries. Under this limitation method, countries with loss operations were effectively ignored in computing the credit, while the credit computed for the countries with profitable operations was not affected. Under these circumstances, the chances that foreign taxes would exceed the credit allowable were less than they might have been under the overall limitation method where losses could reduce the allowable credit.

Foreign Tax Carryover and Carryback

The carryover and carryback provisions of the law enabled the taxpayer to obtain credit for taxes which could not otherwise be credited because of the above

limitations. Although foreign taxes for which credit was not allowable because of the credit limitation could be carried back 2 years and forward 5 years, they could not be carried from a year in which the overall limitation applied and used in a year in which the per-country limitation applied, and vice versa.

Corporations Not Eligible for Foreign Tax Credit

The foreign tax credit was not allowed Small Business Corporations electing to be taxed through stockholders even when these corporations were taxed on certain capital gain income. These corporations had to deduct from gross income any foreign taxes they paid and could not pass these taxes on to their stockholders for their use as a foreign tax credit. Since Domestic International Sales Corporations (DISC's) themselves were not taxable, the foreign tax credit was not applicable; however, DISC stockholders were allowed the credit for the DISC's foreign taxes.

In addition, the following types of U.S. corporations were specifically precluded from taking the credit for eligible foreign taxes: (1) China Trade Act corporations entitled to the special deduction allowed by section 941 of the Code; (2) corporations whose income was exempt from U.S. taxation under Code section 931, if 80 percent or more of their gross income was from sources within a U.S. possession other than the Virgin Islands, and 50 percent or more of it was from the active conduct of a trade or business in such possessions for a specified time period; and (3) regulated investment companies which elected under Code section 853 to allow their stockholders to claim the credit for the foreign taxes paid by the company. However, for purposes of the foreign tax credit for taxes deemed paid China Trade Act corporations and domestic corporations entitled to the benefits of section 931 were treated as foreign corporations.

MAJOR CHANGES IN LAW AFFECTING THE FOREIGN TAX CREDIT STATISTICS

While the following discussion covers law changes affecting the foreign tax credit statistics, it is not strictly limited to this subject. Inasmuch as the data obtained from the foreign tax credit computation schedule comprised all of the foreign source income of both domestic and foreign corporations, subject to the U.S. income tax, all major law

changes dealing with the differentiation between U.S. and foreign source income are also discussed below.

Foreign Investors Tax Act of 1966

The Foreign Investors Tax Act of 1966 brought about major changes in the tax treatment of corporations, both domestic and foreign, that were subject to the U.S. income tax. Most of the provisions were effective for taxable years beginning after 1966. The Act amended the Internal Revenue Code to provide that if foreign corporations were engaged in a trade or business within the United States, they were taxable on all income which was "effectively connected" with the conduct of the U.S. trade or business. In addition to income from U.S. sources which was "effectively connected" with the conduct of a U.S. trade or business, certain types of income from foreign sources were treated as being "effectively connected" with a business in the United States and were, therefore, taxable by the United States.

Income effectively connected with the conduct of a trade or business in the United States

The Act introduced the concept of income "effectively connected" with a U.S. trade or business in order to determine whether the U.S. investment income of a foreign corporation should be taxed on a gross basis at a flat 30 percent rate (or at a lower rate arrived at through international tax treaty), or taxed on a net basis at the generally higher rates that applied to the investment income of a U.S. corporation. Under the new concept any foreign corporation income that was "effectively connected" with the corporation's business operations in the United States was subject to tax at the U.S. tax rates. This included income from nonportfolio type investments that were either used or held for use in the conduct of a trade or business. The lower flat percentage rate was to apply to all other income from investments, chiefly portfolio type investments, not used or held for use in the conduct of the U.S. business operations.

The "effectively connected" income concept was intended to provide an incentive for foreign corporations to invest in the United States. Under prior law, foreign corporations with U.S. income from a business, and from either investments related to a business or passive investments not related to a business, had all

of their net income taxed at the same rates applicable to domestic corporations. For many, this amounted to being taxed at the combined normal tax and surtax rates (see "U.S. income tax before credits" in the Explanation of Terms). Yet foreign corporations with no U.S. business income from direct operations or from related investments, but with U.S. income derived solely from passive investments, were taxable on gross income at the generally lower 30 percent rate (or tax treaty rate). The elimination of this differential in tax treatment by use of the "effectively connected" income concept was therefore designed to encourage passive investments by foreign corporations, heretofore engaged mainly in active U.S. business operations, by allowing the income from such investments to be taxed at the lower rate. Conversely, it was supposed to provide an incentive to foreign corporations, heretofore confining their U.S. activities to passive investments, to consider widening their operations in the United States to include active business or business-related activities. This was to be accomplished by continuing to allow their passive investment income to be taxed at a lower rate regardless of whether or not they also had business or business-related income.

Income "effectively connected" with the conduct of a trade or business in the United States in general covered all types of income attributable to or generated by a U.S. place of business even if it was from foreign sources. All deductions attributable to "effectively connected" income were also allowed, except for certain charitable contributions which were totally deductible regardless of the "effectively connected" rule.

The "effectively connected" concept permitted U.S. taxation of certain foreign source income, described below, in order to eliminate an unintended tax benefit existing prior to the Act under which foreign corporations operating in the U.S. were neither taxed by the United States nor by foreign jurisdictions. These were situations in which foreign corporations, organized in countries which imposed no tax on income derived from export operations, generated foreign source income through a sales office or permanent establishment in the United States thereby using the United States as a "tax haven." The three types of foreign source income which were treated as "effectively connected" with U.S. operations under certain con-

ditions were: (1) rents, royalties, and gains on intangible personal property derived from a licensing business; (2) dividends; interest; or gain from stocks, bonds, or debt obligations derived from a banking, financing, or similar business; and (3) income from the sale of inventory items or of property held primarily for sale to customers in the ordinary course of business, where the sale was outside the United States but through a sales office in the United States. However, this did not include property which was sold for use, consumption, or disposition outside the United States if a foreign office or other place of business maintained by the foreign corporation participated materially in the sale. A foreign branch or office was considered to have materially participated in the sale if it (a) solicited the order resulting in the sale; (b) negotiated the contract of sale; or (c) performed other significant services necessary for the consummation of the sale which were not the subject of a separate agreement between the seller and the buyer.

However, the following two types of foreign source income were in no case treated as "effectively connected" income: (1) dividend, interest, or royalty income from a foreign corporation owned more than 50 percent by the foreign corporation receiving the income, and (2) "Subpart F income" of a Controlled Foreign Corporation as determined under Code section 952 (see "Includable income of Controlled Foreign Corporations" in the Explanation of Terms).

Taxation of interest income

The 1966 Act also changed the taxability, using transitional rules, of interest paid to foreign corporations by U.S. banking and savings institutions on deposits and withdrawable shares, and by U.S. insurance companies on accumulated dividends, policy proceeds left on deposit, and premium prepayments or overcharges.

Previously, the interest paid by banking and savings institutions was taxable only if the foreign corporation receiving it was engaged in trade or business in the United States. Interest received by corporations not engaged in a U.S. trade or business was given special treatment, as foreign source income, exempt from the U.S. income tax. Interest paid by foreign branches of U.S. banking and savings institutions was similarly treated. However, interest and the institutions paying it were somewhat narrowly defined and amounts paid

by insurance companies were fully taxed regardless of whether the foreign corporation receiving it was engaged in a trade or business in the United States.

Under the new transitional rules, the basic approach of prior law was retained except that taxability was based on whether or not the foreign corporation's interest income was "effectively connected" with a U.S. trade or business. In addition, this approach was extended to cover interest received from insurance companies and the definitions of interest and of banking and savings institutions were made more inclusive. The transitional rules were to apply only to interest received prior to January 1, 1973. Beginning with that date, all interest paid to foreign corporations by banking and savings institutions and their foreign branches, as well as by insurance companies, was to be considered U.S. source income, and therefore taxable, even if it was not "effectively connected" with a trade or business in the United States. However, the termination date for the transitional rules was subsequently extended.

The 1966 Act reversed the tax treatment of interest received by foreign corporations on bank deposits in foreign branches of U.S. banks. Previously such interest was treated as from sources within the United States and as such was taxable to corporations engaged in a U.S. trade or business. The new law regarded such interest as foreign source income nontaxable to a foreign corporation doing business in the United States.

Dividends and interest received from foreign corporations

Prior to the 1966 Act, dividends received from foreign corporations were considered to be from U.S. sources if 50 percent or more of the paying corporation's gross income was derived from U.S. sources during the preceding 3 taxable years. A similar rule provided that all of the interest received from a foreign corporation engaged in trade or business in the United States was considered U.S. source income if 20 percent or more of the paying corporation's gross income was from U.S. sources during this same time period.

The portion of the dividend treated as being from U.S. sources where the 50 percent rule was met was based on a special allocation rule. Under this rule, the part of the dividend treated as being from U.S. sources was an amount bearing the same ratio to the

dividend as the gross income from U.S. sources for the 3-year period bore to the gross income from all sources for the same period.

In the case of interest paid though, there was no such allocation rule. All of the interest paid by a foreign corporation was treated as being from U.S. sources.

The Foreign Investors Tax Act changed the source rules by substituting gross income "effectively connected" with a U.S. trade or business for gross income from U.S. sources, when determining whether or not any dividends or interest were considered as originating in the United States. For this purpose, the 50 percent rule that applied to dividends was extended to apply to interest, replacing the former 20 percent rule. An allocation rule was also introduced for interest. Under the new allocation rule, the portion of dividends and interest treated as originating in the United States was based on the ratio to the dividend or interest which the "effectively connected" income of the foreign corporation during the prior 3 years bore to its total gross income from all sources during the 3-year period.

A deduction for dividends received from foreign corporations had been allowed domestic corporations for amounts considered as having originated in the United States. For this purpose, the paying corporation must have been engaged in a trade or business in the United States for an uninterrupted period of at least 3 years and at least 50 percent of its gross income must have come from U.S. sources during that time. The Foreign Investors Tax Act amended this dividend deduction provision by stating that at least 50 percent of gross income had to come from sources "effectively connected" with a trade or business in the United States.

A conforming change was also made with respect to the 85 percent dividends received deduction claimed by the domestic corporation. Previous law limited the deduction to 85 percent of that proportion of the dividend which the foreign corporation's gross income from U.S. sources bore to its total gross income. The 1966 law substituted gross income "effectively connected" with a U.S. trade or business for gross income from U.S. sources. It also allowed the deduction to foreign corporations with income "effectively connected" with a U.S. trade or business if the dividend was "effectively connected" income and the deduction was "effectively connected" with the U.S. business.

The 1966 law also allowed domestic corporations a new 100

percent deduction for dividends received from wholly-owned foreign subsidiaries, all of whose gross income was "effectively connected" with a U.S. business. In return, the foreign subsidiaries were taxed on all of their income in the same manner as domestic subsidiaries.

Allowance of foreign tax credit

A foreign tax credit was allowed foreign corporations for the first time under the 1966 Act for the foreign taxes paid or deemed paid on income "effectively connected" with a U.S. business. The size of the credit was subject to the same two limitations (per-country or overall) that applied to domestic corporations, but in determining the proportion of taxes to be credited under either limitation, only the taxable income that was "effectively connected" with the U.S. trade or business was taken into account. Foreign taxes in excess of these limitations could be carried back and carried over for use in the prescribed number of other years, the same as for domestic corporations. However, in the case of foreign corporations, no amount could be carried to or from a taxable year beginning before January 1, 1967.

The impact of the Act on the foreign tax credit, taxable foreign income, and foreign taxes was minimal. Table 15 of Statistics of Income--1972, Corporation Income Tax Returns, which presents data on foreign corporations with U.S. business operations, shows that almost 800 returns were filed by these corporations. However, only 26 showed a foreign tax credit, which amounted to \$3.6 million out of the total corporate foreign tax credit of \$6.3 billion.

Interest income for which a separate foreign tax credit was computed

The 1966 Act also provided that the foreign tax credit did not have to be computed separately under the per-country limitation for taxes paid on interest income received from a foreign corporation in which a domestic corporation (or one or more members of the group with which the domestic corporation was affiliated) owned, directly or indirectly, at least 10 percent of the voting stock. For this purpose an affiliated group was defined the same as for U.S. consolidated return filing purposes. For purposes of determining the 10 percent stock ownership, stock owned directly or indirectly by or for a foreign corporation was considered as being owned proportionately by its stockholders. Consequently,

this type of interest income received in taxable years ended after 1965, and the taxes associated with it, could be included with the domestic corporation's other foreign income and taxes in computing the foreign tax credit, subject to the same limitation that the company used for the rest of its foreign taxes.

Formerly, this exemption on the separate interest computation applied only to interest received from a foreign corporation in which the domestic corporation directly owned at least 10 percent of the voting stock of the foreign debtor corporation. The change permitted, for example, a U.S. parent corporation to establish a wholly-owned domestic subsidiary to borrow foreign funds and to lend these funds to finance the operations of the U.S. parent corporation's foreign operating subsidiary. Beginning with January 1, 1966, interest received by the domestic subsidiary from the foreign operating subsidiary could be included with the other foreign income of the domestic subsidiary for foreign tax credit purposes even though the domestic subsidiary did not directly own a 10 percent interest in the foreign subsidiary.

The purpose of this change was to encourage U.S. parent corporations to finance the foreign operations of their subsidiaries by raising funds in foreign money markets and loaning them to their foreign subsidiaries rather than transmitting funds from the United States.

Tax Reform Act of 1969

Foreign tax credit for taxes paid on mineral income

Corporations extracting oil, gas, or minerals in foreign countries were allowed to use percentage depletion in computing their foreign source income subject to the U.S. income tax. Because this income was typically less than the income subject to foreign tax, the U.S. tax attributable to these foreign operations was often less than the foreign taxes on the same operations. Prior to the Tax Reform Act of 1969, the full amount of foreign income tax was eligible for the foreign tax credit against U.S. income tax.

The 1969 Act provided that for taxable years beginning after December 31, 1969, in the case of foreign taxes paid or accrued on foreign mineral income (defined below), the allowable credit was to be reduced. The reduction applied when foreign taxes con-

sidered on a country basis (a) exceeded the U.S. tax on foreign mineral income also considered on a country basis and (b) the difference was due to the reduced taxable income from foreign sources that resulted from the excess of the percentage depletion deduction over cost depletion.

Under the new provision, foreign income taxes paid or accrued to a foreign country or U.S. possession on foreign mineral income from sources within the country or possession had to be reduced, for foreign tax credit purposes, to the extent that the foreign taxes (or, if smaller, the amount of U.S. tax that would be computed on such income without the percentage depletion deduction) exceeded the U.S. tax on such income. The foreign taxes thus disallowed could not be used as a credit against U.S. taxes on other types of income from the same country (or any other country) and could not be carried over for use as a credit in other years as could other foreign taxes in excess of the limitation.

Because this credit reduction had its major impact on corporations using the overall limitation method in computing the credit, corporations using this method were allowed a one-time changeover to the per-country limitation without the Internal Revenue Service's consent. Normally, a change in limitation method was not permitted without the Service's consent (see "Credit-limitation method" in the Explanation of Terms).

For purposes of this provision, foreign mineral income meant income derived from the extraction of minerals from mines, wells, or other natural deposits; the processing of such minerals into their primary products; and the transportation, distribution, or sale of such minerals or their primary products. Dividends received from a foreign corporation for which a foreign tax credit based on foreign taxes deemed paid could be claimed were treated as foreign mineral income to the extent the dividends were attributable to this type of income.

Public Law 91-684

In 1971, major changes were made relating to the determination of foreign taxes deemed paid. One change reduced the required voting stock interest of a related (or first-tier) foreign corporation in a second-tier foreign corporation from 50 percent to 10 percent. The other change extended the credit for foreign taxes deemed paid to foreign income taxes paid by yet a third tier of foreign corporations.

A third-tier foreign corporation was one in which a second-tier foreign corporation had at least a 10 percent voting stock interest.

Prior to the enactment of Public Law 91-684, the percentage ownership requirement was at least 50 percent for purposes of treating foreign income taxes paid by a second-tier foreign corporation as foreign taxes deemed paid. As a result of this law, in the case of U.S. corporations with taxable years ending after January 12, 1971, the ownership requirement for first-tier foreign corporations in second-tier foreign corporations was reduced. Therefore, it was possible to allow a larger amount of the foreign income taxes paid by second-tier foreign corporations as foreign tax credit, when dividends were paid by second-tier foreign corporations to first-tier foreign corporations after January 12, 1971.

At the same time, credit was allowed for the first time for foreign taxes deemed paid by a second-tier foreign corporation for the foreign income taxes paid by a third-tier foreign corporation in which the second-tier foreign corporation had at least a 10 percent voting stock interest. In order for taxes of second- or third-tier foreign corporations to be allowed as foreign taxes deemed paid for purposes of the foreign tax credit, the U.S. corporation had to have at least a 5 percent voting stock interest in both the second- and third-tier foreign corporations.

Revenue Act of 1971

The major law change which was introduced during the 1972 income year in the foreign area was the creation of a new type of corporation called a Domestic International Sales Corporation (DISC).

Domestic International Sales Corporations (DISC's)

A new method of tax treatment for U.S. corporations engaging in export activities was provided for by the Revenue Act of 1971. The Act established a new type of corporation, known as the Domestic International Sales Corporation, for tax years beginning on or after January 1, 1972. The principal objectives of the legislation were to increase exports and improve the U.S. balance of payments.

Prior to the DISC legislation, U.S. corporations engaged in export sales were taxed currently on their export profits at the full U.S. corporate income tax rate. The Act provided a system

of tax deferral for DISC's and their stockholders (mainly other corporations). The profits of a DISC were not taxed to the DISC but were taxed to the stockholders of the DISC when distributed or deemed to be distributed. In general, the stockholders of a DISC were deemed to receive an annual dividend equal to at least one-half of the DISC's taxable income. This constructive distribution was fully taxable to the stockholders even if the earnings were not actually distributed. U.S. income taxation was deferred on the portion of the DISC's taxable income which was not deemed distributed until one of the following events occurred: the income was actually distributed to the DISC's stockholders; a stockholder disposed of the DISC stock; the DISC was liquidated; or the election to be treated as a DISC was terminated or revoked.

Corporate stockholders receiving DISC dividends were not permitted the intercorporate dividends received deduction on these dividends. The dividends received deduction was designed to prevent multiple taxation of corporate earnings; consequently, as a DISC itself was not subject to taxation, the dividends received deduction was not applicable.

Dividends deemed or actually paid by a DISC were treated as dividends from a foreign corporation to the extent the dividends were attributable to certain export receipts of the DISC. Thus, all stockholders could claim a foreign tax credit for any foreign taxes imposed directly on a DISC dividend. Corporate stockholders could also claim an indirect credit (for taxes deemed paid) for the foreign taxes paid by a DISC. The limitation on the foreign tax credit was applied separately with respect to aggregate dividends received from all DISC's.

Statistics of Income--1972, Corporation Income Tax Returns

shows that a total of \$313 million in dividends received from DISC's was reported on 1,026 corporation returns for 1972. However, the activity of the DISC's did not generate any appreciable foreign tax credit for their corporate stockholders for 1972. As the foreign tax credit statistics in table 18 of this report show, a credit of only \$81,000 associated with DISC dividends of \$873,000 was reported on Forms 1118 filed for 1972.

For further discussion and statistics relating to DISC's see Statistics of Income--1972 Corporation Income Tax Returns and the International Income and Taxes supplement to Statistics of Income on DISC's.

SUMMARY OF THE DATA

Charts 1A and 1B illustrate the sharp growth in foreign operations of U.S. corporations in the 9-year period, 1964 through 1972. During this period, both the foreign tax credit claimed (chart 1A) and taxable income from foreign sources (chart 1B) almost tripled.

These charts show that there was a particularly sharp increase during the period, 1970 through 1972. A comparison of tables 17 and 18 shows that more than 56 percent of the 1970-72 increase of \$5.6 billion in taxable income from foreign sources was accounted for by corporations whose primary industrial activities were in the oil and gas extraction and refining industries.

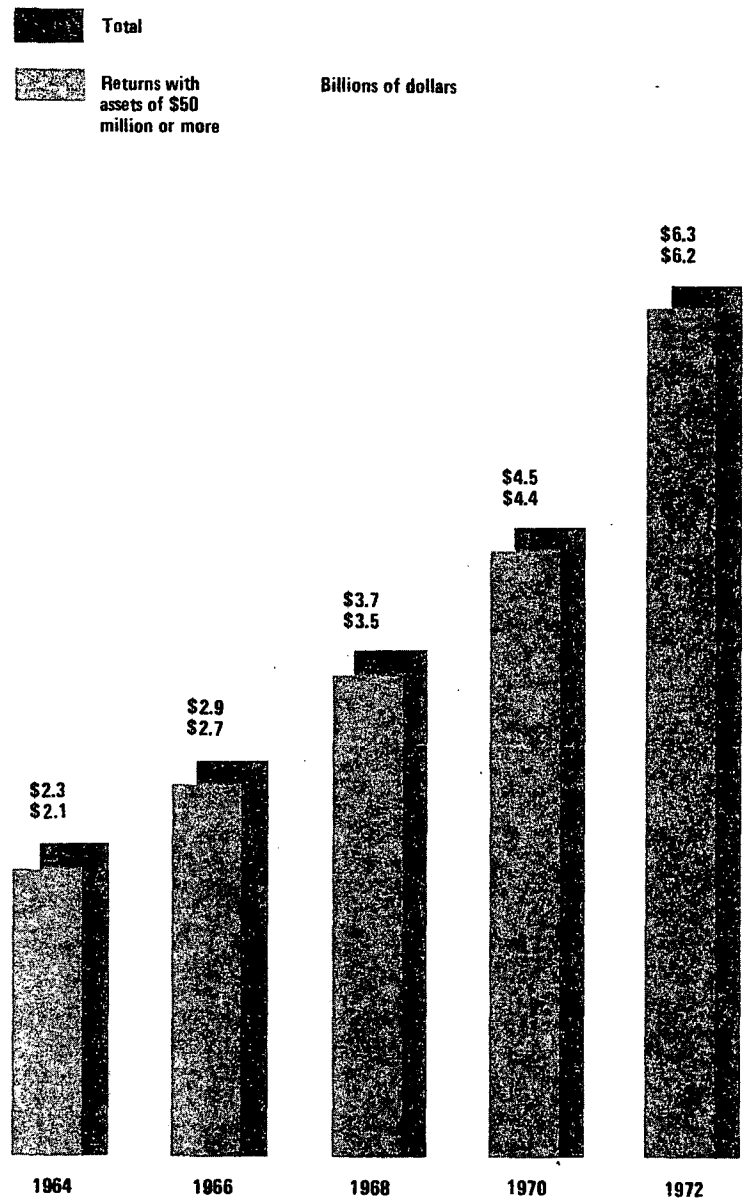
Chart 1C shows for 1964, 1968, and 1972, the increase in taxable income from foreign sources in relation to (a) total "taxable income" of corporations with a Form 1118 filed in support of foreign tax credit claimed and (b) total "taxable income" of all corporations. For purposes of this comparison, income subject to U.S. tax was used for total taxable income since this was the amount in the statistics that most closely approximated "taxable income" as defined in the Code (see "Income subject to U.S. tax" in the Explanation of Terms).

The U.S. income tax liability before credits of corporations with a foreign tax credit was almost 60 percent of the total tax liability before credits on all active corporation returns for both 1968 (\$23.3 billion as a percent of \$39.7 billion) and 1972 (\$25.4 billion as a percent of \$42.9 billion). For 1968, corporations claimed almost \$3.7 billion in foreign tax credit while for 1972, they claimed \$6.3 billion. This allowed them to offset almost 16 percent of their U.S. income tax liability before credits for 1968 and almost 25 percent for 1972.

Impact of Large U.S. Corporations

Most of the foreign tax credit was claimed by a relatively small number of large U.S. corporations. This reflects the fact that larger corporations are likely to have more foreign investments or foreign business activity than smaller corporations. Charts 1A and 1B help show the dominance of these large corporations with foreign operations. Corporations with assets of \$50 million or more accounted for about 96 percent of the total foreign tax credit claimed for 1968 and about 98 percent for 1972. However, these large corporations only accounted

Chart 1A. Amount of foreign tax credit claimed, selected years, 1964-1972



for about one-fifth of the total number of returns with the credit for 1972.

Table 14 presents foreign tax credit data for 1968 by the number of foreign countries in which U.S. corporations were operating. Only 5 percent of the returns showed operations in 10 or more countries, yet these corporations accounted for 65 percent of the taxable income from foreign sources. Similar data for 1972 were not tabulated.

Along with the growth of international trade and investment, during the 1960's there was an increasing number of multinational corporations, i.e., enterprises incorporated in one country and with subsidiaries and branches in many other countries. Consequently, some part of the income and taxes reported by U.S. corporations in their foreign tax credit computation schedules for a particular country may have originated from

sales in, and taxes paid to, other countries in which the U.S. corporation had business operations. This is discussed further below in Limitations of the Foreign Tax Credit Statistics under "Country classification."

Country of Foreign Operations

Chart 1D shows the countries accounting for 3 percent or more of the total taxable income from foreign sources reported by U.S. corporations for 1968 and 1972. In using taxable income from foreign sources for comparisons on a country-by-country basis, it should be noted that in the case of economically developed country corporations, taxable income was

"grossed-up" to include the foreign taxes deemed paid with respect to dividends received by U.S. corporations, while in the case of economically less-developed country corporations these taxes were not included in taxable income. For a discussion of the countries included in each category, see "Economically developed and less-developed countries" in the Explanation of Terms.

Chart 1E shows the countries accounting for 4 percent or more of the total foreign taxes (excluding taxes in excess of the limitation carried forward from prior years) reported by U.S. corporations for 1968 and 1972. Since foreign taxes were dependent on the foreign tax structure,

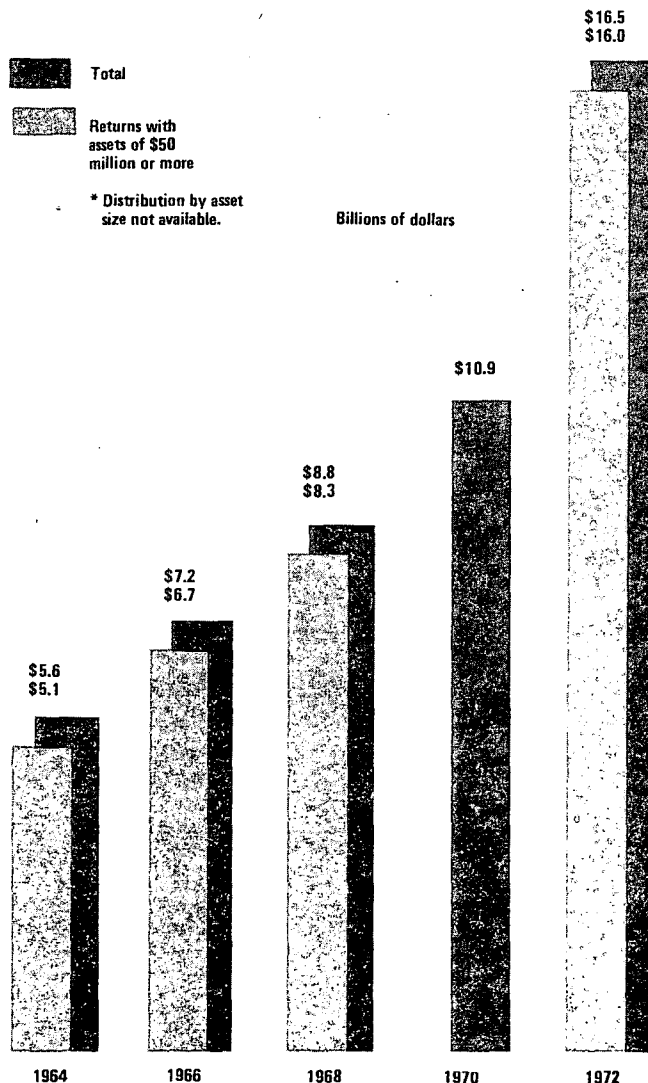
whereas taxable income from foreign sources was dependent on the U.S. tax structure, the foreign taxes were not necessarily based on the taxable income reported. However, a comparison of the data in table 6 for 1968 and table 23 for 1972, by country, showing the relationship between foreign taxes (excluding prior years' excess taxes carried over) to foreign income, furnishes some indication of the relative foreign tax burden borne by U.S. taxpayers on their foreign operations. However, there may be significant differences between this approximation and the actual effective tax rate primarily because of the following reasons: (1) The attribution of foreign income to a particular country was based on U.S. tax law and could differ from the attribution of income by the foreign government which levied the foreign tax. Consequently, a foreign country might have levied taxes on certain income which, according to U.S. law, would have been attributed to another country (including the United States). (2) Gross income and the deductions allocable to gross income, both used in arriving at taxable income from foreign sources under U.S. law, might be different from the tax base upon which the foreign government levied taxes. (3) In the case of economically developed country corporations, not only did the U.S. corporation's taxable income from foreign sources include foreign dividend income resulting from foreign taxes deemed paid but the computation method used for foreign taxes deemed paid resulted in a larger amount than that resulting from the computation method used for economically less-developed country corporations (see "Foreign taxes deemed paid" in the Explanation of Terms).

Industrial Activity of U.S. Corporations Operating Abroad

Corporations engaged primarily in manufacturing accounted for 70 percent and 66 percent, respectively, of the taxable income from foreign sources reported by corporations filing Form 1118 in support of the foreign tax credit claimed for the years 1968 and 1972 (see tables 1 and 18).

Although the industrial activity of the U.S. corporation generally provides an indication of the activity accounting for the major portion of the income from foreign countries, in many cases the foreign activity of the branch or subsidiary differed from that of the U.S. corporation. For example, the foreign branches and subsidiaries of U.S. corporations

Chart 1B. Taxable income from foreign sources, selected years, 1964-1972



classified under Manufacturing: Petroleum refining and related industries and operating in Indonesia, Iran, Kuwait, Libya, and Venezuela were engaged in the extraction of petroleum. On the other hand, U.S. corporations classified under Mining: Crude petroleum and natural gas and operating in Saudi Arabia were also engaged in the extraction of petroleum. Thus, although these foreign branches or subsidiaries were engaged in similar operations, their activity was classified in different industries because the classification was based upon the major portion of total receipts of the U.S. corporation.

Taxpayer Use of the Per-Country and Overall Credit-Limitation Methods

Table 1A shows that for 1968, the per-country limitation was used on almost two out of every three returns with Form 1118 filed in support of foreign tax credit claimed. However, it should be noted that corporations with operations in only one country could claim the same foreign tax credit using either limitation method. When corporations with single country operations did not indicate the limitation method, it was assumed that the per-country method was used. If the returns with single country operations were excluded from consideration, the remaining returns showed that the overall limitation method was used in about four out of five cases.

Returns with the overall limitation accounted for 72 percent of taxable income from foreign sources, 65 percent of foreign taxes including carryover, and 70 percent of the foreign tax credit. The corresponding percentages when returns with single country operations were excluded were 72, 57, and 68 percent, respectively. Because no tabulations were made for 1972 for returns with single country operations, similar data with respect to use of the limitation method are not available. As table 1A shows, for 1972, returns with the overall limitation accounted for a higher percentage of the totals than for 1968, about 45 percent of the returns, 81 percent of the income, 68 percent of the taxes, and 82 percent of the foreign tax credit.

Table 1A shows that for 1968, there was an excess of foreign taxes over taxable income from foreign sources in the statistics for mining. The reason for this was the carryover from prior years of about \$200 million in taxes for returns with the per-country limitation and the carryover of

about \$790 million in taxes for returns with the overall limitation. For 1972, foreign taxes exceeded taxable income from foreign sources on returns with the per-country limitation which were classified in manufacturing. This was the result of a carryover of about \$754 million.

LIMITATIONS OF THE FOREIGN TAX CREDIT STATISTICS

Scope of Foreign Income Covered

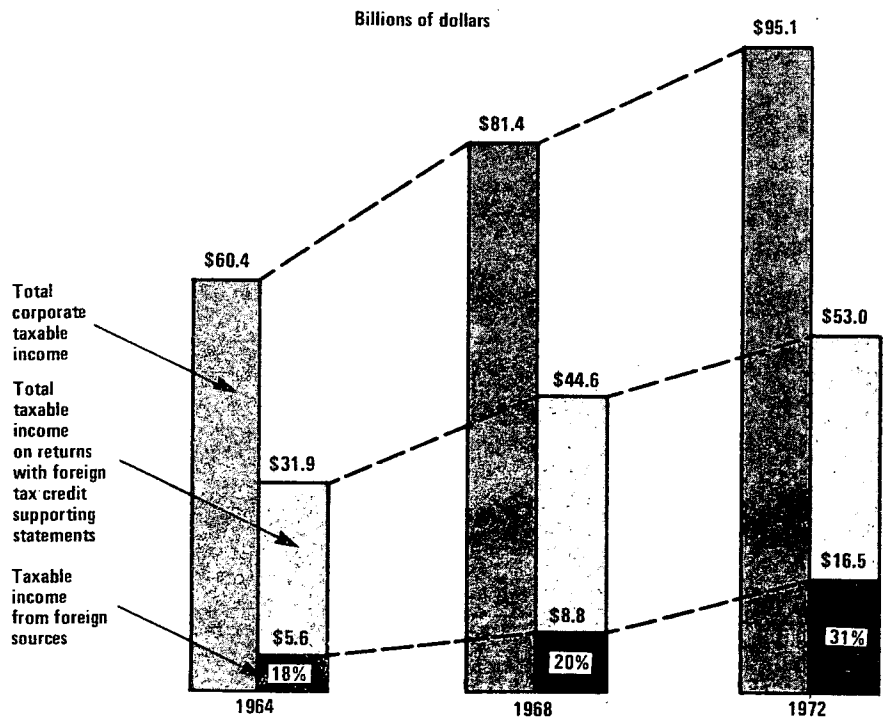
The sources of the data on foreign income included in this report and the components of foreign income reported on these sources were:

(1) Forms 1120, 1120F, 1120L, and 1120M, filed by corporations, which included all foreign income covered in the scope of this report but specifically identified only dividends received from foreign corporations, "foreign dividend gross-up," and includable income of Controlled Foreign Corporations; and

(2) Form 1118, filed in support of foreign tax credit claimed, which provided taxable income from foreign sources in Schedule A (see the copy of Form 1118 in Section 5).

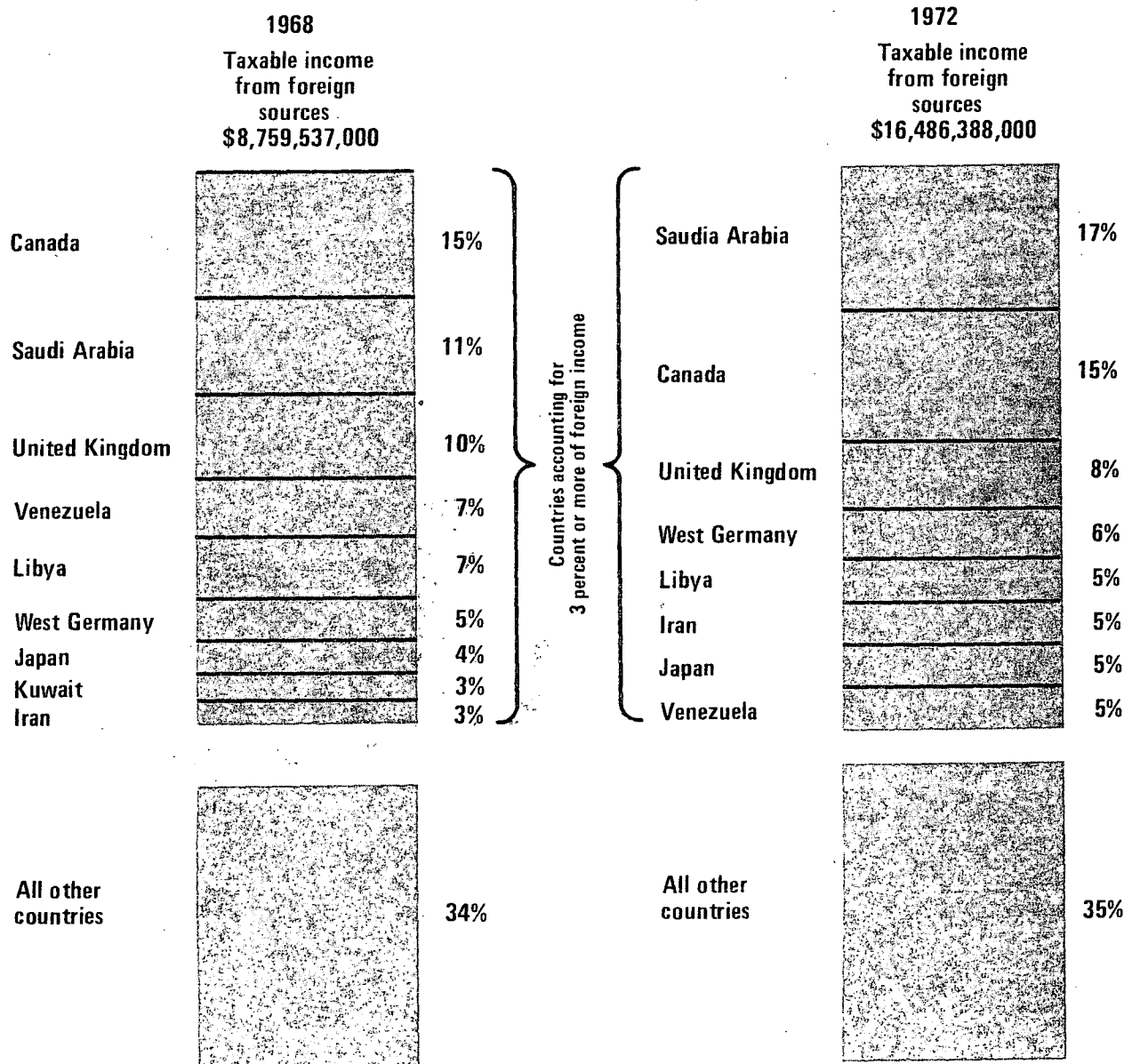
Taxable income from foreign sources included mostly the profits from foreign branch operations and dividends received from foreign corporations (including "gross-up"). However, it also included other types of income: income from sales of real property, rents, interest, royalties, license fees, compensation for services, and partnership income from joint ventures. Since the Form 1118 did not require separate reporting for these components, taxpayers generally did not identify these different kinds of income. However, the major portion of the dividend component of taxable income from foreign sources could be obtained from Schedule B of Form 1118 which showed dividends paid to the U.S. corporation by related (or first-tier) foreign corporations, i.e., foreign corporations in which the

Chart 1C. Total taxable income¹ and taxable income from foreign sources, 1964, 1968, and 1972



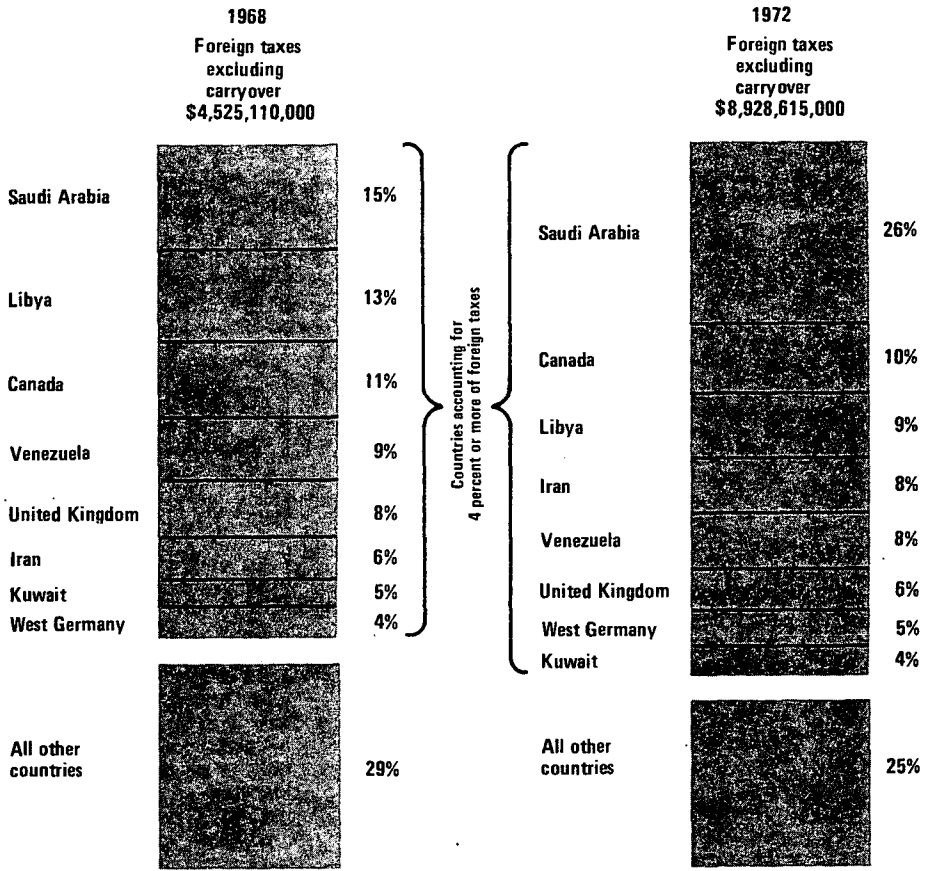
¹ Equals income subject to U.S. tax in the statistics.

Chart 1D. Percent distribution of taxable income from foreign sources, by selected country, 1968 and 1972.



Note: Figures may not add to 100 percent because of rounding.

Chart 1E. Percent distribution of foreign taxes by selected country, 1968 and 1972 .



Note: Figures may not add to 100 percent because of rounding.

Foreign Tax Credit on Corporation Returns

Table 1A.--Returns With Form 1118 Filed in Support of Foreign Tax Credit Claimed: Number of Returns, Foreign Income, Taxes, and Credit, by Credit-Limitation Method and by Selected Industrial Division, 1968 and 1972

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

Selected industrial division	Number of returns		Taxable income from foreign sources		Foreign taxes (including carryover)		Foreign tax credit claimed	
	1968	1972	1968	1972	1968	1972	1968	1972
Returns with overall limitation								
All industrial divisions.....	2,058	2,447	6,288	13,343	3,926	7,313	2,566	5,195
Mining.....	18	33	1,028	2,960	1,494	2,670	536	1,411
Construction.....	20	32	42	82	12	29	11	23
Manufacturing.....	1,107	1,260	4,284	8,383	2,145	4,014	1,766	3,249
Transportation, communication, electric, gas, and sanitary services.....	59	59	157	181	21	48	20	39
Wholesale and retail trade.....	249	249	145	257	63	143	57	95
Finance, insurance, and real estate.....	469	660	542	1,390	156	381	149	356
Services.....	132	143	90	89	35	28	26	22
Returns with per-country limitation								
All industrial divisions.....	4,139	3,051	2,472	3,143	2,091	3,368	1,090	1,111
Mining.....	69	93	234	87	343	69	106	31
Construction.....	55	43	74	5	37	2	35	1
Manufacturing.....	1,454	1,084	1,812	2,516	1,523	3,002	837	921
Transportation, communication, electric, gas, and sanitary services.....	80	52	27	32	15	19	8	12
Wholesale and retail trade.....	731	380	128	235	118	210	55	99
Finance, insurance, and real estate.....	1,416	1,100	135	236	32	50	27	37
Services.....	314	255	22	29	8	15	7	9

U.S. corporation owned at least 10 percent of the voting stock.

Relationship of U.S. Corporation Statistics to Country Statistics

Certain financial statistics for the U.S. corporation, such as total assets, net income, income subject to U.S. tax, U.S. income tax before credits, and total foreign income and taxes are presented for each country to which taxable income was attributed or foreign taxes were paid. Although these statistics indicate

the characteristics of U.S. corporations with operations in a particular country, they cannot be added to any meaningful totals since many companies operate in a number of countries. Table 14 presents data for 1968 on the number of countries for which foreign income or taxes were reported.

Industrial classification of data on foreign income and taxes was based solely on the principal business activity of the U.S. corporation rather than on the

activity of the foreign branch or subsidiary. To the extent that the activity of the foreign branch or subsidiary differed from the activity of the U.S. corporation, the industry classification of the data does not accurately reflect the actual foreign industrial activity.

Coverage

Form 1118, or a taxpayer statement submitted in lieu of it, was filed in support of the

foreign tax credit claimed and was the source of the data on foreign income and taxes. For some corporations, neither was available with the return at the time it was filed. However, the foreign tax credit claimed on returns without Form 1118 (either at time of filing or after followup to obtain missing data) was only 0.2 percent of the total foreign tax credit claimed for 1968 and 0.1 percent of the total for 1972. Consistent with the finding of negligible foreign tax credit on returns without Form 1118 are the data in table 20 which show that, for 1972, most of the returns without this form had less than \$1 million in total assets and only 15 such returns had total assets of \$250 million or more. Table 22 shows that only two returns with foreign tax credit of \$500,000 or more lacked a Form 1118. Therefore, although there was some understatement in the number of returns, the effect on the dollar amounts shown is negligible.

Since corporations had the option of taking a deduction from gross income for foreign income taxes, instead of claiming a credit against their U.S. income tax, Form 1118 was not filed by corporations taking the deduction. However, because it was generally more advantageous to claim a credit against tax rather than reduce income by a deduction, it is probable that the number of corporations taking the deduction as well as the foreign income and taxes involved were negligible.

Besides the problem of nonresponse and of corporations taking a deduction instead of a credit, there was an additional situation whereby corporations with foreign income and taxes operated at a deficit and so had no U.S. tax liability and, consequently, no foreign tax credit. Although some filed a Form 1118 to establish a basis for carrying over unused foreign taxes to other years, data from these forms were not used for the statistics. This was because, by definition, the statistics were limited to returns with foreign tax credit. However, an indication of how little these corporations might have contributed to the foreign income and tax statistics may be obtained from the fact that they reported less than \$90 million in total foreign dividends received, "foreign dividend gross-up," and includable income of Controlled Foreign Corporations out of the \$6.6 billion of such income reported on all returns for 1972.

In addition, a small amount of undercoverage resulted from not using the Forms 1118 filed by regulated investment companies

electing to allow their shareholders to claim the credit for the foreign taxes paid by these companies.

Understatement or Overstatement of Specific Items of Data

As previously mentioned, the data in this report are before audit adjustments. In addition, some corporations, including several claiming large foreign tax credits, specifically indicated that the information provided on their Form 1118 was estimated because all of the necessary information on the corporation's foreign operations, including the receipts for foreign taxes paid, was not available at the time the corporation filed its tax return.

When Forms 1118 contained incomplete or inconsistent data, it was possible in some instances to complete or estimate the data based on logical relationships among items both on the foreign tax credit computation schedule itself and on the corporation income tax return and other forms and schedules filed with it. In the case of large returns (generally those with a foreign tax credit of \$100,000 or more), if the data on the Form 1118 could not be completed during statistical processing, a field followup procedure was implemented to obtain the needed data from the Internal Revenue district office where the return was filed.

For 1972, the followup was much more extensive than for 1968. In response to the followup, the data received were not only more complete than those originally reported by the taxpayer, but for 1972, in several instances the amount of foreign tax credit claimed had already been revised either by amended data or as a result of audit and so was different from that reported by the corporation on its return as originally filed. Consequently, the amount of foreign tax credit claimed shown in this report is slightly different from the amount shown in Statistics of Income--1972, Corporation Income Tax Returns; however, the difference was less than 0.1 percent.

Also, for both 1968 and 1972, the data for foreign dividends, "foreign dividend gross-up", and includable income of Controlled Foreign Corporations shown in this report reflect more complete taxpayer reporting as a result of the followup and verification during statistical processing of the relationship of these data items with related items reported in the foreign tax credit computation schedule. Consequently,

because the statistical processing for this report occurred at a later time than that for Statistics of Income--Corporation Income Tax Returns, there are some differences, although mostly of a minor nature, between data in the Statistics of Income reports and data in this supplemental report.

The understatement or overstatement of specific items and the adjustments to correct some of these situations are described below.

Foreign income

A. All returns

In some instances, total taxable income from foreign sources was reported without its being distributed by country. In those cases where no additional information could be obtained (primarily through field followup) and where foreign taxes but not income were reported by country, the tax data and the tax rates for the particular country were used insofar as possible to estimate the income for each country. Less estimating of this sort was necessary for 1972 than for 1968 since, as noted above, the field followup was more extensive for 1972 than for 1968. When income could not be allocated to a geographic area or a specific country, it was included in the statistics for "Country not stated or not allocable and other income from outside the United States."

B. Returns with per-country limitation

Some corporations using the per-country limitation in the computation of their foreign tax credit did not report the taxable income derived from particular countries because the instructions for completion of Form 1118 did not require the reporting of income unless there were eligible foreign taxes associated with the income. For purposes of tax administration, there was no need for this information to be reported since there could be no foreign tax credit claimed if there were no foreign taxes paid.

Likewise, not all corporations reported their losses and, consequently, the data on loss operations were incomplete. Because there was no way of knowing how complete the loss data on Form 1118 were, for 1968, when losses were reported they were excluded from the statistics. This practice was followed even in those instances when taxes were reported in connection with the loss, since under the per-country limitation these taxes could not

be used for foreign tax credit purposes. (The loss was based on U.S. tax law definitions; under foreign tax law, the loss may well have been defined as income; see "Differences in income concepts" below.) In both of these situations, neither the loss nor the taxes were used for the statistics. However, the decision to exclude these reported losses from the statistics resulted in overstating the net amount shown for taxable income from foreign sources for 1968.

To remedy the latter shortcoming, it was decided for the later years to revert to previous practice by including losses (and taxes) in the statistics whenever they were reported by the corporation. (This was the practice used for the statistics for years prior to 1968.) As a result, statistics for taxable income from foreign sources after 1968, both in total and (for 1972) by country, reflect whatever losses were reported and are, therefore, not altogether comparable with 1968. It should be noted, however, that even though the data for taxable income are more complete beginning with 1969, they are still incomplete to the extent that corporations with losses may not have bothered to report them to start with, inasmuch as the losses, with or without taxes, were not relevant to the foreign tax credit under the per-country limitation. To this extent, the net totals for taxable income from foreign sources for 1969, 1970, and 1972 are still somewhat overstated in relation to corporations' total net taxable income from all sources.

Foreign taxes

Some taxpayers reported their eligible foreign taxes only in total without distinguishing among the three components--taxes paid or accrued, taxes deemed paid, and taxes carried over from prior years which were in excess of the foreign tax credit allowable for the years involved. In these cases, data were estimated from logical relationships among items on returns for the current or prior years. For example, when no dividends from related foreign corporations were reported and no excess taxes were reported for the last 2 immediately preceding years it was presumed that there were no foreign taxes either deemed paid or carried over.

Some taxpayers separately reported two of the components of foreign taxes, taxes paid or accrued and taxes deemed paid, but did not allocate them separately

according to the countries to which they were paid. For taxpayers using the per-country limitation, the amount of foreign tax credit attributed to each country served as a guide in allocating the amount of taxes applicable to each country.

Some understatement of foreign taxes occurred because corporations filing consolidated returns that took both the Western Hemisphere Trade Corporation deduction and the foreign tax credit using the overall limitation method were subject to an additional restriction in computing the credit under Code section 1503(b). This is discussed further under "Qualifications and benefits of Western Hemisphere Trade Corporations" in Section 2.

An additional source of understatement of foreign taxes resulted from the fact that for taxable years beginning after December 31, 1969, the foreign tax credit for taxes paid or accrued on foreign mineral income was reduced to the extent that foreign taxes exceeded U.S. taxes on that income, and the excess was due to the percentage depletion allowance. This is discussed further in this section under the Tax Reform Act of 1969.

The absence of the requirement to show taxes carried over from prior years by country on returns with the overall limitation method resulted in the absence of data on both total foreign taxes and carryover by country. Likewise, since foreign tax credit was not computed on a country basis on these returns, data on foreign tax credit by country were only available for returns with the per-country limitation. However, on returns with the overall limitation on which a foreign tax credit was also taken for taxes on certain interest income, data on carryover, total foreign taxes, and foreign tax credit were available by country for this type of income alone. This was because the law required that the credit for such taxes be computed separately on a per-country basis.

Because Statistics of Income is based on returns as originally filed, the amount of excess foreign taxes carried back from the two succeeding years for inclusion in a recomputed foreign tax credit for 1968, 1969, 1970, and 1972 is not available. Therefore, the statistics for foreign taxes and the foreign tax credit for each of these years are necessarily incomplete.

Differences in Income Concepts

Taxable income from foreign sources was gross income (including certain income "construc-

tively," although not "actually," received, i.e., "foreign dividend gross-up" and includable income of Controlled Foreign Corporations) less allocable deductions determined under the Internal Revenue Code and by provisions of any tax treaty between the United States and a particular foreign country. This taxable income was the base on which U.S. taxes on foreign earnings were determined. It could differ from the net profit from overseas business operations and investments computed under foreign tax law which was used as the basis for foreign taxation.

Net income for U.S. tax purposes, as shown in the statistics, was generally larger than taxable income mostly because of the statutory special nonbusiness deductions allowed the majority of corporations in computing taxable income (see "Income subject to U.S. tax" in the Explanation of Terms). Thus, Western Hemisphere Trade Corporations, for example, could reduce their taxable income from foreign sources by taking a deduction of 29 percent (for 1972) of the income earned in countries in the Western Hemisphere in which they were operating. Therefore, because taxable income in the statistics was less than net income, Form 1118, which reflects taxable income from foreign sources, understates the corresponding net income from foreign operations.

Country Classification

Taxable income shown on Form 1118 was generally reported for each country on the basis of the "source of income" rules in Code sections 861 through 864 and the regulations pertaining to these Code sections. Although there were tax treaties with various countries covering sources of income, the source rules in most treaties were similar to those found in the Code. A summary of the principles in these Code sections used in the allocation of foreign income appears in the Explanation of Terms under "Geographic classification: area or country."

Based on the "source of income" rules, foreign income and taxes attributed to a particular country may have included both income derived from, and taxes paid and deemed paid to, other countries. For example, when a U.S. corporation owned 10 percent or more of the stock of a foreign corporation, all of the dividends received from this related foreign corporation plus the foreign taxes paid directly by the U.S. corporation and the foreign taxes deemed paid by it on the dividend

income were attributed to the country in which the related foreign corporation was incorporated.

This rule applied under two different sets of circumstances. If the related foreign corporation received income from branches or other operations in another country, the dividends paid by it were held to be derived entirely from the country of incorporation. The fact that the profits out of which they were paid were derived from another country was not relevant in determining the source of the dividend income. Similarly, if the related foreign corporation owned 50 percent or more (10 percent after January 12, 1971) of the stock of foreign corporations incorporated in another country, the dividends received from the related foreign corporation were held to be derived entirely from its country of incorporation, although part or all of its total profit was derived in the form of dividends from its foreign subsidiaries in other countries.

Consequently, the 1968 statistics for "Dividends paid to related foreign corporations by subsidiaries" and the 1972 statistics for "Dividends paid to related foreign corporations by second-tier foreign corporations" were classified by the related foreign corporation's country of incorporation even though these second-tier foreign corporations may have been incorporated in countries other than those in which the related foreign corporation was incorporated. As a result of the addition of third-tier foreign corporations to the foreign tax credit structure after January 12, 1971, the 1972 statistics also include data for "Dividends paid by third-tier foreign corporations to second-tier foreign corporations" and these data were also classified by the related foreign corporation's country of incorporation.

However, it should be noted that there were some instances where a U.S. corporation reported in Schedule A, Form 1118, that taxes were paid on dividends received from a related foreign corporation to the country in which the foreign corporation's

principal place of business was located and that the place of business was different from the country of incorporation shown in Schedule B, Form 1118. In these cases, for statistical purposes, the country in which the foreign operations were located and to which the taxes were paid was determined to be the source of the dividends rather than the country of incorporation of the foreign corporation paying the dividends. The foreign taxes deemed paid reported in Schedule B were also attributed to the country shown in Schedule A, and the data were classified in this manner in the tables. There were, however, relatively few instances where this situation was identified on the Form 1118.

Taxes on income from branch operations and on other receipts such as portfolio dividends, royalties, and interest, were generally reported for the country to which the taxes were actually paid.

Branch profits derived from a manufacturing operation were allocated in part to the country in which the manufacturing took place and in part to the country in which the sale of manufactured goods was consummated. In contrast, profits derived from mining operations were ordinarily attributed to the country in which the natural deposits were mined or extracted. Therefore, part of the income attributed to countries in which mining or extraction of natural deposits was the major source of income, such as Saudi Arabia, Venezuela, Iran, and Kuwait, was earned by sales made in other countries. In 1968-1972, as well as in prior years, corporations engaged in mining operations abroad accounted for a substantial part of branch profits.

In the tables with data classified by country, there is an additional classification, based on the country's stage of economic development, which groups the countries into economically developed countries and economically less-developed countries. The statistics for economically less-developed countries include data for some corporations which were not economically less-developed country corporations.

Although a country may have been classified as a less-developed country on the basis of the provisions of Code section 955(c)(3) and Executive Order 11071 (which designated the countries considered economically less developed), incorporation in such a country did not automatically qualify a foreign corporation for "less-developed country corporation" status, as defined in section 955(c)(1). Generally speaking, an economically less-developed country corporation was a foreign corporation engaged in the active conduct of a trade or business, deriving at least 80 percent of its gross income from sources within, and having at least 80 percent of its assets located within economically less-developed countries. (For the rules concerning shipping and aircraft companies, see "Economically developed and less-developed countries" in the Explanation of Terms.) In addition, for purposes of the foreign tax credit, Code section 902(d) provided that a foreign corporation which owned at least 10 percent of the voting stock of an economically less-developed country corporation and which met both of the 80 percent tests specified above was also itself considered to be an economically less-developed country corporation.

For 1972, the tables with data classified by country show an additional grouping, "DISC dividends." Dividends deemed or actually paid by a Domestic International Sales Corporation (DISC) were treated as dividends from a foreign corporation to the extent the dividends were attributable to certain export receipts of the DISC and a foreign tax credit could be claimed for the foreign taxes related to these dividends. As can be seen in Schedule A of Form 1118, the foreign tax credit for DISC dividends received was computed separately for the sum of these dividends and no country information was required. Consequently, in the tables presenting data by country, DISC dividends are shown as a separate category in the classification otherwise used for geographic groupings because DISC dividends could not be classified by country.

RETURNS WITH FOREIGN TAX CREDIT

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

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

Major Industry	Returns with and without Form 1118 statements filed in support of credit claimed								
	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Income subject to U.S. tax	U.S. income tax before credits	Investment credit
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
All Industries	7,110	916,884,244	47,593,591	2,044,221	67,497	967,586	45,185,243	23,251,491	1,368,749
Agriculture, forestry, and fishery	59	629,446	68,282	2,462	7	713	57,145	29,076	404
Mining	107	8,086,464	1,502,796	78,887	312	12,003	1,427,942	749,012	24,384
Metal mining	15	3,772,817	288,977	67,236	312	11,046	234,048	121,215	8,534
Coal and nonmetallic minerals (except fuels) mining	20	1,615,920	87,148	4,239	—	—	73,357	37,509	10,688
Crude petroleum and natural gas	72	2,697,727	1,126,671	7,412	—	957	1,120,537	590,288	5,162
Contract construction	75	2,990,468	251,836	12,154	58	6,559	236,753	120,176	7,278
Manufacturing	2,810	341,995,884	33,432,578	1,782,424	49,431	867,721	31,677,862	16,452,733	964,388
Food and kindred products	154	18,887,192	2,132,693	141,148	4,387	95,220	2,101,649	1,085,406	50,218
Tobacco manufactures	10	2,808,077	323,626	2,940	2,074	1,968	318,116	167,936	2,160
Textile mill products	72	6,193,376	443,134	4,517	—	1,263	434,973	223,915	13,702
Apparel and other fabricated textile products	226	3,620,957	258,622	7,140	381	5,166	250,895	125,172	4,508
Lumber and wood products, except furniture	28	3,779,508	317,418	2,779	137	373	329,204	105,920	17,987
Furniture and fixtures	51	401,781	69,346	509	—	466	69,186	36,304	677
Paper and allied products	57	9,554,810	894,448	45,480	369	32,061	859,784	405,341	42,737
Printing and publishing	175	5,491,596	772,019	16,623	362	12,513	753,602	378,856	12,262
Chemicals and allied products	391	35,477,894	4,903,662	300,771	21,656	183,070	4,794,157	2,450,812	143,140
Petroleum refining and related industries	33	70,822,806	4,056,538	477,316	298	62,161	3,280,822	1,691,910	171,864
Rubber and miscellaneous plastics products	56	6,692,932	674,967	75,767	152	14,562	659,177	345,177	25,263
Leather and leather products	22	1,229,803	115,917	1,511	—	314	102,375	53,186	2,491
Stone, clay, and glass products	76	6,715,549	591,707	29,935	249	13,371	571,612	295,049	24,543
Primary metal industries	127	33,148,827	1,543,078	63,247	1,861	21,228	1,328,571	684,655	68,392
Fabricated metal products, except machinery and transportation equipment	326	12,452,594	1,325,949	53,893	2,091	35,706	1,301,414	668,429	34,539
Machinery, except electrical	471	25,970,255	3,835,604	166,917	9,466	117,115	3,790,701	1,977,430	61,390
Electrical equipment and supplies	200	27,178,401	2,599,282	111,528	1,128	53,077	2,569,967	1,328,517	75,553
Motor vehicles and equipment	84	41,982,621	5,487,018	174,998	1,411	134,395	5,424,787	2,854,375	82,513
Transportation equipment, except motor vehicles	53	18,774,247	1,230,675	11,596	141	8,519	1,116,532	584,001	85,690
Scientific instruments, photographic equipment, watches and clocks	76	7,438,246	1,517,607	63,972	1,735	68,149	1,514,994	794,328	20,350
Miscellaneous manufactured products, and manufacturing not allocable	95	3,374,418	329,268	9,837	1,533	7,024	306,370	155,414	4,389
Transportation, communication, electric, gas, and sanitary services	218	91,223,685	5,461,422	16,634	3,720	8,455	5,345,166	2,763,019	280,378
Transportation	170	27,807,198	699,515	4,001	3,564	2,365	652,402	320,688	106,504
Communication	11	50,279,987	4,334,547	10,478	141	4,595	4,282,232	2,244,697	132,327
Electric, gas, and sanitary services	37	13,136,500	427,360	2,155	15	1,495	410,532	197,634	41,547
Wholesale and retail trade¹	1,167	22,720,460	1,790,289	76,935	3,511	34,946	1,749,213	903,602	28,224
Wholesale trade	858	11,017,012	675,610	36,494	3,454	8,509	648,340	325,137	10,348
Groceries and related products	53	761,572	84,133	2,662	240	1,925	82,149	42,680	1,435
Machinery, equipment, and supplies	195	1,208,309	97,785	680	—	55	92,908	46,170	1,730
Miscellaneous wholesale trade	610	9,047,131	493,692	33,152	3,214	6,529	473,287	236,297	7,183
Retail trade	308	11,668,926	1,111,637	40,381	57	26,437	1,097,832	576,875	17,801
Building materials, hardware, and farm equipment	44	32,954	4,927	6	—	—	4,380	2,103	58
General merchandise stores	15	9,627,967	863,576	38,876	—	26,147	856,940	452,239	11,135
Food stores	6	1,444,484	197,406	688	—	199	196,434	103,237	5,710
Automotive dealers and service stations	14	8,374	(¹)	—	—	—	(¹)	(¹)	—
Apparel and accessory stores	122	79,973	4,926	(¹)	—	—	3,356	1,243	129
Furniture, home furnishings, and equipment stores	26	89,641	2,096	10	—	—	1,927	880	28
Eating and drinking places	29	195,287	17,118	105	57	91	14,102	6,696	328
Miscellaneous retail stores	53	190,246	21,588	696	—	—	20,693	10,477	413
Finance, insurance, and real estate	2,119	442,174,510	4,554,685	51,055	7,890	23,327	3,977,258	1,979,936	53,566
Banking	194	231,335,207	947,962	9,345	3	3,991	910,813	465,466	25,837
Credit agencies other than banks	116	17,862,714	197,787	1,557	991	1,867	177,884	90,504	14,316
Security and commodity brokers, dealers, exchanges, and services	55	5,894,079	290,506	3,296	6,637	1,323	285,854	144,484	1,060
Holding and other investment companies	837	4,089,410	410,780	26,215	99	13,756	213,999	76,088	261
Insurance carriers	213	181,286,407	2,555,985	8,741	160	1,041	2,246,844	1,138,170	11,311
Insurance agents, brokers, and service	79	364,254	51,547	1,360	—	1,347	48,629	25,233	296
Real estate	625	1,342,439	100,118	541	—	2	93,235	39,991	485
Services	555	7,063,327	531,703	23,670	2,568	13,862	513,904	253,937	10,127
Hotels and other lodging places	18	797,720	80,809	3,601	—	2,200	77,340	31,161	717
Personal services	13	197,962	30,943	560	68	586	29,675	15,163	627
Business services	252	2,835,838	264,362	9,291	156	5,330	257,708	133,920	3,850
Automobile services, and miscellaneous repair services	35	93,497	3,402	95	—	71	3,328	1,802	133
Amusement and recreation services	102	2,907,264	123,153	8,749	2,344	4,611	119,623	59,148	4,605
Other services	136	231,046	29,034	1,374	—	1,064	26,230	12,943	195
Nature of business not allocable	—	—	—	—	—	—	—	—	—

Footnotes at end of table.

RETURNS WITH FOREIGN TAX CREDIT

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

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

Major industry	Returns with and without Form 1118 statements filed in support of credit claimed—Continued		Returns with Form 1118 statements filed in support of credit claimed								
	Foreign tax credit claimed		Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed
	Total amount	Consolidated returns									
	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)
All Industries	3,663,820	3,042,894	6,196	900,953,730	46,839,271	2,036,762	67,173	966,140	44,573,941	22,941,938	3,656,530
Agriculture, forestry, and fishery	14,657	14,579	22	610,170	67,363	2,462	7	713	56,226	28,829	14,636
Mining	642,027	603,686	87	7,929,342	1,496,051	78,882	312	12,003	1,421,658	746,270	642,012
Metal mining	82,627	51,348	15	3,772,817	288,977	67,236	312	11,046	234,048	121,215	82,627
Coal and nonmetallic minerals (except fuels) mining	9,996	9,649	18	1,562,272	84,032	4,234	—	—	70,651	36,201	9,993
Crude petroleum and natural gas	549,404	542,689	55	2,594,253	1,123,042	7,412	—	957	1,116,959	588,854	549,392
Contract construction	46,692	28,180	75	2,990,468	251,836	12,154	58	6,559	236,753	120,176	46,692
Manufacturing	2,607,751	2,224,326	2,561	338,463,138	33,097,314	1,778,098	49,107	866,628	31,550,275	16,283,919	2,602,852
Food and kindred products	157,901	104,860	148	16,763,010	2,111,105	141,148	4,387	95,220	2,080,122	1,074,150	157,842
Tobacco manufactures	4,689	2,647	10	2,808,077	323,626	2,940	2,074	1,968	318,116	167,936	4,689
Textile mill products	5,439	1,033	71	6,176,326	440,447	4,517	—	1,263	432,367	222,543	5,437
Apparel and other fabricated textile products	9,130	7,027	140	3,585,923	244,478	7,140	381	5,166	236,753	117,698	9,024
Lumber and wood products, except furniture	2,183	1,746	28	3,779,506	317,418	2,779	137	373	329,204	105,920	2,183
Furniture and fixtures	657	18	31	381,255	61,453	509	—	466	61,293	32,159	654
Paper and allied products	44,079	36,503	55	9,503,556	888,129	45,427	369	32,033	853,445	402,044	44,039
Printing and publishing	19,787	16,174	127	5,264,615	746,292	16,549	362	12,511	729,425	366,776	19,676
Chemicals and allied products	309,463	206,569	380	34,887,168	4,829,606	298,742	21,656	182,649	4,720,660	2,452,620	308,743
Petroleum refining and related industries	1,060,165	1,055,849	32	70,586,525	4,052,092	477,316	298	62,161	3,276,450	1,690,041	1,059,971
Rubber and miscellaneous plastics products	50,004	351	56	6,692,932	674,967	75,767	152	14,562	659,171	345,177	50,004
Leather and leather products	1,050	233	21	1,229,803	115,256	1,511	—	—	101,714	52,640	1,049
Stone, clay, and glass products	25,002	12,394	75	6,703,478	590,205	29,935	249	13,371	570,110	294,262	24,993
Primary metal industries	232,009	214,623	125	32,930,612	1,520,810	83,215	1,861	21,217	1,306,336	673,142	231,776
Fabricated metal products, except machinery and transportation equipment	61,590	41,184	294	12,035,793	1,288,714	53,842	1,944	35,641	1,265,332	649,688	61,304
Machinery, except electrical	196,627	146,061	456	25,620,895	3,798,716	166,808	9,466	117,017	3,754,143	1,958,349	196,311
Electrical equipment and supplies	117,032	222	222	26,260,731	2,563,330	110,014	951	52,717	2,533,181	1,310,734	114,802
Motor vehicles and equipment	190,805	180,779	75	41,782,813	5,464,924	174,604	1,411	134,344	5,395,201	2,839,503	190,262
Transportation equipment, except motor vehicles	18,911	16,220	51	18,760,397	1,229,974	11,596	141	8,519	1,115,832	583,648	18,911
Scientific instruments, photographic equipment, watches and clocks	89,930	80,296	74	7,376,171	1,511,906	63,903	1,735	68,092	1,509,293	791,429	89,837
Miscellaneous manufactured products, and manufacturing not allocable	11,298	3,081	92	3,333,550	323,866	9,836	1,533	7,024	302,107	153,260	11,284
Transportation, communication, electric, gas, and sanitary services	28,375	20,194	139	91,107,637	5,449,736	16,629	3,720	8,455	5,335,018	2,758,100	28,009
Transportation	13,977	7,321	116	27,731,149	691,427	4,001	3,564	2,365	645,786	317,565	13,630
Communication	12,037	11,944	11	50,279,987	4,334,547	10,478	141	4,595	4,282,232	2,244,697	12,037
Electric, gas, and sanitary services	2,361	929	12	13,096,501	423,762	2,150	15	1,495	407,000	195,838	2,342
Wholesale and retail trade ¹	113,362	55,715	981	21,415,775	1,619,391	76,659	3,511	34,855	1,581,571	816,300	112,743
Wholesale trade	76,384	53,285	827	10,930,851	667,385	36,494	3,454	8,509	640,654	321,649	75,938
Groceries and related products	2,997	352	34	748,689	82,451	2,662	240	1,925	80,483	41,923	2,983
Machinery, equipment, and supplies	2,973	1,371	194	1,133,145	96,686	680	—	55	91,789	45,586	2,972
Miscellaneous wholesale trade	70,414	51,562	599	8,989,017	488,248	33,152	3,214	6,529	468,382	234,141	69,983
Retail trade	36,947	2,399	154	10,484,924	952,026	40,165	57	26,346	940,917	494,651	36,805
Building materials, hardware, and farm equipment	420	3	9	26,368	4,655	6	—	—	4,109	1,903	404
General merchandise stores	34,572	1,382	8	8,597,688	715,942	38,765	—	26,147	711,385	375,430	34,551
Food stores	1,091	697	6	1,444,484	197,406	688	—	199	196,434	103,237	1,091
Automotive dealers and service stations	—	—	—	—	—	—	—	—	—	—	—
Apparel and accessory stores	1	—	84	54,985	3,190	(9)	—	—	1,620	466	1
Furniture, home furnishings, and equipment stores	36	8	6	85,850	2,077	10	—	—	1,908	880	36
Eating and drinking places	349	309	22	90,841	8,966	—	57	—	6,567	3,161	244
Miscellaneous retail stores	478	—	18	184,708	19,790	696	—	—	18,895	8,574	478
Finance, insurance, and real estate	177,557	72,974	1,885	431,642,114	4,340,102	48,661	7,890	23,114	3,890,803	1,939,621	176,276
Banking	87,978	60,688	168	225,003,353	925,052	8,953	3	3,778	890,343	455,031	87,642
Credit agencies other than banks	12,232	1,227	90	17,322,659	191,014	1,557	991	1,867	175,534	89,410	12,115
Security and commodity brokers, dealers, exchanges, and services	2,253	572	54	5,796,277	279,467	2,133	6,637	1,323	275,766	140,255	2,031
Holding and other investment companies	24,613	200	807	3,582,348	291,506	25,423	99	13,756	205,455	73,613	24,383
Insurance carriers	48,449	8,879	196	178,298,041	2,504,872	8,722	160	1,041	2,205,032	1,117,281	48,091
Insurance agents, brokers, and service	1,643	1,354	79	364,254	51,547	1,360	—	1,347	48,629	25,233	1,643
Real estate	389	54	491	1,275,182	96,644	513	2	2	90,044	38,798	371
Services	33,399	23,240	446	6,785,086	517,418	23,217	2,568	13,813	501,637	248,723	33,310
Hotels and other lodging places	4,261	755	17	751,533	76,746	3,601	—	2,200	74,063	30,260	4,261
Personal services	810	—	13	197,962	30,943	560	68	586	26,675	15,163	810
Business services	10,546	8,325	194	2,643,245	254,228	8,838	156	5,281	248,806	129,625	10,457
Automobile services, and miscellaneous repair services	107	—	35	93,497	3,402	95	—	71	3,328	1,602	107
Amusement and recreation services	15,369	12,448	102	2,907,264	123,153	8,749	2,344	4,611	119,623	59,148	15,369
Other services	2,306	1,712	86	201,585	28,946	1,374	—	1,064	26,142	12,925	2,306
Nature of business not allocable	—	—	—	—	—	—	—	—	—	—	—

Footnotes at end of table.

Foreign Tax Credit on Corporation Returns, 1968

RETURNS WITH FOREIGN TAX CREDIT

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

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

Major industry	Returns with Form 1118 statements filed in support of credit claimed—continued										
	Taxable income from foreign sources			Foreign Taxes					Foreign tax credit computed		Dividends paid to related foreign corporations by subsidiaries
	Total (less loss) ¹	Dividends from related foreign corporations	Interest for which separate credit was computed	Total	Paid or accrued		Deemed paid	Carryover	Total	For taxes on interest for which separate credit was computed	
					Total	On interest for which separate credit computed					
(21)	(22)	(23)	(24)	(25)	(26)	(27)	(28)	(29)	(30)	(31)	
All Industries	8,759,537	1,948,425	23,946	6,016,934	3,267,023	2,297	1,258,087	1,491,819	3,659,911	2,255	335,660
Agriculture, forestry, and fishery	39,549	1,984	—	14,805	13,726	—	1,079	—	14,636	—	49
Mining	1,261,604	72,289	696	1,837,051	820,160	6	25,305	991,587	642,214	6	22,739
Metal mining	163,433	61,933	653	281,487	73,461	—	19,686	188,340	82,627	—	22,611
Coal and nonmetallic minerals (except fuels) mining	46,775	4,200	43	11,299	7,928	6	3,022	349	9,394	6	—
Crude petroleum and natural gas	1,051,396	6,156	—	1,544,265	738,771	—	2,597	802,898	549,593	—	128
Contract construction	116,209	10,964	84	49,278	40,621	13	7,091	1,565	46,929	13	187
Manufacturing	6,095,716	1,714,017	15,327	3,667,691	2,064,820	1,491	1,133,184	469,886	2,605,354	1,470	223,793
Food and kindred products	359,575	141,789	337	164,224	53,027	36	103,155	8,042	157,843	36	15,299
Tobacco manufactures	18,117	4,979	—	4,951	2,563	—	2,138	250	4,689	—	13,508
Textile mill products	15,427	4,170	—	6,448	3,526	—	1,950	972	5,437	—	76
Apparel and other fabricated textile products	29,472	7,380	51	9,751	4,293	7	5,287	171	9,024	6	1,144
Lumber and wood products, except furniture	9,644	2,753	56	3,567	767	9	969	1,831	2,183	—	492
Furniture and fixtures	1,729	508	—	683	177	—	466	40	654	—	—
Paper and allied products	104,681	44,907	201	48,954	9,194	30	34,082	5,678	44,039	30	705
Printing and publishing	55,716	16,635	71	24,252	6,717	10	12,626	4,709	19,914	9	3,242
Chemicals and allied products	833,345	298,951	2,601	319,610	105,885	430	205,999	7,725	308,745	430	49,624
Petroleum refining and related industries	2,095,739	436,006	1,837	1,793,401	1,399,930	195	235,850	157,621	1,062,156	195	47,148
Rubber and miscellaneous plastics products	124,317	65,225	38	50,317	17,998	5	32,009	310	50,013	5	1,168
Leather and leather products	3,831	1,258	38	1,367	621	3	438	308	1,049	3	1,969
Stone, clay, and glass products	75,522	26,600	566	27,041	7,731	95	16,036	3,273	24,994	93	2,149
Primary metal industries	562,047	82,983	776	503,833	217,817	94	35,445	250,570	231,815	94	14,635
Fabricated metal products, except machinery and transportation equipment	163,982	46,768	2,864	62,854	23,903	148	36,761	2,190	61,306	145	6,874
Machinery, except electrical	573,082	172,793	1,704	208,069	75,831	249	123,429	8,809	196,324	244	18,928
Electrical equipment and supplies	353,614	107,560	2,947	123,057	52,271	79	60,091	10,696	114,804	79	9,343
Motor vehicles and equipment	406,428	167,320	359	193,109	49,226	84	139,737	4,146	190,332	84	19,541
Transportation equipment, except motor vehicles	72,645	11,556	2	19,174	9,503	(7)	9,129	542	18,911	(7)	647
Scientific instruments, photographic equipment, watches and clocks	207,702	63,581	745	90,533	20,574	4	69,659	301	89,837	4	13,983
Miscellaneous manufactured products, and manufacturing not allocable	29,101	10,295	134	12,696	3,266	13	7,728	1,702	11,285	13	3,318
Transportation, communication, electric, gas, and sanitary services	184,218	15,721	534	35,752	18,350	24	9,596	7,805	26,026	24	1,541
Transportation	48,941	6,333	476	19,265	11,055	9	2,397	5,812	13,646	9	—
Communication	124,725	7,957	54	6,279	6,279	11	5,703	35	12,037	11	1,541
Electric, gas, and sanitary services	10,552	1,431	4	4,450	1,016	4	1,496	1,938	2,343	4	—
Wholesale and retail trade ²	272,983	66,330	1,892	180,845	134,850	234	40,371	5,624	112,826	212	3,180
Wholesale trade	192,537	26,386	1,221	141,878	125,469	141	12,927	3,482	76,021	119	1,038
Groceries and related products	8,839	2,568	49	3,195	911	6	2,115	169	2,983	6	—
Machinery, equipment, and supplies	13,134	225	264	3,431	2,930	24	63	439	2,972	2	—
Miscellaneous wholesale trade	170,564	23,595	908	135,252	121,628	111	10,749	2,874	70,066	111	1,038
Retail trade	80,426	39,944	671	38,967	9,381	93	27,444	2,142	36,805	93	2,142
Building materials, hardware, and farm equipment	1,500	—	—	404	404	—	—	—	404	—	—
General merchandise stores	72,952	38,765	124	35,197	7,685	11	26,815	697	34,551	11	2,012
Food stores	2,582	490	544	2,369	581	82	343	1,445	1,091	82	130
Automotive dealers and service stations	—	—	—	—	—	—	—	—	—	—	—
Apparel and accessory stores	312	—	—	1	1	—	—	—	1	—	—
Furniture, home furnishings, and equipment stores	108	—	—	39	39	—	—	—	36	—	—
Eating and drinking places	1,843	—	—	469	469	—	—	—	244	—	—
Miscellaneous retail stores	1,129	689	3	488	202	(7)	286	—	478	(7)	—
Finance, insurance, and real estate	677,000	43,407	5,215	188,084	154,479	482	26,033	7,569	176,303	483	82,617
Banking	322,189	7,938	—	88,379	83,779	—	4,386	214	87,643	—	4,634
Credit agencies other than banks	40,682	2,235	1,575	12,723	10,056	45	1,944	723	12,115	45	3,408
Security and commodity brokers, dealers, exchanges, and services	14,692	8,305	24	2,355	1,031	4	1,323	1	2,030	4	—
Holding and other investment companies	65,264	21,941	485	29,567	10,259	44	15,608	3,698	24,393	44	74,174
Insurance carriers	227,756	1,639	3,095	52,915	48,618	386	1,388	2,909	48,092	387	396
Insurance agents, brokers, and service	4,305	1,339	17	1,702	314	3	1,382	5	1,643	3	7
Real estate	2,112	10	19	443	422	(7)	2	19	387	(7)	—
Services	112,278	23,713	198	43,228	20,017	47	15,428	7,783	33,623	47	1,554
Hotels and other lodging places	9,166	2,954	—	4,300	1,578	—	2,654	68	4,261	—	463
Personal services	1,824	626	—	823	237	—	586	—	810	—	—
Business services	27,996	8,177	53	13,532	4,781	15	6,166	2,585	10,464	15	597
Automobile services, and miscellaneous repair services	295	92	(7)	107	36	—	71	—	107	—	—
Amusement and recreation services	65,704	10,490	145	21,620	11,610	32	4,880	5,130	15,372	32	294
Other services	7,293	1,374	—	2,846	1,775	—	1,071	—	2,609	—	200
Nature of business not allocable	—	—	—	—	—	—	—	—	—	—	—

¹Includes "Wholesale and retail trade not allocable" which is not shown separately.²Less than \$500 per return.³Includes the "gross-up" of certain foreign dividends.

NOTE: See text for explanatory statements and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

RETURNS WITH FOREIGN TAX CREDIT

Table 2.—Number of Returns for Selected Items, By Selected Major Industry

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

Selected major industry	Returns with and without Form 1118 statements filed in support of credit claimed				Returns with Form 1118 statements filed in support of credit claimed						Carryover
	Total number of returns	Dividends received from foreign corporations	Foreign dividend income resulting from foreign taxes deemed paid	Foreign tax credit claimed and filing a consolidated return	Total number of returns	Dividends received from foreign corporations	Foreign dividend income resulting from foreign taxes deemed paid	Dividends from related foreign corporations	Foreign taxes paid or accrued	Taxes deemed paid	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
All Industries	7,110	2,813	864	1,017	6,196	2,662	840	1,002	6,071	1,002	816
Mining	107	51	6	30	87	34	6	13	87	13	42
Metal mining	15	11	4	7	15	11	4	5	15	5	8
Coal and nonmetallic minerals (except fuels) mining	20	10	—	7	18	9	—	3	18	3	6
Contract construction	75	27	11	22	75	27	11	16	75	16	15
Manufacturing	2,810	1,036	636	625	2,561	992	616	721	2,517	721	335
Food and kindred products	154	80	44	41	148	79	43	55	147	55	32
Textile mill products	72	26	12	21	71	26	12	17	68	17	12
Apparel and other fabricated textile products	226	13	8	19	140	13	8	8	140	8	8
Furniture and fixtures	51	5	4	6	31	5	4	4	31	4	5
Paper and allied products	57	30	15	15	55	29	14	19	54	19	9
Printing and publishing	175	100	30	32	127	78	29	33	124	33	10
Chemicals and allied products	391	148	99	90	380	144	96	101	379	101	77
Petroleum refining and related industries	33	22	15	24	32	22	15	19	32	19	16
Rubber and miscellaneous plastics products	56	19	13	10	56	19	13	18	51	18	7
Leather and leather products	22	6	3	3	21	6	3	4	21	4	5
Stone, clay, and glass products	76	31	14	13	75	31	14	18	75	18	19
Primary metal industries	127	80	44	31	125	79	43	52	120	52	9
Fabricated metal products, except machinery and transportation equipment	326	96	51	48	294	94	49	61	293	61	20
Machinery, except electrical	471	177	109	104	456	172	105	122	448	122	47
Electrical equipment and supplies	230	78	73	80	222	75	70	75	216	75	21
Motor vehicles and equipment	84	29	24	21	75	26	22	27	74	27	10
Transportation equipment, except motor vehicles	53	17	15	23	51	17	15	16	50	16	5
Scientific instruments, photographic equipment, watches and clocks	76	44	36	19	74	43	35	42	65	42	7
Miscellaneous manufactured products, and manufacturing not allocable	95	29	18	18	92	28	17	21	92	17	21
Transportation, communication, electric, gas and sanitary services	218	77	14	58	139	57	14	17	139	17	21
Transportation	170	58	7	38	116	44	7	8	116	8	15
Electric, gas, and sanitary services	37	12	4	13	12	7	4	5	12	5	4
Wholesale and retail trade	1,167	304	63	86	981	295	62	73	951	73	166
Wholesale trade	858	266	57	65	827	266	57	66	797	66	159
Machinery, equipment and supplies	195	64	22	16	194	64	22	24	180	24	51
Miscellaneous wholesale trade	610	188	31	36	599	188	31	38	583	38	106
Retail trade	308	36	6	20	154	29	5	7	154	7	7
General merchandise stores	15	9	3	8	8	3	3	3	8	3	4
Apparel and Accessory stores	122	3	—	—	84	3	—	—	84	—	—
Furniture, home furnishings, and equipment stores	26	4	—	5	6	4	—	—	6	—	—
Finance, insurance, and real estate	2,119	1,229	95	98	1,865	1,170	93	110	1,840	110	178
Banking	194	39	10	32	168	35	8	11	167	11	12
Credit agencies other than banks	116	17	7	3	90	17	7	8	89	8	8
Holding and other investment companies	837	505	62	11	807	562	62	66	769	66	95
Insurance carriers	213	62	5	22	196	58	5	8	193	8	16
Insurance agents, brokers, and service	79	65	3	15	79	65	—	8	79	8	5
Services	555	82	38	90	446	78	37	50	440	50	58
Personal services	13	5	3	—	13	5	3	3	13	3	—
Business services	252	41	22	42	194	38	21	31	191	31	38
Amusement and recreation services	102	18	5	28	102	18	5	6	102	6	18

NOTE: See text for explanatory statements and for "Description of the Sample and Limitations of the Data."

Foreign Tax Credit on Corporation Returns, 1968

RETURNS WITH FOREIGN TAX CREDIT

Table 3.—Total Assets, Income, Tax, and Credits, and Foreign Income, Taxes, and Credit, by Size of Total Assets

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

Size of total assets	Returns with and without Form 1118 statements filed in support of credit claimed									
	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations		Includable income of Controlled Foreign Corporations		Foreign dividend income resulting from foreign taxes deemed paid		Income subject to U.S. tax
				Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Total	7,110	916,884,244	47,593,591	2,813	2,044,221	187	67,497	864	967,586	45,185,243
Zero assets	152	—	399,989	47	15,038	6	641	16	5,459	377,796
\$1 under \$50,000	444	9,162	1,677	28	86	5	71	—	—	1,492
\$50,000 under \$100,000	391	30,416	4,403	78	1	5	27	5	11	3,375
\$100,000 under \$250,000	879	151,311	22,624	416	1,195	—	—	17	253	21,208
\$250,000 under \$500,000	604	214,230	38,674	212	860	—	—	14	823	33,045
\$500,000 under \$1,000,000	511	353,384	36,627	237	340	—	—	15	21	32,898
\$1,000,000 under \$5,000,000	1,627	4,055,977	536,828	648	10,263	21	801	121	4,434	495,057
\$5,000,000 under \$10,000,000	429	3,056,010	400,094	153	6,977	6	1,096	50	5,540	381,222
\$10,000,000 under \$25,000,000	588	9,507,928	1,121,260	233	24,777	25	3,562	120	14,010	1,059,512
\$25,000,000 under \$50,000,000	357	12,819,387	1,357,371	156	42,778	24	5,390	86	26,341	1,299,072
\$50,000,000 under \$100,000,000	286	20,500,094	1,971,012	128	70,810	21	13,938	87	48,152	1,902,533
\$100,000,000 under \$250,000,000	355	55,834,849	4,584,667	184	159,980	25	15,022	123	33,141	4,416,645
\$250,000,000 under \$1,000,000,000	311	155,889,051	11,459,759	187	549,229	34	12,778	138	335,361	10,901,189
\$1,000,000,000 or more	176	654,462,445	25,658,606	107	1,161,867	14	14,171	71	434,040	24,259,809

Size of total assets	Returns with and without Form 1118 statements filed in support of credit claimed—Continued			Returns with Form 1118 statements filed in support of credit claimed								
	U.S. income tax before credits	Foreign tax credit claimed	Investment credit	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations		Includable income of Controlled Foreign Corporations		Foreign dividend income resulting from foreign taxes deemed paid	
							Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)
Total	23,251,491	3,663,820	1,368,749	6,196	900,953,730	46,839,211	2,662	2,036,762	185	67,173	840	966,140
Zero assets	196,492	20,138	15,739	144	—	384,066	45	14,972	6	641	16	5,459
\$1 under \$50,000	430	76	—	193	3,061	1,394	23	81	5	71	—	—
\$50,000 under \$100,000	942	508	32	327	25,656	4,241	78	1	5	27	5	11
\$100,000 under \$250,000	7,148	1,162	62	656	117,436	18,776	360	1,195	—	—	17	253
\$250,000 under \$500,000	14,119	1,980	288	532	193,470	37,015	211	879	—	—	14	823
\$500,000 under \$1,000,000	13,615	2,154	155	430	293,685	31,787	212	334	—	—	15	21
\$1,000,000 under \$5,000,000	239,536	25,807	8,267	1,563	3,912,971	522,922	638	10,175	21	801	121	4,434
\$5,000,000 under \$10,000,000	189,143	14,058	5,523	397	2,822,424	381,736	142	6,488	6	1,096	48	5,327
\$10,000,000 under \$25,000,000	534,001	45,220	16,444	539	8,744,088	1,031,791	222	24,071	25	3,562	113	13,890
\$25,000,000 under \$50,000,000	560,394	52,097	21,703	334	11,998,696	1,296,744	149	42,336	24	5,390	84	26,310
\$50,000,000 under \$100,000,000	967,411	98,751	39,534	272	19,411,200	1,860,527	120	68,530	20	13,791	81	47,590
\$100,000,000 under \$250,000,000	2,280,229	224,839	101,544	340	53,586,815	4,500,707	175	157,156	24	14,645	118	92,976
\$250,000,000 under \$1,000,000,000	5,594,542	1,145,208	320,750	296	148,472,260	11,123,935	181	548,677	34	12,778	136	335,006
\$1,000,000,000 or more	12,553,489	2,031,822	840,698	174	651,371,968	25,643,570	107	1,161,867	14	14,171	71	434,040

Footnotes at end of table.

RETURNS WITH FOREIGN TAX CREDIT

Table 3.—Total Assets, Income, Tax, and Credits, and Foreign Income, Taxes, and Credit, by Size of Total Assets — Continued

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

Size of total assets	Returns with Form 1118 statements filed in support of credit claimed — Continued											
	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed	Total (less loss) ¹	Taxable income from foreign sources				Foreign taxes			
					Dividends from related foreign corporations		Interest for which separate credit was computed		Total	Paid or accrued		On interest for which separate credit was computed
					Number of returns	Amount	Number of returns	Amount		Number of returns	Amount	
(23)	(24)	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)	(33)	(34)	
Total	44,573,941	22,941,938	3,656,530	8,759,537	1,002	1,948,425	382	23,946	6,016,934	5,071	3,267,023	2,297
Zero assets	362,792	188,779	20,095	62,701	21	15,282	5	632	55,844	143	16,046	72
\$1 under \$50,000	1,242	430	76	817	—	—	—	—	112	193	103	—
\$50,000 under \$100,000	3,613	910	476	2,205	5	27	—	—	727	321	520	—
\$100,000 under \$250,000	17,417	6,172	1,046	5,016	17	632	94	101	1,465	650	669	16
\$250,000 under \$500,000	31,417	13,481	1,964	9,586	14	749	32	161	2,914	507	1,935	32
\$500,000 under \$1,000,000	28,343	11,542	2,085	8,506	15	32	30	402	2,691	417	2,492	88
\$1,000,000 under \$5,000,000	482,145	233,627	25,649	80,490	150	8,342	56	151	30,106	1,518	21,546	23
\$5,000,000 under \$10,000,000	363,477	180,009	13,308	45,793	59	7,040	17	119	16,347	388	8,803	18
\$10,000,000 under \$25,000,000	975,231	490,659	44,337	118,991	132	23,740	29	957	55,203	529	30,534	97
\$25,000,000 under \$50,000,000	1,240,313	632,365	51,352	145,443	105	41,497	18	1,164	73,793	330	25,746	139
\$50,000,000 under \$100,000,000	1,797,281	914,046	96,759	251,207	97	74,668	17	501	131,530	270	44,820	102
\$100,000,000 under \$250,000,000	4,335,453	2,239,053	223,223	597,336	144	153,523	36	3,107	248,688	335	122,818	352
\$250,000,000 under \$1,000,000,000	10,690,401	5,485,177	1,144,428	2,641,009	158	543,225	30	6,398	2,163,400	296	972,303	698
\$1,000,000,000 or more	24,244,816	12,545,688	2,031,732	4,790,437	85	1,079,668	18	10,253	3,234,114	174	2,018,688	660

Size of total assets	Returns with Form 1118 statements filed in support of credit claimed — Continued							
	Foreign taxes — Continued				Foreign tax credit computed		Dividends paid to related foreign corporations by subsidiaries	
	Deemed paid		Carryover		Total	For taxes on interest for which separate credit was computed	Number of returns	Amount
	Number of returns	Amount	Number of returns	Amount				
(35)	(36)	(37)	(38)	(39)	(40)	(41)	(42)	
Total	1,002	1,258,087	816	1,491,819	3,659,911	2,255	185	335,660
Zero assets	21	8,343	12	31,455	20,334	72	5	3,184
\$1 under \$50,000	—	—	50	9	77	—	—	—
\$50,000 under \$100,000	5	11	50	197	476	—	—	—
\$100,000 under \$250,000	17	253	118	542	1,046	16	—	—
\$250,000 under \$500,000	14	823	39	156	2,111	32	—	—
\$500,000 under \$1,000,000	15	21	57	178	2,118	88	—	—
\$1,000,000 under \$5,000,000	150	4,923	123	3,633	26,019	23	—	—
\$5,000,000 under \$10,000,000	59	5,451	41	2,092	13,315	19	3	402
\$10,000,000 under \$25,000,000	132	15,942	70	8,727	44,530	93	17	4,117
\$25,000,000 under \$50,000,000	105	29,304	52	18,743	51,458	137	18	1,960
\$50,000,000 under \$100,000,000	97	58,162	38	20,548	96,836	96	21	55,031
\$100,000,000 under \$250,000,000	144	104,714	62	21,156	223,226	330	26	48,965
\$250,000,000 under \$1,000,000,000	158	365,805	62	825,292	1,144,439	698	53	84,162
\$1,000,000,000 or more	85	664,335	41	551,081	2,033,926	651	42	137,839

¹Includes the "gross-up" of certain foreign dividends.

NOTE: See text for explanatory statements and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

RETURNS WITH FOREIGN TAX CREDIT

Table 4.—Total Assets, Income, Tax, and Credits, and Foreign Income, Taxes, and Credit, by Size of Net Income

(All figures are estimates based on samples—money amounts are in thousands of dollars)

Size of net income	Returns with and without Form 1118 statements filed in support of credit claimed										Returns with Form 1118 statements filed in support of credit claimed					
	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed	Investment credit	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign Dividend income resulting from foreign taxes deemed paid
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
Total	7,110	918,884,244	47,593,591	2,044,221	67,497	967,586	45,185,243	23,251,491	3,643,820	1,368,749	6,196	900,953,730	46,839,211	2,036,762	67,173	968,140
Under \$5,000 ¹	787	116,964	1,162	89	—	—	1,622	464	136	5	398	88,964	663	89	—	—
\$5,000 under \$10,000	361	159,137	2,508	90	27	11	2,265	707	150	25	282	122,616	1,906	85	27	11
\$10,000 under \$15,000	257	138,274	3,093	168	71	—	2,652	691	211	84	177	107,618	2,076	150	71	—
\$15,000 under \$20,000	186	86,740	3,170	166	—	13	2,993	787	138	93	166	71,810	2,785	166	—	13
\$20,000 under \$25,000	268	144,536	5,996	680	—	46	5,621	1,492	296	63	253	120,345	5,674	680	—	46
\$25,000 under \$50,000	759	1,494,752	26,851	608	—	57	22,185	6,845	1,708	328	672	1,241,875	23,920	510	—	57
\$50,000 under \$100,000	612	2,253,784	43,404	993	57	260	37,800	15,240	2,176	831	565	1,960,307	39,689	993	57	260
\$100,000 under \$250,000	742	4,021,358	121,223	2,708	352	765	105,050	47,256	6,009	2,521	898	3,682,524	115,004	2,267	352	572
\$250,000 under \$500,000	496	9,610,644	182,159	5,527	208	2,021	161,571	79,104	8,338	4,199	485	8,143,344	178,316	4,598	208	2,021
\$500,000 under \$1,000,000	639	18,416,776	445,511	13,590	2,394	7,506	412,726	199,185	20,136	8,316	595	15,618,874	413,813	13,468	2,394	7,506
\$1,000,000 under \$5,000,000	1,079	92,610,777	2,518,017	73,568	7,917	34,308	2,348,140	1,170,350	98,696	66,465	1,016	87,882,498	2,365,385	71,947	7,740	33,901
\$5,000,000 under \$10,000,000	325	79,964,437	2,302,087	66,707	11,144	33,115	2,166,806	1,104,445	90,451	84,225	303	73,592,238	2,144,933	85,818	11,144	32,669
\$10,000,000 under \$25,000,000	288	96,479,828	4,589,002	147,693	9,665	90,798	4,338,135	2,218,357	190,151	150,715	279	96,079,015	4,449,649	144,480	9,518	90,418
\$25,000,000 under \$50,000,000	146	114,575,855	5,085,960	167,581	16,595	99,637	4,837,094	2,446,239	295,611	176,093	146	114,575,855	5,085,960	167,581	16,595	99,637
\$50,000,000 under \$100,000,000	97	183,412,679	6,788,768	409,521	6,951	184,705	6,473,442	3,310,295	620,636	271,293	97	183,412,679	6,788,768	409,521	6,951	184,705
\$100,000,000 or more	68	312,397,701	25,474,680	1,154,532	12,116	504,324	24,267,011	12,650,034	2,328,977	623,393	66	311,053,368	25,220,668	1,154,409	12,116	504,324

Size of net income	Returns with Form 1118 statements filed in support of credit claimed—Continued													Dividends paid to related foreign corporations by subsidiaries
	Income subject to U.S. tax	U.S. income tax before credit	Foreign tax credit claimed	Taxable income from foreign sources			Foreign taxes			Foreign tax credit computed		Dividends related to foreign corporations by subsidiaries		
				Total (less loss) ²	Dividends from related foreign corporations	Interest for which separate credit was computed	Total	Paid or accrued	Carryover	Total	For taxes on interest for which separate credit was computed			
													Total	
(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)	(25)	(26)	(27)	(28)	(29)	(30)	
Total	44,573,941	22,941,938	3,656,530	8,759,537	1,948,425	23,946	6,016,934	3,267,023	2,297	1,258,087	1,491,819	3,659,911	2,255	335,660
Under \$5,000 ¹	1,125	412	85	671	—	—	109	90	—	—	19	65	—	—
\$5,000 under \$10,000	1,718	422	69	797	27	82	132	117	16	11	4	72	16	—
\$10,000 under \$15,000	1,671	432	192	2,281	—	33	251	241	33	—	10	226	33	—
\$15,000 under \$20,000	2,627	700	134	987	132	19	177	89	(*)	13	75	134	(*)	—
\$20,000 under \$25,000	5,318	1,407	293	1,697	232	16	381	305	(*)	46	30	309	(*)	—
\$25,000 under \$50,000	19,365	5,978	1,562	6,983	265	524	2,269	1,565	87	57	648	1,571	87	—
\$50,000 under \$100,000	34,333	13,979	2,115	8,099	538	25	2,839	2,015	4	280	542	2,116	4	—
\$100,000 under \$250,000	99,050	44,275	5,705	24,313	1,372	95	7,620	6,073	13	755	789	6,140	13	6
\$250,000 under \$500,000	157,788	77,274	8,130	29,631	3,262	122	11,661	6,659	21	2,184	3,019	8,135	22	299
\$500,000 under \$1,000,000	383,062	184,706	19,989	80,846	12,703	457	39,024	15,617	34	8,077	15,329	20,194	24	1,990
\$1,000,000 under \$5,000,000	2,209,070	1,101,832	95,512	326,709	71,279	2,708	131,368	62,154	345	43,228	25,985	95,731	321	24,558
\$5,000,000 under \$10,000,000	2,020,744	1,029,896	88,517	278,052	70,991	1,986	122,537	56,493	309	42,023	24,021	88,528	309	20,246
\$10,000,000 under \$25,000,000	4,204,244	2,149,678	189,021	542,751	142,590	3,859	240,020	84,720	450	98,898	56,402	189,028	450	58,341
\$25,000,000 under \$50,000,000	4,837,094	2,446,239	295,611	807,331	155,647	3,381	359,083	186,800	260	113,741	56,542	295,856	260	35,000
\$50,000,000 under \$100,000,000	6,473,442	3,310,295	620,636	1,575,050	380,949	5,473	1,006,341	553,989	475	234,293	218,059	622,728	475	75,033
\$100,000,000 or more	24,123,290	12,574,415	2,328,959	5,073,339	1,108,438	5,166	4,092,922	2,288,096	250	714,481	1,090,345	2,329,058	241	120,187

¹Includes returns without net income.

²Includes the "gross-up" of certain foreign dividends.

³Less than \$500 per return.

NOTE: See text for explanatory statements and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

Under \$50 \$50 \$100 \$500 \$1,000 \$5,000 \$10,000 \$100,000 \$1,000,000

Under \$50 \$50 \$100 \$500 \$1,000 \$5,000 \$10,000 \$100,000 \$1,000,000

Under \$50 \$50 \$100 \$500 \$1,000 \$5,000 \$10,000 \$100,000 \$1,000,000

RE

RETURNS WITH FOREIGN TAX CREDIT

Table 5.—Total Assets, Income, Tax, and Credits, and Foreign Income, Taxes, and Credit, by Size of Foreign Tax Credit Claimed

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

Size of foreign tax credit claimed	Returns with and without Form 1118 statements filed in support of credit claimed									
	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations		Includable income of Controlled Foreign Corporations		Foreign dividend income resulting from foreign taxes deemed paid		Income subject to U.S. tax
				Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Total	7,110	916,834,244	47,593,591	2,813	2,044,221	187	67,497	864	967,586	45,185,243
Under \$50,000	6,034	169,807,767	6,896,446	2,079	17,269	63	3,266	266	2,420	6,410,876
\$50,000 under \$100,000	219	39,080,144	1,330,122	86	7,463	11	1,239	56	2,654	1,256,710
\$100,000 under \$500,000	451	109,708,553	4,503,931	293	77,104	49	10,921	245	40,618	4,258,994
\$500,000 under \$750,000	74	24,313,389	1,437,016	56	30,538	9	8,828	51	16,934	1,367,370
\$750,000 under \$1,000,000	48	27,555,595	1,326,055	40	28,260	8	5,846	29	14,696	1,237,751
\$1,000,000 under \$10,000,000	230	353,998,512	15,648,552	208	562,194	40	30,709	173	330,559	15,133,609
\$10,000,000 or more	53	192,420,284	16,451,469	50	1,321,393	7	6,688	44	559,705	15,499,931

Size of foreign tax credit claimed	Returns with and without Form 1118 statements filed in support of credit claimed—Continued			Returns with Form 1118 statements filed in support of credit claimed								
	U.S. income tax before credits	Foreign tax credit claimed	Investment credit	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations		Includable income of Controlled Foreign Corporations		Foreign dividend income resulting from foreign taxes deemed paid	
							Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)
Total	23,251,491	3,663,820	1,368,749	6,196	900,953,730	46,839,211	2,662	2,036,762	185	67,173	840	966,140
Under \$50,000	3,199,991	24,995	217,440	5,152	159,037,237	6,357,189	1,949	15,822	63	3,266	258	2,379
\$50,000 under \$100,000	615,655	15,238	60,745	211	36,909,546	1,280,867	81	7,204	11	1,239	52	2,493
\$100,000 under \$500,000	2,189,405	106,260	168,526	431	107,041,423	4,354,632	279	72,754	48	10,774	235	39,667
\$500,000 under \$750,000	699,282	45,483	48,127	71	23,991,133	1,420,447	54	29,135	8	8,651	49	16,647
\$750,000 under \$1,000,000	632,457	41,199	28,662	48	27,555,595	1,326,055	40	28,260	8	5,846	29	14,696
\$1,000,000 under \$10,000,000	7,769,199	748,407	546,700	230	353,998,512	15,648,552	208	562,194	40	30,709	173	330,559
\$10,000,000 or more	8,145,502	2,682,238	298,549	53	192,420,284	16,451,469	50	1,321,393	7	6,688	44	559,705

Size of foreign tax credit claimed	Returns with Form 1118 statements filed in support of credit claimed—Continued											
	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed	Total (less loss) ¹	Taxable income from foreign sources				Total	Foreign taxes		
					Dividends from related foreign corporations		Interest for which separate credit was computed			Paid or accrued		On interest for which separate credit was computed
					Number of returns	Amount	Number of returns	Amount		Number of returns	Amount	
	(23)	(24)	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)	(33)	(34)
Total	44,573,941	22,941,938	3,656,530	8,759,537	1,002	1,948,425	382	23,946	6,016,934	6,071	3,267,023	2,297
Under \$50,000	6,003,379	2,994,382	23,759	154,963	328	8,707	291	4,320	28,710	5,030	21,009	619
\$50,000 under \$100,000	1,214,826	593,631	14,719	76,272	70	5,889	9	403	16,651	208	12,900	31
\$100,000 under \$500,000	4,113,541	2,115,829	102,675	434,342	272	74,137	29	4,947	134,158	430	62,357	641
\$500,000 under \$750,000	1,370,904	690,938	43,533	149,583	57	34,533	8	841	56,722	71	25,977	164
\$750,000 under \$1,000,000	1,237,751	632,457	41,199	132,064	33	28,507	5	1,593	51,692	48	24,963	48
\$1,000,000 under \$10,000,000	15,133,609	7,769,199	748,407	2,234,015	196	549,070	32	6,264	938,233	230	390,781	590
\$10,000,000 or more	15,499,931	8,145,502	2,682,238	5,578,298	47	1,247,582	8	5,578	4,790,768	53	2,729,016	204

Size of foreign tax credit claimed	Returns with Form 1118 statements filed in support of credit claimed—Continued							
	Foreign taxes—Continued				Foreign tax credit computed		Dividends paid to related foreign corporations by subsidiaries	
	Deemed paid		Carryover		Total	For taxes on interest for which separate credit was computed	Number of returns	Amount
	Number of returns	Amount	Number of returns	Amount				
	(35)	(36)	(37)	(38)	(39)	(40)	(41)	(42)
Total	1,002	1,258,087	816	1,491,819	3,659,911	2,255	185	335,660
Under \$50,000	328	3,079	528	4,616	23,863	609	10	1,120
\$50,000 under \$100,000	70	2,981	28	772	15,155	31	6	415
\$100,000 under \$500,000	272	45,751	110	26,049	103,024	640	25	9,302
\$500,000 under \$750,000	57	20,315	22	10,410	43,533	164	16	4,522
\$750,000 under \$1,000,000	33	17,479	20	9,250	41,200	48	7	6,216
\$1,000,000 under \$10,000,000	196	383,347	87	164,105	748,711	559	82	172,991
\$10,000,000 or more	47	785,135	21	1,276,617	2,684,425	204	29	140,984

¹Includes the "gross-up" of certain foreign dividends.
NOTE: See text for explanatory statements and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 6.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Geographic Area, Subarea, and Country Where Foreign Taxes Were Paid — Continued

(All figures are estimates based on samples—money amounts are in thousands of dollars)

Geographic area, subarea, and country	All foreign sources—Continued				Specific geographic area, subarea, or country								Dividends paid to related foreign corporations by subsidiaries
	Foreign taxes				Taxable income from foreign sources		Interest for which separate credit was computed	Foreign taxes, excluding carryover			Deemed paid		
	Total	Paid or accrued	Deemed paid	Carryover	Total (less loss) ¹	Dividends from related foreign corporations		Total	Total	On interest for which separate credit was computed			
(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)		
Africa—Continued													
West and Central Africa, total	1,791,085	1,240,002	468,579	82,504	35,826	26,380	16	13,321	7,073	—	6,248	4,200	
Congo (Kinshasa)	125,150	57,703	66,447	1,000	673	—	—	367	367	—	—	—	
Ghana	287,791	111,541	175,232	1,018	4,008	3,536	—	2,610	663	—	1,947	—	
Ivory Coast	713,571	563,242	147,859	2,470	31	35	—	16	—	—	16	—	
Liberia	1,157,890	799,124	343,901	14,665	21,224	17,897	2	3,302	542	—	2,760	4,200	
Nigeria	1,238,454	943,776	271,879	22,708	10,559	—	—	4,541	4,541	—	—	—	
Other West and Central African countries	1,225,832	812,066	364,923	48,843	-769	6,912	14	2,485	960	—	1,525	—	
Southern Africa, total	2,198,643	1,118,602	871,155	208,885	142,567	83,521	217	55,005	15,811	7	39,194	23,488	
Malawi	159,460	125,914	31,661	1,895	1,895	256	—	186	—	—	140	—	
Rhodesia	285,422	94,893	189,418	1,111	2,653	2,048	—	1,071	468	—	603	28	
South Africa, Republic of	2,167,691	1,110,957	848,665	206,068	125,017	68,032	217	47,953	14,941	7	33,012	23,460	
Zambia	387,272	205,737	175,903	5,632	14,218	13,185	—	5,760	321	—	5,439	—	
Other Southern African countries	2,896	1,146	1,728	22	187	—	—	35	35	—	—	—	
Africa, not allocable	20,017	11,362	8,355	300	1,578	—	—	359	359	—	—	—	
Asia, total	4,745,799	2,674,030	1,089,757	982,013	2,242,104	200,905	920	1,449,705	1,340,954	112	108,751	3,769	
Middle East, total													
Iran	3,890,082	2,307,779	684,219	898,083	1,573,299	48,188	56	1,208,164	1,186,092	(?)	22,072	57	
Iraq	2,084,769	1,483,442	499,035	102,291	265,290	1,260	1	252,863	252,863	—	—	229	
Israel	1,008,692	719,892	282,785	6,015	31,267	40,910	—	19,278	55	—	19,223	—	
Kuwait	335,845	144,219	160,466	32,160	8,491	1,378	53	2,930	2,509	(?)	421	57	
Other Middle East countries	1,306,556	1,019,261	241,610	45,685	296,389	3,165	—	242,077	239,989	—	2,088	—	
Lebanon	1,235,954	744,711	477,317	13,926	-16,614	—	2	174	174	—	—	—	
Saudi Arabia	2,439,737	1,319,444	943,486	778,805	926,820	—	—	664,846	664,846	—	—	—	
Other areas of Arabian peninsula	994,432	737,844	234,047	22,541	40,265	1,250	—	23,069	23,056	—	13	—	
Other Middle East countries	1,195,516	786,425	400,947	8,144	1,401	225	—	2,927	2,829	—	98	—	
Southern and Southeastern Asia, total													
Ceylon	2,783,163	1,744,771	933,091	85,300	317,814	102,124	46	155,606	102,134	10	53,472	425	
India	827,966	590,244	236,259	1,463	599	8	—	447	443	—	4	—	
Indonesia	1,922,334	1,294,460	573,417	54,457	30,898	4,832	1	19,647	17,048	—	2,599	—	
Malaysia	1,268,324	952,155	288,397	7,772	66,589	67,339	—	41,275	118	—	41,157	—	
Pakistan	1,114,616	729,701	370,248	14,667	4,881	1,266	1	2,139	1,514	(?)	625	—	
Other Southern and Southeastern Asian countries	1,106,652	767,556	324,753	14,343	100,494	1,158	2	53,718	53,092	—	626	—	
Philippines	2,157,157	1,291,324	792,147	73,685	78,851	24,448	24	29,518	21,840	10	7,678	425	
Singapore	969,242	671,408	282,702	5,132	4,664	448	(?)	1,959	1,831	(?)	128	—	
South Vietnam	906,348	628,352	268,404	9,592	10,783	—	—	309	309	—	—	—	
Thailand	1,389,622	811,696	560,369	17,557	17,295	2,624	18	5,377	4,723	—	654	—	
Other Southern and Southeastern Asian countries	900,831	606,397	293,022	1,412	2,660	1	—	1,217	1,216	—	1	—	
Eastern Asia, total													
China, Republic of (Taiwan)	3,009,304	1,788,578	1,021,749	198,978	350,939	50,593	818	85,935	52,728	102	33,207	3,287	
Hong Kong	1,604,970	1,158,748	400,945	45,277	8,111	341	4	1,330	1,276	—	54	—	
Japan	1,224,382	747,323	451,778	25,281	17,142	7,855	16	3,338	1,809	(?)	1,529	492	
Other Eastern Asia countries	2,963,306	1,775,762	990,213	197,332	316,721	42,008	798	79,525	48,033	102	31,492	2,785	
Okinawa and Ryukyu Islands	222,870	89,895	128,252	4,923	3,268	—	—	1,411	1,411	—	—	—	
South Korea, Republic of	1,328,631	973,633	332,110	22,888	5,113	389	—	295	183	—	132	—	
Other Eastern Asia countries	46,926	32,661	13,701	564	584	—	—	36	36	—	—	—	
Asia, not allocable	2,217	938	1,114	165	52	—	—	—	—	—	—	—	
Oceania, total													
Australia	2,351,187	1,303,264	952,321	95,601	153,559	61,317	644	79,514	32,445	80	47,069	15,234	
New Zealand	1,569,546	913,409	636,458	19,678	9,007	1,656	3	4,608	3,004	2	1,604	3	
Other countries of Oceania	182,227	55,353	72,692	182	708	—	—	55	55	—	—	—	
Puerto Rico and United States Possessions, total													
Puerto Rico	2,692,572	1,551,893	845,955	294,725	102,039	5,309	59	32,321	30,805	16	1,516	—	
U. S. Possessions	2,167,538	1,101,559	799,013	266,967	80,759	5,084	59	24,057	22,661	16	1,396	—	
Guam	1,689,777	1,256,176	387,828	45,774	21,280	225	—	8,264	8,144	—	120	—	
Panama Canal Zone	1,075,706	762,360	303,605	9,741	5,329	—	—	2,798	2,798	—	—	—	
Virgin Islands, U.S.	149,761	80,910	64,119	4,732	121	—	—	(?)	(?)	—	—	—	
Other U. S. Possessions	866,941	668,644	165,131	33,167	9,936	225	—	4,492	4,372	—	120	—	
Other U. S. Possessions	16,660	6,250	10,402	8	5,894	—	—	974	974	—	—	—	
Country not stated or not allocable and other income from outside the United States													
	1,656,127	998,052	625,220	32,856	146,661	1,351	696	6,266	5,603	5	683	—	
Other geographic areas (combinations of countries shown above):													
Not economically less-developed countries	4,360,184	2,443,437	1,251,945	664,799	4,028,678	1,401,058	19,197	1,530,063	467,130	1,897	1,062,933	308,535	
Economically less-developed countries	5,844,879	3,196,102	1,195,204	1,453,570	4,582,335	545,541	4,051	2,987,981	2,793,980	390	194,001	27,130	
except Sino-Soviet Bloc	237,993	112,777	115,032	10,184	1,774	495	—	543	104	—	439	—	

¹Includes the "gross-up" of certain foreign dividends.

²Less than \$500 per return.

NOTE: See text for explanatory statements, including Geographic classification under "Explanation of Terms," and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED
 Table 7.—Number of Returns for Selected Items, by Geographic Area, Subarea, and Selected Country
 Where Foreign Taxes Were Paid

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

Geographic area, subarea, and selected country	Total number of returns	All sources—Domestic and foreign			Specific geographic area, subarea, or country		
		Dividends received from foreign corporations	Foreign dividend income resulting from foreign taxes deemed paid	Western Hemisphere Trade Corporation deduction	Dividends from related foreign corporations	Foreign taxes paid or accrued	Foreign taxes deemed paid
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All geographic areas	6,196	2,662	840	412	1,002	6,071	1,002
Canada	3,825	1,695	584	263	393	3,704	393
Latin America, total	1,541	698	442	238	266	1,501	266
Mexico	1,061	475	348	114	120	985	120
Central America, total	254	199	146	86	53	184	53
Costa Rica	78	64	55	34	5	56	5
El Salvador	60	48	40	25	5	41	5
Guatemala	98	81	64	30	6	81	6
Honduras	39	30	22	17	4	27	4
Nicaragua	55	49	37	23	5	22	5
Panama, excluding Canal Zone	141	119	88	58	36	69	36
Caribbean countries, total	106	88	69	39	11	74	11
Trinidad	49	41	32	18	5	32	5
South America, total	931	522	397	204	170	889	170
Argentina	420	256	211	103	57	389	57
Brazil	418	302	199	70	75	394	75
Chile	171	125	107	56	21	140	21
Colombia	245	164	130	96	34	209	34
Ecuador	80	54	53	30	5	60	5
Peru	200	148	115	56	19	177	19
Uruguay	99	84	69	34	11	70	11
Venezuela	379	256	191	102	61	346	61
Other Western Hemisphere, total	134	111	81	46	8	65	8
The Bahamas	41	34	28	15	4	6	4
Netherlands Antilles	49	37	15	13	3	26	3
Europe, total	1,691	1,189	655	124	624	1,550	624
Common Market countries, total	1,233	915	533	106	386	1,090	386
Belgium	263	189	167	48	47	186	47
France (includes Andorra)	412	322	275	67	142	322	142
Italy (includes San Marino)	418	330	254	72	70	359	70
Luxembourg	14	13	13	5	4	4	4
Netherlands	526	480	189	44	108	409	108
West Germany	464	360	310	74	198	339	198
Other European countries, total	1,014	723	502	110	432	867	432
Austria	89	71	61	26	13	52	13
Denmark	74	66	56	25	20	5	20
Finland	65	57	50	25	11	21	11
Greece	57	52	40	24	3	28	3
Ireland	50	44	38	14	12	22	12
Norway	72	61	49	22	12	20	12
Portugal	71	60	45	22	9	36	9
Spain	239	192	156	50	50	208	50
Sweden	133	120	104	35	29	43	29
Switzerland	331	266	219	57	159	239	159
Turkey	64	56	46	23	7	40	7
United Kingdom	720	544	389	87	303	555	303
Africa, total	571	395	241	80	98	521	98
North Africa, total	73	65	53	30	6	42	6
Morocco	19	17	17	8	3	6	3
Egypt (formerly United Arab Republic)	29	28	22	14	—	15	—
East Africa, total	30	24	22	15	4	14	4
Ethiopia	6	5	4	3	—	3	—
Kenya	17	14	13	8	4	7	4
Tanzania	5	5	4	3	—	3	—
West and Central Africa, total	62	52	43	25	13	26	13
Liberia	27	26	20	10	7	6	7
Nigeria	20	16	14	9	—	8	—
Southern Africa, total	521	363	221	66	98	483	98
Rhodesia	58	35	16	4	7	7	7
South Africa, Republic of	452	325	214	65	80	415	80
Zambia	32	28	10	6	5	24	5
Asia, total	1,260	678	404	123	187	1,217	187
Middle East, total	293	198	104	57	16	257	16
Iran	71	59	49	35	5	54	5
Israel	199	135	55	21	8	180	8
Lebanon	39	35	29	18	—	18	—
Saudi Arabia	32	17	13	10	—	21	—
Southern and Southeastern Asia, total	475	303	216	78	79	440	79
India	176	146	126	41	33	154	33
Indonesia	25	21	16	11	4	6	4
Malaysia	47	39	36	13	6	30	6
Pakistan	66	53	41	20	11	48	11
Philippines	339	210	142	54	48	313	48
Singapore	35	30	26	10	5	18	5
Thailand	72	59	50	29	6	55	6
Eastern Asia, total	904	511	354	107	130	863	130
China, Republic of (Taiwan)	77	70	41	22	4	81	4
Hong Kong	77	57	52	21	20	41	20
Japan	845	471	335	103	113	816	113
Okinawa and Ryukyu Island	26	16	12	7	—	22	—
Oceania, total	777	416	336	90	165	736	165
Australia	722	401	323	89	151	676	151
New Zealand	191	119	103	35	32	176	32
Puerto Rico and U.S. Possessions, total	521	327	168	101	21	493	21
Puerto Rico	496	308	157	95	20	464	20
Country not stated or not allocable and other income from outside the United States	293	214	126	46	8	164	8

NOTE: See text for explanatory statements, including Geographic classifications under "Explanation of Terms" and for "Description of the Sample and Limitations of the Data."

Foreign Tax Credit on Corporation Returns, 1968

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 8.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Geographic Area, Selected Subarea, and Selected Country where Foreign Taxes were Paid, and by Size of Total Assets—Continued

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

Geographic area, selected subarea, and selected country, and size of total assets	Number of returns	Total assets	All sources—domestic and foreign								All foreign sources	
			Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Western Hemisphere Trade Corporation deduction	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed	Taxable income from foreign sources	
											Total (less loss) ¹	Dividends from related foreign corporations
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
Africa, Total												
Total	571	383,178,308	22,391,769	1,562,171	29,445	700,708	222,678	21,250,625	11,051,765	2,370,168	5,510,167	1,489,710
Under \$10,000,000 ²	245	386,545	125,775	9,419	935	2,788	637	118,243	58,460	13,502	52,145	9,878
\$10,000,000 under \$100,000,000	120	4,862,421	607,839	32,637	3,312	22,013	177	594,163	305,076	49,318	130,884	31,346
\$100,000,000 under \$250,000,000	64	10,586,818	1,294,231	73,292	7,407	44,367	5,422	1,260,897	654,695	86,254	238,921	87,959
\$250,000,000 or more	142	367,342,524	20,363,924	1,446,824	17,791	631,540	216,442	19,277,322	10,033,534	2,221,094	5,088,217	1,390,527
Northern Africa												
Total	73	156,487,576	12,125,977	944,916	10,289	383,759	117,754	11,329,337	5,935,077	1,410,467	3,066,032	878,085
Under \$10,000,000 ²	11	276,031	58,601	3,768	457	2,935	637	56,438	29,648	9,932	20,691	3,554
\$10,000,000 under \$100,000,000	12	1,974,978	167,229	11,988	6,746	10,638	859	164,805	84,545	20,913	63,907	18,056
\$100,000,000 under \$250,000,000	50	154,236,567	11,900,147	929,160	3,086	370,186	116,258	11,108,094	5,820,884	1,379,622	2,981,434	856,475
Southern Africa												
Total	521	253,702,491	19,222,132	1,408,714	27,428	664,512	130,205	18,564,096	9,649,065	1,650,084	3,961,214	1,350,513
Under \$10,000,000 ²	239	383,589	85,528	9,418	935	2,788	(1)	79,466	38,027	7,007	32,989	9,878
\$10,000,000 under \$100,000,000	109	4,428,097	543,340	29,765	3,290	19,688	177	530,779	272,025	43,758	116,112	28,856
\$100,000,000 under \$250,000,000	56	9,304,665	1,237,159	67,273	7,407	43,254	4,678	1,205,715	625,966	79,116	215,347	62,320
\$250,000,000 or more	117	239,586,140	17,356,105	1,302,258	15,796	598,782	125,350	16,748,136	8,713,047	1,520,203	3,596,766	1,249,459
Asia, Total												
Total	1,260	625,786,934	35,398,917	1,743,490	42,655	828,860	261,188	33,851,453	17,518,093	3,094,909	7,350,096	1,671,412
Under \$10,000,000 ²	508	1,145,552	317,763	11,848	1,192	7,194	—	311,419	158,786	28,576	85,160	12,093
\$10,000,000 under \$100,000,000	321	12,915,205	1,450,464	52,647	12,883	39,713	1,146	1,410,415	723,837	96,320	259,830	59,803
\$100,000,000 under \$250,000,000	143	22,750,796	2,181,198	95,485	10,078	58,933	7,766	2,119,112	1,092,510	141,323	393,856	93,269
\$250,000,000 or more	288	588,975,381	31,449,502	1,583,510	18,502	723,020	252,276	30,010,507	15,542,960	2,830,680	6,611,250	1,506,227
Middle East												
Total	293	282,345,734	17,310,235	1,105,911	7,595	480,679	165,382	16,413,517	8,557,028	2,289,504	5,101,186	1,051,656
Under \$10,000,000 ²	117	223,643	81,574	1,639	764	1,238	—	80,877	41,477	7,575	27,913	2,262
\$10,000,000 under \$100,000,000	61	2,140,641	175,604	8,814	264	3,544	182	170,931	87,033	16,415	44,622	7,990
\$100,000,000 under \$250,000,000	24	3,732,058	364,169	29,756	—	11,572	2,205	352,733	184,759	31,954	106,554	23,753
\$250,000,000 or more	91	276,249,392	16,888,888	1,065,702	6,567	464,325	162,995	15,809,976	8,243,759	2,233,560	4,922,097	1,017,651
Southern and Southeastern Asia												
Total	475	411,461,604	23,639,070	1,468,881	20,830	698,231	188,527	22,579,026	11,701,632	2,189,710	5,255,861	1,399,800
Under \$10,000,000 ²	129	329,414	109,574	4,939	435	1,721	—	106,437	54,501	15,972	48,599	4,890
\$10,000,000 under \$100,000,000	96	4,177,593	495,926	25,379	2,399	13,925	113	485,254	250,339	51,929	129,256	24,371
\$100,000,000 under \$250,000,000	65	10,404,774	1,096,890	54,439	7,824	32,630	5,816	1,071,251	557,426	91,071	253,321	50,975
\$250,000,000 or more	185	396,549,723	21,936,680	1,384,124	10,172	649,955	182,598	20,916,084	10,839,366	2,030,738	4,824,685	1,319,564
Eastern Asia												
Total	904	577,696,410	31,729,055	1,621,019	38,259	789,036	235,907	30,480,398	15,771,448	2,350,015	5,865,618	1,554,865
Under \$10,000,000 ²	306	711,597	245,546	8,313	17	5,782	—	242,807	124,343	14,933	52,536	7,954
\$10,000,000 under \$100,000,000	232	9,965,210	1,131,847	43,931	12,445	36,736	1,046	1,103,174	566,500	89,874	193,245	52,270
\$100,000,000 under \$250,000,000	116	18,613,486	1,800,406	86,138	9,827	53,923	5,987	1,756,578	903,344	104,577	308,091	83,876
\$250,000,000 or more	250	548,406,117	28,551,256	1,482,637	15,970	692,595	228,674	27,377,839	14,177,261	2,160,631	5,311,746	1,410,765
Oceania												
Total	777	502,133,185	29,039,447	1,542,118	27,176	746,674	194,785	28,028,623	14,536,453	1,960,640	4,925,279	1,471,342
Under \$10,000,000 ²	266	811,315	292,831	14,371	1,366	10,318	—	288,973	148,631	21,408	65,129	15,637
\$10,000,000 under \$100,000,000	221	8,894,595	1,216,659	65,183	3,891	1,198,679	1,396	1,198,679	616,004	80,439	214,467	61,669
\$100,000,000 under \$250,000,000	98	16,024,083	1,893,307	98,440	8,097	63,535	4,559	1,833,629	947,142	108,685	297,600	94,139
\$250,000,000 or more	192	476,403,192	25,636,650	1,364,124	13,822	627,801	188,830	24,707,342	12,824,676	1,750,109	4,348,083	1,299,897
Puerto Rico and United States Possessions												
Total	521	460,524,101	28,223,530	1,384,699	21,468	635,806	207,370	25,257,839	13,121,790	2,003,319	4,758,065	1,298,968
Under \$10,000,000 ²	216	378,279	226,006	4,470	71	1,564	3,658	209,407	107,632	11,653	38,107	4,305
\$10,000,000 under \$100,000,000	96	3,746,818	438,023	25,122	994	13,887	1,348	405,320	201,524	39,393	97,295	21,181
\$100,000,000 under \$250,000,000	51	8,415,888	967,248	45,435	3,156	24,631	3,592	945,237	484,634	56,932	170,141	38,501
\$250,000,000 or more	158	447,983,116	24,592,253	1,289,672	17,247	595,724	198,772	23,697,875	12,328,000	1,895,341	4,452,522	1,234,981
Country not stated or not allocable and other income from outside the United States												
Total	293	298,083,956	19,891,613	1,020,258	5,269	472,463	117,712	19,133,719	9,946,863	1,298,957	3,239,119	960,042
Under \$10,000,000 ²	111	177,329	69,091	3,438	183	3,146	—	66,973	33,813	9,676	29,909	3,476
\$10,000,000 under \$100,000,000	53	1,602,959	199,423	8,382	697	4,580	531	193,162	98,294	10,102	34,027	8,014
\$100,000,000 under \$250,000,000	41	6,508,302	821,060	53,463	411	31,032	4,423	798,114	417,527	51,391	158,134	46,032
\$250,000,000 or more	88	289,795,366	18,802,039	954,995	3,978	433,705	112,758	18,074,470	9,397,229	1,227,788	3,017,049	902,520

Footnotes at end of table.

Foreign Tax Credit on Corporation Returns, 1968

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 8.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Geographic Area, Selected Subarea, and Selected Country where Foreign Taxes were Paid, and by Size of Total Assets—Continued

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

Geographic area, selected subarea, and selected country, and size of total assets	All foreign sources—Continued				Specific geographic area, subarea, or country							
	Foreign taxes				Taxable income from foreign sources			Foreign taxes, excluding carryover				Dividends paid to related foreign corporations by subsidiaries
	Total	Paid or accrued	Deemed paid	Carryover	Total (less loss)	Dividends from related corporations	Interest for which separate credit was computed	Total	Paid or accrued		Deemed paid	
									Total	On interest for which separate credit was computed		
(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)	
Africa, Total	3,345,240	2,034,380	950,723	360,138	844,704	113,500	233	690,849	644,956	7	45,883	27,688
Under \$10,000 ^a	47,150	12,947	4,738	29,464	8,048	506	—	3,038	2,737	—	301	—
\$10,000,000 under \$100,000,000	55,917	20,551	27,316	8,050	7,984	2,009	—	2,057	1,049	—	1,008	78
\$100,000,000 under \$250,000,000	91,334	38,290	47,955	5,089	19,528	4,883	—	5,582	2,913	—	2,669	382
\$250,000,000 or more	3,150,839	1,962,592	870,714	317,533	809,144	106,102	233	680,172	638,267	7	41,905	27,230
Northern Africa	2,102,283	1,421,366	576,316	104,601	664,820	1,224	—	621,724	621,439	—	285	—
Under \$10,000 ^a	41,516	8,277	3,097	30,142	4,092	32	—	2,619	2,608	—	11	—
\$10,000,000 under \$100,000,000	23,898	8,438	12,238	3,222	4,505	659	—	865	788	—	77	—
\$100,000,000 under \$250,000,000	2,036,869	1,404,651	560,981	71,237	656,223	533	—	618,240	618,043	—	197	—
Southern Africa	2,198,643	1,118,602	871,155	208,885	142,567	83,521	217	55,005	15,811	7	39,194	23,488
Under \$10,000 ^a	9,650	4,736	4,738	175	4,707	506	—	653	352	—	301	—
\$10,000,000 under \$100,000,000	50,157	17,444	24,991	7,722	6,420	1,725	—	1,565	643	—	922	76
\$100,000,000 under \$250,000,000	82,949	32,873	45,806	3,370	12,208	4,142	—	3,474	915	—	2,559	382
\$250,000,000 or more	2,056,787	1,063,548	795,620	197,618	119,232	77,148	217	49,313	13,901	7	35,412	23,030
Asia, Total	4,745,799	2,674,030	1,089,757	982,013	2,242,104	200,905	920	1,449,705	1,340,954	112	108,751	3,769
Under \$10,000 ^a	28,674	18,860	8,214	1,601	41,451	982	(1)	13,443	13,101	(1)	342	103
\$10,000,000 under \$100,000,000	129,859	58,218	45,739	25,902	95,028	5,990	37	40,257	35,416	3	4,841	46
\$100,000,000 under \$250,000,000	150,930	78,481	63,036	9,413	100,183	5,202	121	40,310	37,860	10	2,450	—
\$250,000,000 or more	4,436,336	2,518,471	972,768	945,097	2,005,442	188,731	762	1,355,695	1,254,577	99	101,118	3,620
Middle East	3,890,082	2,307,779	684,219	898,083	1,573,299	48,188	56	1,208,164	1,186,092	(1)	22,072	57
Under \$10,000 ^a	7,775	5,975	1,664	135	4,319	—	(1)	903	903	(1)	—	—
\$10,000,000 under \$100,000,000	41,780	17,041	4,757	19,982	13,500	1,109	—	9,715	9,424	—	281	—
\$100,000,000 under \$250,000,000	35,020	18,079	13,569	3,372	16,201	1,345	—	4,459	4,429	—	30	—
\$250,000,000 or more	3,805,507	2,266,684	664,229	874,594	1,539,179	45,734	56	1,193,067	1,171,336	—	21,751	57
Southern and Southeastern Asia	2,763,163	1,744,771	933,091	85,300	317,814	102,124	46	155,606	102,134	10	53,472	425
Under \$10,000 ^a	17,633	14,249	2,582	801	21,289	423	—	9,330	9,179	—	151	103
\$10,000,000 under \$100,000,000	57,744	33,725	19,563	4,456	44,024	2,321	—	20,849	19,992	—	857	46
\$100,000,000 under \$250,000,000	94,905	56,150	35,692	3,063	57,909	1,238	—	30,520	30,038	—	482	—
\$250,000,000 or more	2,582,881	1,640,647	875,254	76,980	194,592	98,142	46	94,907	42,925	10	51,982	276
Eastern Asia	3,009,304	1,788,578	1,021,749	198,978	350,939	50,593	818	85,935	52,728	102	33,207	3,287
Under \$10,000 ^a	15,550	8,364	5,992	1,195	15,843	559	(1)	3,210	3,019	(1)	191	—
\$10,000,000 under \$100,000,000	101,181	34,710	41,435	25,036	37,374	2,560	37	9,693	6,000	3	3,693	—
\$100,000,000 under \$250,000,000	110,305	47,394	56,798	6,113	26,051	2,619	121	5,331	3,393	10	1,938	—
\$250,000,000 or more	2,782,268	1,698,110	917,524	166,634	271,671	44,855	660	67,701	40,316	89	27,385	3,287
Oceania	2,387,490	1,315,115	973,832	98,542	163,274	62,973	647	84,177	35,504	82	48,673	15,237
Under \$10,000 ^a	22,900	10,117	11,651	1,131	7,983	1,156	—	2,502	1,644	—	858	665
\$10,000,000 under \$100,000,000	86,542	30,983	51,443	4,116	19,793	5,128	19	8,031	4,162	2	3,869	893
\$100,000,000 under \$250,000,000	115,300	38,168	69,369	7,763	25,881	5,356	354	10,656	6,457	35	4,199	129
\$250,000,000 or more	2,162,748	1,235,847	841,369	85,532	110,217	51,333	274	62,988	23,241	45	39,747	13,550
Puerto Rico and United States Possessions	2,692,572	1,551,893	845,955	294,725	102,039	5,309	59	32,321	30,805	16	1,516	—
Under \$10,000 ^a	43,533	11,032	2,077	30,425	7,329	549	36	1,841	1,585	10	256	—
\$10,000,000 under \$100,000,000	42,285	20,374	19,293	2,618	12,180	2,881	—	4,017	3,100	—	917	—
\$100,000,000 under \$250,000,000	60,999	30,255	25,901	4,833	10,222	—	9	2,809	2,609	3	—	—
\$250,000,000 or more	2,545,755	1,490,222	798,684	258,849	72,308	1,879	14	23,654	23,511	3	343	—
Country not stated or not allocable and other income from outside the United States	1,656,127	998,052	625,220	32,856	146,661	1,351	696	6,286	5,603	5	683	—
Under \$10,000 ^a	9,932	5,677	3,246	1,010	4,196	—	—	429	429	—	—	—
\$10,000,000 under \$100,000,000	11,169	5,533	5,040	596	8,369	1,309	—	1,730	1,055	—	675	—
\$100,000,000 under \$250,000,000	53,960	17,272	32,465	3,823	16,408	40	31	639	632	5	7	—
\$250,000,000 or more	1,581,466	969,570	584,459	27,427	117,688	2	665	3,488	3,487	—	—	—

^aIncludes the "gross-up" of certain foreign dividends.

^bIncludes returns with zero assets.

^cLess than \$500 per return.

NOTE: See text for explanatory statements, including Geographic classification under "Explanation of Terms," and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 9.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid

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

Selected major industry, and selected area, subarea, and country	Number of returns	Taxable income from foreign sources		Foreign taxes, excluding carryover			Dividends paid to related foreign corporations by subsidiaries
		Total (less loss) ¹	Dividends from related foreign corporations	Total	Paid or accrued	Deemed paid	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All Industries							
All geographic areas	6,196	8,759,537	1,948,425	4,525,110	3,267,093	1,258,087	335,660
Canada	3,825	1,304,174	355,742	483,120	198,673	284,447	111,099
Latin America, total	1,541	1,750,954	315,915	921,719	623,119	98,600	22,420
Mexico	1,016	216,009	44,388	74,748	53,997	20,751	1,255
Central America, total	254	166,590	70,740	46,672	28,837	17,835	14,069
Costa Rica	78	14,017	686	5,185	4,943	242	49
El Salvador	60	2,897	471	925	884	41	—
Guatemala	98	8,385	384	2,177	2,107	70	—
Honduras	39	25,457	967	9,906	9,618	288	76
Nicaragua	55	1,341	519	498	413	85	—
Panama, excluding Canal Zone	141	114,020	67,713	27,981	10,872	17,109	13,944
Not allocable	4	473	—	—	—	—	—
Caribbean countries, total	106	102,453	1,109	38,185	37,821	364	—
Cuba	4	—113	—	—	—	—	—
Dominican Republic	44	25,493	12	2,930	2,924	6	—
Haiti	14	1,678	279	673	560	113	—
Jamaica	57	47,260	385	11,677	11,603	74	—
Trinidad	49	28,275	433	22,856	22,685	171	—
Other Caribbean countries	19	—140	—	49	49	—	—
South America, total	931	1,264,900	199,678	762,114	702,464	59,650	7,096
Argentina	420	143,018	47,079	55,844	38,514	17,330	15
Bolivia	46	5,866	—	4,801	4,801	—	—
Brazil	418	119,868	60,655	52,020	33,528	18,495	1,874
Chile	171	189,885	39,016	153,944	145,466	8,478	—
Colombia	245	45,844	11,089	23,313	19,694	3,619	596
Ecuador	80	4,673	1,241	1,601	1,214	387	—
Paraguay	22	954	—	224	182	62	—
Peru	200	107,964	4,314	60,313	58,887	1,426	271
Uruguay	99	5,973	1,283	1,379	1,156	223	54
Venezuela	379	655,327	32,430	407,040	398,035	9,005	4,286
Other South American countries	20	—14,472	159	1,001	930	71	—
Latin America, not allocable	6	1,002	—	—	—	—	—
Other Western Hemisphere, total	134	66,636	17,187	13,142	11,945	1,187	—
The Bahamas	41	18,103	8,985	1,324	238	1,086	—
Bermuda	14	17,199	8,068	44	—	44	—
Netherlands Antilles	49	5,159	134	694	627	67	—
Other British West Indies	14	191	—	56	56	—	—
Other Western Hemisphere	55	25,984	—	11,024	11,024	—	—
Europe, total	1,691	2,138,902	875,563	843,554	175,248	668,306	155,452
Common Market countries, total	1,233	977,906	405,995	378,904	82,253	296,651	13,148
Belgium	263	63,499	19,982	18,476	7,154	11,322	14
France (includes Andorra)	412	208,821	73,683	81,523	15,846	65,677	906
Italy (includes San Marino)	416	135,542	35,687	41,219	7,809	33,410	1,074
Luxembourg	14	4,432	3,141	525	109	416	14
Netherlands	526	108,239	47,981	39,880	3,702	36,178	7,983
West Germany	464	457,210	225,521	197,281	47,633	149,648	3,157
Common Market countries, not allocable	3	163	—	—	—	—	—
Other European countries, total	1,014	1,160,789	469,568	464,647	92,992	371,655	142,304
Austria	89	16,497	3,267	4,636	1,816	2,820	1,097
Denmark	74	16,926	6,717	4,016	97	3,919	562
Finland	65	4,342	1,361	1,493	768	725	—
Greece	57	3,696	271	1,352	1,342	10	—
Ireland	50	7,537	2,448	1,182	491	691	—
Liechtenstein	4	15,431	4,200	4,721	—	4,721	5,300
Norway	72	5,567	4,210	4,459	805	3,654	—
Portugal	71	8,014	3,381	2,618	1,555	1,063	—
Spain	239	34,037	7,056	7,887	4,438	3,449	389
Sweden	133	33,779	10,650	11,729	692	11,037	50
Switzerland	331	152,771	80,600	83,944	8,194	34,817	27,221
Turkey	64	9,371	3,159	4,319	2,721	1,598	—
United Kingdom	720	850,144	341,743	372,042	69,330	302,712	107,685
Other West European countries	18	526	—	50	50	—	—
East European countries	21	2,151	495	532	93	439	—
Europe, not allocable	9	207	—	3	3	—	—
Africa, total	571	844,704	113,500	690,849	644,966	45,883	27,688
North Africa, total	73	664,820	1,224	621,724	621,439	285	—
Algeria	6	8,293	—	6,170	6,170	—	—
Libya	30	653,161	736	610,515	610,425	90	—
Morocco	19	—932	194	549	469	80	—
Egypt (formerly United Arab Republic)	29	3,569	—	4,299	4,299	—	—
Other North African countries	18	729	294	191	76	115	—
East Africa, total	30	—87	375	440	284	156	—
Ethiopia	6	—134	—	93	93	—	—
Kenya	17	79	375	170	14	156	—
Tanzania	5	213	—	46	46	—	—
Uganda	3	269	—	22	22	—	—
Other East African countries	13	—454	—	109	109	—	—
West and Central Africa, total	62	35,826	26,380	13,321	7,073	6,248	4,200
Congo (Kinshasa)	6	673	—	367	367	—	—
Ghana	12	4,008	3,536	2,610	663	1,947	—
Ivory Coast	7	31	—	16	16	—	—
Liberia	27	21,224	17,897	3,302	542	2,760	4,200
Nigeria	20	10,659	—	4,541	4,541	—	—
Other West and Central African countries	35	—769	6,912	2,485	960	1,525	—

Footnotes at end of table.

Foreign Tax Credit on Corporation Returns, 1968

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED
 Table 9.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area,
 Subarea, and Country where Foreign Taxes were Paid—Continued

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

Selected major industry, and selected area, subarea, and country	Number of returns	Taxable income from foreign sources		Foreign taxes, excluding carryover			Dividends paid to related foreign corporations by subsidiaries
		Total (less loss) ¹	Dividends from related foreign corporations	Total	Paid or accrued	Deemed paid	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All Industries—Continued							
Africa—Continued							
South Africa, total	521	142,567	83,521	55,005	15,811	39,194	23,488
Malawi	3	492	256	186	46	140	—
Rhodesia	58	2,653	2,048	1,071	468	603	28
South Africa, Republic of	452	125,017	68,032	47,953	14,941	33,012	23,460
Zambia	32	14,218	13,185	5,760	321	5,439	—
Other South African countries	11	187	—	35	35	—	—
Africa, not allocable	5	1,578	—	359	359	—	—
Asia, total	1,260	2,242,104	200,905	1,449,705	1,340,954	108,751	3,789
Middle East, total	293	1,573,299	48,188	1,208,164	1,186,092	22,072	57
Iran	71	285,280	1,260	252,863	252,834	229	—
Iraq	111	31,267	40,910	19,278	55	19,223	—
Israel	199	8,491	1,378	2,930	2,509	421	57
Kuwait	15	296,389	3,165	242,077	239,989	2,088	—
Lebanon	39	—	—	174	—	—	—
Saudi Arabia	32	926,820	—	664,846	664,846	—	—
Other areas of Arabian Peninsula	17	40,265	1,250	23,069	23,056	13	—
Other Middle East countries	27	1,401	225	2,927	2,829	98	—
Southern and Southeastern Asia, total	475	317,814	102,124	155,606	102,134	53,472	425
Ceylon	15	699	8	447	443	4	—
India	176	30,898	4,832	19,847	17,048	2,599	—
Indonesia	25	66,589	67,339	41,275	118	41,157	—
Malaysia	47	4,881	1,266	2,139	1,514	625	—
Pakistan	66	100,494	1,158	53,718	53,092	626	—
Philippines	339	78,851	24,448	29,518	21,840	7,678	425
Singapore	35	4,664	448	1,959	1,831	128	—
South Vietnam	22	10,783	—	309	309	—	—
Thailand	72	17,295	2,624	5,377	4,723	654	—
Other Southern and Southeastern Asian countries	14	2,860	1	1,217	1,216	1	—
Eastern Asia, total	904	350,939	50,593	85,935	52,728	33,207	3,287
China, Republic of (Taiwan)	77	8,111	341	1,330	1,276	54	—
Hong Kong	77	17,142	7,855	3,338	1,909	1,529	492
Japan	845	316,721	42,008	79,525	48,033	31,492	2,795
Okinawa and Ryukyu Islands	26	3,268	—	1,411	1,411	—	—
South Korea, Republic of	28	5,113	389	295	163	132	—
Other Eastern Asian countries	11	584	—	36	36	—	—
Asia, not allocable	4	52	—	—	—	—	—
Oceania, total	777	163,274	62,973	84,177	35,504	48,673	15,237
Australia	722	153,559	61,317	79,514	32,445	47,069	15,234
New Zealand	191	9,007	1,656	4,808	3,004	1,804	3
Other countries of Oceania	9	708	—	55	55	—	—
Puerto Rico and United States Possessions, total	521	102,039	5,309	32,321	30,805	1,516	—
Puerto Rico	496	80,759	5,084	24,057	22,661	1,396	—
U. S. Possessions, total	61	21,280	225	8,264	8,144	120	—
Guam	26	5,329	—	2,798	2,798	—	—
Panama Canal Zone	9	121	—	(P)	(P)	—	—
Virgin Islands, U. S.	36	9,936	225	4,492	4,372	120	—
Other U. S. Possessions	4	5,894	—	974	974	—	—
Country not stated or not allocable and other income from outside of the United States	293	146,661	1,351	6,286	5,603	683	—
Other geographic classifications (combinations of countries shown above):							
Not economically less-developed countries	5,087	4,028,678	1,401,058	1,530,063	467,130	1,062,933	308,535
Economically less-developed countries	2,268	4,582,335	545,541	2,987,981	2,793,980	194,001	27,130
Sino-Soviet Bloc	25	1,774	495	543	104	439	—
Total Mining							
All geographic areas	87	1,261,604	72,289	845,465	820,160	25,305	22,739
Canada	52	62,775	5,511	26,895	24,418	2,477	—
Latin America, total	27	111,763	42,350	64,211	53,677	10,534	128
Mexico	6	8,686	4,255	4,145	1,167	2,978	—
Central America	4	6,702	3,300	2,236	2,102	134	—
South America, total	24	96,105	34,545	57,724	50,395	7,329	128
Argentina	8	1,379	—	883	883	—	—
Brazil	6	2,064	—	1,142	1,142	—	—
Chile	7	32,742	32,536	16,368	9,836	6,532	—
Colombia	4	1,178	—	2,471	2,471	—	—
Peru	7	54,089	509	34,622	34,393	229	—
Venezuela	6	4,112	1,500	1,851	1,283	568	128
Europe, total	14	5,273	961	989	344	645	—
Common Market countries	7	1,807	766	609	117	492	—
Other European countries, total	7	3,466	195	380	227	153	—
United Kingdom	7	987	31	47	25	22	—
Africa, total	9	99,860	21,591	74,034	63,055	10,979	22,611
North Africa, total	5	66,537	659	59,699	59,822	77	—
Libya	3	64,137	659	57,310	57,833	77	—
Southern Africa, total	5	33,807	20,932	14,331	3,429	10,902	22,611
South Africa, Republic of	3	33,763	20,932	14,325	3,423	10,902	22,611

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 9.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid—Continued

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

Selected major industry, and selected area, subarea, and country	Number of returns	Taxable income from foreign sources		Foreign taxes, excluding carryover			Dividends paid to related foreign corporations by subsidiaries
		Total (less loss) ¹	Dividends from related foreign corporations	Total	Paid or accrued	Deemed paid	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Total Mining—Continued							
Asia, total	15	975,798	1,276	676,780	676,741	39	—
Middle East, total	8	972,407	1,276	675,673	675,634	39	—
Iran	4	4,821	26	5,543	5,517	26	—
Kuwait	4	3,227	—	3,243	3,243	—	—
Saudi Arabia	4	957,902	—	664,186	664,186	—	—
Southern and Southeastern Asia, total	6	2,872	—	970	970	—	—
Malaysia	3	1,504	—	634	634	—	—
Eastern Asia, total	5	519	—	137	137	—	—
Japan	4	407	—	61	61	—	—
Oceania, total	9	4,687	600	2,554	1,923	631	—
Australia	9	4,687	600	2,554	1,923	631	—
Other geographic classifications (combinations of countries shown above):							
Not economically less-developed countries	66	104,740	27,900	44,636	30,042	14,596	22,611
Economically less-developed countries	38	1,155,724	44,389	800,325	790,116	10,709	128
Mining: Crude Petroleum and Natural Gas							
All geographic areas	55	1,051,396	6,156	741,368	738,771	2,597	128
Canada	30	2,700	377	797	416	381	—
Latin America, total	17	10,878	2,418	7,381	6,476	905	128
Mexico	4	437	159	94	79	15	—
South America, total	17	9,819	2,009	7,177	6,380	797	128
Argentina	8	1,379	—	893	869	—	—
Brazil	4	2,044	—	1,136	1,136	—	—
Colombia	4	1,178	—	2,471	2,471	—	—
Peru	3	359	509	374	145	229	—
Venezuela	6	4,112	1,500	1,851	1,283	568	128
Europe, total	8	2,679	826	814	250	564	—
Common Market countries, total	3	1,282	766	588	96	492	—
Other European countries, total	6	1,397	60	226	154	72	—
United Kingdom	5	932	—	20	20	—	—
Africa, total	4	63,663	659	57,958	57,881	77	—
North Africa, total	4	64,147	659	57,954	57,877	77	—
Libya	3	64,137	659	57,910	57,833	77	—
Asia, total	11	968,477	1,276	673,187	673,148	39	—
Middle East, total	7	966,776	1,276	672,985	672,946	39	—
Iran	4	4,821	26	5,543	5,517	26	—
Kuwait	4	3,227	—	3,243	3,243	—	—
Saudi Arabia	4	957,902	—	664,186	664,186	—	—
Southern and Southeastern Asia	4	1,183	—	69	69	—	—
Eastern Asia, total	4	518	—	133	133	—	—
Japan	3	406	—	57	57	—	—
Oceania, total	6	2,463	600	1,230	599	631	—
Australia	6	2,463	600	1,230	599	631	—
Other geographic classifications (combinations of countries shown above):							
Not economically less-developed countries	38	8,097	1,803	2,839	1,263	1,576	—
Economically less-developed countries	23	1,042,744	4,353	738,528	737,507	1,021	128
Mining: Coal, Metal, and Nonmetallic Minerals Mining							
All geographic areas	33	210,208	66,133	104,097	81,389	22,708	22,611
Canada	23	60,075	5,134	26,098	24,002	2,096	—
Latin America, total	10	100,885	39,932	56,830	47,201	9,629	—
South America, total	7	86,286	32,536	50,547	44,015	6,532	—
Peru	4	53,730	—	34,248	34,248	—	—
Europe, total	6	2,594	135	175	94	81	—
Common Market countries	4	525	—	21	21	—	—
Other European countries	4	2,069	135	154	73	81	—
Africa, total	5	36,197	20,932	16,076	5,174	10,902	22,611
Southern Africa, total	5	33,807	20,932	14,331	3,429	10,902	22,611
South Africa, Republic of	3	33,763	20,932	14,325	3,423	10,902	22,611
Asia	4	7,321	—	3,593	3,593	—	—
Oceania, total	3	2,224	—	1,324	1,324	—	—
Australia	3	2,224	—	1,324	1,324	—	—
Other geographic classifications (combinations of countries shown above):							
Not economically less-developed countries	29	96,643	26,097	41,799	26,779	13,020	22,611
Economically less-developed countries	15	112,980	40,036	62,297	52,609	9,688	—

Footnotes at end of table.

Foreign Tax Credit on Corporation Returns, 1968

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 9.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid—Continued

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

Selected major industry, and selected area, subarea, and country	Number of returns	Taxable income from foreign sources		Foreign taxes, excluding carryover			Dividends paid to related foreign corporations by subsidiaries
		Total (less loss) ¹	Dividends from related foreign corporations	Total	Paid or accrued	Deemed paid	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Contract Construction							
All geographic areas	75	116,209	10,964	47,712	40,621	7,091	187
Canada	31	3,131	986	1,306	424	882	—
Latin America, total	22	20,310	5,090	5,804	3,575	2,229	187
Mexico	11	2,913	45	452	433	19	—
Central America, total	7	7,305	4,385	2,274	201	2,073	187
Guatemala	4	507	—	104	104	—	—
Panama, excluding Canal Zone	3	6,518	4,385	2,097	24	2,073	187
South America, total	11	10,017	660	3,058	2,921	137	—
Argentina	5	2,106	475	1,124	1,058	66	—
Brazil	4	2,050	185	910	839	71	—
Colombia	5	2,913	—	467	467	—	—
Peru	6	1,119	—	213	213	—	—
Europe, total	17	9,820	3,894	4,034	797	3,237	—
Common Market countries, total	14	5,448	2,576	2,588	594	1,994	—
France (includes Andorra)	4	1,172	557	657	61	596	—
Italy (includes San Marino)	4	132	—	28	28	—	—
Netherlands	4	1,331	700	656	35	621	—
West Germany	5	2,529	1,319	1,238	461	777	—
Other European countries, total	12	4,372	1,318	1,446	203	1,243	—
Spain	3	1,295	—	86	86	—	—
United Kingdom	7	2,680	1,318	1,340	97	1,243	—
Africa, total	8	1,443	200	317	284	33	—
West and Central Africa	3	812	200	233	200	33	—
Southern Africa, total	3	147	—	31	31	—	—
South Africa, Republic of	3	147	—	31	31	—	—
Asia, total	28	73,340	3	32,661	32,660	1	—
Middle East, total	8	8,226	—	1,066	1,066	—	—
Iran	3	7,014	—	893	893	—	—
Saudi Arabia	3	1,212	—	173	173	—	—
Southern and Southeastern Asia, total	13	63,550	3	31,393	31,392	1	—
Pakistan	7	57,715	—	31,241	31,241	—	—
Thailand	3	254	—	40	40	—	—
Eastern Asia, total	15	1,564	—	202	202	—	—
Japan	11	1,246	—	151	151	—	—
Oceania, total	7	6,677	791	2,992	2,282	710	—
Australia	7	6,677	791	2,992	2,282	710	—
Puerto Rico and United States Possessions, total	11	1,443	—	526	526	—	—
Puerto Rico	11	1,443	—	526	526	—	—
Other geographic classifications (combinations of countries shown above):							
Not economically less-developed countries	44	21,075	5,671	8,525	3,696	4,829	—
Economically less-developed countries	44	95,062	5,293	39,185	36,922	2,263	187
Total Manufacturing							
All geographic areas	2,561	6,095,716	1,714,017	3,198,004	2,064,620	1,133,184	223,793
Canada	1,681	852,190	303,141	351,601	103,438	248,163	49,349
Latin America, total	828	1,388,629	243,368	788,970	711,257	77,713	21,320
Mexico	618	132,049	34,915	56,292	40,702	15,590	1,255
Central America, total	167	93,208	52,570	22,752	9,731	13,021	13,833
Costa Rica	55	4,825	405	1,619	1,428	191	—
El Salvador	42	2,030	74	693	683	10	—
Guatemala	65	5,434	384	1,181	1,110	70	—
Honduras	21	6,598	406	2,185	2,039	146	76
Nicaragua	36	—1,022	380	350	288	62	—
Panama, excluding Canal Zone	86	74,873	50,921	16,724	4,182	12,542	13,757
Caribbean countries, total	63	101,093	543	37,582	37,356	226	—
Dominican Republic	25	25,307	—	2,842	—	—	—
Haiti	9	1,653	272	666	555	111	—
Jamaica	37	46,587	150	11,469	11,409	60	—
Trinidad	25	27,735	121	22,605	22,550	55	—
South America, total	538	1,062,109	155,340	672,344	623,468	48,876	6,232
Argentina	272	114,491	45,639	47,430	30,522	16,908	15
Bolivia	28	5,188	2,158	5,299	4,745	554	—
Brazil	262	93,297	55,651	41,041	24,009	17,032	1,160
Chile	121	151,869	6,404	136,054	134,126	1,928	—
Colombia	156	31,192	10,841	17,265	13,682	3,583	596
Ecuador	51	3,819	1,241	1,227	840	387	—
Paraguay	7	281	254	77	15	62	—
Peru	133	42,507	3,420	23,028	21,934	1,094	249
Uruguay	72	3,152	1,285	1,215	992	223	54
Venezuela	246	631,942	28,290	399,086	392,652	7,034	4,158
Other South American countries	15	—15,639	159	622	351	71	—

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED
 Table 9.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area,
 Subarea, and Country where Foreign Taxes were Paid—Continued

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

Selected major industry, and selected area, subarea, and country	Number of returns	Taxable income from foreign sources		Foreign taxes, excluding carryover			Dividends paid to related foreign corporations by subsidiaries
		Total (less loss) ¹	Dividends from related foreign corporations	Total	Paid or accrued	Deemed paid	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Total Manufacturing—Continued							
Other Western Hemisphere, total	59	61,644	17,187	13,045	11,848	1,197	—
The Bahamas	27	13,753	8,985	1,324	238	1,086	—
Bermuda	8	16,964	8,058	44	—	44	—
Netherlands Antilles	12	4,760	134	613	546	67	—
Other British West Indies	6	211	—	54	54	—	—
Other Western Hemisphere	26	26,056	—	11,010	11,010	—	—
Europe, total	999	1,826,171	803,508	752,466	133,369	619,097	131,307
Common Market countries, total	728	902,287	380,943	350,082	68,382	281,700	11,421
Belgium	186	54,626	18,822	17,041	6,335	10,706	14
France (includes Andorra)	319	198,434	72,163	77,181	12,742	64,439	806
Italy (includes San Marino)	356	122,949	32,356	36,859	6,041	30,818	1,019
Luxembourg	12	4,390	3,099	498	103	395	14
Netherlands	201	103,692	46,491	38,313	3,349	34,964	6,311
West Germany	351	418,095	208,012	180,190	39,812	140,378	3,157
Other European countries, total	700	923,730	422,565	402,381	64,984	337,397	119,886
Austria	59	14,436	3,207	4,422	1,674	2,748	1,097
Denmark	56	16,061	6,688	3,926	20	3,906	562
Finland	42	3,540	1,333	1,407	746	661	—
Greece	31	2,119	29	927	923	4	—
Ireland	38	5,093	2,293	860	247	613	—
Liechtenstein	4	15,431	4,200	—	—	4,721	5,300
Norway	56	4,899	4,199	4,444	804	3,640	—
Portugal	40	6,513	3,378	2,216	1,154	1,062	—
Spain	189	27,870	6,580	7,070	3,882	3,188	389
Sweden	107	32,240	10,547	11,522	622	10,900	50
Switzerland	234	137,376	72,973	38,419	7,058	31,361	21,475
Turkey	42	8,143	3,137	3,970	—	1,592	—
United Kingdom	516	648,104	303,506	317,895	45,333	272,562	91,013
East European countries	15	1,553	495	532	93	439	—
Europe, not allocable	7	154	—	3	3	—	—
Africa, total	337	636,109	89,809	507,160	473,217	33,943	5,001
North Africa, total	41	502,514	449	455,341	455,160	181	—
Algeria	4	8,852	—	4,425	4,425	—	—
Libya	18	493,509	—	446,096	446,096	—	—
Morocco	14	—	162	532	463	69	—
Egypt (formerly United Arab Republic)	13	3,687	—	4,154	4,154	—	—
Other North African countries	9	451	267	134	22	112	—
East Africa, total	18	—	375	434	278	156	—
Ethiopia	4	—	—	93	93	—	—
Kenya	12	—	375	167	11	156	—
Tanzania	4	—	—	46	46	—	—
Uganda	3	—	—	22	22	—	—
Other East African countries	7	—	—	106	106	—	—
West and Central Africa, total	34	32,526	27,801	12,336	6,223	6,113	4,200
Congo (Kinshasa)	3	665	—	367	367	—	—
Ghana	8	4,048	3,536	2,609	652	1,947	—
Liberia	14	19,901	17,385	2,995	342	2,653	4,200
Nigeria	8	9,360	—	4,021	4,021	—	—
South Africa, total	316	100,279	61,184	38,690	11,197	27,493	801
Malawi	3	492	256	186	46	140	—
Rhodesia	16	2,554	2,048	1,049	446	603	28
South Africa, Republic of	300	83,229	45,741	31,723	10,392	21,331	773
Zambia	9	13,661	13,139	5,703	284	5,419	—
Asia, total	766	1,041,787	194,780	687,678	580,532	107,146	3,666
Middle East, total	150	580,615	45,763	528,732	506,971	21,761	57
Iran	44	270,190	—	1,161	246,118	194	—
Iraq	6	31,257	40,910	19,278	55	19,223	—
Israel	101	2,897	302	1,277	1,119	158	57
Kuwait	6	292,858	3,165	238,654	236,566	2,088	—
Lebanon	23	—	—	55	55	—	—
Saudi Arabia	9	—	—	97	97	—	—
Other areas of Arabian Peninsula	6	38,055	—	23,015	23,015	—	—
Other Middle East countries	17	—	225	238	140	98	—
Southern and Southeastern Asia, total	281	183,476	99,561	94,469	41,885	52,584	322
Ceylon	10	670	—	439	439	—	—
India	132	24,384	4,806	15,681	13,097	2,584	—
Indonesia	11	66,175	67,339	41,168	11	41,157	—
Malaysia	25	1,802	1,256	780	161	619	—
Pakistan	26	20,953	1,144	10,335	9,718	617	—
Philippines	191	47,000	22,058	20,813	13,944	6,869	322
Singapore	16	1,265	344	406	320	86	—
South Vietnam	10	7,038	—	253	253	—	—
Thailand	39	13,287	2,613	4,104	3,453	651	—
Other Southern and Southeastern Asian countries	7	902	—	490	489	1	—
Eastern Asia, total	625	277,666	49,456	64,477	31,676	32,801	3,287
China, Republic of (Taiwan)	33	4,690	314	589	540	49	—
Hong Kong	40	7,516	—	7,917	1,971	1,374	492
Japan	613	260,421	41,736	61,551	30,305	31,246	2,795
Okinawa and Ryukyu Islands	7	1,341	—	469	469	—	—
South Korea, Republic of	17	3,569	389	292	160	132	—

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED
 Table 9.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area,
 Subarea, and Country where Foreign Taxes were Paid—Continued

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

Selected major industry, and selected area, subarea, and country	Number of returns	Taxable income from foreign sources		Foreign taxes, excluding carryover			Dividends paid to related foreign corporations by subsidiaries
		Total (less loss) ¹	Dividends from related foreign corporations	Total	Paid or accrued	Deemed paid	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Total Manufacturing—Continued							
Oceania, total	614	127,077	57,419	72,076	27,691	44,385	13,153
Australia	576	119,305	55,858	67,789	24,916	42,873	13,150
New Zealand	146	7,610	1,561	4,232	2,720	1,512	3
Other countries of Oceania	4	162	—	55	55	—	—
Puerto Rico and United States Possessions, total	203	72,963	4,452	22,185	20,962	1,223	—
Puerto Rico	191	55,621	4,227	16,069	14,966	1,103	—
U. S. Possessions, total	32	17,342	225	6,116	5,996	102	—
Guam	14	3,284	—	1,722	1,722	—	—
Panama Canal Zone	5	119	—	(9)	(9)	—	—
Virgin Islands, U. S.	15	8,046	225	3,420	3,300	120	—
Country not stated or not allocable and other income from outside of the United States	163	89,103	367	2,642	2,351	291	—
Other geographic classifications (combinations of countries shown above):							
Not economically less-developed countries	2,331	3,128,975	1,247,897	1,260,968	299,743	961,225	197,869
Economically less-developed countries	1,012	2,876,200	465,272	1,933,676	1,762,473	171,203	25,927
Sino-Soviet Bloc	15	1,395	495	537	98	439	—
Manufacturing: Food and Kindred Products							
All geographic areas	148	359,575	141,789	156,182	53,027	103,155	15,299
Canada	78	59,118	23,788	29,661	5,272	24,389	259
Latin America, total	50	55,902	14,592	24,150	18,250	5,900	1,645
Mexico	37	19,241	1,243	8,887	8,347	540	—
Central America, total	22	16,345	4,175	5,130	2,984	2,146	1,403
Costa Rica	5	3,723	300	1,196	1,052	144	—
Guatemala	6	100	—	17	17	—	—
Nicaragua	5	498	357	59	1	58	—
Panama, excluding Canal Zone	11	6,045	3,112	1,983	185	1,798	1,327
Caribbean countries, total	10	502	222	121	29	92	—
Jamaica	7	312	150	71	11	60	—
Trinidad	4	176	72	48	16	32	—
South America, total	33	19,814	8,952	10,012	6,890	3,122	242
Argentina	16	5,530	1,312	2,554	1,863	691	—
Brazil	14	5,533	4,816	3,226	1,722	1,504	6
Chile	6	635	—	358	358	—	—
Colombia	12	1,372	446	680	452	228	—
Ecuador	5	751	—	146	146	—	—
Peru	12	3,215	1,258	1,649	1,263	386	236
Uruguay	6	604	—	303	303	—	—
Venezuela	25	2,139	1,120	1,087	774	313	—
Other Western Hemisphere, total	9	1,421	32	83	80	3	—
The Bahamas	4	1,129	—	3	3	—	—
Europe, total	69	174,318	79,017	73,307	15,557	57,750	11,152
Common Market countries, total	40	81,223	37,703	35,061	7,955	27,106	—
Belgium	14	5,681	585	1,286	962	324	—
France (includes Andorra)	13	14,280	5,980	6,946	313	6,033	—
Italy (includes San Marino)	15	11,165	4,680	4,162	909	3,353	—
Netherlands	21	4,800	1,377	2,101	528	1,573	—
West Germany	20	45,297	25,081	20,566	4,743	15,823	—
Other European countries, total	58	93,095	41,314	38,246	7,602	30,644	11,152
Austria	3	238	87	142	5	137	—
Denmark	3	3,013	1,621	933	—	933	—
Ireland	6	2,042	1,476	281	63	218	—
Norway	4	708	—	387	387	—	—
Spain	16	3,032	1,200	687	372	515	—
Sweden	3	282	31	22	2	20	—
Switzerland	16	16,798	6,130	5,221	535	4,686	2,710
United Kingdom	47	66,146	30,736	29,749	5,623	24,126	8,442
Africa, total	16	6,071	1,449	2,468	1,676	792	—
North Africa	3	583	—	313	313	—	—
Southern Africa, total	13	5,355	1,332	2,105	1,360	745	—
South Africa, Republic of	12	4,444	722	1,538	1,128	411	—
Asia, total	44	37,434	16,808	17,286	7,500	9,786	—
Middle East, total	14	—698	—	9	9	—	—
Lebanon	3	—781	—	(¹)	(¹)	—	—
Southern and Southeastern Asia, total	25	14,485	4,621	7,213	5,670	1,543	—
India	3	3,323	—	2,533	—	—	—
Pakistan	5	444	197	281	189	92	—
Philippines	24	9,814	4,391	4,339	2,901	1,438	—
Eastern Asia, total	21	23,647	12,187	10,064	1,821	8,243	—
Japan	19	23,343	11,982	9,939	1,803	8,136	—

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED
 Table 9.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area,
 Subarea, and Country where Foreign Taxes were Paid—Continued

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

Selected major industry, and selected area, subarea, and country	Number of returns	Taxable income from foreign sources		Foreign taxes, excluding carryover			Dividends paid to related foreign corporations by subsidiaries
		Total (less loss) ¹	Dividends from related foreign corporations	Total	Paid or accrued	Deemed paid	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Manufacturing: Food and Kindred Products—Continued							
Oceania, total	30	12,828	5,301	6,417	2,155	4,262	2,243
Australia	30	12,224	5,195	6,128	1,963	4,165	2,243
New Zealand	6	604	106	289	192	97	—
Puerto Rico and United States Possessions, total	23	8,981	800	2,802	2,525	277	—
Puerto Rico	23	6,976	800	1,828	1,551	277	—
Country not stated or not allocable and other income from outside of the United States	9	3,508	—	12	12	—	—
Other geographic classifications (combinations of countries shown above):							
Not economically less-developed countries	125	271,401	119,506	120,066	25,238	94,828	13,654
Economically less-developed countries	67	84,672	22,281	36,108	27,777	8,331	1,645
Manufacturing: Chemicals and Allied Products							
All geographic areas	380	833,345	298,951	311,884	105,885	205,999	49,524
Canada	260	161,241	47,642	67,181	16,915	50,266	6,483
Latin America, total	168	131,195	67,322	56,195	33,305	22,890	12,867
Mexico	140	36,936	12,202	15,472	9,792	5,680	254
Central America, total	47	38,578	28,428	10,885	857	10,028	12,430
Costa Rica	15	463	—	75	75	—	—
El Salvador	12	376	—	121	—	—	—
Guatemala	21	2,196	346	172	111	61	—
Honduras	6	142	—	11	11	—	—
Nicaragua	16	406	23	37	33	4	—
Panama, excluding Canal Zone	27	34,531	28,059	10,469	506	9,963	12,430
Caribbean countries, total	17	917	49	166	143	23	—
Dominican Republic	13	619	—	44	44	—	—
Jamaica	7	204	—	98	98	—	—
South America, total	109	54,610	26,643	29,672	22,513	7,159	183
Argentina	54	15,112	3,483	4,506	3,459	1,047	—
Bolivia	7	2,541	—	1,287	733	554	—
Brazil	50	10,127	4,180	3,513	2,001	1,512	—
Chile	32	1,841	490	595	550	145	—
Colombia	40	10,719	4,527	4,985	3,490	1,495	50
Ecuador	14	972	823	385	114	271	—
Peru	41	2,057	269	1,010	947	63	—
Uruguay	18	297	—	154	—	—	—
Venezuela	66	27,906	10,554	13,049	11,048	2,001	133
Other South American countries	6	—16,975	159	88	17	71	—
Other Western Hemisphere, total	12	11,918	8,564	275	87	188	—
The Bahamas	3	474	402	163	73	90	—
Other Western Hemisphere	9	1,412	—	14	14	—	—
Europe, total	172	334,789	130,981	126,001	20,541	105,460	27,991
Common Market countries, total	141	154,951	58,731	56,053	8,498	47,555	6,653
Belgium	45	4,149	780	829	432	397	—
France (includes Andorra)	70	46,988	15,892	18,848	1,875	16,973	653
Italy (includes San Marino)	71	38,395	11,026	13,296	1,790	11,506	1,011
Netherlands	34	24,586	11,263	8,471	532	7,939	4,989
West Germany	82	38,970	17,478	14,240	3,869	10,371	—
Other European countries, total	119	179,822	72,250	69,948	12,043	57,905	21,338
Austria	12	1,098	15	20	7	13	—
Denmark	15	1,200	227	122	—	122	—
Finland	11	267	48	24	5	19	—
Greece	10	264	1	33	33	—	—
Ireland	11	612	254	208	144	64	—
Norway	13	233	—	1	—	—	—
Portugal	7	355	29	13	3	10	—
Spain	34	6,151	640	691	467	224	213
Sweden	21	1,855	876	820	50	770	50
Switzerland	38	38,080	18,817	11,987	2,312	9,675	14,540
Turkey	14	540	—	43	43	—	—
United Kingdom	102	122,113	51,343	55,986	8,978	47,008	6,535
Africa, total	56	26,437	10,491	16,362	11,305	5,057	382
North Africa	6	9,785	—	9,496	9,496	—	—
East Africa	5	300	—	104	104	—	—
West and Central Africa, total	7	5,310	4,903	2,743	557	2,186	—
Ghana	3	3,752	3,536	2,443	496	1,947	—
Other West and Central African countries	6	1,552	1,367	287	48	239	—
Southern Africa, total	55	11,062	5,588	4,019	1,148	2,871	382
South Africa, Republic of	52	9,963	4,482	3,679	997	2,682	382

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 9.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid—Continued

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

Selected major industry, and selected area, subarea, and country	Number of returns	Taxable income from foreign sources		Foreign taxes, excluding carryover			Dividends paid to related foreign corporations by subsidiaries
		Total (less loss) ¹	Dividends from related foreign corporations	Total	Paid or accrued	Deemed paid	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Manufacturing: Chemicals and Allied Products—Continued							
Asia, total	111	79,859	21,365	26,218	13,319	12,899	—
Middle East, total	23	1,521	48	283	279	4	—
Iran	9	1,484	48	144	140	4	—
Israel	12	165	—	96	96	—	—
Lebanon	3	180	—	28	28	—	—
Other Middle East countries	3	—588	—	15	15	—	—
Southern and Southeastern Asia, total	50	28,984	11,849	10,710	6,402	4,308	—
India	27	5,558	2,508	2,572	1,212	1,360	—
Malaysia	8	380	125	135	72	63	—
Pakistan	9	2,426	581	448	88	360	—
Philippines	36	10,702	5,766	4,899	3,093	1,806	—
Singapore	4	742	300	195	127	68	—
Thailand	11	6,547	2,569	2,310	1,659	651	—
Eastern Asia, total	100	49,354	9,468	15,225	6,638	8,587	—
China, Republic of (Taiwan)	9	2,516	314	316	267	49	—
Hong Kong	10	816	465	111	29	82	—
Japan	97	44,954	8,689	14,674	6,218	8,456	—
South Korea, Republic of	3	1,018	—	119	—	—	—
Oceania, total	108	31,100	11,217	14,742	5,668	9,074	1,903
Australia	102	28,542	10,401	13,640	5,266	8,274	1,903
New Zealand	27	2,554	816	1,101	301	800	—
Puerto Rico and United States Possessions, total	39	22,581	1,320	4,576	4,431	145	—
Puerto Rico	36	20,954	1,320	4,386	4,241	145	—
U. S. Possessions, total	9	1,627	—	190	190	—	—
Virgin Islands, U. S.	5	1,223	—	1	1	—	—
Country not stated or not allocable and other income from outside of the United States	30	34,207	50	304	294	10	—
Other geographic classifications (combinations of countries shown above):							
Not economically less-developed countries	340	580,156	203,144	226,066	50,139	175,927	36,759
Economically less-developed countries	186	218,889	95,758	85,479	55,427	30,052	12,867
Manufacturing: Petroleum Refining and Related Industries							
All geographic areas	32	2,095,739	436,006	1,635,780	1,399,930	235,850	47,148
Canada	24	170,355	99,542	69,379	22,479	46,900	12,266
Latin America, total	25	546,034	36,256	413,215	404,015	9,200	—
Mexico	15	4,365	1,758	1,996	1,278	718	—
Central America	3	11,236	4,430	1,574	1,552	22	—
South America, total	20	502,289	30,069	386,145	377,695	8,460	—
Argentina	7	27,584	12,275	14,960	10,704	4,256	—
Brazil	5	12,609	12,273	6,326	3,218	3,108	—
Chile	3	2,344	1,515	1,054	614	440	—
Colombia	7	8,233	75	6,554	6,513	41	—
Peru	3	485	—	80	80	—	—
Uruguay	3	595	276	172	172	—	—
Venezuela	17	448,111	3,400	352,972	352,475	497	—
Europe, total	24	187,898	140,787	113,172	9,971	103,201	32,108
Common Market countries, total	17	86,774	47,681	34,840	6,855	27,985	—
Belgium	4	6,920	4,449	3,098	715	2,383	—
France (includes Andorra)	8	25,499	17,965	13,041	3,726	9,315	—
Italy (includes San Marino)	7	4,394	147	282	202	80	—
Netherlands	6	32,318	17,610	14,463	1,018	13,445	—
West Germany	5	17,521	7,444	3,932	1,192	2,740	—
Other European countries, total	17	101,124	93,106	78,332	3,116	75,216	32,108
Ireland	3	1,282	503	303	2	301	—
Spain	4	1,206	607	250	93	157	—
Switzerland	6	—4,494	225	81	15	66	—
Turkey	3	399	—	194	—	—	—
United Kingdom	11	90,359	83,702	70,728	2,387	68,341	26,500
Africa, total	12	515,033	27,664	457,503	450,608	6,895	—
North Africa, total	9	488,123	406	444,968	444,803	165	—
Algeria	4	4,852	—	4,425	4,425	—	—
Libya	7	482,467	—	436,434	436,434	—	—
West and Central Africa, total	4	11,016	11,075	4,077	3,567	510	—
Liberia	3	11,046	10,685	410	—	410	—
Southern Africa, total	5	15,211	16,183	8,412	2,192	6,220	—
South Africa, Republic of	5	15,037	15,995	8,332	2,190	6,142	—
Asia, total	20	672,769	122,515	579,586	511,415	68,171	2,774
Middle East, total	14	572,022	44,528	526,236	504,700	21,538	—
Iran	11	264,261	—	245,005	245,005	—	—
Israel	3	332	228	159	32	127	—
Kuwait	4	292,637	3,165	238,654	236,566	2,088	—
Other Middle East countries	3	—3,801	225	177	79	98	—
Southern and Southeastern Asia, total	11	72,542	68,840	45,307	3,613	41,694	—
India	8	778	151	1,009	934	75	—
Indonesia	4	65,973	67,339	41,157	—	41,157	—
Philippines	5	3,595	1,000	1,399	1,094	305	—
Eastern Asia, total	15	28,205	9,147	8,043	3,102	4,941	2,774
China, Republic of (Taiwan)	4	744	—	99	—	—	—
Japan	15	25,754	5,480	7,226	2,995	4,231	2,774

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED
 Table 9.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area,
 Subarea, and Country where Foreign Taxes were Paid—Continued

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

Selected major industry, and selected area, subarea, and country	Number of returns	Taxable income from foreign sources		Foreign taxes, excluding carryover			Dividends paid to related foreign corporations by subsidiaries
		Total (less loss) ¹	Dividends from related foreign corporations	Total	Paid or accrued	Deemed paid	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Manufacturing: Petroleum Refining and Related Industries—Continued							
Oceania, total	5	—26,524	671	720	229	491	—
Australia	5	—25,488	671	719	228	491	—
Puerto Rico and United States Possessions, total	6	1,829	—	949	949	—	—
Puerto Rico	4	700	—	212	212	—	—
U. S. Possessions	4	1,129	—	737	737	—	—
Country not stated or not allocable and other income from outside of the United States	4	9,173	—	263	263	—	—
Other geographic classifications (combinations of countries shown above):							
Not economically less-developed countries	29	367,887	261,885	197,383	37,243	160,140	47,148
Economically less-developed countries	28	1,718,680	174,123	1,438,132	1,362,423	75,709	—
Manufacturing: Primary Metal Industries							
All geographic areas	125	562,047	82,983	253,262	217,817	35,445	14,635
Canada	69	38,360	9,886	15,393	6,456	8,937	3,319
Latin America, total	34	399,747	23,481	195,265	190,634	4,631	636
Mexico	25	8,626	4,229	6,932	5,052	1,880	636
Central America	3	18,039	12,053	3,365	3,309	76	—
Caribbean countries, total	4	68,539	—	12,753	12,753	—	—
Jamaica	4	43,756	—	10,154	10,154	—	—
South America, total	24	304,543	7,199	172,195	169,520	2,675	—
Argentina	13	5,970	4,004	1,898	205	1,693	—
Brazil	11	1,782	514	671	484	187	—
Chile	10	136,675	781	128,575	128,455	120	—
Colombia	8	669	243	276	161	115	—
Peru	8	29,081	797	17,741	17,426	315	—
Uruguay	3	129	—	21	21	—	—
Venezuela	10	129,789	860	22,760	22,515	245	—
Europe, total	66	35,460	6,655	7,685	2,419	5,266	789
Common Market countries, total	60	10,396	2,702	2,887	638	2,249	—
Belgium	9	793	49	57	59	26	—
France (includes Andorra)	26	2,965	823	863	100	763	—
Italy (includes San Marino)	33	3,835	655	913	273	640	—
Netherlands	8	1,154	575	519	31	488	—
West Germany	11	1,243	600	505	175	330	—
Other European countries, total	25	25,064	3,953	4,798	1,781	3,017	789
Spain	9	2,090	49	365	323	42	—
Sweden	5	355	11	8	1	7	—
Switzerland	5	11,841	232	142	113	29	—
United Kingdom	15	8,887	2,784	3,381	1,032	2,349	—
Africa, total	16	42,050	33,898	15,098	2,847	12,251	4,200
West and Central Africa	3	10,157	9,252	2,940	657	2,283	4,200
South Africa, total	14	31,893	24,646	12,158	2,190	9,968	—
South Africa, Republic of	13	18,561	11,468	6,658	2,159	4,499	—
Asia, total	34	9,612	251	2,463	2,365	98	57
Middle East, total	6	193	33	55	42	13	57
Israel	5	143	33	54	41	13	57
Southern and Southeastern Asia, total	11	2,855	208	1,675	1,598	77	—
India	8	2,504	69	1,535	1,500	35	—
Philippines	4	294	139	96	54	42	—
Eastern Asia, total	28	6,564	10	733	725	8	—
Japan	28	5,773	10	687	679	8	—
Oceania, total	23	17,149	8,813	7,697	3,433	4,264	5,634
Australia	23	17,130	8,811	7,687	3,425	4,262	5,634
Puerto Rico and United States Possessions, total	6	349	—	94	94	—	—
Puerto Rico	6	347	—	94	94	—	—
Country not stated or not allocable and other income from outside of the United States	3	368	—	—	—	—	—
Other geographic classifications (combinations of countries shown above):							
Not economically less-developed countries	120	115,234	36,825	38,089	15,126	22,963	9,742
Economically less-developed countries	39	446,446	46,159	215,172	202,688	12,484	4,893
Manufacturing: Machinery, Except Electrical							
All geographic areas	456	573,082	172,793	199,260	75,831	123,429	18,928
Canada	271	78,405	16,216	28,984	12,280	16,704	970
Latin America, total	153	44,192	13,570	16,901	12,401	4,500	304
Mexico	97	15,321	2,277	3,509	2,560	949	—
Central America, total	17	3,127	1,541	745	280	465	—
Costa Rica	6	120	100	70	24	46	—
El Salvador	4	298	68	167	158	9	—
Guatemala	7	182	—	21	—	—	—
Honduras	3	123	—	24	24	—	—
Panama, excluding Canal Zone	9	2,354	1,373	456	46	410	—

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED
 Table 9.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area,
 Subarea, and Country where Foreign Taxes were Paid—Continued

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

Selected major industry, and selected area, subarea, and country	Number of returns	Taxable income from foreign sources		Foreign taxes, excluding carryover			Dividends paid to related foreign corporations by subsidiaries
		Total (less loss) ¹	Dividends from related foreign corporations	Total	Paid or accrued	Deemed paid	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Manufacturing: Machinery, Except Electrical—Continued							
Latin America—Continued							
Caribbean countries, total	9	414	—	261	261	—	—
Jamaica	6	374	—	248	248	—	—
South America, total	103	25,330	9,752	12,366	9,280	3,086	304
Argentina	37	7,992	340	4,734	4,529	206	—
Bolivia	5	—	—	24	24	—	—
Brazil	61	8,866	4,032	3,057	1,910	1,147	7
Chile	16	1,146	391	735	577	158	—
Colombia	13	941	953	730	216	514	—
Ecuador	6	196	132	83	43	40	—
Peru	17	1,109	648	867	623	244	—
Uruguay	7	423	235	155	121	34	—
Venezuela	24	4,622	3,021	1,940	1,197	743	297
Other Western Hemisphere, total	4	1,028	10	224	219	5	—
The Bahamas	3	241	10	97	92	5	—
Europe, total	187	319,987	121,370	113,579	25,989	87,590	17,020
Common Market countries, total	127	165,905	63,554	56,156	11,877	44,279	161
Belgium	32	11,407	3,819	4,342	2,016	2,326	—
France (includes Andorra)	64	40,188	9,352	11,838	1,832	10,006	—
Italy (includes San Marino)	56	22,202	5,404	7,333	994	6,339	—
Netherlands	31	10,472	4,194	3,434	227	3,207	—
West Germany	61	81,459	40,785	29,147	6,746	22,401	161
Other European countries, total	137	154,082	57,816	57,423	14,112	43,311	16,859
Austria	9	5,770	—	1,046	1,046	—	—
Denmark	7	3,964	2,321	1,246	—	1,246	—
Finland	7	1,047	216	153	—	152	—
Greece	4	1,073	—	501	501	—	—
Ireland	5	720	—	20	20	—	—
Norway	8	1,794	360	646	214	432	—
Portugal	7	472	206	28	70	—	—
Spain	31	6,260	1,481	1,954	1,032	922	—
Sweden	19	8,397	1,965	1,507	100	1,407	—
Switzerland	55	37,140	23,797	13,080	2,068	11,012	2,857
Turkey	7	2,535	90	676	662	14	—
United Kingdom	93	85,024	27,378	36,465	8,409	28,056	14,002
East European countries	4	—	—	—	7	—	—
Africa, total	61	17,926	3,529	5,328	3,256	2,072	172
North Africa, total	8	1,532	—	320	320	—	—
Libya	7	1,165	—	160	160	—	—
East Africa, total	3	310	161	112	43	69	—
Kenya	3	220	161	69	—	69	—
West and Central Africa	6	901	—	548	548	—	—
Southern Africa, total	50	14,247	3,368	3,989	1,986	2,003	172
Rhodesia	5	129	—	48	48	—	—
South Africa, Republic of	51	13,695	3,353	3,754	1,757	1,997	172
Zambia	3	368	15	182	176	6	—
Asia, total	148	73,542	11,862	20,290	13,376	6,914	17
Middle East, total	13	3,645	—	1,077	1,077	—	—
Iran	6	1,654	—	228	228	—	—
Israel	7	1,428	—	681	681	—	—
Southern and Southeastern Asia, total	50	14,792	2,933	6,755	5,795	960	—
India	31	4,762	268	3,835	3,678	157	—
Malaysia	5	133	—	25	25	—	—
Pakistan	4	467	—	289	289	—	—
Philippines	29	4,273	2,665	2,062	1,259	803	—
South Vietnam	3	3,148	—	133	133	—	—
Thailand	5	1,371	—	188	188	—	—
Eastern Asia, total	131	55,105	8,929	12,458	6,504	5,954	17
China, Republic of (Taiwan)	3	245	—	40	40	—	—
Hong Kong	6	711	280	88	44	44	—
Japan	131	52,379	8,649	11,870	5,960	5,910	17
Okinawa and Ryukyu Islands	3	1,301	—	460	460	—	—
South Korea, Republic of	3	469	—	(?)	(?)	—	—
Oceania, total	120	22,314	5,306	10,793	5,522	5,271	446
Australia	118	20,173	5,200	9,118	3,948	5,170	446
New Zealand	17	2,122	106	1,667	1,566	101	—
Puerto Rico and United States Possessions, total	23	8,959	840	2,228	1,930	298	—
Puerto Rico	23	8,520	840	2,081	1,783	298	—
Country not stated or not allocable and other income from outside of the United States	14	6,736	92	889	805	84	—
Other geographic classifications (combinations of countries shown above):							
Not economically less-developed countries	416	481,863	154,660	167,581	50,301	117,280	18,625
Economically less-developed countries	184	84,149	18,043	30,739	24,665	6,074	304
Sino-Soviet Bloc	3	341	—	7	7	—	—

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED
 Table 9.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area,
 Subarea, and Country where Foreign Taxes were Paid—Continued

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

Selected major industry, and selected area, subarea, and country	Number of returns	Taxable income from foreign sources		Foreign taxes, excluding carryover			Dividends paid to related foreign corporations by subsidiaries
		Total (less loss) ¹	Dividends from related foreign corporations	Total	Paid or accrued	Deemed paid	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Manufacturing: Electrical Equipment and Supplies							
All geographic areas	222	353,814	107,560	112,362	52,271	60,091	9,343
Canada	155	43,081	12,794	12,426	5,795	6,631	1,417
Latin America, total	76	48,603	16,601	18,988	12,818	6,170	802
Mexico	62	14,879	4,970	6,134	3,774	2,360	—
Central America, total	10	1,631	41	234	225	9	—
Guatemala	5	274	—	22	22	—	—
Nicaragua	4	486	—	23	23	—	—
Panama, excluding Canal Zone	7	634	41	19	10	9	—
Caribbean countries, total	6	1,060	272	311	200	111	—
Dominican Republic	4	291	—	23	23	—	—
Haiti	4	469	272	157	46	111	—
Jamaica	3	157	—	57	57	—	—
Trinidad	4	146	—	74	74	—	—
South America, total	42	31,017	11,318	12,309	8,619	3,690	802
Argentina	27	3,464	144	1,090	1,080	10	—
Bolivia	5	384	—	53	53	—	—
Brazil	24	8,925	5,529	3,479	1,933	1,546	—
Chile	9	6,185	2,727	3,077	2,153	924	—
Colombia	9	2,738	519	1,648	1,337	311	—
Ecuador	4	1,198	—	315	315	—	—
Peru	11	3,423	—	464	464	—	—
Uruguay	9	62	—	25	25	—	—
Venezuela	18	6,416	2,400	2,054	1,155	899	802
Other Western Hemisphere, total	6	2,542	—	1,138	1,138	—	—
The Bahamas	4	256	—	—	—	—	—
Other British West Indies	3	158	—	54	54	—	—
Europe, total	89	161,516	67,724	55,017	13,641	41,376	5,855
Common Market countries, total	71	92,989	38,155	33,030	7,729	25,301	2,294
Belgium	11	12,687	4,249	3,340	701	2,639	14
France (includes Andorra)	24	22,184	7,178	7,733	1,784	6,029	95
Italy (includes San Marino)	25	14,685	3,535	3,850	481	3,369	8
Netherlands	18	8,524	3,447	2,564	503	2,061	1,322
West Germany	46	34,403	19,008	15,479	4,280	11,199	841
Other European countries, total	55	68,527	29,569	21,987	5,912	16,075	3,561
Denmark	6	185	60	31	31	—	—
Greece	5	365	—	206	206	—	—
Norway	4	2,084	1,058	1,575	53	1,522	—
Portugal	5	174	157	143	110	33	—
Spain	13	3,301	1,261	1,606	909	697	166
Sweden	6	1,447	564	803	70	733	—
Switzerland	25	15,940	12,872	4,037	1,171	2,866	1,036
Turkey	4	1,268	1,032	1,106	428	678	—
United Kingdom	43	43,267	12,431	12,066	2,697	9,369	2,359
East European countries	4	227	—	3	3	—	—
Africa, total	19	3,526	35	779	759	20	—
North Africa	3	1,634	—	171	171	—	—
West and Central Africa	3	340	—	234	234	—	—
Southern Africa, total	19	2,284	35	292	272	20	—
South Africa, Republic of	19	1,962	35	184	164	20	—
Asia, total	80	56,322	6,833	11,641	8,226	3,415	280
Middle East, total	14	908	129	204	171	33	—
Iran	5	676	95	78	61	17	—
Southern and Southeastern Asia, total	20	6,864	1,294	3,022	2,619	403	276
India	11	482	103	382	331	51	—
Philippines	13	3,328	1,191	1,219	867	352	276
Thailand	4	2,092	—	929	929	—	—
Eastern Asia, total	66	48,546	5,510	8,415	5,436	2,979	4
China, Republic of (Taiwan)	5	223	—	19	19	—	—
Hong Kong	5	1,864	1,173	265	58	207	—
Japan	65	46,357	4,337	8,131	5,359	2,772	4
Oceania, total	54	8,556	3,161	4,108	1,862	2,246	988
Australia	52	8,004	3,161	3,915	1,669	2,246	988
New Zealand	19	552	—	193	193	—	—
Puerto Rico and United States Possessions, total	22	16,554	133	7,938	7,902	36	—
Puerto Rico	22	10,511	133	4,686	4,650	36	—
U. S. Possessions	4	6,043	—	3,252	3,252	—	—
Country not stated or not allocable and other income from outside of the United States	12	12,904	185	312	122	190	—
Other geographic classifications (combinations of countries shown above):							
Not economically less-developed countries	203	261,092	87,975	78,528	26,017	52,511	8,264
Economically less-developed countries	94	79,534	19,406	33,504	26,121	7,383	1,078

Footnotes at end of table.

Foreign Tax Credit on Corporation Returns, 1968

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED
Table 9.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area,
Subarea, and Country where Foreign Taxes were Paid—Continued

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

Selected major industry, and selected area, subarea, and country	Number of returns	Taxable income from foreign sources		Foreign taxes, excluding carryover			Dividends paid to related foreign corporations by subsidiaries
		Total (less loss) ¹	Dividends from related foreign corporations	Total	Paid or accrued	Deemed paid	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Manufacturing: Motor Vehicles and Equipment							
All geographic areas	75	406,428	167,320	188,963	49,226	139,737	19,541
Canada	63	63,238	20,329	30,459	8,019	22,440	16,784
Latin America, total	35	47,279	13,582	17,862	12,920	4,942	560
Mexico	30	9,179	2,768	3,828	2,590	1,238	—
Central America, total	5	146	—	5	5	—	—
El Salvador	3	100	—	1	1	—	—
Caribbean countries	3	274	—	110	110	—	—
South America, total	27	37,680	10,814	13,919	10,215	3,704	560
Argentina	16	14,538	3,352	4,938	3,624	1,314	15
Brazil	15	18,266	5,425	7,112	5,378	1,734	—
Chile	3	746	—	339	339	—	—
Colombia	7	443	—	30	30	—	—
Peru	6	836	—	392	392	—	—
Venezuela	10	2,029	2,024	951	297	654	545
Other Western Hemisphere	4	996	—	—	—	—	—
Europe, total	29	246,709	118,908	122,880	22,150	100,730	1,871
Common Market Countries, total	23	150,902	74,959	74,397	14,238	60,159	—
Belgium	8	3,292	1,478	1,478	278	900	—
France (includes Andorra)	12	3,620	449	821	356	465	—
Italy (includes San Marino)	14	4,931	1,733	2,070	313	1,757	—
Netherlands	3	1,309	623	620	75	545	—
West Germany	9	137,750	70,675	69,708	13,216	56,492	—
Other European countries, total	22	97,669	43,949	48,480	7,909	40,571	1,871
Austria	4	1,797	987	866	53	813	—
Finland	3	1,143	295	781	585	178	—
Portugal	3	1,436	49	500	484	18	—
Spain	10	613	115	54	26	28	—
Sweden	4	4,345	2,125	2,237	106	2,131	—
Switzerland	8	434	247	160	46	114	20
United Kingdom	14	83,479	37,451	42,254	6,493	35,761	1,289
Africa, total	9	518	26	51	50	1	—
North Africa	3	76	—	22	22	—	—
Southern Africa, total	9	265	26	29	28	1	—
South Africa, Republic of	9	265	26	29	28	1	—
Asia, total	30	8,756	383	1,214	1,028	186	—
Middle East, total	10	589	—	66	86	—	—
Iran	3	332	—	37	37	—	—
Israel	7	194	—	49	49	—	—
Southern and Southeastern Asia, total	16	4,162	155	558	494	64	—
India	10	1,163	155	463	399	64	—
Philippines	7	313	—	94	94	—	—
Eastern Asia, total	23	4,005	228	570	448	122	—
Japan	23	3,771	228	527	405	122	—
Oceania, total	25	30,580	13,998	15,200	3,808	11,392	326
Australia	23	31,030	13,998	15,167	3,775	11,392	326
New Zealand	6	450	—	33	33	—	—
Puerto Rico and United States Possessions, total	4	1,745	99	661	616	45	—
Puerto Rico	4	1,446	99	597	552	45	—
Country not stated or not allocable and other income from outside of the United States	8	4,601	—	612	612	—	—
Other geographic classifications (combinations of countries shown above):							
Not economically less-developed countries	70	343,804	153,145	167,829	33,336	134,493	18,981
Economically less-developed countries	37	58,017	14,180	20,498	15,255	5,243	560
Transportation, Communication, Electric, Gas, and Sanitary Services							
All geographic areas	139	184,218	15,721	27,946	18,350	9,596	1,541
Canada	74	45,301	8,949	12,587	7,306	5,281	196
Latin America, total	84	20,006	1,231	5,787	5,266	521	—
Mexico	49	8,201	624	2,199	1,929	270	—
Central America, total	11	2,138	25	764	784	—	—
Costa Rica	6	1,511	—	666	666	—	—
Panama, excluding Canal Zone	4	178	25	26	26	(*)	—
Caribbean countries	4	224	19	22	16	6	—
South America, total	37	9,443	563	2,782	2,537	245	—
Argentina	6	3,144	178	377	301	76	—
Brazil	23	995	385	344	175	169	—
Chile	3	108	—	1	1	—	—
Colombia	6	3,038	—	1,428	1,428	—	—
Venezuela	14	1,890	—	486	486	—	—

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED
Table 9.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area,
Subarea, and Country where Foreign Taxes were Paid—Continued

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

Selected major industry, and selected area, subarea, and country	Number of returns	Taxable income from foreign sources		Foreign taxes, excluding carryover			Dividends paid to related foreign corporations by subsidiaries
		Total (less loss) ^a	Dividends from related foreign corporations	Total	Paid or accrued	Deemed paid	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Transportation, Communication, Electric, Gas, and Sanitary Services—Continued							
Europe, total	30	85,973	3,713	3,450	669	2,781	402
Common Market countries, total	18	5,462	1,955	1,770	283	1,487	—
France (includes Andorra)	5	332	109	124	29	95	—
Italy (includes San Marino)	6	3,719	1,529	1,351	131	1,220	—
Netherlands	13	110	—	15	16	—	—
West Germany	6	570	16	66	61	5	—
Other European countries, total	19	80,511	1,758	1,680	386	1,294	402
Spain	5	119	—	16	16	—	—
Switzerland	6	445	260	92	28	64	402
United Kingdom	14	79,822	1,498	1,559	329	1,230	—
Africa, total	7	1,061	—	27	27	—	—
West and Central Africa	3	886	—	1	1	—	—
Southern Africa	4	86	—	26	26	—	—
Asia, total	24	20,895	354	3,314	3,235	79	—
Middle East, total	6	1,523	—	40	—	—	—
Israel	4	274	—	33	33	—	—
Southern and Southeastern Asia, total	14	5,316	156	1,171	1,139	32	—
Philippines	11	3,269	156	1,014	982	32	—
South Vietnam	3	1,574	—	17	18	—	—
Thailand	5	161	—	18	18	—	—
Eastern Asia, total	17	14,056	188	2,103	2,056	47	—
China, Republic of (Taiwan)	4	585	—	162	162	—	—
Hong Kong	8	2,428	184	417	385	32	—
Japan	13	9,252	14	1,158	1,143	15	—
Okinawa and Ryukyu Islands	4	664	—	364	364	—	—
Oceania, total	13	4,496	974	1,039	357	682	943
Australia	13	3,832	974	1,031	349	682	943
New Zealand	3	140	—	8	8	—	—
Puerto Rico and United States Possessions, total	12	3,531	500	1,658	1,407	251	—
Puerto Rico	11	3,399	500	1,579	1,328	251	—
U. S. Possessions, total	4	132	—	79	79	—	—
Virgin Islands, U. S.	3	104	—	72	72	—	—
Country not stated or not allocable and other income from outside of the United States	4	2,908	—	84	84	—	—
Other geographic classifications (combinations of countries shown above):							
Not Economically less-developed countries	93	146,958	13,834	18,666	9,875	8,791	1,541
Economically less-developed countries	97	34,354	1,887	9,196	8,392	804	—
Wholesale and Retail Trade							
All geographic areas	981	272,963	66,330	175,221	134,850	40,371	3,180
Canada	496	37,817	12,189	14,194	4,064	10,130	2,733
Latin America, total	218	32,214	10,136	12,015	8,412	3,603	344
Mexico	130	13,170	4,008	5,611	3,928	1,683	—
Central America, total	18	2,924	1,167	1,054	722	332	—
Costa Rica	5	301	—	92	92	—	—
Panama, excluding Canal Zone	7	2,147	1,100	810	482	328	—
South America, total	99	15,274	4,949	5,342	3,760	1,582	344
Argentina	36	1,463	318	279	160	119	—
Brazil	18	5,921	3,614	2,204	1,120	1,084	344
Chile	12	341	—	309	309	—	—
Colombia	32	2,753	12	484	479	5	—
Peru	14	1,200	45	527	513	14	—
Venezuela	16	3,170	960	1,307	947	360	—
Latin America, not allocable	3	827	—	—	—	—	—
Europe, total	188	71,026	40,215	33,484	8,303	25,181	—
Common Market countries, total	120	20,291	12,112	8,928	2,651	6,277	—
Belgium	9	909	509	319	49	270	—
France (includes Andorra)	18	1,367	375	442	174	268	—
Italy (includes San Marino)	9	569	—	35	35	—	—
Netherlands	80	603	90	105	29	76	—
West Germany	18	16,801	11,096	8,000	2,358	5,642	—
Other European countries, total	90	50,735	28,103	24,536	5,652	18,884	—
Portugal	12	981	—	368	368	—	—
Spain	6	422	34	99	75	24	—
Switzerland	36	4,184	3,621	1,638	927	711	—
United Kingdom	45	44,785	24,350	22,273	4,244	18,029	—

Footnotes at end of table.

Foreign Tax Credit on Corporation Returns, 1968

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED
 Table 9.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area,
 Subarea, and Country where Foreign Taxes were Paid—Continued

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

Selected major industry, and selected area, subarea, and country	Number of returns	Taxable income from foreign sources		Foreign taxes, excluding carryover			Dividends paid to related foreign corporations by subsidiaries
		Total (less loss) ¹	Dividends from related foreign corporations	Total	Paid or accrued	Deemed paid	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Wholesale and Retail Trade—Continued							
Africa, total	54	96,759	492	107,406	107,119	287	—
North Africa	3	94,968	—	106,463	106,463	—	—
Southern Africa, total	48	903	492	426	139	287	—
South Africa, Republic of	47	867	492	410	123	287	—
Asia, total	93	15,542	2,317	4,181	3,376	805	103
Middle East	23	2,311	—	279	279	—	—
Southern and Southeastern Asia, total	33	6,452	2,100	2,810	2,061	749	103
India	6	107	—	47	47	—	—
Malaysia	4	107	10	6	—	6	—
Philippines	25	4,240	2,056	1,948	1,222	726	103
Other Southern and Southeastern Asian countries	3	1,730	—	720	—	—	—
Eastern Asia, total	48	6,779	217	1,092	1,036	56	—
China, Republic of (Taiwan)	20	312	—	39	39	—	—
Hong Kong	5	3,010	209	627	582	45	—
Japan	24	3,457	8	426	415	11	—
Oceania, total	32	2,897	12	631	627	4	—
Australia	24	2,743	—	615	615	4	—
New Zealand	14	154	12	16	12	—	—
Puerto Rico and United States Possessions, total	66	9,339	—	2,191	2,191	—	—
Puerto Rico	65	9,287	—	2,171	2,171	—	—
Country not stated or not allocable and other income from outside of the United States	42	7,363	970	1,132	752	380	—
Other geographic classifications (combinations of countries shown above):							
Not economically less-developed countries	690	117,973	53,125	49,350	13,712	35,638	2,733
Economically less-developed countries	340	147,621	12,236	124,732	120,380	4,352	447
Finance, Insurance, and Real Estate							
All geographic areas	1,885	677,000	43,407	180,512	154,479	26,033	82,617
Canada	1,261	278,546	19,834	67,014	54,570	12,444	58,312
Latin America, total	245	118,747	4,847	24,517	22,986	1,531	392
Mexico	164	46,878	413	5,211	5,048	163	—
Central America, total	36	9,416	1,379	1,784	1,710	74	—
Costa Rica	7	136	135	5	—	5	—
El Salvador	10	492	276	101	86	15	—
Guatemala	15	1,869	—	453	453	—	—
Honduras	9	485	191	71	38	33	—
Nicaragua	12	1,707	72	48	29	19	—
Panama, excluding Canal Zone	31	4,724	705	1,106	1,104	2	—
Caribbean countries, total	21	78	—	222	222	—	—
Dominican Republic	11	151	—	58	58	—	—
Jamaica	10	225	—	92	92	—	—
Other Caribbean countries	4	—148	—	4	4	—	—
South America, total	126	62,370	3,055	17,300	16,006	1,294	392
Argentina	51	16,934	363	4,484	4,362	122	—
Bolivia	7	474	—	67	67	—	—
Brazil	73	13,312	597	5,489	5,433	56	370
Chile	15	4,265	54	848	837	11	—
Colombia	27	4,422	236	908	877	31	—
Ecuador	10	601	—	220	220	—	—
Paraguay	11	306	—	15	15	—	—
Peru	28	8,390	259	1,607	1,537	70	22
Uruguay	15	2,615	—	111	111	—	—
Venezuela	57	11,131	1,546	3,551	2,547	1,004	—
Other Western Hemisphere, total	58	4,646	—	26	26	—	—
The Bahamas	13	4,310	—	—	—	—	—
Netherlands Antilles	24	432	—	11	11	—	—
Europe, total	348	104,844	14,268	38,122	27,854	10,268	23,100
Common Market countries, total	268	29,017	4,342	10,518	7,951	2,567	1,727
Belgium	30	6,238	239	756	634	122	—
France (includes Andorra)	35	4,110	212	2,208	2,083	125	—
Italy (includes San Marino)	26	4,245	1,322	1,595	756	839	55
Netherlands	207	1,240	338	373	203	170	1,672
West Germany	56	13,122	2,231	5,586	4,275	1,311	—
Other European countries, total	137	75,774	9,924	27,604	19,903	7,701	21,373
Austria	14	1,663	—	37	—	—	—
Denmark	9	528	17	68	60	8	—
Finland	10	591	7	24	12	12	—
Greece	18	1,390	242	404	398	6	—
Ireland	7	440	—	182	—	—	—
Norway	9	445	—	—	—	—	—
Portugal	10	238	—	(9)	—	—	—
Spain	25	3,444	315	340	202	138	—
Sweden	14	546	23	82	65	17	—
Switzerland	39	9,800	3,650	3,373	736	2,637	5,344
Turkey	8	690	22	46	40	6	—
United Kingdom	95	55,302	5,648	23,048	18,171	4,877	16,029
East European countries	3	531	—	—	—	—	—

Footnotes at end of table.

Foreign Tax Credit on Corporation Returns, 1968

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED
 Table 9.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area,
 Subarea, and Country where Foreign Taxes were Paid—Continued

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

Selected major industry, and selected area, subarea, and country	Number of returns	Taxable income from foreign sources		Foreign taxes, excluding carryover			Dividends paid to related foreign corporations by subsidiaries
		Total (less loss) ¹	Dividends from related foreign corporations	Total	Paid or accrued	Deemed paid	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Finance, insurance, and Real Estate—Continued							
Africa, total	134	7,443	1,151	1,105	621	484	76
North Africa, total	12	290	116	37	10	27	—
Egypt (formerly United Arab Republic)	5	127	—	8	8	—	—
West and Central Africa, total	14	1,287	379	233	131	102	—
Liberia	8	463	312	74	—	74	—
Nigeria	7	395	—	124	124	—	—
Southern Africa, total	124	5,228	656	835	480	355	76
South Africa, Republic of	77	4,815	610	778	443	335	76
Zambia	19	314	46	38	18	20	—
Asia, total	243	102,960	1,866	40,661	40,216	445	—
Middle East, total	65	4,388	1,149	1,220	948	272	—
Iran	8	152	73	30	21	9	—
Israel	58	2,887	1,076	682	419	263	—
Lebanon	10	299	—	104	104	—	—
Saudi Arabia	5	847	—	360	360	—	—
Other areas of Arabian Peninsula	4	187	—	41	41	—	—
Southern and Southeastern Asia, total	102	52,819	235	23,376	23,296	80	—
India	20	5,509	—	3,577	—	—	—
Indonesia	8	—	—	—	—	—	—
Malaysia	11	—	—	—	—	—	—
Pakistan	18	1,339	—	682	682	—	—
Philippines	92	20,093	132	5,276	5,237	39	—
Singapore	8	3,147	92	1,443	1,405	38	—
South Vietnam	4	—	—	—	—	—	—
Thailand	16	3,271	11	976	973	3	—
Eastern Asia, total	135	45,747	482	16,065	15,972	93	—
China, Republic of (Taiwan)	11	1,809	27	524	519	5	—
Hong Kong	18	4,009	445	690	612	78	—
Japan	122	36,063	10	14,364	14,354	10	—
Okinawa and Ryukyu Islands	9	1,052	—	455	455	—	—
South Korea, Republic of	7	360	—	1	1	—	—
Other East Asian countries	7	454	—	31	31	—	—
Oceania, total	60	10,874	1,112	2,372	1,548	824	739
Australia	55	10,061	1,037	2,076	1,333	743	739
New Zealand	12	791	75	296	215	81	—
Puerto Rico and United States Possessions, total	203	12,933	332	5,227	5,192	35	—
Puerto Rico	195	9,199	332	3,183	3,148	35	—
U. S. Possessions, total	20	3,734	—	2,044	2,044	—	—
Guam	7	1,977	—	1,056	1,056	—	—
Virgin Islands, U. S.	17	1,760	—	988	988	—	—
Country not stated or not allocable and other income from outside of the United States	62	35,970	—	1,425	1,425	—	—
Other geographic classifications (combinations of countries shown above):							
Not economically less-developed countries	1,517	437,030	36,006	122,684	98,749	23,935	82,227
Economically less-developed countries	574	203,607	7,402	56,354	54,258	2,096	392
Sino-Soviet Bloc	6	356	—	6	6	—	—
Services							
All geographic areas	446	112,278	23,713	35,445	20,017	15,428	1,554
Canada	224	21,800	4,342	8,693	4,307	4,386	509
Latin America, total	108	23,259	8,000	6,641	4,437	2,204	—
Mexico	31	3,794	128	822	774	48	—
Central America, total	10	9,286	7,021	2,047	111	1,936	—
El Salvador	4	116	121	66	50	16	—
Panama, excluding Canal Zone	7	8,974	6,900	1,931	11	1,920	—
Caribbean countries, total	11	694	285	225	192	33	—
Jamaica	6	393	235	109	95	14	—
Trinidad	8	161	50	52	33	19	—
South America, total	96	9,485	566	3,547	3,360	187	—
Argentina	41	3,404	106	1,250	1,211	39	—
Brazil	31	2,229	223	890	807	83	—
Chile	11	560	22	228	221	7	—
Colombia	14	348	—	51	51	—	—
Ecuador	4	147	—	290	290	—	—
Peru	10	535	81	235	216	19	—
Venezuela	36	2,112	134	573	534	39	—

Footnotes at end of table.

Foreign Tax Credit on Corporation Returns, 1968

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 9.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid—Continued

(All figures are estimates based on samples—money amounts are in thousands of dollars)

Selected major industry, and selected area, subarea, and country	Number of returns	Taxable income from foreign sources		Foreign taxes, excluding carryover			Dividends paid to related foreign corporations by subsidiaries
		Total (less loss) ¹	Dividends from related foreign corporations	Total	Paid or accrued	Deemed paid	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Services—Continued							
Europe, total	90	35,216	8,763	10,862	3,862	7,000	643
Common Market countries, total	72	13,022	3,064	4,243	2,225	2,018	—
Belgium	30	684	111	131	74	57	—
France (includes Andorra)	29	2,888	67	799	746	53	—
Italy (includes San Marino)	13	3,442	286	1,104	812	322	—
Netherlands	20	1,192	362	399	52	347	—
West Germany	23	5,016	2,238	1,780	541	1,239	—
Other European countries, total	44	22,194	5,699	6,619	1,637	4,982	643
Austria	11	246	—	92	92	—	—
Denmark	6	313	—	17	17	—	—
Finland	7	197	21	62	10	52	—
Greece	5	152	—	21	21	—	—
Norway	5	216	11	15	1	14	—
Portugal	6	163	3	9	8	1	—
Spain	9	705	127	212	113	99	—
Sweden	7	729	4	5	(9)	5	—
Switzerland	14	585	90	69	26	43	—
Turkey	7	277	—	199	199	—	—
United Kingdom	36	18,474	5,392	5,880	1,131	4,749	643
Africa, total	20	2,022	257	797	640	157	—
North Africa, total	8	—62	—	131	131	—	—
Egypt (formerly United Arab Republic)	7	—129	—	123	123	—	—
Southern Africa, total	18	2,110	257	663	506	157	—
South Africa, Republic of	18	2,110	257	660	503	157	—
Asia, total	88	11,523	299	4,414	4,185	229	—
Middle East, total	30	3,829	—	1,154	1,154	—	—
Iran	7	1,104	—	183	183	—	—
Israel	20	2,420	—	935	935	—	—
Saudi Arabia	7	260	—	21	21	—	—
Southern and Southeastern Asia, total	25	3,301	69	1,409	1,383	26	—
India	10	615	26	200	185	15	—
Pakistan	13	1,535	—	684	684	—	—
Philippines	14	436	43	168	157	11	—
Singapore	6	171	—	78	78	—	—
Thailand	8	321	—	239	239	—	—
Eastern Asia, total	58	4,377	230	1,851	1,646	203	—
China, Republic of (Taiwan)	7	630	—	16	16	—	—
Hong Kong	5	103	—	22	22	—	—
Japan	58	3,634	230	1,806	1,603	203	—
Oceania, total	41	6,504	2,017	2,497	1,068	1,429	402
Australia	38	6,192	2,009	2,441	1,019	1,422	402
New Zealand	14	312	8	56	49	7	—
Puerto Rico and United States Possessions, total	23	1,827	25	533	526	7	—
Puerto Rico	20	1,807	25	528	521	7	—
Country not stated or not allocable and other income from outside of the United States	18	10,117	14	1,003	991	12	—
Other geographic classifications (combinations of countries shown above):							
Not economically less-developed countries	335	68,441	15,534	24,211	11,108	13,103	1,554
Economically less-developed countries	148	33,704	8,169	10,227	7,918	2,309	—

¹Includes the "gross-up" of certain foreign dividends.²Less than \$500 per return.

NOTE: See text for explanatory statements, including Geographic classification under "Explanation of Terms," and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED AND WITH PER-COUNTRY LIMITATION METHOD
Table 10.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Industrial Division, and by Size of Total Assets

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

Industrial division and size of total assets	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed	Taxable income from foreign sources	
										Total ¹	Dividends from related foreign corporations
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
All Industrial Divisions	4,139	226,933,445	10,648,918	365,525	6,399	90,366	9,878,664	4,889,240	1,090,289	2,471,894	326,906
Under \$100,000 ²	527	23,541	169,686	1,380	325	678	164,820	85,235	5,471	18,384	1,367
\$100,000 under \$1,000,000	1,301	474,377	58,006	1,308	—	285	49,058	18,474	3,319	16,859	778
\$1,000,000 under \$10,000,000	1,386	4,909,089	616,792	8,939	585	3,937	577,186	281,624	23,191	74,464	7,419
\$10,000,000 under \$100,000,000	624	20,481,732	1,901,080	36,864	1,584	19,458	1,815,639	913,114	57,642	157,304	34,331
\$100,000,000 under \$250,000,000	144	23,054,001	1,496,314	18,271	2,454	9,857	1,425,381	738,462	75,799	176,295	14,925
\$250,000,000 or more	157	178,290,646	6,407,040	298,764	1,441	56,151	5,646,580	2,852,311	924,867	2,030,588	268,086
Agriculture, Forestry, and Fishery	20	549,559	62,650	2,408	7	713	52,508	27,476	14,832	39,517	1,984
Under \$100,000 ²	—	—	—	—	—	—	—	—	—	—	—
\$100,000 under \$1,000,000	—	—	—	—	—	—	—	—	—	—	—
\$1,000,000 under \$10,000,000	17	50,827	4,048	131	—	—	3,518	1,702	50	427	—
\$10,000,000 under \$100,000,000	3	498,732	58,602	2,277	7	713	48,990	25,774	14,592	39,090	1,984
\$100,000,000 under \$250,000,000	—	—	—	—	—	—	—	—	—	—	—
\$250,000,000 or more	—	—	—	—	—	—	—	—	—	—	—
Mining	69	5,215,544	395,207	37,536	—	113	342,495	178,574	106,148	233,901	37,336
Under \$100,000 ²	26	6,038	2,297	9	—	—	1,921	904	481	1,553	—
\$100,000 under \$1,000,000	15	42,934	7,532	7	—	—	5,771	2,916	1,116	2,850	—
\$1,000,000 under \$10,000,000	18	567,906	40,512	4,414	—	—	36,695	17,967	7,308	16,019	4,255
\$10,000,000 under \$100,000,000	4	753,105	111,431	5	—	—	88,295	46,554	29,543	57,675	—
\$100,000,000 under \$250,000,000	6	3,845,561	233,435	33,101	—	113	209,813	110,233	67,700	155,804	33,081
\$250,000,000 or more	—	—	—	—	—	—	—	—	—	—	—
Contract Construction	55	1,492,898	148,340	2,162	58	1,238	137,790	71,117	35,318	73,813	1,919
Under \$100,000 ²	—	—	—	—	—	—	—	—	—	—	—
\$100,000 under \$1,000,000	—	—	—	—	—	—	—	—	—	—	—
\$1,000,000 under \$10,000,000	33	110,477	16,298	312	—	—	14,838	7,415	2,141	6,491	60
\$10,000,000 under \$100,000,000	17	541,047	64,964	1,149	16	598	63,881	32,916	12,435	25,942	1,185
\$100,000,000 under \$250,000,000	5	841,374	67,078	701	42	640	59,071	30,786	20,742	41,380	694
\$250,000,000 or more	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	1,454	98,755,695	7,426,642	288,084	4,616	74,181	6,758,766	3,440,784	837,153	1,811,821	264,588
Under \$100,000 ²	40	—	146,741	432	170	316	142,445	74,666	4,403	12,575	528
\$100,000 under \$1,000,000	219	94,151	11,553	19	—	—	11,464	5,047	394	1,609	—
\$1,000,000 under \$10,000,000	711	2,678,510	391,174	4,786	345	2,246	380,953	193,905	6,291	27,694	4,572
\$10,000,000 under \$100,000,000	962	11,606,214	1,400,897	22,815	1,502	15,205	1,364,893	631,627	26,925	74,299	21,850
\$100,000,000 under \$250,000,000	62	9,441,801	932,908	13,841	2,154	6,925	914,674	473,651	20,368	58,040	10,558
\$250,000,000 or more	59	75,035,019	4,543,369	246,191	445	49,389	3,944,427	2,001,918	776,782	1,637,504	227,080
Transportation, Communication, Electric, Gas, and Sanitary Services	80	29,152,112	745,630	3,895	66	2,540	706,933	343,360	7,555	26,880	2,740
Under \$100,000 ²	15	7,131	5,903	500	—	251	5,749	2,928	1,134	2,322	500
\$100,000 under \$1,000,000	27	109,219	11,567	863	—	793	5,252	2,116	2,116	5,024	817
\$1,000,000 under \$10,000,000	15	492,270	37,430	499	—	121	34,875	17,991	1,482	6,464	146
\$10,000,000 under \$100,000,000	5	818,409	18,756	62	66	1,424	16,582	8,063	31	194	—
\$100,000,000 under \$250,000,000	18	27,625,083	671,974	1,971	—	1,375	639,324	309,126	2,792	12,876	1,277
\$250,000,000 or more	—	—	—	—	—	—	—	—	—	—	—
Wholesale and Retail Trade	731	6,694,576	575,072	15,849	347	2,551	559,865	286,949	55,350	128,416	4,300
Under \$100,000 ²	185	10,078	3,906	380	57	100	3,712	1,286	378	1,569	312
\$100,000 under \$1,000,000	316	118,397	18,075	121	—	(9)	14,591	5,749	700	5,404	(9)
\$1,000,000 under \$10,000,000	160	440,410	48,792	610	240	153	45,413	22,646	2,648	7,652	568
\$10,000,000 under \$100,000,000	55	1,491,015	128,940	993	50	638	123,901	62,069	2,395	11,603	842
\$100,000,000 under \$250,000,000	11	1,642,893	204,178	1,157	—	236	202,549	106,253	1,381	2,955	1,024
\$250,000,000 or more	4	2,991,783	170,181	12,588	—	1,424	169,699	88,946	47,848	99,233	1,553
Finance, Insurance, and Real Estate	1,416	83,417,857	1,114,186	11,340	1,286	6,853	945,345	459,778	27,146	135,153	10,378
Under \$100,000 ²	252	11,067	12,175	59	98	11	11,939	5,860	258	1,367	77
\$100,000 under \$1,000,000	593	211,924	19,765	1,168	—	285	15,998	4,920	515	4,784	278
\$1,000,000 under \$10,000,000	318	965,676	101,303	2,056	—	642	82,054	31,246	4,483	15,965	1,384
\$10,000,000 under \$100,000,000	131	5,055,981	149,868	2,125	—	54	115,414	50,546	2,177	8,197	1,647
\$100,000,000 under \$250,000,000	54	9,927,105	135,932	2,447	192	2,011	118,715	59,906	3,666	15,727	2,596
\$250,000,000 or more	68	68,146,104	695,143	3,485	996	3,850	601,225	307,300	16,047	89,113	3,966
Services	314	1,655,204	181,191	4,251	19	2,177	174,962	81,202	6,987	22,393	3,661
Under \$100,000 ²	47	2,396	1,774	—	—	—	1,774	821	34	113	—
\$100,000 under \$1,000,000	134	36,736	4,503	—	—	—	4,285	1,528	493	1,947	—
\$1,000,000 under \$10,000,000	106	311,035	36,078	173	—	3	34,236	16,542	2,356	8,361	37
\$10,000,000 under \$100,000,000	24	618,418	65,833	3,984	19	2,129	64,213	33,672	4,024	11,612	3,355
\$100,000,000 under \$250,000,000	—	—	—	—	—	—	—	—	—	—	—
\$250,000,000 or more	4	686,619	73,003	94	—	45	70,454	28,639	80	360	89

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED AND WITH PER-COUNTRY LIMITATION METHOD
Table 10.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Industrial Division, and by Size of Total Assets—Continued

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

Industrial division and size of total assets	Foreign taxes						Foreign tax credit computed	Dividends paid to related foreign corporations by subsidiaries
	Total foreign taxes			Paid or accrued	Deemed paid	Carryover		
	Total	Equal to foreign tax credit computed	Greater than foreign tax credit computed					
(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	
All Industrial Divisions								
Total	2,090,527	77,644	2,012,883	1,296,915	171,834	821,774	1,093,161	64,872
Under \$100,000 ^a	37,645	1,921	35,724	6,443	803	30,399	5,473	125
\$100,000 under \$1,000,000.....	4,728	1,120	3,608	3,848	285	—	3,499	—
\$1,000,000 under \$10,000,000.....	28,101	11,420	16,681	20,854	4,379	2,865	23,566	—
\$10,000,000 under \$100,000,000.....	86,528	22,701	63,827	38,604	24,577	23,347	57,756	8,942
\$100,000,000 under \$250,000,000.....	91,732	4,767	86,965	70,084	10,605	11,043	75,800	12,153
\$250,000,000 or more.....	1,841,793	35,715	1,806,078	1,157,082	131,185	553,526	927,067	43,752
Agriculture, Forestry, and Fishery								
Total	14,801	948	13,855	13,722	1,079	—	14,632	49
Under \$100,000 ^a	—	—	—	—	—	—	—	—
\$100,000 under \$1,000,000.....	—	—	—	—	—	—	—	—
\$1,000,000 under \$10,000,000.....	50	50	—	50	—	—	50	—
\$10,000,000 under \$100,000,000.....	14,751	896	13,855	13,672	1,079	—	14,582	49
\$100,000,000 under \$250,000,000.....	—	—	—	—	—	—	—	—
\$250,000,000 or more.....	—	—	—	—	—	—	—	—
Mining								
Total	343,174	919	342,255	133,087	9,682	200,406	106,350	—
Under \$100,000 ^a	1,172	2	1,170	920	—	253	612	—
\$100,000 under \$1,000,000.....	2,403	8	2,395	1,355	—	1,048	1,116	—
\$1,000,000 under \$10,000,000.....	27,266	581	26,685	8,696	2,978	—	15,592	7,378
\$10,000,000 under \$100,000,000.....	40,100	248	39,852	32,927	—	—	7,173	29,543
\$100,000,000 under \$250,000,000.....	272,233	80	272,153	89,189	6,704	176,340	67,701	—
\$250,000,000 or more.....	—	—	—	—	—	—	—	—
Contract Construction								
Total	38,860	2,854	34,006	35,342	1,258	259	35,371	—
Under \$100,000 ^a	—	—	—	—	—	—	—	—
\$100,000 under \$1,000,000.....	—	—	—	—	—	—	—	—
\$1,000,000 under \$10,000,000.....	2,768	423	2,345	2,667	20	80	2,194	—
\$10,000,000 under \$100,000,000.....	12,844	2,304	10,340	11,979	598	67	12,435	—
\$100,000,000 under \$250,000,000.....	21,448	127	21,321	20,696	640	112	20,742	—
\$250,000,000 or more.....	—	—	—	—	—	—	—	—
Manufacturing								
Total	1,523,276	45,411	1,477,865	969,046	144,273	409,957	839,409	46,259
Under \$100,000 ^a	36,522	898	35,624	5,760	379	30,383	4,404	125
\$100,000 under \$1,000,000.....	535	116	419	515	—	19	427	—
\$1,000,000 under \$10,000,000.....	9,154	5,754	3,400	5,992	2,640	523	8,286	—
\$10,000,000 under \$100,000,000.....	30,097	14,872	15,225	10,824	16,560	2,713	26,947	8,800
\$100,000,000 under \$250,000,000.....	22,244	3,418	18,826	13,261	7,381	1,802	20,368	793
\$250,000,000 or more.....	1,424,724	20,353	1,404,371	932,694	117,313	374,717	778,977	36,541
Transportation, Communication, Electric, Gas, and Sanitary Services								
Total	14,706	1,941	12,765	8,072	2,541	6,092	7,572	—
Under \$100,000 ^a	1,325	396	929	1,074	251	—	1,134	—
\$100,000 under \$1,000,000.....	3,358	197	3,161	1,667	793	897	2,116	—
\$1,000,000 under \$10,000,000.....	5,181	382	4,799	1,795	121	3,275	1,498	—
\$10,000,000 under \$100,000,000.....	31	31	—	31	—	—	31	—
\$100,000,000 under \$250,000,000.....	4,811	935	3,876	1,515	1,376	1,920	2,793	—
\$250,000,000 or more.....	—	—	—	—	—	—	—	—
Wholesale and Retail Trade								
Total	117,734	4,557	113,177	112,575	3,176	1,982	55,356	—
Under \$100,000 ^a	391	341	50	229	162	—	378	—
\$100,000 under \$1,000,000.....	725	538	187	608	(7)	117	700	—
\$1,000,000 under \$10,000,000.....	2,899	1,915	984	2,415	278	207	2,548	—
\$10,000,000 under \$100,000,000.....	2,375	1,347	1,028	1,893	648	434	2,398	—
\$100,000,000 under \$250,000,000.....	2,175	112	2,063	698	522	955	1,382	—
\$250,000,000 or more.....	108,569	304	108,265	106,732	1,568	269	47,850	—
Finance, Insurance, and Real Estate								
Total	31,713	18,147	13,566	22,259	7,230	2,222	27,171	18,504
Under \$100,000 ^a	300	250	50	273	11	16	259	—
\$100,000 under \$1,000,000.....	731	150	581	394	285	141	531	—
\$1,000,000 under \$10,000,000.....	4,756	1,131	3,625	4,001	647	107	4,487	—
\$10,000,000 under \$100,000,000.....	2,686	1,808	878	1,778	420	488	2,180	—
\$100,000,000 under \$250,000,000.....	5,652	765	4,887	2,445	2,017	1,190	3,666	11,342
\$250,000,000 or more.....	17,588	14,043	3,545	13,458	3,850	280	16,048	7,162
Services								
Total	8,263	2,869	5,394	4,812	2,595	656	7,300	60
Under \$100,000 ^a	34	34	—	34	—	—	34	—
\$100,000 under \$1,000,000.....	638	316	322	574	—	64	493	—
\$1,000,000 under \$10,000,000.....	2,713	1,942	771	2,707	3	3	2,669	—
\$10,000,000 under \$100,000,000.....	4,783	511	4,272	1,467	2,538	778	4,024	42
\$100,000,000 under \$250,000,000.....	—	—	—	—	—	—	—	—
\$250,000,000 or more.....	95	66	29	30	54	11	80	18

^aIncludes the "gross-up" of certain foreign dividends.

^bIncludes returns with zero assets.

^cLess than \$500 per return.

NOTE: See text for explanatory statements and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED AND WITH OVERALL LIMITATION METHOD
Table 11.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Industrial Division, and by Size of Total Assets

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

Industrial division and size of total assets	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed	Taxable income from foreign sources	
										Total (less loss) ¹	Dividends from related foreign corporations
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
All Industrial Divisions											
Total	2,058	674,020,285	36,190,293	1,671,237	60,774	875,774	34,895,277	18,052,698	2,566,241	6,287,643	1,621,519
Under \$100,000 ²	137	5,176	220,015	13,674	414	4,792	202,827	104,884	15,176	49,339	13,942
\$100,000 under \$1,000,000	317	130,214	29,572	1,100	—	812	28,119	12,721	1,776	6,249	635
\$1,000,000 under \$10,000,000	574	2,126,307	287,866	7,725	1,312	5,824	268,436	132,012	15,766	51,819	7,963
\$10,000,000 under \$100,000,000	521	19,672,192	2,287,982	98,073	21,149	68,332	2,197,186	1,123,956	134,806	358,337	105,574
\$100,000,000 under \$250,000,000	196	30,532,814	3,004,393	138,885	12,391	83,119	2,910,072	1,500,571	147,424	421,041	138,598
\$250,000,000 or more	313	621,553,582	30,360,465	1,411,780	25,508	712,895	29,288,637	15,178,554	2,251,293	5,400,858	1,354,807
Mining											
Total	18	2,713,798	1,100,844	41,346	312	11,890	1,079,163	567,696	535,864	1,027,703	34,953
Under \$100,000 ²	—	—	—	—	—	—	—	—	—	—	—
\$100,000 under \$1,000,000	—	—	—	—	—	—	—	—	—	—	—
\$1,000,000 under \$10,000,000	5	17,334	1,870	79	—	—	1,849	677	8	79	—
\$10,000,000 under \$100,000,000	7	337,502	24,556	1,737	—	—	23,700	12,468	5,548	11,612	626
\$100,000,000 under \$250,000,000	3	496,511	46,475	8,787	68	957	43,978	23,168	8,541	22,584	8,671
\$250,000,000 or more	3	1,862,451	1,027,943	30,743	244	10,933	1,009,636	531,383	521,767	993,428	25,656
Contract Construction											
Total	20	1,497,570	103,496	9,992	—	5,321	98,963	49,059	11,374	42,396	9,045
Under \$100,000 ²	—	—	—	—	—	—	—	—	—	—	—
\$100,000 under \$1,000,000	—	—	—	—	—	—	—	—	—	—	—
\$1,000,000 under \$10,000,000	4	26,915	5,014	12	—	—	3,531	1,686	1,087	2,123	—
\$10,000,000 under \$100,000,000	8	277,470	30,145	2,412	—	846	29,312	14,393	1,870	9,457	1,888
\$100,000,000 under \$250,000,000	8	1,193,185	68,337	7,568	—	4,475	66,120	32,980	8,417	30,816	7,147
\$250,000,000 or more	—	—	—	—	—	—	—	—	—	—	—
Manufacturing											
Total	1,107	239,707,443	25,670,672	1,490,014	44,491	792,447	24,791,509	12,843,135	1,765,699	4,283,895	1,449,429
Under \$100,000 ²	23	—	169,807	7,293	414	4,198	165,409	86,424	7,555	17,713	7,693
\$100,000 under \$1,000,000	101	53,359	16,584	1,318	—	—	16,350	7,944	217	1,318	—
\$1,000,000 under \$10,000,000	318	1,324,844	196,363	4,154	1,129	4,148	190,852	96,972	8,318	24,834	5,026
\$10,000,000 under \$100,000,000	357	13,872,889	1,820,584	69,248	17,039	53,017	1,779,445	924,007	92,992	254,092	78,349
\$100,000,000 under \$250,000,000	138	21,434,674	2,496,646	111,757	9,619	70,738	2,432,010	1,262,296	116,873	324,673	110,233
\$250,000,000 or more	170	203,021,677	20,970,688	1,297,562	16,290	660,346	20,207,443	10,465,492	1,539,744	3,661,265	1,248,128
Transportation, Communication, Electric, Gas, and Sanitary Services											
Total	59	61,955,525	4,704,106	12,734	3,654	5,915	4,628,085	2,414,740	20,454	157,338	12,981
Under \$100,000 ²	—	—	—	—	—	—	—	—	—	—	—
\$100,000 under \$1,000,000	20	2,780	2,110	19	—	—	1,685	471	10	52	—
\$1,000,000 under \$10,000,000	7	22,287	1,016	7	—	—	—	366	70	352	—
\$10,000,000 under \$100,000,000	9	510,570	44,955	45	3,498	158	42,231	20,660	1,513	7,364	3,498
\$100,000,000 under \$250,000,000	7	1,091,946	103,567	126	—	—	102,279	47,510	254	1,640	—
\$250,000,000 or more	16	60,327,942	4,552,458	12,537	156	5,757	4,480,960	2,345,733	18,607	147,930	9,483
Wholesale and Retail Trade											
Total	249	14,721,199	1,044,319	60,810	3,164	32,304	1,021,706	529,351	57,393	144,547	62,030
Under \$100,000 ²	67	4,815	7,593	4,612	—	1	5,512	2,171	1,673	11,146	4,527
\$100,000 under \$1,000,000	37	10,157	602	359	—	—	583	145	55	359	—
\$1,000,000 under \$10,000,000	98	310,618	43,502	1,044	183	549	38,582	19,519	4,822	16,898	1,171
\$10,000,000 under \$100,000,000	29	937,566	87,091	6,089	277	1,454	81,018	38,867	5,751	16,414	5,136
\$100,000,000 under \$250,000,000	8	1,229,448	80,814	3,749	2,704	3,954	77,674	38,769	5,890	14,058	6,271
\$250,000,000 or more	12	12,228,595	824,717	44,957	—	26,346	818,337	429,880	39,202	85,582	44,925
Finance, Insurance, and Real Estate											
Total	469	348,224,257	3,225,916	37,321	6,604	16,261	2,945,458	1,479,843	149,130	541,847	33,029
Under \$100,000 ²	46	361	41,691	1,769	—	593	31,154	16,071	5,938	20,447	1,722
\$100,000 under \$1,000,000	86	32,918	5,065	722	—	812	4,137	1,492	738	1,856	635
\$1,000,000 under \$10,000,000	124	388,041	30,009	2,154	—	1,072	22,662	7,666	1,191	6,397	1,491
\$10,000,000 under \$100,000,000	81	2,703,814	161,255	10,629	158	6,722	127,096	54,605	17,165	37,664	8,902
\$100,000,000 under \$250,000,000	27	4,236,396	118,696	4,237	—	1,105	100,947	51,116	3,422	9,383	3,953
\$250,000,000 or more	105	340,882,727	2,869,200	17,810	6,446	5,007	2,659,462	1,348,893	120,676	466,100	16,326
Services											
Total	132	5,139,882	336,227	18,966	2,549	11,636	326,675	167,521	26,323	89,885	20,052
Under \$100,000 ²	—	—	—	—	—	—	—	—	—	—	—
\$100,000 under \$1,000,000	74	31,000	6,135	—	—	—	6,116	2,887	766	2,697	—
\$1,000,000 under \$10,000,000	18	56,268	10,092	275	—	55	10,030	5,126	270	1,046	275
\$10,000,000 under \$100,000,000	28	971,770	114,683	7,859	177	5,185	110,666	57,603	9,963	21,702	7,165
\$100,000,000 under \$250,000,000	5	850,654	89,858	2,661	—	1,890	87,064	44,732	4,027	17,887	2,323
\$250,000,000 or more	7	3,230,190	115,459	8,171	2,372	4,506	112,799	57,173	11,297	46,553	10,288

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED AND WITH OVERALL LIMITATION METHOD
Table 11.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Industrial Division, and by Size of Total Assets—Continued

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

Industrial division and size of total assets	Foreign taxes						Foreign tax credit computed	Dividends paid to related foreign corporations by subsidiaries
	Total foreign taxes			Paid or accrued	Deemed paid	Carryover		
	Total	Equal to foreign tax credit computed	Greater than foreign tax credit computed					
(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	
All Industrial Divisions								
Total	3,926,407	1,177,752	2,748,655	1,970,108	1,088,253	870,045	2,566,750	270,788
Under \$100,000 ^a	19,038	11,905	7,133	10,226	7,551	1,262	15,414	3,059
\$100,000 under \$1,000,000.....	2,342	509	1,833	1,248	812	282	1,776	—
\$1,000,000 under \$10,000,000.....	18,352	9,161	9,191	9,495	5,995	2,860	15,768	402
\$10,000,000 under \$250,000,000.....	173,998	83,620	90,378	62,496	78,831	32,671	135,068	52,266
\$100,000,000 under \$250,000,000.....	156,956	100,861	56,095	52,734	94,109	10,113	147,426	36,812
\$250,000,000 or more.....	3,555,721	971,696	2,584,025	1,833,909	898,955	822,857	2,251,298	178,249
Mining								
Total	1,493,877	7,680	1,486,197	687,073	15,623	791,181	535,864	22,739
Under \$100,000 ^a	—	—	—	—	—	—	—	—
\$100,000 under \$1,000,000.....	—	—	—	—	—	—	—	—
\$1,000,000 under \$10,000,000.....	8	8	—	8	—	—	8	—
\$10,000,000 under \$100,000,000.....	29,142	975	28,167	10,013	657	18,472	5,548	—
\$100,000,000 under \$250,000,000.....	10,199	4,845	5,554	7,209	2,059	931	8,541	128
\$250,000,000 or more.....	1,454,528	2,052	1,452,476	669,843	12,907	771,778	521,767	22,611
Contract Construction								
Total	12,418	8,547	3,871	5,279	5,833	1,306	11,558	187
Under \$100,000 ^a	—	—	—	—	—	—	—	—
\$100,000 under \$1,000,000.....	—	—	—	—	—	—	—	—
\$1,000,000 under \$10,000,000.....	1,589	4	1,579	1,169	—	414	1,087	—
\$10,000,000 under \$100,000,000.....	2,111	1,285	828	710	984	417	2,054	187
\$100,000,000 under \$250,000,000.....	8,724	7,258	1,466	3,400	4,849	475	8,417	—
\$250,000,000 or more.....	—	—	—	—	—	—	—	—
Manufacturing								
Total	2,144,615	987,360	1,157,255	1,095,774	988,911	59,929	1,765,945	177,534
Under \$100,000 ^a	7,934	7,111	823	2,028	5,276	630	7,793	2,205
\$100,000 under \$1,000,000.....	233	201	32	217	—	16	217	—
\$1,000,000 under \$10,000,000.....	9,741	4,825	4,916	4,163	4,236	1,341	8,320	—
\$10,000,000 under \$100,000,000.....	102,777	71,204	31,573	33,476	60,693	8,608	92,992	7,101
\$100,000,000 under \$250,000,000.....	121,226	84,406	36,820	36,339	78,959	5,928	116,875	21,201
\$250,000,000 or more.....	1,902,704	819,613	1,083,091	1,019,551	839,747	43,406	1,539,748	147,027
Transportation, Communication, Electric, Gas, and Sanitary Services								
Total	21,046	16,419	4,627	12,278	7,055	1,713	20,454	1,541
Under \$100,000 ^a	56	(7)	56	16	—	40	10	—
\$100,000 under \$1,000,000.....	70	70	—	70	—	—	70	—
\$1,000,000 under \$10,000,000.....	1,513	1,513	—	1,346	158	9	1,513	—
\$10,000,000 under \$100,000,000.....	286	178	108	236	—	50	254	—
\$100,000,000 under \$250,000,000.....	19,121	14,658	4,463	10,610	6,897	1,614	18,607	1,541
\$250,000,000 or more.....	—	—	—	—	—	—	—	—
Wholesale and Retail Trade								
Total	63,111	45,345	17,766	22,275	37,195	3,642	57,470	3,180
Under \$100,000 ^a	4,390	325	4,065	2,679	1,442	270	1,673	—
\$100,000 under \$1,000,000.....	55	55	—	55	—	—	55	—
\$1,000,000 under \$10,000,000.....	4,968	3,778	1,190	3,438	592	938	4,822	103
\$10,000,000 under \$100,000,000.....	7,171	2,079	5,092	3,874	2,497	800	5,827	33
\$100,000,000 under \$250,000,000.....	6,493	214	6,279	1,862	3,965	666	5,890	902
\$250,000,000 or more.....	40,034	38,894	1,140	10,367	28,699	968	39,203	2,142
Finance, Insurance, and Real Estate								
Total	156,371	96,781	59,590	132,220	18,803	5,347	149,132	64,113
Under \$100,000 ^a	6,658	4,469	2,189	5,503	833	322	5,938	854
\$100,000 under \$1,000,000.....	1,016	35	981	112	812	92	738	—
\$1,000,000 under \$10,000,000.....	1,712	206	1,506	472	1,072	167	1,191	299
\$10,000,000 under \$100,000,000.....	19,520	2,165	17,355	8,473	7,809	3,238	17,167	44,232
\$100,000,000 under \$250,000,000.....	5,234	1,808	3,426	1,827	2,340	1,267	3,422	14,094
\$250,000,000 or more.....	122,231	88,098	34,133	116,033	5,937	261	120,676	4,634
Services								
Total	34,965	15,616	19,349	15,205	12,833	6,927	26,323	1,494
Under \$100,000 ^a	—	—	—	—	—	—	—	—
\$100,000 under \$1,000,000.....	1,038	218	820	864	—	174	766	—
\$1,000,000 under \$10,000,000.....	270	270	—	175	95	—	270	—
\$10,000,000 under \$100,000,000.....	11,760	4,395	7,365	4,600	6,033	1,127	9,963	713
\$100,000,000 under \$250,000,000.....	4,794	2,352	2,442	2,061	1,937	796	4,027	487
\$250,000,000 or more.....	17,103	8,381	8,722	7,505	4,768	4,830	11,297	294

^aIncludes the "gross-up" of certain foreign dividends.

^bIncludes returns with zero assets.

^cLess than \$500 per return.

NOTE: See text for explanatory statements and for "Description of the Sample and Limitations of the Data."

Detail may not add to totals because of rounding.

Foreign Tax Credit on Corporation Returns, 1968

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 RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED AND WITH PER-COUNTRY LIMITATION METHOD
 Table 12.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Geographic Area where Taxes were Paid, and by Selected Industrial Division

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

Geographic area and industrial division	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed	Taxable income from foreign sources		
										Total ¹	Dividends from related foreign corporations	Interest for which separate credit was computed
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
All Geographic Areas												
All Industries	4,139	226,933,445	10,648,918	365,525	6,399	90,366	9,678,664	4,889,240	1,090,289	2,471,894	326,906	8,869
Agriculture, forestry, and fishery	20	549,559	62,650	2,408	7	713	52,508	27,476	14,632	39,517	1,984	—
Mining	69	5,215,544	395,207	37,536	—	113	342,495	178,574	106,148	233,901	37,336	696
Contract construction	55	1,492,898	148,340	2,162	58	1,238	137,790	71,117	35,318	73,813	1,919	84
Manufacturing	1,454	98,755,695	7,426,642	288,084	4,616	74,181	6,758,766	3,440,784	637,153	1,811,821	264,588	4,097
Transportation, communication, electric, gas, and sanitary services	80	29,152,112	745,630	3,895	66	2,540	706,933	343,360	7,555	26,880	2,740	58
Wholesale and retail trade	731	8,694,576	575,072	15,849	347	2,551	559,865	286,949	55,350	128,416	4,300	515
Finance, insurance, and real estate	1,416	83,417,857	1,114,186	11,340	1,286	6,853	945,345	459,778	27,146	135,153	10,378	3,221
Services	314	1,655,204	181,191	4,251	19	2,177	174,962	81,202	6,987	22,393	3,661	198
Canada												
All Industries	2,405	157,806,378	7,476,702	321,976	3,456	71,213	6,662,719	3,372,638	915,176	308,232	43,564	6,751
Agriculture, forestry, and fishery	4	104,133	11,272	885	7	713	10,693	5,606	892	2,584	790	—
Mining	42	3,552,918	214,942	33,037	—	113	189,989	99,100	38,862	62,888	257	43
Contract construction	21	363,288	22,134	80	16	5	21,759	11,198	284	1,342	76	84
Manufacturing	862	78,410,707	5,779,890	263,702	2,133	62,256	5,160,739	2,627,537	798,016	134,689	36,039	2,885
Transportation, communication, electric, gas, and sanitary services	27	7,373,733	155,371	3,135	66	2,191	135,975	69,145	4,038	11,760	2,109	54
Wholesale and retail trade	374	3,736,390	252,789	12,646	—	1,753	243,973	124,597	49,430	11,438	1,645	462
Finance, insurance, and real estate	932	63,192,860	924,119	4,577	1,215	2,081	787,378	386,021	19,157	78,804	2,169	3,066
Services	144	1,072,349	116,185	3,914	19	2,101	112,213	49,434	4,495	4,727	479	157
Latin America												
All Industries	668	123,088,651	5,823,059	305,104	1,540	54,862	5,227,790	2,664,565	865,079	726,067	70,732	1,159
Agriculture, forestry, and fishery	8	511,899	59,529	2,277	7	713	49,453	25,965	14,587	36,026	893	—
Mining	19	3,006,650	225,361	37,105	—	22	191,726	100,697	56,295	98,004	36,791	653
Contract construction	8	401,958	56,209	1,361	42	593	54,786	28,415	20,257	4,102	—	—
Manufacturing	252	72,289,171	4,591,281	260,025	1,194	53,126	4,082,213	2,094,568	765,136	563,720	31,670	344
Transportation, communication, electric, gas, and sanitary services	46	23,676,299	610,679	797	—	100	582,610	276,882	3,595	12,045	15	4
Wholesale and retail trade	153	1,272,005	119,421	1,805	297	253	115,801	59,841	2,024	5,495	1,076	43
Finance, insurance, and real estate	109	21,549,482	127,314	563	—	5	119,052	59,427	2,027	4,812	263	82
Services	71	381,187	33,265	1,151	—	50	32,149	16,570	1,158	1,863	24	33
Other Western Hemisphere												
All Industries	42	767,386	56,720	7,087	42	2,916	47,621	24,251	14,032	2,226	42	—
Contract construction	3	3,662	1,467	—	—	—	1,079	568	70	199	—	—
Manufacturing	4	361,713	38,916	7,015	42	2,916	35,167	18,283	13,032	1,982	42	—
Finance, insurance, and real estate	31	396,357	18,125	72	—	—	11,246	5,363	930	45	—	—
Services	3	5,654	212	—	—	—	129	37	(¹)	(¹)	—	—
Europe												
All Industries	698	90,508,443	4,827,182	300,272	3,743	61,500	4,360,831	2,206,393	598,037	191,795	74,404	313
Agriculture, forestry, and fishery	5	497,019	57,686	2,380	7	713	48,071	25,263	14,598	579	243	—
Mining	6	2,737,313	135,804	32,928	—	22	122,729	64,721	24,342	2,531	135	—
Contract construction	5	289,710	15,014	1,156	—	593	10,922	5,335	930	1,956	1,149	—
Manufacturing	336	66,669,487	4,158,494	249,786	3,175	52,257	3,748,278	1,913,350	543,970	149,036	62,369	232
Transportation, communication, electric, gas, and sanitary services	15	6,316,380	160,227	867	86	98	151,577	61,853	1,020	1,007	84	—
Wholesale and retail trade	136	1,234,213	102,057	2,400	284	757	100,252	51,310	2,934	5,557	1,473	—
Finance, insurance, and real estate	173	12,424,632	148,937	6,874	192	4,959	131,513	59,987	6,200	24,353	6,318	73
Services	22	339,689	48,963	3,881	19	2,101	47,469	24,774	4,043	6,776	2,633	8
Africa												
All Industries	182	57,383,080	3,395,573	257,056	303	41,307	3,007,254	1,527,493	757,093	437,529	37,107	—
Agriculture, forestry, and fishery	3	4,316	169	—	—	—	106	33	3	7	—	—
Mining	3	2,384,396	148,727	32,783	—	22	146,955	77,407	48,830	60,171	153	—
Manufacturing	88	49,090,012	2,909,794	212,313	303	40,950	2,533,803	1,297,820	660,846	279,196	36,830	—
Wholesale and retail trade	22	2,143,917	216,146	11,478	—	206	215,622	113,245	46,740	95,212	75	—
Finance, insurance, and real estate	43	80,230	6,661	167	—	31	5,941	1,980	81	2,903	49	—
Asia												
All Industries	450	94,177,677	4,796,709	251,817	1,393	52,173	4,223,687	2,139,317	716,575	737,914	87,337	593
Agriculture, forestry, and fishery	3	118,497	12,930	913	7	713	12,351	6,506	893	259	10	—
Mining	5	366,360	39,495	74	—	—	33,460	17,625	4,975	7,185	—	—
Contract construction	16	585,247	90,758	1,843	—	1,233	86,259	45,088	33,532	59,624	—	—
Manufacturing	226	69,345,060	4,305,491	245,000	1,140	49,186	3,762,579	1,921,685	665,340	648,555	86,042	593
Transportation, communication, electric, gas, and sanitary services	4	7,528,916	170,922	788	—	98	163,114	68,560	1,138	1,137	—	—
Wholesale and retail trade	24	721,782	32,623	572	246	116	32,468	15,928	2,497	5,168	31	—
Finance, insurance, and real estate	110	15,311,393	122,641	1,542	—	51	111,638	52,814	6,103	11,087	1,247	(¹)
Services	62	200,422	21,849	1,085	—	776	21,818	11,111	2,097	4,899	7	—

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED AND WITH OVERALL LIMITATION METHOD
Table 13.—Total Assets, Income, and Tax, and Foreign income, Taxes, and Credit, by Geographic Area where Taxes were Paid and by Selected Industrial Division

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

Geographic area and industrial division	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Income subject to U. S. tax	U. S. income tax before credits	Foreign tax credit claimed	Taxable income from foreign sources		
										Total (less loss) ¹	Dividends from related foreign corporations	Interest for which separate credit was computed
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
All Geographic Areas												
All Industries	2,058	674,020,285	36,190,293	1,671,237	60,774	875,774	34,895,277	18,052,698	2,566,241	6,287,643	1,621,519	15,077
Mining	18	2,713,798	1,100,844	41,346	312	11,890	1,079,163	567,696	535,864	1,027,703	34,953	—
Contract construction	20	1,497,570	103,496	9,992	—	5,321	98,963	49,059	11,374	42,396	9,045	—
Manufacturing	1,107	239,707,443	25,670,672	1,490,014	44,491	792,447	24,791,509	12,843,135	1,765,699	4,283,895	1,449,429	11,230
Transportation, communication, electric, gas, and sanitary services	59	61,955,525	4,704,106	12,734	3,654	5,915	4,628,085	2,414,740	20,454	157,338	12,981	476
Wholesale and retail trade	250	14,721,199	1,044,319	60,810	3,164	32,304	1,021,706	529,351	57,393	144,547	62,030	1,377
Finance, insurance, and real estate	469	348,224,257	3,225,916	37,321	6,604	16,261	2,945,458	1,479,843	149,130	541,847	33,029	1,894
Services	132	5,139,882	336,227	18,966	2,549	11,636	326,675	167,521	26,323	89,885	20,052	—
Canada												
All Industries	1,420	615,454,361	32,962,111	1,546,166	56,243	819,853	31,741,998	16,416,102	1,939,696	995,942	312,178	5,101
Mining	10	1,191,668	114,819	34,284	244	11,677	95,902	46,655	20,930	—113	5,254	—
Contract construction	10	863,255	58,651	7,566	—	3,457	57,330	29,373	5,116	1,789	910	—
Manufacturing	818	224,201,300	24,110,628	1,428,849	40,382	764,416	23,271,446	12,055,233	1,715,999	717,501	267,102	4,021
Transportation, communication, electric, gas, and sanitary services	47	58,504,097	4,552,293	12,512	3,654	5,910	4,481,249	2,338,492	17,421	33,541	6,840	462
Wholesale and retail trade	122	11,632,368	789,731	13,298	2,965	9,568	775,305	401,740	17,754	26,379	10,544	601
Finance, insurance, and real estate	329	314,097,022	3,026,749	32,250	6,449	13,746	2,761,177	1,389,656	138,216	199,742	17,665	17
Services	80	4,904,040	304,577	17,353	2,549	10,879	295,871	151,600	24,256	17,073	3,863	—
Latin America												
All Industries	875	537,383,195	27,753,562	1,545,666	47,774	810,090	26,782,325	13,835,202	1,934,337	1,024,887	245,183	2,429
Mining	8	938,820	78,682	12,583	312	2,610	66,442	34,988	15,238	13,759	5,559	—
Contract construction	14	1,228,165	85,050	9,372	—	4,941	81,618	40,308	10,615	16,208	5,090	—
Manufacturing	577	217,785,183	23,799,337	1,454,039	40,656	768,446	23,009,679	11,924,922	1,724,358	824,909	211,698	892
Transportation, communication, electric, gas, and sanitary services	38	17,090,823	686,484	8,133	3,654	4,754	667,627	320,722	12,968	7,961	1,216	—
Wholesale and retail trade	65	11,074,600	681,453	18,945	444	5,479	667,237	345,758	19,899	26,719	9,060	262
Finance, insurance, and real estate	135	284,922,915	2,157,871	26,726	159	13,670	2,033,588	1,037,245	128,326	113,935	4,584	1,275
Services	38	4,342,689	264,685	15,868	2,549	10,190	256,134	131,259	22,833	21,396	7,976	—
Other Western Hemisphere												
All Industries	92	186,546,112	10,843,317	801,242	10,339	374,036	10,468,484	5,487,890	1,020,523	64,410	17,145	57
Manufacturing	55	82,299,377	10,029,791	770,979	7,609	357,335	9,691,934	5,085,083	934,049	59,662	17,145	42
Finance, insurance, and real estate	27	101,038,030	619,210	14,076	1	9,588	593,736	307,775	71,757	4,601	—	15
Services	4	806,107	58,085	7,713	2,344	4,085	57,349	29,228	8,020	18	—	—
Europe												
All Industries	993	500,496,004	28,056,951	1,590,190	49,378	850,253	27,033,314	13,949,205	1,969,452	1,947,107	801,159	5,579
Mining	6	722,143	63,837	7,275	244	2,597	52,776	27,791	9,938	2,742	826	—
Contract construction	12	1,236,003	77,229	9,465	—	5,145	74,850	38,532	9,480	7,864	2,745	—
Manufacturing	663	218,814,210	23,984,692	1,462,036	43,404	781,993	23,184,417	12,008,668	1,736,751	1,677,135	741,139	4,978
Transportation, communication, electric, gas, and sanitary services	15	12,390,184	621,176	7,749	—	4,509	611,968	292,947	12,386	84,966	3,629	14
Wholesale and retail trade	52	11,228,560	801,565	53,881	3,164	30,045	788,890	411,187	47,164	65,469	38,742	3
Finance, insurance, and real estate	175	252,503,935	2,258,718	31,471	159	14,939	2,076,798	1,044,015	129,234	80,491	7,948	584
Services	68	3,600,969	249,734	18,313	2,407	11,025	243,615	126,065	24,499	28,440	6,130	—
Africa												
All Industries	409	325,795,228	18,996,196	1,305,115	29,142	659,401	18,243,371	9,524,272	1,613,075	407,175	76,393	233
Mining	6	993,742	101,972	32,598	—	10,237	92,409	46,819	20,026	39,689	21,438	—
Contract construction	6	633,361	24,995	1,727	—	446	23,729	11,918	1,611	1,443	200	—
Manufacturing	249	147,229,673	17,241,509	1,224,419	26,532	626,079	16,583,554	8,671,139	1,459,219	356,913	52,979	217
Transportation, communication, electric, gas, and sanitary services	5	1,792,978	159,284	2,156	15	1,063	157,745	81,643	3,201	1,021	—	—
Wholesale and retail trade	32	2,375,600	66,209	11,494	199	495	62,241	31,613	7,829	1,547	417	—
Finance, insurance, and real estate	91	169,617,275	1,193,855	18,518	24	11,967	1,118,804	574,849	100,564	4,540	1,102	16
Services	20	3,152,599	208,372	14,203	2,372	9,114	204,889	106,291	20,626	2,022	257	—
Asia												
All Industries	810	531,609,257	30,602,208	1,491,673	41,262	776,687	29,627,766	15,378,776	2,378,334	1,504,190	113,568	327
Mining	10	2,313,922	1,078,212	36,342	68	10,237	1,066,224	561,181	532,954	968,613	1,276	—
Contract construction	12	1,104,743	70,189	9,617	—	5,145	68,339	34,881	9,263	13,716	3	—
Manufacturing	540	216,192,818	22,841,154	1,391,475	38,076	739,105	22,049,076	11,439,276	1,671,715	383,232	108,738	186
Transportation, communication, electric, gas, and sanitary services	20	52,092,314	4,505,628	10,822	156	4,601	4,449,924	2,326,945	15,204	19,758	354	—
Wholesale and retail trade	70	4,225,261	105,173	10,246	460	1,314	101,637	50,097	10,291	10,374	2,286	55
Finance, insurance, and real estate	132	253,158,843	1,859,753	17,943	158	6,612	1,757,208	896,766	117,273	91,873	619	86
Services	26	2,521,356	142,099	19,228	2,344	9,673	135,358	69,630	21,634	6,624	292	—

Footnotes at end of table.

Foreign Tax Credit on Corporation Returns, 1968

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED AND WITH OVERALL LIMITATION METHOD
 Table 13.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, *by Geographic Area where Taxes were Paid, and by Selected Industrial Division—Continued

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

Geographic area and industrial division	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Income subject to U. S. tax	U. S. income tax before credits	Foreign tax credit claimed	Taxable income from foreign sources		
										Total (less loss) ¹	Dividends from related foreign corporations	Interest for which separate credit was computed
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
Oceania												
All industries	566	456,806,145	26,319,994	1,349,944	26,580	707,580	25,672,047	13,337,841	1,616,219	122,516	50,363	644
Mining	6	1,114,732	85,884	33,999	244	10,946	67,177	33,675	19,646	1,572	600	—
Contract construction	5	404,131	18,612	1,757	—	589	17,418	8,763	1,581	202	97	—
Manufacturing	446	171,010,388	19,747,949	1,273,422	23,728	674,468	19,260,462	10,004,339	1,450,563	99,723	46,063	189
Transportation, communication, electric, gas, and sanitary services	10	49,719,289	4,380,711	10,442	15	4,505	4,327,692	2,262,993	12,192	4,356	942	—
Wholesale and retail trade	27	2,981,184	169,039	3,838	183	3,519	167,428	87,281	5,512	1,287	12	455
Finance, insurance, and real estate	52	228,450,158	1,719,556	14,613	3	6,748	1,637,059	839,736	109,703	9,856	1,112	—
Services	20	3,126,263	198,243	11,873	2,407	6,805	194,791	101,054	17,022	5,520	1,537	—
Puerto Rico and United States Possessions												
All industries	310	417,621,938	23,812,862	1,169,306	20,793	603,766	23,173,518	12,047,488	1,440,642	89,367	4,392	8
Contract construction	7	578,267	47,338	1,795	—	1,575	45,778	22,242	4,582	1,328	—	—
Manufacturing	150	138,161,989	16,667,960	1,087,790	9,049	557,970	16,262,993	8,472,853	1,258,828	67,005	4,392	5
Transportation, communication, electric, gas, and sanitary services	10	51,124,043	4,393,799	11,969	141	5,756	4,339,425	2,270,413	14,668	2,778	—	—
Wholesale and retail trade	22	7,884,074	646,446	39,100	2,704	25,422	639,266	335,332	34,495	5,944	—	—
Finance, insurance, and real estate	101	217,124,834	1,911,315	16,528	6,446	5,583	1,743,345	874,837	111,298	10,900	—	3
Services	18	2,711,260	142,344	12,070	2,453	7,460	140,046	70,972	16,768	1,410	—	—
Country not stated or not allocable and other income from outside the United States												
All industries	244	289,128,972	19,821,255	1,019,977	5,168	472,345	19,066,885	9,912,923	1,296,730	131,970	1,155	696
Contract construction	3	503,719	13,878	391	—	156	13,186	6,779	1,057	87	—	—
Manufacturing	129	113,873,141	14,040,057	953,676	2,346	445,616	13,465,621	7,002,387	1,172,261	87,770	185	696
Transportation, communication, electric, gas, and sanitary services	4	47,980,901	4,256,842	9,963	—	4,504	4,205,742	2,206,029	11,239	2,908	—	—
Wholesale and retail trade	37	6,694,557	517,978	5,862	183	2,872	512,793	270,268	8,546	6,823	970	—
Finance, insurance, and real estate	57	117,205,455	789,775	12,270	158	4,689	677,526	328,991	76,364	25,880	—	—
Services	12	2,153,052	140,826	8,741	2,481	5,215	139,084	72,274	11,565	7,389	—	—

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED AND WITH OVERALL LIMITATION METHOD
 Table 13.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Geographic Area where Taxes were Paid and by Selected Industrial Division—Continued

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

Geographic area and industrial division	Foreign taxes						Foreign tax credit computed for taxes on—		Dividends paid to related foreign corporations by subsidiaries
	Total ¹	Paid or accrued on—		Deemed paid	Carryover on—		Income other than certain interest ²	Interest for which separate credit was computed	
		Income other than certain interest	Interest for which separate credit was computed		Income other than certain interest ²	Interest for which separate credit was computed			
	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)
All Geographic Areas									
All Industries	3,926,407	1,968,970	1,138	1,086,253	870,044	1	2,565,649	1,101	270,788
Mining	1,493,877	687,073	—	15,623	791,181	—	535,864	—	22,739
Contract construction	12,418	5,279	—	5,833	1,306	—	11,558	—	187
Manufacturing	2,144,615	1,094,878	896	988,911	59,928	1	1,765,064	881	177,534
Transportation, communication, electric, gas, and sanitary services	21,046	12,269	9	7,055	1,713	—	20,445	9	1,541
Wholesale and retail trade	63,111	22,111	164	37,195	3,642	—	57,328	142	3,180
Finance, insurance, and real estate	156,371	132,151	69	18,803	5,347	—	149,063	69	64,113
Services	34,965	15,205	—	12,833	6,927	—	26,323	—	1,494
Canada									
All Industries	387,777	135,592	679	251,506	—	1	—	661	100,383
Mining	2,961	575	—	2,386	—	—	—	—	—
Contract construction	1,022	165	—	857	—	—	—	—	—
Manufacturing	306,044	83,287	578	222,179	—	1	—	563	40,413
Transportation, communication, electric, gas, and sanitary services	8,336	5,238	8	3,090	—	—	—	8	196
Wholesale and retail trade	11,302	2,835	90	8,377	—	—	—	87	2,733
Finance, insurance, and real estate	50,872	40,253	3	10,616	—	—	—	3	56,578
Services	7,237	3,296	—	4,001	—	—	—	—	463
Latin America									
All Industries	555,412	477,622	245	77,545	—	—	—	226	21,520
Mining	7,550	6,526	—	1,024	—	—	—	—	128
Contract construction	4,759	2,530	—	2,229	—	—	—	—	187
Manufacturing	500,199	433,054	177	66,968	—	—	—	177	20,469
Transportation, communication, electric, gas, and sanitary services	2,263	1,746	—	517	—	—	—	—	—
Wholesale and retail trade	10,631	7,423	23	3,185	—	—	—	4	344
Finance, insurance, and real estate	23,941	22,472	45	1,424	—	—	—	45	392
Services	6,069	3,871	—	2,198	—	—	—	—	—
Other Western Hemisphere									
All Industries	12,368	11,179	(*)	1,189	—	—	—	(*)	—
Manufacturing	12,343	11,154	(*)	1,189	—	—	—	(*)	—
Finance, insurance, and real estate	24	24	—	—	—	—	—	—	—
Services	1	1	—	—	—	—	—	—	—
Europe									
All Industries	766,778	152,202	86	614,490	—	—	—	86	111,053
Mining	830	266	—	564	—	—	—	—	—
Contract construction	3,251	607	—	2,644	—	—	—	—	—
Manufacturing	688,926	114,943	64	573,919	—	—	—	64	103,692
Transportation, communication, electric, gas, and sanitary services	3,299	589	1	2,709	—	—	—	1	402
Wholesale and retail trade	31,402	7,192	—	24,210	—	—	—	—	(*)
Finance, insurance, and real estate	31,322	25,988	21	5,313	—	—	—	21	6,330
Services	7,748	2,617	—	5,131	—	—	—	—	629
Africa									
All Industries	300,654	265,266	7	35,381	—	—	—	7	27,688
Mining	16,902	5,923	—	10,979	—	—	—	—	22,611
Contract construction	317	284	—	33	—	—	—	—	—
Manufacturing	280,719	257,195	7	23,517	—	—	—	7	5,001
Transportation, communication, electric, gas, and sanitary services	22	22	—	—	—	—	—	—	—
Wholesale and retail trade	663	621	—	242	—	—	—	—	—
Finance, insurance, and real estate	1,034	581	—	453	—	—	—	—	76
Services	797	640	—	157	—	—	—	—	—
Asia									
All Industries	932,531	869,660	29	62,842	—	—	—	29	958
Mining	673,453	673,414	—	39	—	—	—	—	—
Contract construction	1,102	1,101	—	1	—	—	—	—	—
Manufacturing	213,043	151,486	24	61,533	—	—	—	24	855
Transportation, communication, electric, gas, and sanitary services	3,087	3,008	—	79	—	—	—	—	—
Wholesale and retail trade	2,622	1,821	5	796	—	—	—	5	103
Finance, insurance, and real estate	36,208	36,038	—	170	—	—	—	—	—
Services	3,016	2,792	—	224	—	—	—	—	—

Footnotes at end of table.

Foreign Tax Credit on Corporation Returns, 1968

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED AND WITH OVERALL LIMITATION METHOD
 Table 13.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Geographic Area where Taxes were Paid, and by Selected Industrial Division—Continued

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

Geographic area and industrial division	Foreign taxes						Foreign tax credit computed for taxes on—		Dividends paid to related foreign corporations by subsidiaries
	Total ²	Paid or accrued on—		Deemed paid	Carryover on—		Income other than certain interest ¹	Interest for which separate credit was computed	
		Income other than certain interest	Interest for which separate credit was computed		Income other than certain interest ¹	Interest for which separate credit was computed			
	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)
Oceania									
All Industries	67,080	25,493	82	41,505	—	—	—	82	9,191
Mining	998	367	—	631	—	—	—	—	—
Contract construction	162	92	—	70	—	—	—	—	—
Manufacturing	61,012	22,775	38	38,199	—	—	—	38	7,107
Transportation, communication, electric, gas, and sanitary services	980	320	—	660	—	—	—	—	943
Wholesale and retail trade	341	293	44	4	—	—	—	44	—
Finance, insurance, and real estate	1,558	734	—	824	—	—	—	—	739
Services	2,029	912	—	1,117	—	—	—	—	402
Puerto Rico and United States Possessions									
All Industries	28,004	26,797	1	1,206	—	—	—	1	—
Contract construction	497	497	—	—	—	—	—	—	—
Manufacturing	19,836	18,629	1	1,206	—	—	—	1	—
Transportation, communication, electric, gas, and sanitary services	1,262	1,262	—	—	—	—	—	—	—
Wholesale and retail trade	1,226	1,226	—	—	—	—	—	—	—
Finance, insurance, and real estate	4,788	4,788	—	—	—	—	—	—	—
Services	394	394	—	—	—	—	—	—	—
Country not stated or not allocable and other income from outside the United States									
All Industries	5,553	4,978	5	570	—	—	—	5	—
Contract construction	—	—	—	—	—	—	—	—	—
Manufacturing	2,405	2,210	5	190	—	—	—	5	—
Transportation, communication, electric, gas, and sanitary services	84	84	—	—	—	—	—	—	—
Wholesale and retail trade	1,079	699	—	380	—	—	—	—	—
Finance, insurance, and real estate	1,241	1,241	—	—	—	—	—	—	—
Services	744	744	—	—	—	—	—	—	—

¹Includes the "gross-up" of certain foreign dividends.

²Total taxes for each geographic area do not include the foreign tax carryover on "Income other than certain interest" because this was not reported in country detail on returns for which the overall limitation was used. Consequently, total taxes for each geographic area do not add to total taxes for "All geographic areas".

³Foreign tax credit on "Income other than certain interest" is not available for each geographic area because it was not reported in country detail on returns for which the overall limitation was used.

⁴Less than \$500 per returns.

NOTE: See text for explanatory statements, including Geographic classification under "Explanation of Terms," and for "Description of the Sample and Limitations of the Data". Detail may not add to totals because of rounding.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 14.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Selected Major Industry and by Number of Countries for which Domestic Corporations Reported Taxable Foreign Income or Foreign Tax

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

Selected major industries and number of countries for which taxable foreign income or foreign tax was reported ¹	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
All Industries									
Total	6,196	900,953,730	46,839,211	2,036,762	67,173	966,140	44,573,941	22,941,938	3,656,530
1 country	4,302	144,697,013	6,277,393	44,380	3,449	23,395	5,928,996	2,995,690	668,903
2 countries	696	56,077,439	2,290,935	30,929	8,467	7,622	2,044,660	1,039,799	112,150
3 countries	333	52,402,699	2,040,598	73,628	5,439	40,615	1,936,797	982,529	112,740
4 countries	132	28,082,107	1,193,155	36,199	1,118	18,487	1,091,301	546,958	41,690
5 countries	137	24,383,607	1,118,895	64,414	4,801	17,721	1,088,882	557,276	59,129
6 countries	94	67,581,389	4,936,712	57,336	3,826	16,962	4,765,890	2,477,116	133,281
7 countries	65	51,337,424	1,420,072	14,889	3,320	10,120	1,375,804	697,956	74,637
8 countries	68	13,743,294	1,231,499	32,110	8,792	22,901	1,174,859	611,579	41,990
9 countries	44	23,536,987	753,544	67,503	1,469	31,903	734,374	378,018	64,221
10 or more countries	326	439,111,771	25,576,308	1,615,374	26,492	776,414	24,432,378	12,645,013	2,347,789
Agriculture, Forestry, and Fishery									
Total	22	610,170	67,363	2,462	7	713	56,226	28,829	14,636
1-7 countries	22	610,170	67,363	2,462	7	713	56,226	28,829	14,636
8 countries	—	—	—	—	—	—	—	—	—
9 countries	—	—	—	—	—	—	—	—	—
10 or more countries	—	—	—	—	—	—	—	—	—
Total Mining									
Total	87	7,929,342	1,496,051	78,882	312	12,003	1,421,658	746,270	642,012
1 country	58	3,179,485	1,177,392	6,093	—	91	1,144,808	602,423	581,178
2 countries	16	773,949	48,295	157	—	—	40,695	21,021	6,390
3 countries	3	175,567	10,849	3,459	68	—	8,842	4,573	4,572
4 countries	3	565,225	57,879	120	—	—	45,831	24,108	7,068
5-6 countries	4	2,846,487	157,455	63,566	244	10,955	138,221	71,356	37,333
7 countries	—	—	—	—	—	—	—	—	—
8 countries	—	—	—	—	—	—	—	—	—
9 countries	—	—	—	—	—	—	—	—	—
10 or more countries	3	388,629	44,181	5,487	—	957	43,261	22,789	5,501
Mining: Crude Petroleum and Natural Gas									
Total	55	2,594,253	1,123,042	7,412	—	957	1,116,959	588,854	549,392
1 country	37	1,761,642	1,037,503	1,647	—	—	1,033,900	545,255	539,030
2 countries	11	298,580	26,797	17	—	—	27,669	14,502	619
3-6 countries	4	145,402	12,561	261	—	—	12,129	6,308	4,242
7 countries	—	—	—	—	—	—	—	—	—
8 countries	—	—	—	—	—	—	—	—	—
9 countries	—	—	—	—	—	—	—	—	—
10 or more countries	3	388,629	44,181	5,487	—	957	43,261	22,789	5,501
Mining: All Other									
Total	33	5,335,089	373,009	71,470	312	11,046	304,699	157,416	92,620
1 country	22	1,417,843	139,889	4,446	—	91	110,908	57,168	42,148
2-3 countries	6	612,804	28,469	3,440	68	—	20,420	10,416	9,637
4-6 countries	5	3,304,442	204,651	63,584	244	10,955	173,371	89,832	40,835
7 countries	—	—	—	—	—	—	—	—	—
8 countries	—	—	—	—	—	—	—	—	—
9 countries	—	—	—	—	—	—	—	—	—
10 or more countries	—	—	—	—	—	—	—	—	—
Contract Construction									
Total	75	2,990,468	251,836	12,154	58	6,559	236,753	120,176	46,692
1 country	52	1,043,304	93,586	319	58	5	86,564	44,742	13,212
2 countries	6	551,474	57,221	789	—	640	52,299	25,262	20,690
3-4 countries	5	168,669	24,465	1,664	—	769	23,289	11,396	2,512
5-7 countries	4	296,883	26,587	1,318	—	1,243	26,125	13,665	3,609
8-9 countries	4	560,514	32,204	5,658	—	2,835	31,433	16,479	3,925
10 or more countries	4	369,624	17,773	2,406	—	1,067	17,043	8,632	2,744
Total Manufacturing									
Total	2,561	338,463,138	33,097,314	1,778,098	49,107	866,628	31,550,275	16,283,919	2,602,852
1 country	1,379	24,599,031	2,528,006	14,542	2,232	10,176	2,453,543	1,233,037	24,691
2 countries	351	13,012,445	1,272,355	10,820	1,654	4,735	1,113,320	574,013	23,497
3 countries	192	16,013,469	1,349,263	28,683	2,651	13,293	1,309,347	677,388	62,932
4 countries	86	7,317,898	764,760	26,610	1,118	13,526	737,322	380,267	23,507
5 countries	105	8,743,513	871,633	24,569	745	14,902	857,695	441,468	34,011
6 countries	64	9,235,958	801,131	18,704	3,826	7,682	722,180	353,866	92,910
7 countries	41	14,987,337	870,321	9,417	3,002	7,379	835,719	421,403	58,329
8 countries	57	11,344,873	1,087,568	25,895	8,629	19,786	1,033,323	537,659	37,160
9 countries	31	8,974,490	583,328	53,220	1,449	24,531	571,309	292,812	46,256
10 or more countries	254	224,234,124	22,968,949	1,565,638	23,801	750,618	21,916,517	11,372,006	2,199,559

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 14.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Selected Major Industry and by Number of Countries for which Domestic Corporations Reported Taxable Foreign Income or Foreign Tax—Continued

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

Selected major industries and number of countries for which taxable foreign income or foreign tax was reported ¹	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Manufacturing: Food and Kindred Products									
Total	148	18,763,010	2,111,105	141,148	4,387	95,220	2,080,122	1,074,150	157,842
1 country	88	1,617,950	144,535	318	536	324	143,236	74,909	843
2 countries	9	771,208	81,336	1,004	61	131	81,284	42,663	776
3 countries	11	1,461,966	135,839	4,431	268	2,266	134,772	70,245	4,093
4 countries	6	1,093,593	153,034	11,090	152	8,642	150,053	75,918	10,616
5 countries	5	352,539	62,398	963	—	507	59,279	30,878	1,262
6-7 countries	3	894,295	66,393	1,685	41	358	63,155	31,830	4,254
8 countries	4	627,160	78,005	364	252	149	77,907	39,673	656
9 countries	3	1,978,173	141,271	9,062	—	6,857	139,836	67,726	8,487
10 or more countries	18	9,966,126	1,248,294	112,231	3,077	75,986	1,230,620	640,308	126,855
Manufacturing: Chemicals and Allied Products									
Total	380	34,887,168	4,829,606	298,742	21,656	182,649	4,720,680	2,452,620	308,743
1 country	179	1,770,797	295,802	680	453	614	283,031	147,180	2,966
2 countries	55	547,334	82,843	480	225	552	82,263	43,138	819
3 countries	23	914,696	86,652	4,187	187	5,209	80,041	41,020	6,391
4 countries	11	131,731	37,672	487	—	397	35,186	17,857	655
5 countries	24	125,609	29,384	946	—	763	29,340	15,039	1,119
6 countries	4	175,095	18,083	1,451	—	1,223	16,872	8,777	2,466
7 countries	6	189,796	41,320	2,295	2,511	3,465	41,275	21,617	5,065
8 countries	11	1,082,892	127,824	3,665	7,003	6,401	127,529	65,484	8,210
9 countries	5	665,837	47,668	505	—	495	45,146	23,217	999
10 or more countries	60	29,283,381	4,062,358	284,026	11,277	163,530	3,979,997	2,069,291	280,053
Manufacturing: Petroleum Refining and Related Industries									
Total	32	70,586,525	4,052,092	477,316	298	62,161	3,276,450	1,690,041	1,059,971
1 country	3	643,385	33,336	—	—	—	31,429	15,298	2,637
2 countries	5	696,663	4,963	—	—	—	4,945	2,141	388
3 countries	6	5,887,859	305,849	5,252	—	232	300,108	157,280	38,726
4-5 countries	3	2,805,429	82,215	1,745	—	100	57,420	28,817	12,132
6-7 countries	3	9,993,910	352,802	3,437	—	477	324,710	163,059	45,803
8 countries	—	—	—	—	—	—	—	—	—
9 countries	—	—	—	—	—	—	—	—	—
10 or more countries	12	50,559,279	3,292,927	466,882	298	61,352	2,557,838	1,323,446	960,285
Manufacturing: Primary Metal Industries									
Total	125	32,930,612	1,520,810	83,215	1,861	21,217	1,306,336	673,142	231,776
1 country	78	2,394,827	109,870	298	148	243	101,012	51,393	441
2 countries	13	2,450,326	119,827	808	101	—	97,111	50,854	12,724
3-5 countries	8	2,230,920	128,925	4,215	101	17	113,976	60,173	2,445
6-7 countries	6	5,045,654	359,312	6,242	—	689	311,274	161,531	76,888
8 countries	5	2,779,550	131,954	10,728	538	6,209	93,325	46,663	11,897
9 countries	4	1,696,453	110,574	31,469	892	8,358	107,369	55,496	21,322
10 or more countries	10	16,332,882	560,348	29,455	81	5,701	482,289	247,032	106,059
Manufacturing: Machinery, Except Electrical									
Total	456	25,620,895	3,798,716	166,808	9,466	117,017	3,754,143	1,958,349	196,311
1 country	231	1,885,899	258,798	2,046	427	1,259	254,719	131,191	3,766
2 countries	87	1,782,016	223,174	2,610	1,116	922	218,127	111,275	2,231
3 countries	25	716,021	71,712	2,949	252	1,141	70,939	36,715	2,070
4 countries	15	630,867	71,879	613	88	352	66,283	34,722	1,335
5 countries	16	1,057,610	155,535	7,297	3	3,703	154,527	79,971	5,556
6 countries	28	1,011,513	115,086	3,728	398	2,139	111,759	56,324	4,200
7 countries	7	345,926	33,920	1,300	—	668	33,983	17,553	649
8-9 countries	11	1,246,646	177,241	7,714	—	5,401	174,221	91,555	10,521
10 or more countries	35	16,964,397	2,691,371	138,551	7,182	101,432	2,669,585	1,399,043	165,983
Manufacturing: Electrical Equipment and Supplies									
Total	222	26,260,731	2,563,330	110,014	951	52,717	2,533,181	1,310,734	114,802
1 country	103	2,057,969	249,203	459	212	595	247,266	123,504	1,395
2 countries	40	846,599	121,532	778	16	548	119,562	61,938	854
3 countries	25	554,987	49,491	689	—	549	48,833	25,073	1,150
4 countries	13	1,538,650	156,393	2,641	619	1,718	154,424	80,568	2,913
5 countries	6	481,428	66,948	3,921	—	3,494	66,948	34,891	4,215
6-7 countries	6	645,329	83,433	1,556	—	1,132	82,290	43,236	1,690
8 countries	7	1,891,629	173,031	690	—	574	165,992	87,177	1,097
9 countries	3	205,478	28,615	1,231	—	197	28,610	15,137	930
10 or more countries	19	18,238,662	1,634,684	98,049	104	43,910	1,619,256	838,210	100,558
Manufacturing: Motor Vehicles and Equipment									
Total	75	41,782,813	5,464,924	174,604	1,411	134,344	5,395,201	2,839,503	190,324
1 country	33	235,414	37,887	24	110	8	37,886	19,678	159
2 countries	9	282,057	36,273	370	—	255	35,512	18,026	335
3 countries	4	434,775	29,193	—	383	24	18,990	9,750	405
4-5 countries	6	408,858	54,721	1,189	—	1,144	54,663	28,825	1,823
6 countries	3	840,232	74,636	2,209	288	1,783	73,219	33,445	2,457
7 countries	—	—	—	—	—	—	—	—	—
8 countries	4	118,838	48,209	523	36	265	47,048	24,806	735
9 countries	5	565,862	84,658	745	557	1,032	83,186	43,667	2,098
10 or more countries	11	38,896,777	5,099,347	169,544	37	129,833	5,044,697	2,661,306	182,312

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 14.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Selected Major Industry and by Number of Countries for which Domestic Corporations Reported Taxable Foreign Income or Foreign Tax—Continued

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

Selected major industries and number of countries for which taxable foreign income or foreign tax was reported ¹	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Manufacturing: All Other									
Total	1,124	87,631,384	8,756,731	326,251	9,077	201,303	8,484,162	4,285,380	343,083
1 country	663	13,992,790	1,398,575	10,717	346	7,133	1,354,964	669,884	12,484
2 countries	132	5,656,242	602,407	4,770	135	2,327	474,536	243,978	5,370
3 countries	91	5,136,843	602,403	7,146	1,460	3,855	595,047	305,342	7,848
4 countries	34	2,327,886	245,109	11,721	259	2,365	238,329	122,061	7,566
5 countries	50	3,782,613	480,304	8,380	742	5,243	475,206	243,978	8,130
6 countries	20	2,390,708	229,377	1,234	3,140	1,260	204,285	92,520	4,341
7 countries	19	2,690,837	297,090	2,984	450	1,867	295,077	145,377	3,426
8 countries	16	3,903,675	374,924	4,907	800	2,834	368,171	193,074	6,508
9 countries	10	3,757,170	146,922	7,492	—	5,545	146,292	76,796	9,956
10 or more countries	89	43,992,620	4,379,620	266,900	1,745	168,874	4,332,255	2,192,370	277,454
Transportation, Communication, Electric, Gas, and Sanitary Services									
Total	139	91,107,637	5,449,736	16,629	3,720	8,455	5,335,018	2,758,100	28,009
1 country	78	25,969,373	621,668	3,036	—	2,440	595,464	303,997	6,473
2 countries	37	4,751,484	166,274	1,396	66	1,156	147,563	73,682	2,341
3 countries	5	3,125,543	73,415	709	—	7	66,963	31,829	3,505
4 countries	—	—	—	—	—	—	—	—	—
5—6 countries	7	41,842,024	3,829,112	3,792	3,498	158	3,776,591	1,992,407	4,131
7—8 countries	6	1,753,570	122,604	—	15	1	121,036	63,364	1,864
9 countries	—	—	—	—	—	—	—	—	—
10 or more countries	6	13,665,643	636,663	7,696	141	4,693	627,401	292,821	9,695
Wholesale and Retail Trade									
Total	881	21,415,775	1,619,391	76,659	3,511	34,855	1,581,571	816,300	112,743
1 country	862	4,601,177	446,944	5,433	63	2,257	427,900	217,850	11,047
2 countries	50	3,612,168	262,060	13,078	44	525	258,903	133,474	48,412
3 countries	31	2,934,745	226,795	36,905	2,720	24,807	223,306	114,375	32,946
4 countries	7	1,042,308	104,498	2,984	—	2,953	100,829	51,168	4,606
5 countries	8	471,674	27,867	1,127	240	359	27,335	13,525	885
6—7 countries	8	1,534,813	18,988	5,801	261	831	16,802	8,096	2,538
8—9 countries	5	436,803	18,831	6,667	—	336	17,320	8,795	5,363
10 or more countries	9	6,782,067	513,408	4,664	183	2,787	509,176	268,407	6,946
Finance, Insurance and Real Estate									
Total	1,885	431,642,114	4,340,102	48,661	7,890	23,114	3,890,803	1,939,621	176,276
1 country	1,470	83,369,818	1,208,219	13,295	1,096	7,566	1,025,461	502,590	27,317
2 countries	221	33,075,461	461,776	3,230	6,635	385	412,003	202,312	10,001
3 countries	88	29,906,513	352,515	3,222	—	2,296	302,519	151,107	6,924
4 countries	26	18,879,056	234,343	3,445	—	—	176,393	75,419	3,600
5 countries	13	11,975,587	94,571	404	—	—	80,590	39,300	1,800
6 countries	17	15,269,083	180,838	1,723	—	—	160,140	75,928	3,653
7 countries	8	33,070,115	414,885	2,537	—	298	407,191	207,375	9,944
8 countries	3	870,302	18,712	21	135	—	18,072	9,274	348
9 countries	8	13,968,597	143,565	6,524	1	6,131	138,914	73,010	11,065
10 or more countries	32	191,257,582	1,240,678	14,260	23	6,438	1,169,520	603,306	101,624
Services									
Total	446	6,795,086	517,418	23,217	2,568	13,813	501,637	248,723	33,310
1 country	384	1,850,755	194,831	1,531	—	860	189,039	87,982	4,923
2 countries	14	262,987	19,294	1,405	68	181	17,212	9,196	846
3 countries	12	169,149	17,330	427	—	212	16,043	8,181	489
4 countries	6	186,664	17,641	1,599	—	1,239	17,414	9,076	1,769
5—6 countries	7	962,505	36,917	1,391	74	247	36,888	17,770	1,493
7—9 countries	6	948,944	76,749	1,641	82	1,220	75,581	39,466	2,070
10 or more countries	17	2,414,082	154,656	15,223	2,344	9,854	149,460	77,052	21,720

Footnotes at end of table.

Foreign Tax Credit on Corporation Returns, 1968

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 14.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Selected Major Industry, and by Number of Countries for which Domestic Corporations Reported Taxable Foreign Income or Foreign Tax—Continued

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

Selected major industries and number of countries for which taxable foreign income or foreign tax was reported ¹	Taxable income from foreign sources		Foreign taxes						Foreign tax credit computed	Dividends paid to related foreign corporations by subsidiaries
	Total (less loss) ²	Dividends from related foreign corporations	Total foreign taxes			Paid or accrued	Deemed paid	Carryover		
			Total	Equal to foreign tax credit computed	Greater than foreign tax credit computed					
	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)
All Industries										
Total	6,759,537	1,948,425	6,016,934	1,255,396	4,761,538	3,267,023	1,258,087	1,491,819	3,659,911	335,660
1 country	1,395,420	41,026	1,699,464	39,632	1,659,832	839,980	30,061	829,420	669,339	34,701
2 countries	272,534	24,883	185,899	12,355	173,544	168,899	9,927	7,072	112,376	1,633
3 countries	277,297	72,794	189,904	51,505	138,399	98,507	47,245	44,152	112,832	13,812
4 countries	138,964	31,050	44,742	23,377	21,365	20,414	21,332	2,996	41,693	11,332
5 countries	148,643	65,744	269,351	22,315	247,036	43,842	25,286	200,222	59,132	4,993
6 countries	324,777	50,338	430,301	22,208	408,093	176,404	23,974	227,922	133,284	27,346
7 countries	222,121	15,728	141,310	24,625	116,685	106,938	10,816	23,457	76,722	693
8 countries	130,006	39,240	45,340	18,733	16,607	17,531	25,466	2,342	42,776	1,115
9 countries	155,745	66,914	68,081	49,510	18,571	21,230	41,773	5,079	64,221	45,164
10 or more countries	5,694,030	1,540,708	2,942,542	981,136	1,961,406	1,771,278	1,022,107	149,157	2,348,136	194,871
Agriculture, Forestry, and Fishery										
Total	39,549	1,984	14,805	950	13,855	13,726	1,079	—	14,636	49
1-7 countries	39,549	1,984	14,805	950	13,855	13,726	1,079	—	14,636	49
8 countries	—	—	—	—	—	—	—	—	—	—
9 countries	—	—	—	—	—	—	—	—	—	—
10 or more countries	—	—	—	—	—	—	—	—	—	—
Total Mining										
Total	1,261,604	72,289	1,837,051	8,599	1,828,452	820,160	25,305	991,587	842,214	22,739
1 country	1,103,684	4,979	1,590,839	655	1,590,184	772,441	3,711	814,688	581,176	—
2 countries	16,454	74	10,819	358	10,461	7,199	46	3,574	6,492	—
3 countries	9,288	3,459	6,633	—	6,633	5,561	149	923	4,642	—
4 countries	38,588	30	7,209	33	7,276	7,208	13	58	7,068	—
5-6 countries	76,094	58,376	215,950	2,052	213,898	24,153	19,461	172,336	37,333	22,611
7 countries	—	—	—	—	—	—	—	—	—	—
8 countries	—	—	—	—	—	—	—	—	—	—
9 countries	—	—	—	—	—	—	—	—	—	—
10 or more countries	17,496	5,371	5,501	5,501	—	3,568	1,925	8	5,501	128
Mining: Crude Petroleum and Natural Gas										
Total	1,051,396	6,156	1,544,265	6,129	1,538,136	738,771	2,597	802,898	549,593	128
1 country	1,022,322	626	1,509,769	319	1,509,450	724,637	657	784,476	539,030	—
2 countries	2,812	—	1,077	276	801	1,077	—	—	750	—
3-5 countries	8,766	159	27,918	33	27,885	9,489	15	18,414	4,312	—
7 countries	—	—	—	—	—	—	—	—	—	—
8 countries	—	—	—	—	—	—	—	—	—	—
9 countries	—	—	—	—	—	—	—	—	—	—
10 or more countries	17,496	5,371	5,501	5,501	—	3,568	1,925	8	5,501	128
Mining: All Other										
Total	210,208	66,133	292,786	2,470	290,316	81,389	22,708	188,689	92,621	22,611
1 country	81,362	4,353	81,070	336	80,734	47,804	3,054	30,212	42,148	—
2-3 countries	21,035	3,374	15,296	82	15,214	10,619	180	4,497	9,638	—
4-6 countries	107,811	58,406	196,420	2,052	194,368	22,966	19,474	153,980	40,835	22,611
7 countries	—	—	—	—	—	—	—	—	—	—
8 countries	—	—	—	—	—	—	—	—	—	—
9 countries	—	—	—	—	—	—	—	—	—	—
10 or more countries	—	—	—	—	—	—	—	—	—	—
Contract Construction										
Total	116,209	10,964	49,278	11,401	37,877	40,621	7,091	1,565	46,929	187
1 country	29,807	76	14,258	818	13,440	14,152	25	80	13,265	—
2 countries	40,147	694	21,631	12	21,619	20,615	640	376	20,690	—
3-4 countries	10,748	1,664	2,592	2,258	334	1,590	841	161	2,512	187
5-7 countries	12,980	1,318	3,848	2,165	1,683	2,013	1,243	592	3,609	—
8-9 countries	10,878	5,237	4,109	4,109	—	688	3,138	283	4,109	—
10 or more countries	12,049	1,975	2,840	2,039	801	1,563	1,204	73	2,744	—
Total Manufacturing										
Total	6,095,716	1,714,017	3,667,891	1,032,771	2,635,120	2,064,820	1,133,184	469,886	2,605,354	223,793
1 country	75,249	15,324	39,724	11,040	19,684	14,566	11,036	5,121	24,738	2,431
2 countries	64,807	11,336	29,657	6,696	22,961	22,192	5,721	1,743	23,510	1,619
3 countries	134,979	26,841	135,971	14,019	121,952	76,623	19,299	40,049	62,932	11,619
4 countries	68,577	25,083	25,583	16,708	8,875	6,942	16,350	2,291	23,510	11,104
5 countries	85,560	23,357	90,625	16,813	73,812	29,860	15,336	45,429	34,013	4,993
6 countries	206,916	21,600	359,752	17,356	342,396	141,840	9,986	208,126	92,913	4,686
7 countries	157,599	12,115	124,284	9,799	114,485	93,433	8,170	22,662	60,414	394
8 countries	113,731	33,390	40,326	23,719	16,607	16,200	22,066	2,059	37,162	1,012
9 countries	106,193	52,718	48,156	41,789	6,367	13,970	32,519	1,568	46,256	2,687
10 or more countries	5,082,005	1,492,253	2,782,813	874,832	1,907,981	1,649,394	992,601	140,818	2,199,906	183,249

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 14.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Selected Major Industry, and by Number of Countries for which Domestic Corporations Reported Taxable Foreign Income or Foreign Tax—Continued

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

Selected major industries and number of countries for which taxable foreign income or foreign tax was reported ¹	Taxable income from foreign sources		Foreign taxes						Foreign tax credit computed	Dividends paid to related foreign corporations by subsidiaries
	Total (less loss) ²	Dividends from related foreign corporations	Total	Total foreign taxes		Paid or accrued	Deemed paid	Carryover		
				Equal to foreign tax credit computed	Greater than foreign tax credit computed					
	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)
Manufacturing: Food and Kindred Products										
Total	359,575	141,789	164,224	127,819	36,405	53,027	103,155	8,042	157,843	15,299
1 country	2,801	659	1,068	650	418	392	328	348	844	179
2 countries	2,011	1,046	806	697	109	367	408	31	776	—
3 countries	8,475	4,556	4,695	321	4,374	1,143	3,053	499	4,093	—
4 countries	24,217	11,242	11,152	6,446	2,706	2,089	8,850	213	10,616	6,575
5 countries	3,281	960	1,586	997	589	624	511	451	1,262	1,794
6—7 countries	12,812	1,704	4,285	185	4,100	3,476	778	31	4,254	76
8 countries	3,255	610	732	446	286	371	295	66	656	319
9 countries	16,668	9,044	8,690	6,400	290	1,621	7,008	61	8,487	—
10 or more countries	286,055	111,968	131,210	107,677	23,533	42,944	81,924	6,342	126,855	6,356
Manufacturing: Chemicals and Allied Products										
Total	833,345	298,951	319,610	234,003	85,607	105,885	205,999	7,725	308,745	49,624
1 country	7,750	813	3,438	1,526	1,912	2,701	614	123	2,966	—
2 countries	2,315	601	1,375	438	937	280	552	542	819	—
3 countries	14,298	4,320	6,570	5,589	981	1,278	5,292	—	6,391	—
4 countries	2,048	487	665	405	260	227	397	41	656	125
5 countries	3,352	864	1,120	1,077	43	357	763	—	1,119	—
6 countries	6,791	1,449	2,466	2,466	—	1,243	1,223	—	2,466	155
7 countries	10,864	4,806	5,144	2,561	2,583	1,526	3,818	—	5,065	—
8 countries	19,171	10,302	8,332	6,488	1,844	1,400	6,822	109	8,211	209
9 countries	2,407	505	1,477	591	886	322	495	661	999	60
10 or more countries	764,349	274,804	289,023	212,862	76,161	96,551	186,223	6,249	280,053	49,075
Manufacturing: Petroleum Refining and Related Industries										
Total	2,095,739	436,006	1,793,401	5,110	1,788,291	1,399,930	235,850	157,621	1,062,156	47,148
1 country	5,118	—	3,670	23	3,647	2,593	—	1,077	2,637	—
2 countries	1,127	—	438	27	411	438	—	—	389	—
3 countries	74,122	3,839	109,784	53	109,731	68,719	2,320	38,745	38,726	—
4—5 countries	25,951	210	65,658	154	65,504	23,069	100	42,489	12,132	—
6—7 countries	114,574	3,291	110,322	4,693	105,629	88,106	477	21,739	47,888	—
8 countries	—	—	—	—	—	—	—	—	—	—
9 countries	—	—	—	—	—	—	—	—	—	—
10 or more countries	1,874,847	428,666	1,503,529	160	1,503,369	1,217,005	232,953	53,571	960,384	47,148
Manufacturing: Primary Metal Industries										
Total	562,047	82,983	503,833	65,041	438,792	217,817	35,445	250,570	231,815	14,635
1 country	2,076	405	543	298	245	244	249	49	474	23
2 countries	24,728	791	16,923	86	16,855	16,610	313	—	12,724	—
3—5 countries	6,937	4,296	2,734	197	2,537	932	1,799	9	2,445	—
6—7 countries	160,447	5,991	345,135	3,536	339,597	134,799	2,292	206,044	76,889	4,257
8 countries	32,047	11,018	12,632	6,444	6,188	5,580	7,025	27	11,898	200
9 countries	47,711	31,397	21,322	21,322	—	5,603	15,719	—	21,322	2,570
10 or more countries	288,101	29,095	106,544	33,174	73,370	54,049	8,054	44,441	106,063	7,585
Manufacturing: Machinery, Except Electrical										
Total	573,082	172,793	208,069	170,300	37,769	75,831	123,429	8,809	196,324	18,928
1 country	12,195	2,335	4,121	2,155	1,966	2,516	1,385	220	3,767	—
2 countries	10,817	3,486	2,560	1,597	963	1,237	1,084	239	2,239	1,325
3 countries	7,037	2,791	2,083	1,909	174	598	1,485	(³)	2,370	—
4 countries	7,131	672	1,336	1,336	—	983	353	—	1,336	—
5 countries	16,632	7,236	5,557	5,557	—	1,838	3,716	3	5,557	93
6 countries	15,755	3,952	4,206	3,786	420	1,991	2,215	—	4,202	—
7 countries	3,617	1,299	1,917	420	1,497	337	668	912	649	—
8—9 countries	26,223	7,307	12,094	3,383	8,711	4,863	5,654	1,577	10,521	—
10 or more countries	473,675	143,716	174,195	150,157	24,038	61,468	106,869	5,858	165,983	17,510
Manufacturing: Electrical Equipment and Supplies										
Total	353,614	107,560	123,057	47,398	75,659	52,271	60,091	10,696	114,804	9,343
1 country	5,279	669	1,409	957	452	782	595	33	1,395	—
2 countries	3,385	629	982	463	519	417	554	11	854	—
3 countries	3,439	688	1,161	981	180	577	549	35	1,150	—
4 countries	6,671	3,194	2,914	2,892	22	805	2,074	35	2,913	642
5 countries	9,357	3,892	6,087	554	5,533	820	3,494	1,773	4,216	2,158
6—7 countries	4,221	1,555	1,692	1,663	29	424	1,249	19	1,690	255
8 countries	6,541	664	1,097	1,097	—	495	602	—	1,097	—
9 countries	2,393	851	930	930	—	350	580	—	930	23
10 or more countries	310,328	95,418	106,785	37,861	68,924	47,601	50,394	8,790	100,559	6,265
Manufacturing: Motor Vehicles and Equipment										
Total	406,428	167,320	193,109	185,249	7,860	49,226	139,737	4,146	190,332	19,541
1 country	790	134	164	164	—	105	59	—	164	—
2 countries	1,129	370	351	327	24	74	255	22	335	—
3 countries	1,718	383	405	405	—	381	24	—	405	—
4—5 countries	3,781	1,189	1,824	1,800	24	680	1,144	—	1,823	15
6 countries	6,123	2,497	2,457	2,457	—	594	1,863	—	2,457	331
7 countries	—	—	—	—	—	—	—	—	—	—
8 countries	3,323	553	918	560	358	566	352	—	735	—
9 countries	5,591	1,302	2,659	983	1,675	837	1,133	688	2,098	15
10 or more countries	383,973	160,892	184,332	178,553	5,779	45,989	134,907	3,436	182,315	19,180

Footnotes at end of table.

Foreign Tax Credit on Corporation Returns, 1968

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 14.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Selected Major Industry, and by Number of Countries for which Domestic Corporations Reported Taxable Foreign Income or Foreign Tax—Continued

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

Selected major industries and number of countries for which taxable foreign income or foreign tax was reported ¹	Taxable income from foreign sources		Foreign taxes						Foreign tax credit computed	Dividends paid to related foreign corporations by subsidiaries
	Total (less loss) ²	Dividends from related foreign corporations	Total foreign taxes			Paid or accrued	Deemed paid	Carryover		
			Total	Equal to foreign tax credit computed	Greater than foreign tax credit computed					
	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)
Manufacturing: All Other										
Total	911,886	306,615	362,588	197,851	164,737	110,833	229,478	22,277	343,335	49,275
1 country	39,240	10,209	16,311	5,267	11,044	5,239	7,806	3,271	12,491	2,229
2 countries	19,295	4,413	6,222	3,079	3,143	2,769	2,555	698	5,374	294
3 countries	20,448	6,154	8,752	4,632	4,120	3,133	4,849	770	7,848	11,618
4 countries	23,974	9,436	9,083	3,230	5,863	2,467	4,624	2,002	7,567	3,762
5 countries	24,347	8,872	9,003	7,005	1,998	2,705	5,594	704	8,130	933
6 countries	18,745	3,944	4,928	2,578	2,350	1,166	1,699	2,063	4,341	—
7 countries	10,566	3,238	3,484	2,808	676	1,411	2,074	—	3,426	6
8 countries	27,950	5,652	7,101	5,301	1,800	3,419	3,364	318	6,508	284
9 countries	26,644	8,903	10,499	9,563	936	4,743	5,636	120	9,956	19
10 or more countries	700,677	247,684	287,195	154,388	132,807	83,787	191,277	12,131	277,894	30,130
Transportation, Communication Electric, Gas, and Sanitary Services										
Total	184,218	15,721	35,752	18,360	17,392	18,350	9,596	7,805	28,026	1,541
1 country	19,870	2,602	12,944	1,428	11,516	5,152	2,440	5,351	6,474	—
2 countries	7,327	1,339	2,544	699	1,845	950	1,156	438	2,341	—
3 countries	11,574	179	3,878	1,204	2,674	2,820	39	1,219	3,521	—
4 countries	—	—	—	—	—	—	—	—	—	—
5—6 countries	18,689	4,107	4,163	4,055	108	3,314	790	59	4,131	—
7—8 countries	13,017	15	1,864	1,864	—	1,863	1	—	1,864	—
9 countries	—	—	—	—	—	—	—	—	—	—
10 or more countries	113,741	7,479	10,359	9,110	1,249	4,451	5,170	738	9,695	1,541
Wholesale and Retail Trade										
Total	272,963	66,330	180,845	49,902	130,943	134,850	40,371	5,624	112,826	3,180
1 country	33,949	4,176	13,584	5,520	8,064	8,089	2,965	2,531	11,049	—
2 countries	103,484	1,787	109,412	1,109	108,303	108,144	934	334	48,492	—
3 countries	73,559	39,258	34,160	28,744	5,416	7,458	25,117	1,585	32,946	1,065
4 countries	9,900	2,900	4,785	2,418	2,367	1,732	2,958	95	4,606	—
5 countries	2,644	1,059	887	554	333	341	544	1	886	—
6—7 countries	12,614	5,716	5,644	293	5,351	2,808	2,272	564	2,538	—
8—9 countries	15,576	6,636	5,363	5,363	—	2,790	2,059	514	5,363	103
10 or more countries	21,237	4,798	7,010	5,901	1,109	3,488	3,522	—	6,946	2,012
Finance, Insurance and Real Estate										
Total	677,000	43,407	188,084	114,928	73,156	154,479	26,033	7,569	176,303	82,617
1 country	115,182	12,706	30,995	17,193	13,742	21,030	8,803	1,100	27,340	32,202
2 countries	37,993	8,725	10,587	3,312	7,275	9,604	785	198	10,902	—
3 countries	38,267	2,408	7,395	5,684	1,711	4,852	2,317	226	6,927	479
4 countries	15,024	—	3,696	3,201	495	3,409	—	—	3,600	—
5 countries	10,240	72	1,808	1,794	14	1,672	19	117	1,800	—
6 countries	17,834	334	5,574	1,432	4,142	3,945	296	1,332	3,653	—
7 countries	37,937	627	10,022	9,763	259	9,724	298	—	9,944	299
8 countries	1,977	—	348	348	—	348	—	—	348	—
9 countries	32,293	6,518	12,820	2,689	10,131	3,875	6,151	2,794	11,065	42,477
10 or more countries	370,253	12,017	104,899	69,512	35,387	96,020	7,364	1,515	101,624	7,160
Services										
Total	112,278	23,713	43,228	18,485	24,743	20,017	15,428	7,783	33,623	1,554
1 country	17,391	1,163	6,118	2,916	3,202	4,488	1,081	549	5,233	68
2 countries	2,295	928	1,246	166	1,080	192	645	409	846	14
3 countries	1,627	426	495	482	13	227	252	16	492	463
4 countries	4,130	1,596	2,149	131	2,018	669	1,242	238	1,769	228
5—6 countries	4,493	1,082	1,822	455	1,367	830	642	350	1,493	—
7—9 countries	5,093	1,703	2,278	94	2,184	817	1,245	216	2,070	—
10 or more countries	77,249	16,815	29,120	14,241	14,879	12,794	10,321	6,005	21,720	781

¹For purposes of this table, the following geographic classifications shown in table 9 were counted as if they were single countries: (1) All "Not allocable" categories; (2) All "Other" categories; (3) All groupings of countries, viz., Eastern European countries and Eastern Africa; and (4) Country not stated or not allocable and other income from outside the United States.

²Includes the "gross-up" of certain foreign dividends.

³Less than \$500 per return.

NOTE: See text for explanatory statements and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 15.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Industrial Division, and by Percent of Foreign Tax Credit Claimed to Total Foreign Taxes

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

Industrial division and foreign tax credit claimed as a percent of total foreign taxes	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
All Industrial Divisions									
Total	6,196	900,953,730	46,839,211	2,036,762	67,173	966,140	44,573,941	22,941,938	3,656,530
Under 20 percent	29	5,475,343	219,078	34,623	300	529	199,348	97,943	27,982
20 under 40 percent	62	22,095,576	1,920,108	23,590	—	3,887	1,826,828	933,210	658,354
40 under 50 percent	40	17,016,324	673,206	28,201	525	7,536	651,543	305,722	91,583
50 under 60 percent	240	17,242,467	1,704,851	279,138	285	42,047	1,444,948	714,953	426,885
60 under 70 percent	80	22,983,929	1,005,125	139,046	724	17,206	785,616	402,346	220,149
70 under 80 percent	119	23,556,675	1,589,850	98,754	948	33,282	1,265,530	652,660	441,981
80 under 90 percent	114	27,167,309	1,409,285	176,353	3,956	67,666	1,291,236	622,824	175,823
90 under 95 percent	66	6,073,677	593,681	38,293	748	26,796	566,226	283,326	45,889
95 under 100 percent	89	69,634,385	3,881,279	166,849	9,813	100,977	3,726,469	1,948,919	346,093
100 percent	3,270	674,049,815	33,084,641	1,050,847	49,664	646,214	32,116,734	16,639,165	1,221,791
No percent computed ¹	2,086	15,658,230	758,107	1,068	10	(¹)	699,463	340,670	(¹)
Agriculture, Forestry, and Fishery									
Total	22	610,170	67,363	2,462	7	713	56,226	28,829	14,636
Under 20 percent	—	—	—	—	—	—	—	—	—
20 under 40 percent	—	—	—	—	—	—	—	—	—
40 under 50 percent	—	—	—	—	—	—	—	—	—
50 under 60 percent	—	—	—	—	—	—	—	—	—
60 under 70 percent	—	—	—	—	—	—	—	—	—
70 under 80 percent	—	—	—	—	—	—	—	—	—
80 under 90 percent	—	—	—	—	—	—	—	—	—
90 under 95 percent	—	—	—	—	—	—	—	—	—
95 under 100 percent	—	—	—	—	—	—	—	—	—
100 percent	22	610,170	67,363	2,462	7	713	56,226	28,829	14,636
No percent computed ¹	—	—	—	—	—	—	—	—	—
Mining									
Total	87	7,929,342	1,496,051	78,882	312	12,003	1,421,658	746,270	642,012
Under 20 percent	3	1,990,987	87,748	32,823	—	22	86,587	45,784	21,058
20 under 40 percent	24	1,359,827	996,683	261	—	91	986,233	520,520	520,192
40 under 50 percent	5	2,267	959	—	—	—	719	343	343
50 under 60 percent	6	507,945	68,798	161	—	—	66,434	35,035	32,942
60 under 70 percent	—	—	—	—	—	—	—	—	—
70 under 80 percent	7	475,570	81,674	7,475	68	—	62,658	33,035	32,432
80 under 90 percent	3	793,018	72,079	28,280	—	9,280	58,084	28,966	19,588
90 under 95 percent	3	846,121	54,077	120	—	—	41,827	21,995	6,932
95 under 100 percent	—	—	—	—	—	—	—	—	—
100 percent	24	1,883,556	127,974	9,736	244	2,610	113,552	57,789	8,525
No percent computed ¹	11	70,051	6,059	26	—	—	5,564	2,803	(¹)
Contract Construction									
Total	75	2,990,468	251,836	12,154	58	6,559	236,753	120,176	46,692
Under 20 percent	—	—	—	—	—	—	—	—	—
20 under 40 percent	5	194,950	10,027	—	—	—	8,605	2,484	103
40 under 50 percent	—	—	—	—	—	—	—	—	—
50 under 60 percent	6	186,053	21,526	477	—	332	19,136	9,857	4,037
60 under 70 percent	—	—	—	—	—	—	—	—	—
70 under 80 percent	—	—	—	—	—	—	—	—	—
80 under 90 percent	6	590,484	90,614	1,172	—	1,020	87,000	45,823	31,658
90 under 95 percent	—	—	—	—	—	—	—	—	—
95 under 100 percent	50	1,937,086	125,606	10,505	58	5,207	118,036	59,978	10,894
100 percent	—	—	—	—	—	—	—	—	—
No percent computed ¹	8	81,895	4,063	(¹)	—	—	3,976	2,034	(¹)
Manufacturing									
Total	2,561	338,463,138	33,097,314	1,778,098	49,107	866,628	31,550,275	16,283,919	2,602,852
Under 20 percent	15	2,272,545	109,980	1,591	300	498	94,934	46,078	5,995
20 under 40 percent	19	16,377,735	749,074	15,903	—	1,575	675,870	327,115	133,745
40 under 50 percent	17	9,815,716	414,755	15,423	519	5,943	402,423	192,127	42,107
50 under 60 percent	95	15,555,061	1,581,910	276,239	258	40,983	1,329,480	656,390	391,003
60 under 70 percent	29	22,202,893	952,978	133,668	463	13,552	736,160	377,078	213,419
70 under 80 percent	52	18,318,271	1,265,288	82,208	806	27,513	995,865	522,330	394,677
80 under 90 percent	58	17,185,457	1,155,499	134,707	1,251	67,721	1,066,341	518,392	134,419
90 under 95 percent	41	3,270,429	421,842	27,303	729	20,889	408,549	209,862	30,320
95 under 100 percent	62	34,916,638	3,402,369	160,140	9,573	98,391	3,281,630	1,717,582	256,308
100 percent	1,728	195,880,405	22,756,558	930,775	35,198	589,563	22,285,129	11,577,788	1,000,659
No percent computed ¹	445	2,667,988	287,061	141	10	(¹)	273,894	139,177	(¹)

Footnotes at end of table.

Foreign Tax Credit on Corporation Returns, 1968

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 15.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Industrial Division, and by Percent of Foreign Tax Credit Claimed to Total Foreign Taxes — Continued

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

Industrial division and foreign tax credit claimed as a percent of total foreign taxes	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Transportation, Communication, Electric, Gas, and Sanitary Services									
Total	139	91,107,637	5,449,736	16,629	3,720	8,455	5,335,018	2,758,100	28,009
Under 20 percent	4	5,046,603	138,214	1,389	—	1,375	129,229	50,354	2,828
20 under 40 percent	4	302,349	27,294	1,047	—	793	25,975	13,265	1,531
40 under 50 percent	16	258,960	22,641	265	—	119	22,223	6,726	948
50 under 60 percent	4	2,558,985	22,242	486	—	—	16,720	5,719	2,727
60 under 70 percent	3	2,623,859	70,566	1,361	—	1,158	68,288	36,147	1,961
70 under 80 percent	69	77,440,285	4,979,380	12,036	3,720	5,010	4,883,856	2,546,684	18,014
80 under 90 percent	39	2,876,596	189,399	45	—	—	188,727	99,205	(7)
90 under 95 percent									
95 under 100 percent									
100 percent									
No percent computed ¹									
Wholesale and Retail Trade									
Total	981	21,415,775	1,619,391	76,659	3,511	34,855	1,581,571	816,300	112,743
Under 20 percent	6	1,215,819	147,575	4,721	—	120	145,978	76,804	1,364
20 under 40 percent	7	2,043,900	115,381	10,964	6	75	114,806	60,155	47,096
40 under 50 percent	54	405,614	9,403	1,470	—	405	8,570	4,036	1,114
50 under 60 percent	10	72,344	4,260	1,202	261	830	4,170	1,909	1,308
60 under 70 percent	19	867,619	83,187	2,590	—	1,517	81,642	42,570	3,136
70 under 80 percent	22	171,975	9,463	375	2,704	636	8,865	3,563	2,393
80 under 90 percent	13	897,227	49,241	3,466	—	3,361	43,528	22,066	5,306
90 under 95 percent	4	259,048	82,588	1,276	240	147	81,786	42,928	1,191
95 under 100 percent	508	14,746,419	1,056,779	50,511	300	27,764	1,034,300	535,213	49,835
100 percent									
No percent computed ¹	338	735,809	61,394	84	—	(7)	57,926	27,056	(7)
Finance, Insurance, and Real Estate									
Total	1,885	431,642,114	4,340,102	48,661	7,890	23,114	3,890,803	1,939,621	176,276
Under 20 percent	4	635,751	8,108	139	—	6	7,138	2,482	133
20 under 40 percent	12	3,130,094	24,184	2,705	—	2,101	16,916	7,811	2,093
40 under 50 percent	6	75,340	694	288	—	46	657	337	42
50 under 60 percent	40	383,549	12,095	681	27	95	8,947	3,743	412
60 under 70 percent	22	324,228	4,414	1,527	—	990	3,182	1,439	1,126
70 under 80 percent	13	3,342,976	84,737	2,271	—	1,867	52,661	21,708	4,748
80 under 90 percent	19	6,239,292	128,563	11,262	1	9,361	120,006	55,223	14,653
90 under 95 percent	5	561,277	17,225	3,271	—	104	13,188	6,633	4,792
95 under 100 percent	9	30,578,503	169,418	1,996	—	1,040	162,207	82,789	33,400
100 percent	635	377,435,290	3,718,821	23,766	7,862	7,504	3,372,376	1,704,816	114,877
No percent computed ¹	1,120	8,935,824	171,843	755	—	(7)	133,525	52,640	(7)
Services									
Total	446	6,795,088	517,418	23,217	2,568	13,813	501,637	248,723	33,310
Under 20 percent	4	444,016	3,885	70	—	3	2,927	1,439	760
20 under 40 percent	42	102,550	13,529	286	—	225	13,023	6,900	781
40 under 50 percent	17	331,585	38,163	2,040	—	1,477	37,758	19,734	2,646
50 under 60 percent	9	284,772	46,297	3,945	74	2,266	46,053	24,219	3,768
60 under 70 percent	6	61,017	8,076	766	—	336	8,074	4,188	1,090
70 under 80 percent	4	356,176	60,791	2,892	19	1,284	58,446	22,239	3,377
80 under 90 percent	4	418,508	10,263	753	—	379	9,313	4,733	3,051
90 under 95 percent	235	4,506,395	298,126	12,448	2,475	7,843	290,192	147,516	17,837
95 under 100 percent									
100 percent									
No percent computed ¹	125	290,067	38,288	17	—	—	35,851	17,755	(7)

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 15.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Industrial Division, and by Percent of Foreign Tax Credit Claimed to Total Foreign Taxes — Continued

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

Industrial division and foreign tax credit claimed as a percent of total foreign taxes	Taxable income from foreign sources		Foreign taxes						Foreign tax credit computed	Dividends paid to related foreign corporations by subsidiaries
	Total (less loss) ¹	Dividends from related foreign corporations	Total foreign taxes			Paid or accrued	Deemed paid	Carryover		
			Total	Equal to foreign tax credit computed	Greater than foreign tax credit computed					
	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)
All Industrial Divisions										
Total	8,759,537	1,948,425	6,016,934	1,255,396	4,761,538	3,267,023	1,258,087	1,491,819	3,659,911	335,660
Under 20 percent	69,361	34,251	272,494	—	272,494	32,807	7,276	232,411	27,982	—
20 under 40 percent	1,285,225	21,592	2,033,300	—	2,033,300	931,210	6,032	1,096,059	658,355	5,162
40 under 50 percent	229,263	16,753	207,693	14	207,679	184,706	10,553	12,435	93,809	314
50 under 60 percent	822,905	258,477	744,878	706	744,172	594,034	141,789	9,052	427,315	27,345
60 under 70 percent	449,455	125,119	321,531	526	321,005	236,346	71,436	13,749	220,425	14,851
70 under 80 percent	866,420	93,791	610,251	70	610,181	511,447	58,534	40,269	442,150	14,205
80 under 90 percent	389,153	160,849	206,072	21	206,051	76,501	102,809	26,761	175,829	101,280
90 under 95 percent	94,844	34,550	49,479	4,126	45,353	17,129	29,034	3,316	46,145	18,068
95 under 100 percent	913,923	164,910	349,327	28,142	321,185	189,469	117,750	42,108	346,110	20,541
100 percent	3,633,376	1,038,125	1,221,790	1,221,790	—	493,276	712,874	15,638	1,221,790	133,894
No percent computed ²	5,612	8	119	1	118	98	(³)	21	1	—
Agriculture, Forestry, and Fishery										
Total	39,549	1,984	14,805	950	13,855	13,726	1,079	—	14,636	49
Under 20 percent	—	—	—	—	—	—	—	—	—	—
20 under 40 percent	—	—	—	—	—	—	—	—	—	—
40 under 50 percent	—	—	—	—	—	—	—	—	—	—
50 under 60 percent	—	—	—	—	—	—	—	—	—	—
60 under 70 percent	—	—	—	—	—	—	—	—	—	—
70 under 80 percent	—	—	—	—	—	—	—	—	—	—
80 under 90 percent	—	—	—	—	—	—	—	—	—	—
90 under 95 percent	—	—	—	—	—	—	—	—	—	—
95 under 100 percent	—	—	—	—	—	—	—	—	—	—
100 percent	39,549	1,984	14,805	950	13,855	13,726	1,079	—	14,636	49
No percent computed ²	—	—	—	—	—	—	—	—	—	—
Mining										
Total	1,261,604	72,289	1,837,051	8,599	1,828,452	820,160	25,305	991,587	642,214	22,739
Under 20 percent	40,298	32,720	211,267	—	211,267	20,508	6,554	184,205	21,058	—
20 under 40 percent	985,983	257	1,481,998	—	1,481,998	683,555	91	798,353	520,192	—
40 under 50 percent	1,019	—	801	—	801	801	—	—	474	—
50 under 60 percent	63,171	159	59,333	—	59,333	58,800	15	518	33,012	—
60 under 70 percent	—	—	—	—	—	—	—	—	—	—
70 under 80 percent	62,558	7,396	45,012	—	45,012	34,839	3,097	7,076	32,432	—
80 under 90 percent	39,151	22,778	23,102	—	23,102	9,849	11,885	1,368	19,568	22,611
90 under 95 percent	40,409	104	7,013	74	6,939	6,896	59	58	6,933	—
95 under 100 percent	28,987	8,875	8,525	8,525	—	4,912	3,604	9	8,525	128
100 percent	—	—	—	—	—	—	—	—	—	—
No percent computed ²	28	—	(³)	(³)	—	(³)	—	—	(³)	—
Contract Construction										
Total	116,209	10,964	49,278	11,401	37,877	40,621	7,091	1,565	46,929	187
Under 20 percent	—	—	—	—	—	—	—	—	—	—
20 under 40 percent	391	—	393	—	393	85	—	308	103	—
40 under 50 percent	—	—	—	—	—	—	—	—	—	—
50 under 60 percent	—	—	—	—	—	—	—	—	—	—
60 under 70 percent	11,328	477	5,440	507	4,933	4,431	332	677	4,274	—
70 under 80 percent	—	—	—	—	—	—	—	—	—	—
80 under 90 percent	—	—	—	—	—	—	—	—	—	—
90 under 95 percent	—	—	—	—	—	—	—	—	—	—
95 under 100 percent	64,085	1,172	32,551	—	32,551	31,419	1,020	112	31,658	—
100 percent	40,400	9,315	10,894	10,894	—	4,686	5,739	468	10,894	187
No percent computed ²	5	—	(³)	(³)	—	(³)	—	—	(³)	—
Manufacturing										
Total	6,095,716	1,714,017	3,667,891	1,032,771	2,635,120	2,064,820	1,133,184	469,886	2,605,354	223,793
Under 20 percent	16,052	1,474	52,277	—	52,277	9,346	694	42,237	5,995	—
20 under 40 percent	280,491	14,001	536,153	—	536,153	241,819	2,172	292,162	133,746	—
40 under 50 percent	122,683	15,035	94,164	14	94,150	75,629	8,960	9,576	44,200	300
50 under 60 percent	751,347	256,060	679,944	68	679,876	532,902	140,284	6,756	391,040	27,345
60 under 70 percent	434,066	119,796	311,400	19	311,381	232,366	67,677	11,357	213,425	14,288
70 under 80 percent	765,032	78,434	545,617	32	545,585	465,632	48,877	31,107	394,784	13,878
80 under 90 percent	293,663	122,759	156,975	21	156,954	57,467	79,766	19,742	134,425	23,037
90 under 95 percent	62,981	24,232	32,630	3,917	28,713	8,589	21,409	2,633	30,558	3,974
95 under 100 percent	665,962	158,916	257,870	27,840	230,030	102,069	113,903	41,898	256,321	19,821
100 percent	2,701,795	923,306	1,000,859	1,000,859	—	338,999	649,442	12,418	1,000,859	121,251
No percent computed ²	1,444	4	2	1	1	2	(³)	(³)	1	—

Footnotes at end of table.

Foreign Tax Credit on Corporation Returns, 1968

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 15.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Industrial Division, and by Percent of Foreign Tax Credit Claimed to Total Foreign Taxes — Continued

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

Industrial division and foreign tax credit claimed as a percent of total foreign taxes	Taxable income from foreign sources		Foreign taxes						Foreign tax credit computed	Dividends paid to related foreign corporations by subsidiaries
	Total (less loss) ¹	Dividends from related foreign corporations	Total foreign taxes			Paid or accrued	Deemed paid	Carryover		
			Total	Equal to foreign tax credit computed	Greater than foreign tax credit computed					
	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)
Transportation, Communication, Electric, Gas, and Sanitary Services										
Total	184,218	15,721	35,752	18,360	17,392	18,350	9,596	7,805	28,026	1,541
Under 20 percent	7,729	1,270	8,529	—	8,529	2,015	1,375	5,139	2,828	—
20 under 40 percent	3,411	973	2,739	—	2,739	1,030	825	884	1,531	—
40 under 50 percent	2,067	139	1,214	—	1,214	1,008	119	87	948	—
50 under 60 percent	8,346	—	3,121	—	3,121	1,890	—	1,230	2,727	—
60 under 70 percent	4,353	1,346	2,135	346	1,789	637	1,158	340	1,978	—
70 under 80 percent	158,182	11,993	18,014	18,014	—	11,770	6,119	125	18,014	1,541
80 under 90 percent	130	—	(¹)	(¹)	—	(¹)	—	—	(¹)	—
90 under 95 percent	—	—	—	—	—	—	—	—	—	—
95 under 100 percent	—	—	—	—	—	—	—	—	—	—
100 percent	—	—	—	—	—	—	—	—	—	—
No percent computed ²	—	—	(¹)	(¹)	—	(¹)	—	—	(¹)	—
Wholesale and Retail Trade										
Total	272,963	66,330	180,845	49,902	130,943	134,850	40,371	5,624	112,826	3,180
Under 20 percent	9,814	4,640	4,670	—	4,670	2,220	1,561	889	1,364	130
20 under 40 percent	97,409	79	108,435	—	108,435	107,553	75	807	47,098	—
40 under 50 percent	3,038	1,440	2,010	—	2,010	700	814	497	1,191	—
50 under 60 percent	2,571	1,189	2,001	—	2,001	603	830	568	1,308	—
60 under 70 percent	6,262	2,204	4,054	8	4,046	1,392	1,778	884	3,138	—
70 under 80 percent	6,610	3,079	2,880	—	2,880	1,531	636	713	2,393	902
80 under 90 percent	10,743	3,295	5,714	14	5,700	2,246	3,371	96	5,307	—
90 under 95 percent	2,807	1,269	1,211	45	1,166	655	556	—	1,192	—
95 under 100 percent	133,151	49,135	49,835	49,835	—	17,917	30,750	1,168	49,835	2,148
100 percent	558	(¹)	35	(¹)	35	33	(¹)	2	(¹)	—
No percent computed ²	—	—	—	—	—	—	—	—	—	—
Finance, Insurance, and Real Estate										
Total	677,000	43,407	188,084	114,928	73,156	154,479	26,033	7,569	176,303	82,617
Under 20 percent	309	1	1,868	—	1,868	545	6	1,317	133	—
20 under 40 percent	7,106	2,694	5,882	—	5,882	2,257	2,208	1,417	2,093	5,032
40 under 50 percent	1,349	232	94	—	94	21	46	27	42	—
50 under 60 percent	1,314	272	754	20	734	383	95	274	422	—
60 under 70 percent	3,875	1,522	1,681	—	1,681	498	1,024	159	1,142	76
70 under 80 percent	17,296	1,986	6,228	—	6,228	4,264	1,867	97	4,748	299
80 under 90 percent	34,742	11,201	17,603	—	17,603	4,325	9,642	3,636	14,653	54,680
90 under 95 percent	9,651	3,221	5,118	11	5,107	3,777	1,330	11	4,793	14,084
95 under 100 percent	98,003	1,837	33,898	21	33,877	32,644	1,218	36	33,401	278
100 percent	500,026	20,437	114,876	114,876	—	105,702	8,597	576	114,876	8,158
No percent computed ²	3,329	4	82	(¹)	82	63	(¹)	19	(¹)	—
Services										
Total	112,278	23,713	43,228	18,485	24,743	20,017	15,428	7,783	33,623	1,554
Under 20 percent	12,578	56	6,773	—	6,773	2,363	22	4,388	760	—
20 under 40 percent	—	—	—	—	—	—	—	—	—	—
40 under 50 percent	3,385	286	1,555	618	937	973	225	357	1,087	14
50 under 60 percent	5,167	2,036	3,951	—	3,951	1,584	1,533	834	2,646	487
60 under 70 percent	7,826	3,632	5,014	30	4,984	1,200	2,796	1,018	3,775	228
70 under 80 percent	2,145	555	1,287	—	1,287	667	548	72	1,090	50
80 under 90 percent	7,054	2,456	3,727	—	3,727	1,725	1,766	236	3,377	—
90 under 95 percent	6,797	519	3,084	—	3,084	2,451	629	4	3,051	294
95 under 100 percent	67,208	14,173	17,837	17,837	—	9,054	7,909	874	17,837	481
100 percent	118	(¹)	(¹)	(¹)	—	(¹)	(¹)	—	(¹)	—
No percent computed ²	—	—	—	—	—	—	—	—	—	—

¹No percentage could be computed where the foreign tax credit and/or foreign taxes were less than \$500 because returns were processed in thousands of dollars.²Less than \$500 per return.³Includes the "gross-up" of certain foreign dividends.

NOTE: See text for explanatory statements and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

RETURNS WITH FOREIGN TAX CREDIT

Table 16.—Total Assets, Income, Tax, and Credits, and Foreign Income, Taxes, and Credit, by Selected Major Industry

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

Selected major industry	Returns with and without Form 1118 statements filed in support of credit claimed									
	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed	Investment credit
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
All industries	6,820	1,028,854,806	47,191,962	2,806,809	72,811	1,073,479	45,156,069	23,121,438	3,987,894	1,184,905
Agriculture, forestry, and fishery	29	1,279,714	46,999	2,818	—	1,226	40,524	18,352	11,575	172
Mining	102	9,782,526	1,626,936	72,027	3,109	14,502	1,528,978	796,750	656,676	17,473
Metal mining	15	4,653,851	406,291	64,783	—	11,928	324,663	164,529	87,238	6,253
Coal mining	3	516,322	4,376	14	—	—	4,067	1,828	17	732
Crude petroleum and natural gas	69	3,509,243	1,154,036	7,096	3,109	2,574	1,148,134	603,653	562,291	4,682
Nonmetallic minerals (except fuels) mining	15	1,103,110	62,233	134	—	—	52,114	26,740	7,130	3,806
Contract construction	142	3,759,200	283,453	21,522	232	7,476	271,036	134,654	24,169	7,122
Manufacturing	2,888	388,268,230	32,495,839	2,412,735	61,514	945,465	31,269,409	16,048,667	2,876,011	754,579
Food and kindred products	183	23,730,515	2,122,640	160,427	2,582	91,339	2,088,887	1,091,687	161,804	41,381
Tobacco manufactures	7	5,543,267	657,375	1,989	99	659	645,905	339,358	4,938	9,190
Textile mill products	55	6,004,276	406,854	7,310	86	3,802	399,101	209,216	7,711	14,893
Apparel and other fabricated textile products	172	2,492,071	203,567	967	277	624	199,361	103,587	4,139	1,648
Lumber and wood products, except furniture	25	5,018,601	391,370	9,966	501	1,454	418,353	123,469	6,606	22,554
Furniture and fixtures	30	699,197	89,134	2,224	—	1,412	88,271	46,096	2,117	977
Paper and allied products	75	13,424,868	1,054,232	57,516	924	42,455	1,034,925	474,367	62,703	40,222
Printing and publishing	214	6,198,213	726,560	14,512	609	7,626	698,478	354,721	14,620	8,374
Chemicals and allied products	377	40,440,167	4,728,733	322,924	22,500	181,237	4,627,956	2,386,761	320,429	122,598
Petroleum refining and related industries	38	80,674,181	3,880,913	813,899	5,428	84,770	3,267,498	1,659,759	1,216,963	81,023
Rubber and miscellaneous plastics products	104	7,891,432	636,982	76,480	26	17,155	622,370	326,657	52,276	31,699
Leather and leather products	39	1,429,036	105,899	1,312	343	391	90,396	47,085	1,324	1,570
Stone, clay, and glass products	66	7,601,758	697,292	26,132	212	14,887	678,143	348,758	23,953	19,669
Primary metal industries	105	37,538,501	1,622,289	214,048	2,506	29,756	1,427,855	712,437	241,346	63,263
Fabricated metal products, except machinery and transportation equipment	238	11,441,988	1,171,989	37,190	2,820	29,290	1,145,137	587,676	44,515	27,338
Machinery, except electrical	515	29,852,203	3,665,545	203,007	7,786	125,352	3,623,055	1,899,297	220,674	48,707
Electrical equipment and supplies	288	32,371,525	2,724,814	128,371	12,938	73,279	2,674,024	1,389,495	140,295	72,210
Motor vehicles and equipment	72	46,409,255	4,773,467	198,353	965	117,337	4,736,151	2,494,190	178,991	82,709
Transportation equipment, except motor vehicles	55	17,392,034	821,395	19,241	193	14,281	804,078	418,388	28,842	36,900
Scientific instruments, photographic equipment, watches and clocks	99	8,475,238	1,703,791	109,308	251	105,244	1,696,357	888,291	135,931	22,821
Miscellaneous manufactured products, and manufacturing not allocable	130	3,839,904	310,998	7,549	558	2,915	303,108	149,362	5,834	5,033
Transportation, communication, electric, gas, and sanitary services	220	106,621,007	5,563,586	34,103	473	13,560	5,456,248	2,826,473	35,551	310,365
Transportation	171	34,751,125	744,601	20,681	179	7,398	698,793	332,603	18,890	109,341
Communication	35	55,121,134	4,418,371	10,862	125	4,094	4,375,862	2,405,636	13,656	151,279
Electric, gas, and sanitary services	14	16,748,748	400,614	2,560	169	2,068	381,593	188,234	3,005	49,745
Wholesale and retail trade	800	27,955,185	2,110,349	183,130	919	52,805	2,072,221	1,070,582	178,446	23,239
Wholesale trade	614	13,000,740	806,344	145,364	919	16,217	776,272	394,397	135,977	6,112
Groceries and related products	20	838,622	74,812	2,768	—	2,343	68,310	32,843	3,351	355
Machinery, equipment, and supplies	167	836,332	88,651	1,150	—	699	86,148	44,235	2,227	802
Miscellaneous wholesale trade	427	11,325,786	642,881	141,446	919	13,175	621,814	317,319	130,399	4,955
Retail trade	185	14,470,720	1,293,771	37,766	(¹)	36,588	1,285,825	671,414	42,451	16,785
Building materials, hardware, and farm equipment	28	20,156	466	(¹)	—	—	479	171	(¹)	(¹)
General merchandise stores	12	12,337,051	1,099,023	35,375	(¹)	35,564	1,092,996	573,243	38,827	12,010
Food stores	33	1,439,888	142,069	968	(¹)	713	141,177	72,833	1,313	3,888
Apparel and accessory stores	20	59,507	4,856	46	—	33	3,554	1,794	43	27
Eating and drinking places	26	173,492	19,158	—	—	—	20,228	9,527	241	148
Miscellaneous retail stores	63	389,072	25,492	931	—	—	24,702	12,510	1,628	704
Finance, insurance, and real estate	1,940	484,678,558	4,535,187	59,222	6,055	24,338	4,007,927	1,965,410	175,664	61,796
Banking	168	255,214,023	976,029	13,010	218	5,740	958,849	477,417	77,762	36,782
Credit agencies other than banks	84	19,257,885	197,821	2,132	—	1,196	166,894	81,692	7,409	10,509
Security and commodity brokers, dealers, exchanges, and services	69	4,170,545	120,246	2,016	5,320	179	117,480	50,479	994	913
Holding and other investment companies	843	4,479,753	324,461	28,803	351	15,508	237,589	80,727	20,922	208
Insurance carriers	240	200,088,954	2,799,625	11,891	166	1,231	2,411,651	1,215,830	67,478	12,028
Insurance agents, brokers, and service	52	180,362	15,738	295	—	88	13,238	6,770	412	80
Real estate	483	1,287,036	111,267	1,075	—	396	101,935	43,495	687	1,276
Services	700	6,493,847	528,309	21,252	509	14,107	508,464	259,886	29,802	10,086
Hotels and other lodging places	14	1,065,797	65,672	7,440	—	4,489	64,704	33,308	8,056	1,924
Personal services	6	206,474	32,391	70	—	42	32,302	16,906	241	503
Business services	369	3,460,111	325,709	11,437	245	8,391	311,670	159,460	14,796	4,118
Automobile services, and miscellaneous repair services	95	280,817	12,362	37	—	40	12,220	6,317	112	2,374
Amusement and recreation services	137	1,104,410	59,749	625	—	41	57,882	29,553	4,147	890
Other services	78	376,238	32,426	1,643	264	1,104	29,686	14,342	2,450	277

Footnotes at end of table.

RETURNS WITH FOREIGN TAX CREDIT

Table 16.—Total Assets, Income, Tax, and Credits, and Foreign Income, Taxes, and Credit, by Selected Major Industry—Continued

(All figures are estimates based on samples—money amounts are in thousands of dollars)

Selected major industry	Returns with Form 1118 statements filed in support of credit claimed								
	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed
	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)
All industries	6,289	1,014,178,588	46,512,479	2,798,497	72,765	1,067,280	44,495,835	22,785,650	3,973,952
Agriculture, forestry, and fishery	23	1,270,838	46,054	2,818	—	1,226	40,142	18,219	11,486
Mining	102	9,782,526	1,626,936	72,027	3,109	14,502	1,528,978	796,750	656,676
Metal mining	15	4,653,851	406,291	64,783	—	11,928	324,663	164,529	87,238
Coal mining	3	516,322	4,376	14	—	—	4,967	1,828	—
Crude petroleum and natural gas	69	3,509,243	1,154,036	7,096	3,109	2,574	1,148,134	603,653	562,291
Nonmetallic minerals (except fuels) mining	15	1,103,110	62,233	134	—	—	52,114	26,740	7,130
Contract construction	121	3,725,793	277,483	21,522	232	7,476	265,418	131,920	23,817
Manufacturing	2,743	383,162,869	31,955,842	2,405,823	61,483	940,058	30,733,089	15,769,730	2,866,185
Food and kindred products	175	22,304,641	1,909,614	155,811	2,582	86,749	1,875,938	980,094	156,238
Tobacco manufactures	7	5,543,267	657,375	1,899	99	859	645,905	339,358	4,938
Textile mill products	50	5,896,141	400,032	7,310	65	3,802	392,317	205,007	7,688
Apparel and other fabricated textile products	171	2,382,386	203,422	967	277	624	199,216	103,527	4,132
Lumber and wood products, except furniture	21	4,993,565	385,540	9,952	501	1,454	412,768	120,762	6,605
Furniture and fixtures	30	899,197	89,134	2,224	—	1,412	88,271	46,096	2,117
Paper and allied products	71	13,414,747	1,053,281	57,516	924	42,455	1,034,008	473,920	62,696
Printing and publishing	141	6,173,875	722,873	14,484	609	7,626	694,992	353,094	14,582
Chemicals and allied products	363	40,181,032	4,692,402	322,478	22,500	180,989	4,592,315	2,368,062	319,607
Petroleum refining and related industries	38	80,674,181	3,880,913	813,899	5,428	84,770	3,267,498	1,659,759	1,216,963
Rubber and miscellaneous plastics products	103	7,877,936	636,401	76,374	26	17,056	621,906	326,420	52,142
Leather and leather products	39	1,429,036	105,899	1,312	343	391	90,396	47,085	1,324
Stone, clay, and glass products	64	7,560,996	689,071	26,132	212	14,887	669,921	344,432	23,932
Primary metal industries	98	37,061,863	1,591,574	214,008	2,506	29,740	1,397,178	697,197	241,131
Fabricated metal products, except machinery and transportation equipment	228	9,882,184	1,048,745	36,280	2,820	29,140	1,022,681	524,199	43,301
Machinery, except electrical	508	29,213,943	3,629,299	202,810	7,786	125,180	3,587,324	1,879,461	219,741
Electrical equipment and supplies	287	32,292,171	2,716,975	127,981	12,838	73,279	2,666,739	1,385,651	140,049
Motor vehicles and equipment	68	46,098,300	4,726,241	198,192	965	117,205	4,689,286	2,469,546	178,451
Transportation equipment, except motor vehicles	54	17,292,984	818,086	19,140	193	14,281	800,789	416,665	28,834
Scientific instruments, photographic equipment, watches and clocks	96	8,350,520	1,687,967	109,305	251	105,244	1,680,533	880,034	135,900
Miscellaneous manufactured products, and manufacturing not allocable	130	3,839,904	310,998	7,549	558	2,915	303,108	149,362	5,834
Transportation, communication, electric, gas, and sanitary services	203	106,000,500	5,542,807	34,103	458	13,559	5,435,847	2,816,073	35,245
Transportation	155	34,729,958	742,307	20,681	179	7,398	696,499	331,484	18,850
Communication	35	55,121,134	4,418,371	10,862	125	4,094	4,375,862	2,305,636	13,656
Electric, gas, and sanitary services	13	16,149,408	382,129	2,560	154	2,067	363,486	178,953	2,739
Wholesale and retail trade	751	27,755,040	2,089,123	183,125	919	52,805	2,055,894	1,064,894	178,253
Wholesale trade	572	12,822,833	786,707	145,361	919	16,217	761,298	389,395	135,787
Groceries and related products	19	691,094	57,523	2,768	—	2,343	55,674	28,824	3,162
Machinery, equipment, and supplies	166	822,740	87,294	1,150	—	699	84,791	43,524	2,226
Miscellaneous wholesale trade	388	11,308,939	641,890	141,442	919	13,175	620,833	317,047	130,399
Retail trade	177	14,448,482	1,292,182	37,764	(1)	36,588	1,284,472	670,728	42,448
Building materials, hardware, and farm equipment	28	20,156	486	(1)	—	—	479	171	(1)
General merchandise stores	12	12,337,051	1,099,023	35,375	(1)	35,564	1,092,998	573,243	38,827
Food stores	28	1,422,605	141,609	966	—	713	140,796	72,638	1,310
Apparel and accessory stores	20	59,507	4,856	46	—	33	3,554	1,734	43
Eating and drinking places	26	173,492	19,158	—	—	—	20,228	9,527	241
Miscellaneous retail stores	60	384,117	24,363	931	—	—	23,730	12,019	1,628
Finance, insurance, and real estate	1,776	476,320,357	4,466,296	58,313	6,055	23,748	3,944,789	1,936,050	173,531
Banking	162	247,647,190	942,905	12,276	218	5,150	926,085	460,351	75,780
Credit agencies other than banks	77	19,250,177	187,588	2,132	—	1,196	166,779	81,606	7,405
Security and commodity brokers, dealers, exchanges, and services	69	4,170,545	120,246	2,016	5,320	179	117,480	59,479	994
Holding and other investment companies	836	4,462,669	320,853	28,757	351	15,508	234,390	79,835	20,916
Insurance carriers	224	199,408,617	2,776,849	11,785	166	1,231	2,392,638	1,206,825	67,341
Insurance agents, brokers, and service	52	180,362	15,738	295	—	88	13,238	6,770	412
Real estate	355	1,200,797	102,117	1,052	—	396	94,179	41,184	683
Services	570	6,144,126	506,634	20,766	509	13,906	490,416	251,350	28,759
Hotels and other lodging places	13	953,558	60,981	7,271	—	4,342	60,057	30,950	7,755
Personal services	6	206,474	32,391	70	—	42	32,302	16,906	241
Business services	330	3,386,171	319,532	11,264	245	8,364	308,472	158,573	14,228
Automobile services, and miscellaneous repair services	9	277,476	12,259	37	—	40	12,133	6,317	112
Amusement and recreation services	134	944,209	49,045	481	—	14	47,766	24,262	3,973
Other services	78	376,238	32,426	1,643	264	1,104	29,686	14,342	2,450

Footnotes at end of table.

RETURNS WITH FOREIGN TAX CREDIT

Table 16.—Total Assets, Income, Tax, and Credits, and Foreign Income, Taxes, and Credit, by Selected Major Industry—Continued

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

Selected major industry	Returns with Form 1118 statements filed in support of credit claimed—Continued						Dividends paid to related foreign corporations by subsidiaries
	Taxable income from foreign sources		Foreign taxes				
	Total (less loss) ¹	Dividends from related foreign corporations	Total	Paid or accrued	Deemed paid	Carryover	
	(20)	(21)	(22)	(23)	(24)	(25)	
All Industries	9,622,195	2,654,815	7,892,204	3,757,986	1,428,153	2,706,002	354,934
Agriculture, forestry, and fishery	37,512	2,724	13,647	12,029	1,585	34	—
Mining	1,292,855	74,315	1,798,736	835,954	25,640	937,146	19,332
Metal mining	174,523	64,294	268,449	83,027	21,452	163,970	19,332
Coal mining	110	—	17	17	—	—	—
Crude petroleum and natural gas	1,081,244	9,936	1,523,041	745,830	4,119	773,094	—
Nonmetallic minerals (except fuels) mining	36,978	85	7,229	7,080	69	82	—
Contract construction	73,823	21,135	27,008	15,357	8,075	2,531	595
Manufacturing	6,802,829	2,320,462	5,421,711	2,509,281	1,246,758	1,665,678	240,033
Food and kindred products	356,721	151,404	163,160	59,479	96,908	6,767	13,729
Tobacco manufactures	14,357	2,036	4,936	3,852	1,051	34	—
Textile mill products	19,544	6,923	8,758	3,718	4,532	508	619
Apparel and other fabricated textile products	18,901	1,234	4,525	3,562	677	290	36
Lumber and wood products, except furniture	24,959	9,895	7,322	2,282	3,303	1,738	1,715
Furniture and fixtures	4,647	2,200	2,411	465	1,948	—	803
Paper and allied products	147,753	56,745	90,890	13,622	45,423	31,848	14,644
Printing and publishing	35,719	12,787	17,258	5,136	9,498	2,626	2,476
Chemicals and allied products	917,685	340,679	335,326	116,206	211,197	7,920	30,938
Petroleum refining and related industries	2,381,454	777,838	3,313,980	1,711,385	273,821	1,328,775	16,660
Rubber and miscellaneous plastics products	131,332	63,903	52,567	20,197	31,904	465	744
Leather and leather products	4,669	1,134	1,665	943	391	321	164
Stone, clay, and glass products	76,079	19,553	26,529	8,085	15,947	2,494	1,275
Primary metal industries	559,367	200,229	604,140	297,387	48,446	258,301	25,663
Fabricated metal products, except machinery and transportation equipment	115,011	35,833	47,010	15,184	31,100	732	3,814
Machinery, except electrical	669,774	194,686	226,902	90,562	130,334	6,011	67,981
Electrical equipment and supplies	478,448	129,731	157,037	64,711	81,266	11,061	6,049
Motor vehicles and equipment	402,598	178,055	182,808	47,392	131,037	4,380	22,199
Transportation equipment, except motor vehicles	100,047	18,105	29,009	13,174	15,767	68	5,373
Scientific instruments, photographic equipment, watches and clocks	316,117	110,678	136,097	28,647	107,311	137	23,433
Miscellaneous manufactured products, and manufacturing not allocable	23,647	6,814	9,377	3,292	4,897	1,192	1,718
Transportation, communication, electric, gas, and sanitary services	150,948	31,446	48,786	21,980	19,915	6,886	46,723
Transportation	69,082	19,799	28,981	12,237	12,151	4,589	44,646
Communication	73,010	8,863	13,657	8,012	5,645	—	1,767
Electric, gas, and sanitary services	8,856	2,784	6,148	1,731	2,119	2,297	310
Wholesale and retail trade	389,068	139,695	337,334	178,994	82,992	75,325	12,638
Wholesale trade	301,826	102,223	292,622	174,180	45,416	73,007	8,000
Groceries and related products	6,949	2,853	3,404	691	2,516	198	—
Machinery, equipment, and supplies	8,466	1,115	2,535	1,664	712	158	—
Miscellaneous wholesale trade	286,411	98,255	286,683	171,825	42,188	72,651	8,000
Retail trade	87,195	37,472	44,694	4,796	37,576	2,318	4,638
Building materials, hardware, and farm equipment	7	—	(¹)	(¹)	—	—	—
General merchandise stores	79,029	35,321	39,746	2,745	36,147	853	3,472
Food stores	2,971	967	2,625	572	713	1,341	1,166
Apparel and accessory stores	132	46	43	10	33	—	—
Eating and drinking places	651	—	245	179	—	62	—
Miscellaneous retail stores	3,452	694	1,636	1,176	405	55	—
Finance, insurance, and real estate	780,897	46,887	205,263	167,978	27,862	9,380	32,512
Banking	290,785	9,525	93,776	87,795	5,948	35	2,121
Credit agencies other than banks	31,045	1,935	7,834	6,219	1,196	420	—
Security and commodity brokers, dealers, exchanges, and services	9,800	5,593	1,062	834	186	42	5,320
Holding and other investment companies	53,693	25,316	26,306	5,737	18,254	2,269	24,410
Insurance carriers	392,856	3,688	73,867	66,694	1,734	5,439	412
Insurance agents, brokers, and service	1,127	262	1,677	453	148	1,076	24
Real estate	1,291	570	741	246	396	99	225
Services	94,262	18,151	39,719	15,373	15,326	9,022	3,101
Hotels and other lodging places	16,592	5,540	8,252	2,853	5,084	317	—
Personal services	655	67	241	199	42	—	—
Business services	37,093	10,804	16,824	5,789	8,928	2,108	2,403
Automobile services, and miscellaneous repair services	376	37	116	76	40	—	—
Amusement and recreation services	28,850	181	10,829	4,271	128	6,430	—
Other services	10,696	1,522	3,457	2,185	1,104	167	698

¹Less than \$500 per return.

²Includes the "gross-up" of certain foreign dividends.

NOTE: Foreign income, taxes, and credit include amounts related to interest for which separate credit was required to be computed. See text for explanatory statements and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

RETURNS WITH FOREIGN TAX CREDIT

Table 17.—Total Assets, Income, Tax, and Credits, and Foreign Income, Taxes, and Credit, by Selected Major Industry

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

Selected major industry	Returns with and without Form 1118 statements filed in support of credit claimed									
	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed	Investment credit
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
All industries	5,745	1,089,285,865	41,566,254	3,332,469	76,335	1,564,983	39,233,719	19,109,322	4,548,986	582,693
Agriculture, forestry, and fishery	52	1,327,431	53,774	3,841	—	782	51,104	23,357	5,180	154
Mining	92	9,535,010	1,783,830	82,968	—	21,419	1,685,502	826,250	698,076	4,917
Metal mining	15	4,776,132	388,627	68,242	—	13,803	316,229	155,396	88,279	3,378
Coal mining	7	1,136,423	100,732	8,668	—	5,224	87,761	40,674	12,098	306
Crude petroleum and natural gas	44	2,675,464	1,253,964	7,759	—	2,592	1,248,474	613,727	588,764	1,015
Nonmetallic minerals (except fuels) mining	25	946,991	40,507	299	—	—	33,038	16,453	8,935	138
Contract construction	156	3,082,787	191,580	19,425	100	10,325	186,317	89,824	19,935	954
Manufacturing	2,522	389,902,379	27,239,805	2,932,964	64,148	1,397,978	25,849,638	12,605,058	3,288,009	372,583
Food and kindred products	143	24,287,597	2,194,124	169,736	11,650	102,181	2,173,719	1,064,763	178,257	15,995
Tobacco manufactures	10	5,918,815	873,666	3,952	451	2,057	862,349	424,124	10,089	3,397
Textile mill products	99	5,496,181	315,047	6,882	410	3,176	310,990	152,099	8,051	4,231
Apparel and other fabricated textile products	97	2,547,400	165,934	3,046	89	2,267	162,113	79,295	5,559	512
Lumber and wood products, except furniture	38	5,715,619	245,741	8,272	1,077	3,114	246,608	81,792	5,730	5,483
Furniture and fixtures	31	570,914	56,340	283	—	171	55,601	26,895	314	182
Paper and allied products	46	13,807,593	782,026	54,904	3,280	33,639	775,126	339,411	55,293	24,170
Printing and publishing	163	6,856,114	643,927	14,535	284	8,169	628,680	303,286	14,426	4,151
Chemicals and allied products	298	43,089,812	4,451,459	452,157	16,992	216,899	4,333,167	2,089,782	385,525	77,463
Petroleum refining and related industries	35	83,497,085	4,443,593	824,102	118	104,566	3,500,532	1,830,230	1,231,379	80,913
Rubber and miscellaneous plastics products	55	7,806,668	405,130	89,259	88	16,936	401,124	196,434	58,238	10,901
Leather and leather products	42	1,243,256	140,286	664	341	101	126,624	55,607	1,582	156
Stone, clay, and glass products	63	7,929,431	528,080	53,048	1,194	33,231	508,270	241,814	44,917	6,766
Primary metal industries	75	27,867,179	855,861	122,477	2,582	28,740	765,695	366,733	120,913	19,025
Fabricated metal products, except machinery and transportation equipment	302	11,424,687	910,985	57,279	2,349	35,458	896,489	426,540	53,330	8,839
Machinery, except electrical	529	33,202,089	3,949,975	513,411	11,975	417,841	3,918,186	1,913,764	556,989	17,786
Electrical equipment and supplies	186	36,054,093	2,029,703	165,029	5,632	100,077	1,987,637	959,972	169,177	24,307
Motor vehicles and equipment	51	40,456,867	2,098,999	289,403	583	208,243	2,083,134	1,020,995	269,971	39,471
Transportation equipment, except motor vehicles	59	19,744,545	702,927	16,447	379	9,375	693,902	338,118	22,701	20,583
Scientific instruments, photographic equipment, watches and clocks	80	8,068,991	1,231,320	80,299	4,229	68,666	1,224,303	598,144	85,968	5,296
Miscellaneous manufactured products, and manufacturing not allocable	109	4,317,443	215,282	7,779	445	3,581	195,461	95,260	9,600	2,956
Transportation, communication, electric, gas, and sanitary services	140	104,645,670	4,361,676	33,103	792	16,738	4,255,457	2,091,621	42,824	139,953
Transportation	99	25,260,787	341,613	16,813	400	9,212	312,126	150,791	22,574	31,312
Communication	21	62,307,532	3,703,956	13,125	373	5,717	3,641,350	1,791,655	16,826	87,383
Electric, gas, and sanitary services	19	17,077,351	316,107	3,165	19	1,809	301,939	149,175	3,424	21,258
Wholesale and retail trade	542	34,971,635	2,413,892	151,782	1,281	59,955	2,269,921	1,103,104	206,904	18,285
Wholesale trade	476	13,583,235	934,957	106,114	1,281	22,677	906,343	439,325	161,793	1,742
Groceries and related products	37	1,118,809	91,769	8,137	—	3,604	85,087	39,742	5,134	358
Machinery, equipment, and supplies	67	853,149	90,404	226	—	41	88,805	43,253	711	439
Miscellaneous wholesale trade	371	11,610,277	752,784	99,751	1,281	19,032	732,451	356,330	155,948	951
Retail trade	64	20,800,403	1,471,615	45,668	—	37,278	1,356,365	661,480	45,111	15,613
General merchandise stores	15	17,682,507	1,240,513	40,342	—	34,902	1,131,357	552,138	40,094	13,298
Food stores	27	1,585,424	164,116	2,339	—	1,039	163,376	80,173	1,751	916
Automotive dealers and service stations	4	175,636	4,106	1	—	—	3,924	1,861	4	4
Apparel and accessory stores	3	98,425	7,874	417	—	—	7,081	3,385	303	14
Eating and drinking places	5	549,500	22,995	1,624	—	1,304	19,482	9,491	1,033	989
Miscellaneous retail stores	6	413,783	17,845	945	—	33	16,981	8,281	1,866	335
Finance, insurance, and real estate	1,540	537,583,453	4,969,511	67,937	9,671	35,214	4,406,197	2,118,173	246,702	38,629
Banking	179	309,428,204	1,452,519	17,794	672	7,815	1,431,737	690,907	130,826	32,318
Credit agencies other than banks	50	12,433,914	100,903	7,965	429	8,977	82,921	40,488	17,992	2,674
Security and commodity brokers, dealers, exchanges, and services	53	6,006,098	135,274	1,582	5,169	836	150,630	63,328	1,681	56
Holding and other investment companies	692	4,235,383	274,693	28,041	2,870	14,618	114,338	47,703	19,276	244
Insurance carriers	224	203,878,912	2,880,423	10,576	335	1,345	2,530,990	1,221,205	74,331	2,797
Insurance agents, brokers, and service	47	689,811	96,432	1,567	118	1,598	93,169	46,050	2,360	232
Real estate	291	911,131	29,267	412	78	25	22,412	8,492	236	308
Services	698	8,237,500	552,186	40,449	343	22,572	529,583	251,935	41,356	7,218
Hotels and other lodging places	24	1,206,271	63,773	7,088	—	3,828	62,717	30,539	6,863	1,712
Personal services	29	260,385	36,005	281	—	229	36,006	17,947	499	146
Business services	391	3,502,082	277,288	11,179	122	7,060	264,268	127,770	12,415	2,600
Amusement and recreation services	143	2,779,337	115,416	17,805	221	7,797	110,604	51,154	15,564	2,737
Other services	108	439,829	57,176	3,979	—	3,584	54,565	23,886	5,942	22

Footnotes at end of table.

RETURNS WITH FOREIGN TAX CREDIT

Table 17.—Total Assets, Income, Tax, and Credits, and Foreign Income, Taxes, and Credit, by Selected Major Industry—Continued

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

Selected major industry	Returns with Form 1118 statements filed in support of credit claimed								
	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed
	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)
All Industries	5,571	1,077,001,978	41,409,073	3,327,583	76,335	1,561,567	39,080,757	19,029,921	4,542,463
Agriculture, forestry, and fishery	52	1,327,431	53,774	3,841	—	782	51,104	23,357	5,180
Mining	92	9,535,010	1,783,830	82,968	—	21,419	1,685,502	626,250	698,076
Metal mining	15	4,776,132	388,627	68,242	—	13,603	316,229	155,396	88,279
Coal mining	7	1,136,423	100,732	6,668	—	5,224	87,761	40,674	12,098
Crude petroleum and natural gas	44	2,675,464	1,253,964	7,759	—	2,592	1,248,474	613,727	588,764
Nonmetallic minerals (except fuels) mining	25	946,991	40,507	299	—	—	33,038	16,453	8,935
Contract construction	156	3,082,787	191,580	19,425	100	10,325	186,317	89,824	19,935
Manufacturing	2,467	389,545,914	27,199,100	2,932,098	64,148	1,397,978	25,803,262	12,577,547	3,287,441
Food and kindred products	137	24,146,706	2,180,653	169,736	11,650	102,181	2,160,248	1,058,090	178,248
Tobacco manufactures	10	5,918,815	873,666	3,952	451	2,057	862,349	424,124	10,089
Textile mill products	96	5,486,309	314,373	6,882	410	3,176	310,317	151,818	8,044
Apparel and other fabricated textile products	96	2,538,879	164,112	3,046	89	2,267	160,291	78,420	5,558
Lumber and wood products, except furniture	35	5,707,385	244,953	8,272	1,077	3,114	245,817	81,426	5,730
Furniture and fixtures	31	570,914	56,340	283	—	—	171	55,601	26,895
Paper and allied products	46	13,807,593	782,026	54,904	3,280	33,639	775,126	339,411	55,293
Printing and publishing	163	6,856,114	643,927	14,535	284	8,169	628,608	303,286	14,426
Chemicals and allied products	298	43,089,812	4,451,459	452,157	16,992	216,389	4,333,167	2,089,782	385,525
Petroleum refining and related industries	34	83,430,072	4,435,307	824,102	118	104,566	3,491,184	1,819,662	1,231,379
Rubber and miscellaneous plastics products	55	7,806,668	405,130	89,259	88	16,936	401,124	196,434	58,238
Leather and leather products	42	1,243,256	140,286	664	341	101	126,824	55,607	1,582
Stone, clay, and glass products	62	7,923,326	526,405	53,048	1,194	33,231	506,597	241,011	44,894
Primary metal industries	75	27,867,179	855,861	122,477	2,582	28,740	755,695	366,733	120,913
Fabricated metal products, except machinery and transportation equipment	302	11,424,687	912,787	57,279	2,349	35,458	894,677	426,471	53,330
Machinery, except electrical	498	33,114,899	3,934,983	512,545	11,975	417,841	3,903,259	1,906,532	556,468
Electrical equipment and supplies	180	36,037,387	2,029,615	165,029	5,632	100,077	1,986,499	959,673	189,174
Motor vehicles and equipment	51	40,456,867	2,098,399	289,403	583	208,243	2,083,134	1,020,995	269,971
Transportation equipment, except motor vehicles	59	19,744,545	702,827	16,447	379	9,375	1,223,902	338,118	22,701
Scientific instruments, photographic equipment, watches and clocks	80	8,068,991	1,231,320	80,299	4,229	68,666	1,694,303	598,144	85,969
Miscellaneous manufactured products, and manufacturing not allocable	107	4,305,510	214,561	7,779	445	3,581	194,740	94,915	9,595
Transportation, communication, electric, gas, and sanitary services	137	98,941,318	4,329,671	32,636	792	16,420	4,229,467	2,077,682	42,118
Transportation	98	25,255,078	340,559	16,813	400	9,212	311,114	150,279	22,568
Communication	21	62,307,532	3,703,956	13,125	373	5,717	3,641,350	1,791,655	16,826
Electric, gas, and sanitary services	17	11,378,708	285,156	2,698	19	1,491	277,003	135,748	2,724
Wholesale and retail trade	534	34,944,591	2,408,851	151,182	1,281	59,461	2,260,914	1,099,578	206,308
Wholesale trade	473	13,567,260	929,091	105,514	1,281	22,183	900,477	436,419	161,197
Groceries and related products	37	1,119,809	91,769	6,137	—	3,604	85,087	39,742	5,134
Machinery, equipment, and supplies	67	853,149	90,404	226	—	41	88,805	43,253	711
Miscellaneous wholesale trade	368	11,594,302	746,918	99,151	1,281	18,538	726,585	353,424	155,352
Retail trade	61	20,789,334	1,472,440	45,668	—	37,278	1,353,224	660,860	45,111
General merchandise stores	15	17,682,507	1,242,577	40,342	—	34,902	1,129,299	552,035	40,094
Food stores	27	1,585,424	164,116	2,339	—	1,039	163,376	80,173	1,751
Automotive dealers and service stations	4	175,636	4,106	1	—	—	3,924	1,861	4
Apparel and accessory stores	3	98,425	7,874	417	—	—	7,081	3,385	303
Eating and drinking places	5	549,500	22,995	1,624	—	1,304	19,482	9,491	1,033
Miscellaneous retail stores	3	402,714	16,606	945	—	33	15,898	7,764	1,866
Finance, insurance, and real estate	1,485	531,550,263	4,903,618	67,499	9,671	35,214	4,347,924	2,090,130	245,066
Banking	169	306,440,405	1,424,134	17,794	672	7,815	1,403,375	677,173	130,548
Credit agencies other than banks	45	12,410,881	99,007	7,965	429	8,977	81,025	39,585	17,444
Security and commodity brokers, dealers, exchanges, and services	49	5,580,157	124,229	1,582	5,169	836	119,744	58,020	1,173
Holding and other investment companies	687	4,212,239	273,101	27,738	2,870	14,618	113,045	47,227	19,261
Insurance carriers	216	201,340,019	2,858,349	10,447	335	1,345	2,515,859	1,213,814	74,044
Insurance agents, brokers, and service	33	681,721	96,165	1,567	118	1,598	92,944	45,994	2,360
Real estate	284	884,841	28,634	406	78	25	21,932	8,317	236
Services	643	8,074,664	538,649	37,934	343	19,968	516,267	245,553	38,339
Hotels and other lodging places	24	1,206,271	63,773	7,088	—	3,829	62,717	30,539	6,863
Personal services	29	260,385	36,005	281	—	229	36,006	17,947	499
Business services	358	3,485,398	276,396	11,162	122	7,060	263,591	127,580	12,415
Amusement and recreation services	139	2,663,931	108,841	17,707	221	7,797	104,035	47,936	15,521
Other services	91	409,083	51,106	1,578	—	980	48,495	20,912	2,968

Footnotes at end of table.

RETURNS WITH FOREIGN TAX CREDIT

Table 17.—Total Assets, Income, Tax, and Credits, and Foreign Income, Taxes, and Credit, by Selected Major Industry—Continued

(All figures are estimates based on samples—money amounts in thousands of dollars)

Selected major industry	Returns with Form 1118 statements filed in support of credit claimed—Continued						Dividends paid to related foreign corporations by subsidiaries
	Taxable income from foreign sources		Foreign taxes				
	Total (less loss) ¹	Dividends from related foreign corporations	Total	Paid or accrued	Deemed paid	Carryover	
	(20)	(21)	(22)	(23)	(24)	(25)	(26)
All industries	10,932,007	3,024,262	8,459,522	3,616,636	1,911,496	2,931,439	301,051
Agriculture, forestry, and fishery	22,330	1,396	6,264	5,468	795	—	192
Mining	1,467,705	80,042	1,896,772	879,827	31,820	985,131	25,314
Metal mining	191,065	65,929	244,703	95,111	22,539	127,057	24,778
Coal mining	26,861	6,622	15,246	9,030	5,224	992	—
Crude petroleum and natural gas	1,212,107	7,432	1,610,040	749,118	4,030	856,894	536
Nonmetallic minerals (except fuels) mining	37,672	59	26,783	26,568	27	188	—
Contract construction	70,325	18,803	23,487	10,117	11,690	1,678	606
Manufacturing	7,765,303	2,663,761	5,882,825	2,275,600	1,707,610	1,879,631	195,082
Food and kindred products	392,140	117,157	189,973	63,839	120,551	5,575	11,177
Tobacco manufactures	23,978	4,334	10,094	7,791	2,302	—	45
Textile mill products	21,846	4,819	10,200	3,632	4,276	2,295	2,025
Apparel and other fabricated textile products	18,538	3,120	6,085	3,490	2,357	241	89
Lumber and wood products, except furniture	26,615	9,298	5,861	1,683	3,621	558	586
Furniture and fixtures	983	214	346	164	182	—	—
Paper and allied products	158,377	56,604	77,736	16,156	36,255	25,329	26,806
Printing and publishing	32,050	11,196	18,032	4,562	10,394	3,058	1,845
Chemicals and allied products	1,178,790	423,156	498,073	129,457	263,462	15,156	51,497
Petroleum refining and related industries	2,410,396	705,107	3,348,340	1,589,173	255,917	1,509,255	6,497
Rubber and miscellaneous plastics products	148,590	77,862	59,760	22,775	36,886	100	76
Leather and leather products	6,697	1,002	1,650	1,071	285	295	164
Stone, clay, and glass products	125,146	49,338	47,485	12,323	34,578	582	1,551
Primary metal industries	326,248	97,633	448,798	98,760	41,383	308,659	24,319
Fabricated metal products, except machinery and transportation equipment	158,270	49,730	59,563	18,750	37,504	3,314	10,422
Machinery, except electrical	1,248,099	509,080	578,821	145,371	427,554	5,893	16,562
Electrical equipment and supplies	547,626	156,968	182,272	73,447	105,452	3,371	20,770
Motor vehicles and equipment	577,708	282,288	281,133	41,355	239,403	376	15,466
Transportation equipment, except motor vehicles	110,151	13,715	26,765	16,275	10,396	93	2,890
Scientific instruments, photographic equipment, watches and clocks	221,462	83,893	89,021	18,920	69,981	123	1,975
Miscellaneous manufactured products, and manufacturing not allocable	31,593	7,247	12,615	6,586	4,871	1,358	320
Transportation, communication, electric, gas, and sanitary services	164,954	23,969	56,226	24,937	18,362	12,931	11,434
Transportation	82,492	11,705	34,534	13,496	9,412	11,625	1,516
Communication	73,470	10,337	16,870	9,596	7,221	57	9,538
Electric, gas, and sanitary services	8,992	1,927	4,822	1,845	1,729	1,249	380
Wholesale and retail trade	463,576	144,445	301,721	192,282	81,303	28,148	4,448
Wholesale trade	365,633	99,149	250,737	185,178	41,223	24,348	644
Groceries and related products	13,089	5,415	6,541	1,555	4,642	346	180
Machinery, equipment, and supplies	3,001	193	713	609	103	—	—
Miscellaneous wholesale trade	349,543	93,541	243,483	183,014	36,478	24,002	464
Retail trade	97,941	45,296	50,984	7,104	40,080	3,800	3,804
General merchandise stores	84,065	40,176	43,732	3,985	36,966	2,782	3,099
Food stores	4,449	2,327	2,833	749	1,213	871	625
Automotive dealers and service stations	32	—	4	4	—	—	—
Apparel and accessory stores	860	240	303	122	177	4	—
Eating and drinking places	4,054	1,624	2,095	662	1,314	119	—
Miscellaneous retail stores	4,254	929	1,946	1,522	410	13	80
Finance, insurance, and real estate	832,984	59,741	267,958	210,663	38,424	18,878	61,713
Banking	442,454	14,723	138,100	119,773	8,937	9,383	6,345
Credit agencies other than banks	52,171	8,238	18,107	8,740	9,007	363	4,768
Security and commodity brokers, dealers, exchanges, and services	9,193	5,895	1,287	387	891	5	—
Holding and other investment companies	65,315	25,311	27,058	7,877	15,774	3,418	48,963
Insurance carriers	255,213	3,848	79,243	72,784	2,154	4,305	1,564
Insurance agents, brokers, and service	7,218	1,626	3,836	893	1,636	1,307	73
Real estate	1,420	100	327	209	25	97	—
Services	144,830	32,105	44,269	17,742	21,492	5,042	2,262
Hotels and other lodging places	16,617	3,233	6,985	2,198	4,788	—	496
Personal services	1,386	267	550	314	237	—	550
Business services	36,785	9,833	16,226	5,929	7,549	2,748	1,070
Amusement and recreation services	75,866	17,591	17,338	7,343	7,865	2,129	34
Other services	13,701	1,064	3,097	1,958	980	165	112

¹Includes the "gross-up" of certain foreign dividends.

NOTE: Foreign income, taxes, and credit include amounts related to interest for which separate credit was required to be computed. See text for explanatory statements and for "Description of the Sample and Limitations of the data." Detail may not add to totals because of rounding.

Foreign Tax Credit on Corporation Returns, 1972

RETURNS WITH FOREIGN TAX CREDIT

Table 18.—Total Assets, Income, Tax, and Credits, and Foreign Income, Taxes, and Credit, by Major Industry

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

Major industry	Returns with and without Form 1118 statements filed in support of credit claimed										
	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Dividends received from DISCs	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed	Investment credit
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
All industries	6,412	1,425,852,439	56,657,256	4,442,247	74,431	1,916,716	268,133	53,497,714	25,355,878	6,315,317	1,715,588
Agriculture, forestry, and fishery	41	555,714	60,017	163	—	30	—	57,270	25,831	287	901
Mining	126	10,948,690	3,279,387	32,126	365	18,661	7,537	3,216,762	1,544,074	1,442,137	17,765
Metal mining	15	2,902,414	141,984	18,270	—	8,788	9	102,346	49,264	26,997	3,257
Coal mining	6	2,215,474	59,604	8,261	101	7,814	5,648	49,562	24,864	16,417	2,286
Crude petroleum and natural gas	73	4,825,851	3,036,082	5,327	264	1,913	1,880	3,027,846	1,452,582	1,393,536	10,376
Nonmetallic minerals (except fuels) mining	32	1,004,951	41,717	268	—	146	—	17,364	17,364	5,187	1,846
Contract construction	166	3,647,558	251,231	21,045	99	12,609	222	38,290	111,811	23,917	6,642
Manufacturing	2,544	491,142,352	38,895,746	4,004,868	61,169	1,727,325	247,407	36,845,983	17,510,729	4,174,961	1,013,520
Food and kindred products	155	26,010,817	2,394,718	239,201	7,968	140,865	8,710	2,363,325	1,114,670	244,928	61,015
Tobacco manufacturers	8	8,440,554	990,565	12,604	2,130	5,538	5,627	951,203	453,226	30,054	16,025
Textile mill products	82	7,147,874	434,971	11,407	867	5,556	1,018	429,150	201,568	12,742	23,418
Apparel and other fabricated textile products	186	3,317,643	241,295	5,961	—	2,425	126	236,167	112,230	7,233	4,247
Lumber and wood products, except furniture	24	7,449,142	538,293	9,232	538	913	3,109	546,861	195,820	6,427	23,441
Furniture and fixtures	24	871,554	105,798	1,276	—	61	62	105,285	49,962	861	2,102
Paper and allied products	75	16,691,103	1,098,423	65,513	5,638	44,588	2,892	1,084,152	471,724	71,195	44,855
Printing and publishing	118	9,256,124	919,236	20,656	1,083	16,511	1,855	893,685	413,976	23,999	19,442
Chemicals and allied products	317	51,509,134	3,378,000	513,850	12,830	275,656	38,926	5,246,046	2,485,503	487,652	145,643
Petroleum refining and related industries	28	94,804,604	5,725,645	1,327,577	433	145,979	2,699	4,326,952	2,181,140	1,558,690	108,993
Rubber and miscellaneous plastics products	132	9,554,680	744,090	77,939	77	14,172	50	735,892	349,887	59,396	26,112
Leather and leather products	28	1,461,886	114,707	131	36	114	314	97,045	46,261	1,243	2,115
Stone, clay, and glass products	69	9,896,711	807,285	47,152	1,159	26,846	5,692	785,382	369,184	45,305	30,528
Primary metal industries	102	45,370,342	1,333,262	191,109	2,878	24,384	4,724	1,216,868	572,940	152,712	78,510
Fabricated metal products, except machinery and transportation equipment	220	11,176,806	985,784	71,184	2,206	37,253	574	963,554	457,607	61,286	30,554
Machinery, except electrical	398	49,350,406	4,934,031	675,967	5,581	465,036	11,266	4,890,089	2,336,279	682,297	81,200
Electrical equipment and supplies	182	44,245,436	3,226,745	201,510	11,018	108,844	50,260	3,123,084	1,462,321	197,967	115,922
Motor vehicles and equipment	72	59,032,740	6,183,911	356,113	1,702	292,133	47,120	6,155,206	2,954,796	345,802	124,028
Transportation equipment, except motor vehicles	77	20,981,857	855,683	24,650	406	12,980	19,559	827,751	391,456	32,077	42,537
Scientific instruments, photographic equipment, watches and clocks	111	10,397,197	1,485,512	138,995	2,919	99,786	37,441	1,475,276	703,753	136,139	22,475
Miscellaneous manufactured products, and manufacturing not allocable	135	4,175,741	397,790	13,040	1,700	7,683	5,383	393,009	186,425	14,955	10,358
Transportation, communication, electric, gas, and sanitary services	142	133,758,978	4,199,040	48,754	4,848	25,159	2,076	4,041,676	1,936,454	51,806	493,311
Transportation	112	33,414,483	697,082	24,512	1,301	9,308	407	626,318	301,998	17,429	92,439
Water transportation	17	77,151	35,877	4,324	1,086	304	2	33,201	14,812	1,204	1,874
Other transportation	95	32,642,962	661,206	19,588	215	9,004	405	593,117	287,186	16,225	90,565
Communication	12	77,020,083	2,960,963	20,379	216	13,766	1,184	2,892,410	1,392,219	26,545	322,330
Electric, gas, and sanitary services	19	23,234,412	540,995	3,863	3,329	2,086	485	522,948	242,237	7,832	78,542
Wholesale and retail trade ^a	893	44,328,381	2,383,081	192,781	622	60,480	10,659	2,303,733	1,085,697	194,954	57,484
Wholesale trade	571	18,143,645	881,327	125,481	374	19,208	10,438	844,635	396,075	127,993	13,602
Groceries and related products	35	1,590,959	143,494	3,444	186	1,032	101	136,905	64,314	4,246	4,103
Machinery, equipment, and supplies	96	980,565	97,785	2,448	2	1,230	1,504	95,898	45,488	3,057	902
Miscellaneous wholesale trade	440	15,572,121	640,049	119,589	187	16,947	8,933	610,321	286,273	120,690	8,596
Drugs, chemicals, and allied products	40	4,153,069	135,774	28,658	128	567	—	130,800	62,666	53,834	272
Petroleum and petroleum products	22	1,185,263	88,382	73,837	—	11,608	—	87,750	42,906	40,002	169
Other miscellaneous wholesale trade	378	10,233,788	415,893	17,094	59	4,772	8,833	391,771	181,601	26,854	8,155
Retail trade	320	25,107,305	1,480,511	67,300	248	41,271	212	1,440,092	682,378	66,947	41,750
Building materials, hardware, and farm equipment	34	582,418	23,955	11	—	6	—	23,296	9,704	57	1,387
General merchandise stores	119	20,343,114	1,181,322	64,003	118	40,463	—	1,147,455	545,746	55,980	25,168
Food stores	6	1,939,080	157,224	821	—	376	—	156,586	74,630	1,352	10,067
Automotive dealers and service stations	68	471,552	18,224	191	—	(^b)	12	17,634	7,709	6,346	106
Eating and drinking places	34	1,038,702	67,465	1,327	130	296	—	66,018	30,803	1,351	3,755
Miscellaneous retail stores	60	732,440	32,294	947	—	130	200	29,093	13,786	1,861	1,268
Finance, insurance, and real estate	1,973	732,205,977	6,973,833	116,172	5,529	55,562	145	6,199,984	2,866,416	395,175	103,485
Banking	212	436,322,632	1,361,255	35,195	1,232	16,266	—	1,320,460	610,943	221,620	56,194
Credit agencies other than banks	98	14,977,099	176,638	9,654	620	8,359	123	167,242	80,464	20,036	6,237
Security and commodity brokers, dealers, exchanges, and services	41	8,775,711	237,201	8,548	—	2,114	—	231,510	107,341	3,612	4,480
Holding and other investment companies	808	4,658,667	353,591	35,413	1,935	17,946	22	269,406	96,104	25,163	1,831
Insurance carriers	271	265,457,731	4,720,567	24,570	1,455	9,250	—	4,098,576	1,920,634	122,083	33,127
Insurance agents, brokers, and service	72	600,115	75,507	1,805	180	1,569	—	71,921	34,235	2,119	763
Real estate	472	1,414,022	49,074	988	108	508	—	40,868	16,695	543	834
Services	510	9,263,091	612,702	26,338	1,798	16,890	87	591,796	273,839	31,798	22,500
Hotels and other lodging places	36	1,593,225	77,903	576	—	244	—	74,028	35,214	1,116	3,614
Personal services	6	488,747	46,342	1,534	—	1,258	—	45,802	21,951	1,650	1,691
Business services	221	3,449,098	284,522	12,944	250	7,764	—	274,614	128,672	13,057	3,579
Automobile services, and miscellaneous repair services	35	253,199	3,161	45	—	—	—	3,050	1,422	141	552
Amusement and recreation services	72	2,437,481	95,899	9,173	1,548	6,476	—	96,079	43,285	10,316	10,949
Other services	140	1,041,343	2,065	—	—	1,148	87	98,223	43,294	5,517	2,115
Nature of business not allocable	15	1,699	2,220	—	—	—	—	2,220	1,028	283	—

Footnotes at end of table.

Foreign Tax Credit on Corporation Returns, 1972

RETURNS WITH FOREIGN TAX CREDIT

Table 18.—Total Assets, Income, Tax, and Credits, and Foreign Income, Taxes, and Credit, by Major Industry—Continued

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

Major industry	Returns with Form 1118 statements filed in support of credit claimed											
	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Dividends received from DISCs	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed	Foreign income and taxes of domestic corporations reported on Form 1118	
											Taxable income	
											Total (less loss) ¹	Dividends from related foreign corporations
(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)	
All industries	5,497	1,407,096,996	56,149,288	4,434,803	73,450	1,913,268	265,676	53,028,432	25,135,819	6,306,232	16,486,388	4,200,434
Agriculture, forestry, and fishery	40	536,502	56,164	163	—	30	—	53,418	23,989	287	2,270	92
Mining	126	10,948,690	3,279,387	32,126	365	18,661	-7,537	3,216,762	1,544,074	1,442,137	3,046,384	29,965
Metal mining	15	2,902,414	141,984	18,270	—	8,788	9	102,346	49,264	26,997	61,920	17,002
Coal mining	6	2,215,474	59,604	8,261	101	7,814	5,648	49,562	24,864	16,417	29,799	8,114
Crude petroleum and natural gas	73	4,825,851	3,036,082	5,327	264	1,913	1,880	3,027,946	1,452,582	1,393,516	2,921,000	4,667
Nonmetallic minerals (except fuels) mining	32	1,004,951	41,717	268	—	146	—	36,908	17,364	5,187	33,666	182
Contract construction	75	3,594,128	249,524	21,045	99	12,609	222	236,583	111,130	23,679	87,255	17,094
Manufacturing	2,344	486,810,308	38,576,409	3,999,595	60,189	1,724,190	244,950	36,541,844	17,368,392	4,170,516	10,898,549	3,834,696
Food and kindred products	153	25,358,548	2,336,859	238,796	7,966	140,865	8,710	2,305,669	1,087,103	244,124	579,703	229,094
Tobacco manufacturers	8	8,440,554	990,565	12,604	2,130	5,538	5,627	951,203	453,226	30,054	86,684	14,010
Tortilla mill products	80	7,103,446	429,746	11,407	867	5,556	1,018	423,925	199,072	12,647	32,902	11,871
Apparel and other fabricated textile products	126	3,260,689	238,344	5,961	—	2,425	126	232,220	110,902	7,213	28,115	5,685
Lumber and wood products, except furniture	24	7,449,142	538,293	9,232	538	913	3,109	546,861	195,820	6,427	31,041	9,524
Furniture and fixtures	24	871,554	105,798	1,276	—	61	62	105,285	49,962	861	2,474	1,275
Paper and allied products	75	16,691,103	1,098,423	65,513	5,638	44,588	2,892	1,084,152	471,724	71,195	204,301	65,791
Printing and publishing	117	9,998,718	904,693	20,656	1,083	16,511	1,855	884,622	410,385	23,864	107,743	20,085
Chemicals and allied products	308	50,898,372	5,341,448	511,401	11,893	274,149	38,597	5,209,902	2,468,345	487,230	1,347,428	486,540
Petroleum refining and related industries	28	94,804,604	5,725,645	1,327,577	433	145,979	2,699	4,326,952	2,181,140	1,558,690	3,839,227	1,288,537
Rubber and miscellaneous plastics products	75	9,535,798	740,908	77,549	77	13,856	50	732,709	348,429	59,080	148,507	67,073
Leather and leather products	28	1,461,886	114,707	131	36	114	314	97,045	46,261	1,243	4,719	165
Stone, clay, and glass products	68	9,891,583	805,780	47,152	1,159	26,846	5,692	783,879	368,467	45,301	107,420	42,657
Primary metal industries	101	45,355,655	1,332,292	191,109	2,878	24,384	4,724	1,215,898	572,481	152,711	488,768	115,515
Fabricated metal products, except machinery and transportation equipment	215	10,928,179	958,975	71,123	2,206	37,253	574	936,886	444,833	61,135	167,077	67,482
Machinery, except electrical	371	48,640,653	4,893,841	674,444	5,538	464,010	9,920	4,851,102	2,319,396	680,557	1,672,418	672,954
Electrical equipment and supplies	177	44,028,780	3,203,029	201,298	11,018	108,685	50,260	3,099,378	1,450,960	197,668	708,874	201,165
Motor vehicles and equipment	72	59,032,740	6,183,911	356,113	1,702	292,133	47,120	6,155,206	2,954,796	345,802	757,717	357,248
Transportation equipment, except motor vehicles	74	20,184,405	827,465	24,603	406	12,966	19,559	806,976	381,374	31,992	178,856	23,252
Scientific instruments, photographic equipment, watches and clocks	101	9,944,542	1,443,513	138,609	2,919	99,673	37,441	1,433,518	684,188	137,805	352,577	140,174
Miscellaneous manufactured products, and manufacturing not allocable	120	3,839,357	362,233	13,040	1,700	7,683	4,601	357,456	169,527	14,916	51,996	14,598
Transportation, communication, electric, gas, and sanitary services	111	130,088,947	4,128,256	48,751	4,648	25,159	2,076	3,971,443	1,901,239	51,527	213,150	36,593
Transportation	82	29,762,991	627,970	24,511	1,301	9,308	407	557,727	267,559	17,150	82,831	16,093
Water transportation	17	771,521	35,877	4,924	1,086	304	2	33,201	14,812	1,204	4,761	2,383
Other transportation	65	28,991,470	592,094	19,587	215	9,004	405	524,527	252,747	15,946	78,070	13,710
Communication	12	77,020,083	2,960,963	20,379	218	13,766	1,184	2,892,410	1,392,219	26,545	112,662	17,557
Electric, gas, and sanitary services	17	23,305,873	539,323	3,861	3,329	2,086	485	521,306	241,461	7,832	17,656	2,942
Wholesale and retail trade ²	629	44,066,647	2,370,963	191,173	622	60,167	10,659	2,292,272	1,081,026	193,939	492,118	159,058
Wholesale trade	523	17,970,449	874,894	123,874	374	18,895	10,438	838,656	393,464	127,029	335,929	92,478
Groceries and related products	33	1,578,103	141,972	3,444	186	1,032	101	137,033	63,620	3,631	11,015	3,031
Machinery, equipment, and supplies	96	980,565	97,785	2,448	2	1,230	1,504	95,809	45,488	3,057	14,144	2,384
Miscellaneous wholesale trade	394	15,411,781	635,137	117,981	187	16,634	8,833	605,815	284,356	120,341	310,770	87,063
Drugs, chemicals, and allied products	40	4,153,069	135,774	28,658	128	567	—	130,800	62,666	53,834	126,726	1,386
Petroleum and petroleum products	22	1,185,263	88,382	73,837	—	11,608	—	87,750	42,006	40,002	89,496	72,260
Other miscellaneous wholesale trade	332	10,073,448	410,981	55,486	59	4,459	8,833	387,265	179,684	26,505	94,548	13,416
Retail trade	105	25,018,767	1,474,827	67,300	248	41,271	212	1,434,610	680,318	66,896	156,095	66,579
Building materials, hardware, and farm equipment	3	552,724	21,638	11	—	6	—	20,979	8,717	26	133	5
General merchandise stores	24	20,325,744	1,180,078	64,003	118	40,463	—	1,146,221	545,341	55,980	129,152	63,859
Food stores	6	1,939,080	157,252	821	—	376	—	156,586	74,630	1,352	3,611	618
Automotive dealers and service stations	24	435,721	16,101	191	—	(P)	12	15,713	7,040	6,326	14,157	—
Eating and drinking places	34	1,038,702	67,465	1,327	130	296	—	66,018	30,803	1,351	4,296	1,154
Miscellaneous retail stores	15	726,796	32,294	947	—	130	200	29,093	13,786	1,861	4,746	943
Finance, insurance, and real estate	1,760	721,878,599	6,878,627	115,657	5,528	55,562	145	6,126,969	2,833,261	392,839	1,626,491	96,088
Banking	201	429,265,920	1,342,946	35,188	1,231	16,286	—	1,302,733	603,188	220,326	1,024,962	29,956
Credit agencies other than banks	82	14,718,131	171,651	9,654	620	8,359	123	162,259	78,143	19,819	61,054	9,810
Security and commodity brokers, dealers, exchanges, and services	41	8,775,711	237,201	8,548	—	2,114	—	231,510	107,341	3,612	18,250	7,438
Holding and other investment companies	672	4,587,456	346,931	35,351	1,935	17,946	22	267,796	95,546	24,850	61,704	33,205
Insurance carriers	259	262,564,341	4,659,466	24,163	1,455	9,250	—	4,053,331	1,899,563	121,648	451,673	13,715
Insurance agents, brokers, and service	72	600,115	75,507	1,805	180	1,568	—	71,921	34,235	2,119	5,676	1,749
Real estate	433	1,366,926	44,925	949	108	59	—	37,418	15,245	466	3,173	214
Services	397	9,171,478	607,737	26,292	1,798	16,890	87	586,820	271,679	31,025	118,353	26,849
Hotels and other lodging places	17	1,580,834	77,353	576	—	244	—	73,559	35,033	943	3,318	300
Personal services	6	488,747	46,342	1,534	—	1,258	—	45,802	21,951	1,650	3,641	1,531
Business services	158	3,428,630	282,328	12,944	250	7,764	—	272,427	127,778	12,885	35,600	12,526
Automobile services, and miscellaneous repair services	25	245,688	2,430	(P)	—	—	—	2,320	997	(P)	—	—
Amusement and recreation services	68	2,405,370	95,068	9,173	1,548	6,476	—	95,249	42,903	10,050	52,425	10,630
Other services	123	1,022,209	104,216	2,065	—	1,148	87	97,564	43,017	5,488	23,365	1,862
Nature of business not allocable	15	1,699	2,220	—	—	—	—	2,220	1,028	283	1,817	—

Footnote at end of table.

Foreign Tax Credit on Corporation Returns, 1972

RETURNS WITH FOREIGN TAX CREDIT

Table 18.—Total Assets, Income, Tax, and Credits, and Foreign Income, Taxes, and Credit, by Major Industry—Continued

(All figures are estimates based on samples—money amounts are in thousands of dollars)

Major Industry	Returns with Form 1118 statements filed in support of credit claimed—Continued												
	Foreign income and taxes of domestic corporations reported on Form 1118—Continued												
	Taxable income—Continued		Foreign taxes					Foreign tax credit computed				Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
	Dividends received from DISCs	Interest for which separate credit was computed	Total	Paid or accrued		Deemed paid		Carryover	Total	For taxes on—			
Total				On interest for which separate credit was computed	Total	On DISC dividends	DISC dividends			Interest for which separate credit was computed			
	(24)	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)	(33)	(34)	(35)	(36)
All industries	873	103,466	10,680,701	6,535,979	5,300	2,392,636	81	1,752,086	6,616,507	81	5,383	737,438	29,209
Agriculture, forestry, and fishery			357	327		30			295				
Mining		1,029	2,739,478	2,050,371	126	16,318		663,885	1,442,140		126	32,368	
Food and kindred products		974	55,814	28,175	118	8,799		19,841	29,996		118	32,328	
Metal mining			23,655	8,198		7,814		6,642	16,417			40	
Coal mining			2,644,524	2,010,342	8	2,561		631,621	1,303,537		8		
Crude petroleum and natural gas			15,482	2,554		146		12,781	5,186				
Nonmetallic minerals (except fuels) mining													
Contract construction		245	30,850	13,289		13,839		3,822	23,806			1,100	(*)
Manufacturing	873	88,970	7,015,881	3,878,374	3,348	2,170,202	81	969,305	4,478,928	81	3,297	597,660	20,354
Food and kindred products		3,668	254,093	89,741	232	151,126		13,227	244,838		232	19,796	457
Tobacco manufacturers		2	33,121	26,214	(9)	6,908			30,053		(9)	3,183	
Textile mill products		373	14,718	4,632	56	7,771		2,316	12,542		56	4,231	2,826
Apparel and other fabricated textile products		47	7,482	4,484	15	2,496		483	7,238		15		
Lumber and wood products, except furniture		901	7,105	2,891	198	2,328		1,866	6,426		198	710	
Furniture and fixtures			1,223	451		419		353	861				
Paper and allied products		1,303	82,224	16,330	37	48,788		17,125	71,707		37	5,540	2,277
Printing and publishing		315	24,172	7,505	58	16,556		111	23,881		58	547	
Chemicals and allied products	141	5,310	500,571	171,856	521	310,066	7	18,549	487,394	7	521	84,111	3,075
Petroleum refining and related industries		7,084	4,199,641	2,938,264	996	463,750		79,627	1,858,084		997	267,403	
Rubber and miscellaneous plastics products		47	59,669	27,936	17	30,936		797	59,089		17	2,244	528
Leather and leather products		122	1,392	748	5	114		526	1,247		5	164	
Stone, clay, and glass products		531	51,018	14,833	45	30,357		5,828	45,299		45	1,577	
Primary metal industries		2,118	228,792	118,796	142	30,983		79,013	159,671		142	51,738	8,810
Fabricated metal products, except machinery and transportation equipment		649	63,931	22,700	92	39,420		1,811	61,139		94	1,625	
Machinery, except electrical		2,320	700,722	199,069	257	482,959		18,694	680,972		257	127,397	
Electrical equipment and supplies	732	3,777	217,161	91,890	448	118,957	73	6,315	197,788	73	410	31,099	417
Motor vehicles and equipment		342	380,100	78,960	65	299,752		1,398	345,810		65	10,684	227
Transportation equipment, except motor vehicles		57,885	32,178	16,404	1	14,931		641	31,995		1	2,547	1,735
Scientific instruments, photographic equipment, watches and clocks		429	140,807	36,206	43	103,377		1,023	137,796		43	2,603	
Miscellaneous manufactured products, and manufacturing not allocable		1,747	15,983	6,384	182	8,226		1,391	14,917		182	510	
Transportation, communication, electric, gas, and sanitary services		2,541	67,259	28,150	345	26,696		11,413	51,667		345	12,851	580
Transportation		313	27,991	10,795	33	10,016		7,191	17,194		33	10,585	580
Water transportation		138	1,897	680	14	898		319	1,206		14	335	
Other transportation		775	26,295	10,115	19	9,318		6,862	15,979		19	10,051	590
Communication		1,627	26,591	11,781	312	14,475		336	26,544		312	1,725	
Electric, gas, and sanitary services			12,677	6,574		2,206		3,897	7,833			541	
Wholesale and retail trade ^a		4,076	353,021	216,329	738	84,278		52,415	194,688		738	11,166	1,157
Wholesale trade		3,514	271,289	186,122	651	36,983		46,194	127,558		651	3,228	
Groceries and related products		912	5,891	2,033	293	1,883		2,175	3,625		293	436	
Machinery, equipment, and supplies		131	3,355	1,856	9	1,275		224	3,059		9	14	
Miscellaneous wholesale trade		2,470	262,043	182,232	348	36,025		43,795	120,874		345	3,214	
Drugs, chemicals, and allied products		4	152,969	151,373	1	898			54,365		1		
Petroleum and petroleum products			69,878	5,503		28,554		35,820	40,000			235	
Other miscellaneous wholesale trade		2,466	39,197	25,357	348	6,773		7,067	26,508		344	2,979	
Retail trade		562	81,718	30,192	87	45,295		6,231	67,116		87	7,938	1,157
Building materials, hardware, and farm equipment			28	21		6		1	26				
General merchandise stores		322	62,567	12,985	48	44,041		5,541	56,200		48	7,310	1,021
Food stores		224	1,737	867	34	376		494	1,351		34	580	136
Automotive dealers and service stations			14,014	14,009				5	6,331				
Eating and drinking places		16	1,369	885	5	428		57	1,348		5		
Miscellaneous retail stores			2,003	1,425		444		134	1,861			48	
Finance, insurance, and real estate		6,378	430,818	333,411	674	59,846		37,562	393,788		696	79,049	7,108
Banking			228,344	199,345		18,613		10,986	221,200			31,322	2,885
Credit agencies other than banks		293	20,217	10,674	76	8,359		1,185	19,832		76	10,869	
Security and commodity brokers, dealers, exchanges, and services		3	3,862	1,090	1	2,288		483	3,612		1	108	2
Holding and other investment companies		740	39,947	7,326	50	19,454		13,167	24,939		50	36,086	4,222
Insurance carriers		4,766	135,586	112,810	473	9,445		12,331	121,768		494		
Insurance agents, brokers, and service		71	2,118	491	9	1,827		1	2,117		9	63	
Real estate		504	744	675	66	59		10	481		67		
Services		227	42,781	16,552	70	18,326		7,883	31,043		69	3,243	
Hotels and other lodging places		6	1,045	801	1	244			944		1		
Personal services		7	1,907	649	3	1,258			1,650		3	250	
Business services		185	16,633	5,593	61	8,262		2,778	12,874		61	2,765	
Automobile services, and miscellaneous repair services			1	1					1				
Amusement and recreation services		29	12,762	4,775		7,406		600	10,063			229	
Other services			10,993	4,733	4	1,156		4,505	5,512		4		
Nature of business not allocable			278	278									

^aIncludes the "gross-up" of certain foreign dividends.

^bIncludes "Wholesale and retail trade not allocable" which is not shown separately.

^cLess than \$500 per return.

NOTE: See text for explanatory statements and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

RETURNS WITH FOREIGN TAX CREDIT CLAIMED

Table 19.—Number of Returns for Selected Items, by Selected Major Industry

[All figures are estimates based on samples]

Selected major industry	Returns with and without Form 1118 statements filed in support of credit claimed			Returns with Form 1118 statements filed in support of credit claimed						
	Total number of returns	Dividends received from foreign corporations	Foreign dividend income resulting from foreign taxes deemed paid	Total number of returns	Dividends received from foreign corporations	Foreign dividend income resulting from foreign taxes deemed paid	Foreign income and taxes of domestic corporation reported on Form 1118			
							Dividends from related foreign corporations	Foreign taxes		
								Paid or accrued	Deemed paid	Carryover
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	
All industries	6,412	2,407	1,067	5,497	2,273	1,028	1,031	5,401	1,034	778
Mining	126	47	10	126	47	10	11	126	11	26
Metal mining	15	7	3	15	7	3	4	15	4	7
Crude petroleum and natural gas	73	32	5	73	32	5	5	73	5	15
Contract construction	166	40	11	75	40	11	14	71	14	19
Manufacturing	2,544	897	718	2,344	870	701	744	2,314	746	314
Food and kindred products	155	62	53	153	61	53	55	152	56	21
Tobacco manufactures	8	7	7	8	7	7	7	8	7	—
Textile mill products	82	42	21	80	42	21	24	80	24	14
Apparel and other fabricated textile products	166	28	23	126	28	23	24	111	24	9
Lumber and wood products, except furniture	24	7	3	24	7	3	4	24	4	4
Furniture and fixtures	24	4	3	24	4	3	3	24	3	4
Paper and allied products	75	33	27	75	33	27	27	75	27	12
Printing and publishing	118	38	30	117	38	30	31	117	31	9
Chemicals and allied products	317	131	120	308	127	116	126	307	126	39
Petroleum refining and related industries	28	20	15	28	20	15	16	28	16	12
Rubber and miscellaneous plastics products	132	37	33	75	30	26	28	75	28	15
Leather and leather products	28	4	4	28	4	4	4	28	4	4
Stone, clay, and glass products	69	34	16	68	34	16	20	67	20	19
Primary metal industries	102	39	28	101	39	28	32	100	32	14
Fabricated metal products, except machinery and transportation equipment	220	47	36	215	46	36	38	214	38	19
Machinery, except electrical	398	125	119	371	122	117	121	367	121	42
Electrical equipment and supplies	182	74	74	177	73	73	71	172	72	27
Motor vehicles and equipment	72	33	24	72	33	24	28	71	28	7
Transportation equipment, except motor vehicles	77	17	17	74	16	16	17	74	17	9
Scientific instruments, photographic equipment, watches and clocks	111	64	43	101	54	41	42	101	42	18
Miscellaneous manufactured products, and manufacturing not allocable	135	52	22	120	52	22	26	120	26	18
Transportation, communication, electric, gas, and sanitary services	142	54	32	111	51	32	36	111	36	28
Transportation	112	37	21	82	36	21	23	82	23	21
Other transportation	95	24	19	95	23	19	20	95	20	18
Electric, gas, and sanitary services	19	9	4	17	7	4	5	17	5	6
Wholesale and retail trade	893	267	82	629	234	67	88	614	88	65
Wholesale trade	571	207	59	523	189	44	73	510	73	54
Groceries and related products	35	15	3	33	15	3	19	26	19	12
Machinery, equipment, and supplies	96	23	11	96	23	11	11	95	11	8
Miscellaneous wholesale trade	440	169	45	394	151	30	43	389	43	34
Other miscellaneous wholesale trade	378	155	43	332	137	28	33	328	33	22
Retail trade	320	60	23	105	46	23	15	103	15	11
Finance, insurance, and real estate	1,973	960	159	1,760	898	151	81	1,721	81	155
Banking	212	47	20	201	45	20	21	201	21	20
Credit agencies other than banks	98	20	18	82	20	18	8	82	8	5
Security and commodity brokers, dealers, exchanges, and services	41	30	7	41	30	7	6	41	6	6
Holding and other investment companies	808	460	42	672	425	35	25	664	25	52
Insurance carriers	271	93	13	259	92	13	11	255	11	32
Real estate	472	305	57	433	282	56	8	407	8	39
Services	510	130	55	397	121	55	56	388	57	170
Business services	221	49	25	158	49	25	32	150	33	78
Automobile services, and miscellaneous repair services	35	33	—	25	24	—	—	25	—	—
Amusement and recreation services	72	6	6	68	6	6	6	66	6	3
Other services	140	28	14	123	28	14	15	123	15	89
Nature of business not allocable	15	—	—	15	—	—	—	15	—	—

NOTE: See text for explanatory statements and for "Description of the Sample and Limitations of the Data."

Foreign Tax Credit on Corporation Returns, 1972

RETURNS WITH FOREIGN TAX CREDIT

Table 20.—Total Assets, Income, Tax, and Credits, and Foreign income, Taxes, and Credit, by Size of Total Assets

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

Size of total assets	Returns with and without Form 1118 statements filed in support of credit claimed										
	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Dividends received from DISCs	Income subject to U. S. tax	U. S. income tax before credits	Foreign tax credit claimed	Investment credit
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
Total	6,412	1,425,852,439	56,657,256	4,442,247	74,431	1,916,716	268,133	53,497,714	25,355,878	6,315,317	1,715,588
Zero assets	69	—	171,090	6,864	219	4,752	15	149,440	66,172	13,597	10,159
\$1 under \$50,000	469	14,016	3,007	—	—	—	—	2,956	794	126	(?)
\$50,000 under \$100,000	151	10,023	1,785	(?)	—	—	—	1,685	479	102	(?)
\$100,000 under \$250,000	550	86,771	9,545	1,607	—	275	—	7,770	2,576	728	51
\$250,000 under \$500,000	487	179,778	22,556	1,650	—	313	—	14,088	4,653	1,357	63
\$500,000 under \$1,000,000	473	340,550	34,912	752	72	(?)	—	30,467	12,764	1,207	879
\$1,000,000 under \$5,000,000	1,434	3,427,914	420,597	15,131	828	4,825	1,180	392,247	174,580	20,214	4,749
\$5,000,000 under \$10,000,000	492	3,455,738	420,215	15,201	126	7,702	441	393,610	180,007	18,935	5,113
\$10,000,000 under \$25,000,000	577	9,282,892	972,930	29,698	2,272	17,366	3,118	918,155	429,452	42,721	16,094
\$25,000,000 under \$50,000,000	348	12,514,513	1,232,402	37,668	2,431	22,336	4,048	1,187,252	559,539	51,033	25,409
\$50,000,000 under \$100,000,000	302	21,046,608	1,730,678	76,718	8,422	49,050	3,809	1,676,852	793,389	83,229	35,813
\$100,000,000 under \$250,000,000	404	65,726,220	4,722,158	269,697	14,070	162,564	19,294	4,522,225	2,108,006	266,243	111,400
\$250,000,000 under \$500,000,000	193	67,267,772	4,218,553	207,413	6,414	115,995	26,509	4,015,720	1,881,211	228,104	124,247
\$500,000,000 under \$1,000,000,000	184	131,689,382	6,405,809	492,915	10,461	286,780	37,134	6,164,713	2,897,334	514,806	188,294
\$1,000,000,000 or more	278	1,110,820,262	36,291,020	3,286,934	29,116	1,244,758	172,584	34,020,535	16,244,893	5,072,918	1,193,317

Size of total assets	Returns with Form 1118 statements filed in support of credit claimed											
	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Dividends received from DISCs	Income subject to U. S. tax	U. S. income tax before credits	Foreign tax credit claimed	Foreign income and taxes of domestic corporations reported on Form 1118	
											Total (less loss) ¹	Dividends from related foreign corporations
	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)
Total	5,497	1,407,096,996	56,149,288	4,434,803	73,450	1,913,268	265,676	53,028,432	25,135,819	6,306,232	16,486,388	4,200,434
Zero assets	66	—	167,502	5,375	—	3,733	15	145,853	64,404	13,458	49,755	5,319
\$1 under \$50,000	127	3,966	1,967	—	—	—	—	1,916	604	75	893	—
\$50,000 under \$100,000	126	8,426	1,710	(?)	—	—	—	1,610	454	102	1,597	—
\$100,000 under \$250,000	429	70,328	8,634	1,607	—	275	—	6,859	2,348	703	4,285	1,556
\$250,000 under \$500,000	299	111,295	13,593	41	—	—	—	8,568	2,735	575	2,451	—
\$500,000 under \$1,000,000	428	309,275	32,729	707	72	(?)	—	28,284	11,903	1,080	5,631	—
\$1,000,000 under \$5,000,000	1,341	3,258,796	406,603	14,634	828	4,510	1,180	380,746	169,537	18,904	72,288	11,573
\$5,000,000 under \$10,000,000	470	3,296,351	404,529	15,153	126	7,702	441	378,097	172,826	18,589	58,737	10,301
\$10,000,000 under \$25,000,000	557	8,958,303	943,213	28,967	2,272	16,858	3,013	889,099	415,746	42,231	134,008	26,144
\$25,000,000 under \$50,000,000	335	12,066,213	1,202,981	37,606	2,431	22,310	4,048	1,158,517	545,751	50,465	153,732	33,723
\$50,000,000 under \$100,000,000	293	20,398,197	1,710,977	76,455	7,704	48,879	3,283	1,657,460	784,143	82,862	234,751	80,791
\$100,000,000 under \$250,000,000	387	63,169,822	4,597,925	267,545	14,027	161,469	18,250	4,416,069	2,060,312	263,538	752,610	255,222
\$250,000,000 under \$500,000,000	188	65,623,272	4,102,673	207,278	6,414	115,995	25,727	3,907,695	1,829,872	227,895	729,344	185,954
\$500,000,000 under \$1,000,000,000	177	126,884,237	6,310,000	492,503	10,461	286,780	37,134	6,073,290	2,854,093	513,388	1,462,970	483,358
\$1,000,000,000 or more	275	1,102,937,515	36,244,253	3,286,934	29,115	1,244,758	172,584	33,974,360	16,221,090	5,072,329	12,823,336	3,106,493

Size of total assets	Returns with Form 1118 statements filed in support of credit claimed—Continued													
	Foreign income and taxes of domestic corporations reported on Form 1118—Continued													
	Taxable income—Cont.		Foreign taxes						Foreign tax credit computed				Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
	Dividends received from DISCs	Interest for which separate credit was computed	Paid or accrued		Deemed paid		For taxes on							
(24)	(25)	Total	Total	On interest for which separate credit was computed	Total	On DISC dividends	Carryover	Total	DISC dividends	Interest for which separate credit was computed	(35)	(36)		
Total	873	103,466	10,680,701	6,535,979	5,300	2,392,636	81	1,752,086	6,616,507	81	5,363	737,438	29,209	
Zero assets	—	133	16,108	8,303	19	3,733	—	4,072	13,460	—	19	118	—	
\$1 under \$50,000	—	—	95	95	—	—	—	—	95	—	—	—	—	
\$50,000 under \$100,000	—	—	89	52	—	—	—	37	85	—	—	—	—	
\$100,000 under \$250,000	—	—	721	429	—	275	—	17	684	—	—	—	—	
\$250,000 under \$500,000	—	—	1,123	819	4	—	—	304	626	—	—	—	—	
\$500,000 under \$1,000,000	—	—	2,211	1,516	5	—	—	695	1,123	—	5	—	—	
\$1,000,000 under \$5,000,000	—	—	30,926	15,372	65	5,834	—	9,720	19,177	—	85	4	—	
\$5,000,000 under \$10,000,000	—	—	27,818	11,283	221	7,796	—	8,739	18,606	—	222	180	—	
\$10,000,000 under \$25,000,000	—	—	47,958	24,270	141	17,734	—	5,954	42,551	—	135	1,243	—	
\$25,000,000 under \$50,000,000	732	1,666	62,421	28,261	238	24,520	73	9,641	50,612	73	243	2,107	1,735	
\$50,000,000 under \$100,000,000	—	—	106,203	34,139	204	51,286	—	20,778	83,006	—	158	29,404	2	
\$100,000,000 under \$250,000,000	—	—	296,383	95,072	364	176,800	—	24,511	263,921	—	375	43,986	4,679	
\$250,000,000 under \$500,000,000	—	—	290,991	136,957	634	126,785	—	27,249	227,880	—	631	68,548	8,947	
\$500,000,000 under \$1,000,000,000	—	—	564,062	193,153	1,112	312,647	7	58,262	514,406	7	1,255	38,919	5,518	
\$1,000,000,000 or more	141	82,826	9,233,590	5,986,257	2,273	1,665,227	—	1,582,107	5,380,275	—	2,232	552,929	8,328	

¹Includes the "gross-up" of certain foreign dividends.
²Less than \$500 per return.
 NOTE: See text for explanatory statements and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

Foreign Tax Credit on Corporation Returns, 1972

RETURNS WITH FOREIGN TAX CREDIT

Table 21.—Total Assets, Income, Tax, and Credits, and Foreign Income, Taxes, and Credit, by Size of Net Income

(All figures are estimates based on samples—money amounts are in thousands of dollars)

Size of net income	Returns with and without Form 1118 statements filed in support of credit claimed										
	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Dividends received from DISCs	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed	Investment credit
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
Total	6,412	1,425,852,439	56,657,256	4,442,247	74,431	1,916,716	268,133	53,497,714	25,355,878	6,315,317	1,715,588
Returns with net income, total.....	6,316	1,425,845,728	56,657,256	4,442,247	74,431	1,916,716	268,133	53,497,714	25,355,878	6,315,317	1,715,588
Under \$10,000.....	906	303,106	4,478	1,060	133	92	—	3,486	867	193	26
\$10,000 under \$15,000.....	107	167,711	1,296	—	—	—	—	1,261	306	123	25
\$15,000 under \$20,000.....	299	211,038	4,984	1,706	—	(?)	—	4,461	1,085	235	37
\$20,000 under \$25,000.....	192	958,044	4,294	101	128	—	—	3,390	879	268	62
\$25,000 under \$50,000.....	588	888,968	20,825	332	—	(?)	—	15,540	4,503	539	366
\$50,000 under \$100,000.....	392	1,019,106	28,703	2,340	151	442	74	22,262	8,608	1,828	571
\$100,000 under \$250,000.....	570	6,747,117	93,449	3,610	490	1,156	782	82,452	35,727	6,359	2,257
\$250,000 under \$500,000.....	580	9,835,254	205,194	6,477	371	2,898	227	179,021	80,740	10,633	4,793
\$500,000 under \$1,000,000.....	562	25,508,482	399,321	16,586	800	6,194	1,047	372,010	171,142	18,631	8,362
\$1,000,000 under \$5,000,000.....	1,065	132,809,611	2,500,780	98,007	8,572	44,223	12,146	2,336,850	1,085,415	124,613	68,897
\$5,000,000 under \$10,000,000.....	350	103,663,311	2,469,792	100,868	9,204	56,549	19,356	2,310,102	1,078,115	129,004	81,033
\$10,000,000 under \$25,000,000.....	358	247,789,113	5,630,932	291,559	17,173	135,505	27,358	5,314,787	2,498,135	308,975	210,214
\$25,000,000 under \$50,000,000.....	157	146,975,996	5,568,953	379,811	10,556	245,108	31,886	5,272,305	2,452,887	444,590	211,773
\$50,000,000 under \$100,000,000.....	105	233,319,083	7,408,873	500,553	11,669	223,265	37,706	7,064,757	3,330,945	637,952	237,777
\$100,000,000 under \$250,000,000.....	60	234,368,092	8,830,334	561,796	9,291	219,751	34,309	8,585,136	4,031,489	842,525	398,271
\$250,000,000 or more.....	25	281,281,697	23,485,138	2,477,441	5,894	981,533	103,242	21,929,896	10,575,034	3,788,850	551,725
Returns without net income.....	96	6,711	—	—	—	—	—	(?)	(?)	(?)	(?)

Size of net income	Returns with Form 1118 filed in support of credit claimed											
	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Dividends received from DISCs	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed	Foreign income and taxes of domestic corporations reported on Form 1118	
											Total (less loss) ¹	Dividends from related foreign corporations
	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)
Total	5,497	1,407,096,996	56,149,288	4,434,803	73,450	1,913,268	265,676	53,028,432	25,135,819	6,306,232	16,486,388	4,200,434
Returns with net income, total.....	5,497	1,407,096,996	56,149,288	4,434,803	73,450	1,913,268	265,676	53,028,432	25,135,819	6,306,232	16,486,388	4,200,434
Under \$10,000.....	489	225,346	2,837	1,060	133	92	—	1,849	501	86	273	287
\$10,000 under \$15,000.....	107	167,711	1,296	—	—	—	—	1,261	306	123	577	—
\$15,000 under \$20,000.....	275	193,643	4,574	1,706	—	(?)	—	4,050	1,004	226	2,589	—
\$20,000 under \$25,000.....	131	927,692	2,950	41	128	—	—	2,416	598	111	3,473	130
\$25,000 under \$50,000.....	470	799,078	16,647	326	—	(?)	—	11,983	3,515	446	3,340	—
\$50,000 under \$100,000.....	347	869,228	25,347	699	151	129	74	19,989	7,659	1,468	10,196	486
\$100,000 under \$250,000.....	519	6,623,068	86,414	3,543	490	1,156	782	76,851	33,316	6,123	26,062	3,163
\$250,000 under \$500,000.....	553	9,630,152	194,841	6,087	371	2,582	227	171,887	77,537	9,720	49,419	5,486
\$500,000 under \$1,000,000.....	550	25,284,742	390,387	15,949	800	6,194	1,047	363,607	167,140	18,226	73,327	13,427
\$1,000,000 under \$5,000,000.....	1,027	123,986,461	2,410,020	96,057	7,630	42,972	11,685	2,250,652	1,044,046	121,762	481,429	84,023
\$5,000,000 under \$10,000,000.....	337	100,535,724	2,375,022	99,101	9,165	55,541	18,622	2,231,210	1,040,560	126,495	480,956	99,864
\$10,000,000 under \$25,000,000.....	349	244,754,877	5,497,858	291,174	17,173	135,418	26,878	5,192,534	2,442,823	308,194	1,158,795	239,491
\$25,000,000 under \$50,000,000.....	153	144,130,404	5,416,749	379,271	10,556	245,108	31,104	5,120,553	2,379,346	443,924	1,266,661	366,989
\$50,000,000 under \$100,000,000.....	105	233,319,083	7,408,873	500,553	11,669	223,265	37,706	7,064,757	3,330,945	637,952	1,716,060	463,458
\$100,000,000 under \$250,000,000.....	60	234,368,092	8,830,334	561,796	9,291	219,751	34,309	8,585,136	4,031,489	842,525	2,428,352	482,400
\$250,000,000 or more.....	25	281,281,697	23,485,138	2,477,441	5,894	981,533	103,242	21,929,896	10,575,034	3,788,850	8,782,180	2,441,230
Returns without net income.....	—	—	—	—	—	—	—	—	—	—	—	—

Size of net income	Returns with Form 1118 statements filed in support of credit claimed—Continued												
	Foreign income and taxes of domestic corporations reported on Form 1118—Continued												
	Taxable income—Cont.		Foreign taxes					Foreign tax credit computed				Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
	Dividends received from DISCs	Interest for which separate credit was computed	Total	Paid or accrued		Deemed paid		Carryover	For taxes on				
(24)	(25)	(26)	Total	On interest for which separate credit was computed	Total	On DISC dividends	Total		DISC dividends	Interest for which separate credit was computed	(35)	(36)	
Total	873	103,466	10,680,701	6,535,979	5,300	2,392,636	81	1,752,086	6,616,507	81	5,363	737,438	29,209
Returns with net income, total.....	873	103,466	10,680,701	6,535,979	5,300	2,392,636	81	1,752,086	6,616,507	81	5,363	737,438	29,209
Under \$10,000.....	—	—	1,231	354	—	120	—	757	144	—	—	—	—
\$10,000 under \$15,000.....	16	137	120	5	—	—	—	17	107	—	—	—	—
\$15,000 under \$20,000.....	12	338	264	1	—	—	—	74	217	—	5	—	
\$20,000 under \$25,000.....	—	252	248	—	—	4	—	—	110	—	1	—	
\$25,000 under \$50,000.....	101	1,690	697	14	—	—	—	992	479	—	14	—	
\$50,000 under \$100,000.....	804	6,846	2,733	66	—	131	—	3,982	1,532	—	66	—	
\$100,000 under \$250,000.....	307	8,544	5,628	77	—	1,225	—	1,791	6,769	—	76	5	
\$250,000 under \$500,000.....	841	13,389	8,073	151	—	2,820	—	2,496	9,713	—	153	33	
\$500,000 under \$1,000,000.....	431	24,618	11,608	31	—	7,161	—	5,849	18,604	—	31	118	
\$1,000,000 under \$5,000,000.....	1,944	167,369	81,002	428	—	49,318	—	37,049	122,389	—	376	6,987	
\$5,000,000 under \$10,000,000.....	732	183,599	86,964	363	—	63,123	73	33,512	126,616	73	377	28,417	
\$10,000,000 under \$25,000,000.....	—	6,653	381,692	178,471	—	736	—	50,738	315,749	—	732	120,734	
\$25,000,000 under \$50,000,000.....	—	7,412	505,638	180,459	—	842	—	64,909	444,429	—	842	73,695	
\$50,000,000 under \$100,000,000.....	141	66,892	804,625	438,744	—	1,025	—	106,296	642,721	—	1,168	37,822	
\$100,000,000 under \$250,000,000.....	—	12,287	1,586,247	909,927	—	1,186	—	413,717	848,823	—	1,186	50,039	
\$250,000,000 or more.....	—	3,129	6,994,385	4,630,686	—	376	—	1,029,907	4,078,106	—	334	409,587	
Returns without net income.....	—	—	—	—	—	—	—	—	—	—	—	—	

¹Includes the "gross-up" of certain foreign dividends.

²Less than \$500 per return.

NOTE: See text for explanatory statements and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

Foreign Tax Credit on Corporation Returns, 1972

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 23.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends

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

Geographic area, subarea, country and DISC dividends	Number of returns	Total assets	Income and taxes of domestic corporations from all sources									Income and taxes of domestic corporations from all foreign sources reported on Form 1118	
			Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Dividends received from DISCs	Western Hemisphere Trade Corporation deduction	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed	Taxable income	
												Total (less loss) ¹	Dividends from related foreign corporations and from DISCs
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	
All geographic areas and DISC dividends	5,497	1,407,096,996	56,149,288	4,434,803	73,450	1,913,268	265,676	304,800	53,028,432	25,135,819	6,306,232	16,486,388	4,201,306
Canada	3,298	1,243,984,480	48,752,795	4,249,415	67,880	1,860,852	248,798	276,521	45,845,595	21,732,724	4,713,432	12,922,707	4,027,961
Latin America, total	1,498	1,084,257,264	40,984,416	4,167,875	62,024	1,776,960	246,786	294,206	38,529,660	18,295,350	4,529,517	12,484,378	3,946,798
Mexico	1,031	926,177,372	36,217,952	3,974,965	55,138	1,710,213	209,776	242,278	34,100,276	16,212,971	3,917,697	10,894,802	3,769,966
Central America, total	338	636,758,075	28,065,456	3,375,947	41,599	1,381,265	161,438	228,632	26,145,653	12,404,441	3,265,817	9,008,977	3,239,484
Costa Rica	119	368,523,651	16,343,171	2,068,566	16,291	862,720	99,107	148,522	14,958,554	7,149,913	1,976,835	5,549,275	2,033,165
El Salvador	65	200,023,690	13,307,264	1,792,306	8,616	706,579	99,494	128,487	12,035,950	5,808,498	1,589,642	4,445,712	1,758,023
Guatemala	121	375,217,669	17,896,821	2,270,088	18,899	1,023,445	108,718	142,693	16,542,512	7,908,731	2,180,400	5,925,481	2,232,459
Honduras	69	286,878,105	10,084,209	1,475,870	5,068	577,796	38,057	118,209	9,114,346	4,379,827	1,464,608	4,110,296	1,459,078
Nicaragua	74	288,167,411	14,502,272	1,860,552	9,503	741,140	75,549	136,721	13,788,787	6,351,112	1,134,218	4,707,402	1,839,404
Panama, excluding Canal Zone	206	536,024,674	20,940,834	2,930,765	36,894	1,112,818	99,682	194,080	19,129,657	9,998,751	2,819,452	7,642,384	2,832,754
Not allocable	8	5,992,188	413,556	5,711	1,121	5,781	952	1,486	397,668	188,663	12,994	62,261	5,792
Caribbean countries, total	200	538,808,214	22,423,743	2,778,347	25,980	1,092,987	115,095	185,294	20,717,376	9,876,045	2,719,601	7,516,279	2,670,530
Dominican Republic	77	317,090,724	11,283,026	1,647,689	18,644	673,933	40,706	81,895	10,215,569	4,832,597	1,663,541	4,596,142	1,596,976
Haiti	21	113,415,222	6,580,218	1,262,836	4,728	443,138	1,792	126,480	5,617,001	2,687,133	1,134,218	3,148,622	1,217,265
Jamaica	112	325,580,099	19,074,682	2,550,959	16,882	995,702	105,602	157,350	17,485,841	8,353,506	3,357,566	6,451,879	2,479,463
Trinidad	92	287,743,521	11,984,241	1,768,457	7,547	585,162	54,425	138,202	10,814,906	5,210,623	1,750,136	4,755,323	1,727,198
Other	26	177,709,990	7,725,271	637,663	2,679	463,681	38,961	6,172	7,615,820	3,639,307	769,386	1,978,558	635,128
South America, total	946	905,698,676	36,577,708	3,982,038	54,938	1,678,923	235,937	283,755	34,354,100	16,357,038	4,332,658	11,823,117	3,778,266
Argentina	388	717,820,067	28,008,872	3,468,697	38,938	1,451,655	189,372	222,092	26,115,680	12,478,018	3,440,038	9,447,007	3,330,470
Bolivia	54	248,667,634	11,211,383	995,739	8,048	593,133	58,899	40,259	10,904,757	5,213,568	1,309,536	3,422,441	981,469
Brazil	467	727,647,615	28,854,375	3,284,040	45,656	1,459,528	203,369	206,996	27,249,781	12,957,302	3,358,143	9,003,373	3,138,963
Chile	120	377,063,267	18,073,237	2,381,121	15,714	963,619	113,891	147,380	16,801,648	8,013,125	2,352,271	6,039,864	2,327,720
Colombia	293	561,570,061	24,935,815	3,172,230	26,477	1,300,995	160,047	215,369	23,153,017	11,058,403	3,367,157	9,059,662	3,062,858
Ecuador	111	314,848,480	13,231,811	1,827,875	17,438	675,695	66,249	141,277	12,328,768	5,894,610	2,092,922	5,424,965	1,784,577
Paraguay	32	184,888,788	9,622,542	1,152,962	302	579,813	43,274	108,159	8,898,596	4,261,612	1,216,987	2,989,579	1,142,440
Peru	251	569,911,484	25,312,769	3,036,639	28,304	1,337,867	160,312	205,180	20,806,715	11,366,707	3,291,956	8,524,508	2,956,169
Uruguay	85	289,206,457	15,519,744	2,031,721	7,690	899,169	105,566	116,475	14,728,123	7,041,271	2,013,359	5,126,708	1,985,144
Venezuela	495	758,749,566	30,290,291	3,499,743	41,749	1,405,215	148,647	225,809	28,297,109	13,490,439	3,825,554	10,345,436	3,359,191
Other	32	120,324,794	9,113,612	1,138,833	1,193	538,137	39,121	97,640	8,558,540	4,109,822	1,125,028	2,573,568	1,081,863
Latin American, not allocable	5	4,292,455	308,979	35,242	703	22,039	522	2,579	303,794	144,553	42,154	133,552	34,833
Other Western Hemisphere, total	704	498,625,716	19,612,437	2,421,195	40,345	1,048,517	90,333	152,833	18,555,117	8,786,347	2,611,608	6,839,072	2,359,686
The Bahamas	29	350,444,408	13,868,823	1,946,245	19,883	819,542	69,722	126,006	12,982,030	6,161,334	1,973,338	5,073,943	1,898,599
Bermuda	30	32,995,650	6,874,572	1,336,200	9,128	432,816	17,449	101,264	6,180,575	1,265,037	3,060,279	1,314,011	518,551
Netherlands Antilles	104	324,565,217	11,488,683	1,686,077	25,170	653,416	18,000	115,165	10,657,993	5,096,148	1,925,728	4,924,394	1,671,944
Other British West Indies	26	57,664,701	4,897,758	28,997	1,866	17,305	1,343	10	46,937	209,806	71,153	225,157	29,489
Other	46	167,903,668	9,917,651	1,151,793	3,058	569,985	43,761	107,813	9,375,875	4,477,815	1,178,566	739,849	1,136,261
Europe, total	1,826	1,072,851,798	43,658,732	4,221,111	64,556	1,829,078	236,736	274,230	41,131,316	19,550,777	4,669,312	12,773,492	4,002,595
Common Market countries, total	1,268	912,530,967	38,564,297	3,798,924	57,197	1,783,613	220,938	236,052	36,641,686	17,401,997	4,001,082	10,742,778	3,617,610
Belgium	309	572,052,083	25,670,574	2,910,317	30,039	1,275,169	164,265	179,057	24,217,072	11,527,681	3,076,809	8,123,235	2,815,635
France (includes Andorra)	539	713,867,163	32,515,319	3,368,837	45,044	1,529,044	201,011	210,319	30,856,358	14,642,550	3,498,222	9,360,539	3,219,338
Italy (includes San Marino)	409	568,498,376	27,832,588	3,223,292	38,041	1,432,691	198,628	200,984	26,313,888	12,486,599	3,240,041	8,596,320	3,104,615
Luxembourg	40	226,395,095	11,143,335	1,608,569	10,172	627,883	63,661	67,508	10,395,501	4,971,887	1,560,428	3,856,737	1,577,103
Netherlands	549	502,878,694	23,623,701	2,773,915	35,114	1,222,387	137,467	181,142	22,168,273	10,499,926	2,873,893	7,512,056	2,680,892
West Germany	555	619,551,518	28,665,456	3,230,949	44,073	1,551,782	188,363	187,937	27,437,951	12,983,049	3,313,628	8,803,450	3,120,890
Not allocable	5	36,639,604	703,745	28,126	—	11,036	659	2,221	686,918	329,912	40,819	139,196	27,964
Other West European countries, total	1,217	944,024,791	39,121,879	4,115,906	62,447	1,774,013	231,287	258,283	36,811,191	17,488,408	4,556,274	12,415,157	3,906,444
Austria	116	313,816,632	15,585,723	2,036,501	14,117	911,188	120,451	119,646	14,765,550	7,038,606	2,037,668	5,298,390	2,005,059
Denmark	112	207,975,212	12,837,729	1,883,611	11,768	764,407	69,302	112,009	12,046,629	5,750,361	1,796,265	4,608,286	1,855,645
Finland	80	285,311,354	15,945,318	1,971,626	6,745	892,335	106,894	109,675	15,172,757	7,261,224	1,929,224	4,818,917	1,942,498
Greece	91	369,632,465	17,195,574	2,108,782	10,177	955,437	101,350	121,031	16,395,722	7,850,842	2,180,193	5,610,377	2,081,204
Ireland	80	267,632,964	14,289,907	1,515,539	5,649	786,042	107,273	103,683	13,690,148	6,543,476	1,814,830	4,111,247	1,500,226
Liechtenstein	14	21,956,576	492,550	1,609,539	1,929	16,643	1,929	4,352	476,745	224,267	76,620	203,140	54,443
Monaco	6	5,392,025	299,801	43,294	367	18,606	543	531	258,258	112,388	40,852	129,168	38,317
Nonway	89	235,078,478	15,905,149	2,017,939	12,431	906,690	130,279	129,602	15,075,354	7,189,261	1,988,543	4,992,300	1,980,757
Portugal	101	254,248,675	16,911,391	2,065,329	9,269	893,092	113,149	135,171	16,075,578	7,688,752	2,043,444	5,063,382	1,899,711
Spain	308	568,716,593	27,110,363	3,125,604	37,689	1,284,774	177,280	177,485	25,283,338	12,049,777	3,435,620	9,267,030	3,049,960
Sweden	185	296,439,531	20,102,594	2,290,411	24,316	1,035,222	159,759	155,544	19,200,344	9,109,242	2,272,429	5,798,097	2,244,522
Switzerland	330	469,493,146	24,805,924	3,041,009	42,493	1,360,429	175,261	168,936	23,430,109	11,154,104	2,978,712	7,852,525	

Foreign Tax Credit on Corporation Returns, 1972

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 23.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Geographic area, subarea, country and DISC dividends	Number of returns	Total assets	Income and taxes of domestic corporations from all sources								Income and taxes of domestic corporations from all foreign sources reported on Form 1118		
			Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Dividends received from DISCs	Western Hemisphere Trade Corporation deduction	Income subject to U.S. tax	U.S. Income tax before credits	Foreign tax credit claimed	Taxable income	
												Total (less loss)	Dividends from related foreign corporations and from DISCs
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	
Africa—Continued													
East Africa, total	68	302,930,715	11,950,049	1,957,465	13,283	724,239	41,234	125,658	11,143,786	5,317,920	1,936,457	5,007,135	1,915,393
Ethiopia	12	86,493,848	4,895,573	1,206,933	1,124	393,207	1,090	98,616	4,270,068	2,067,462	1,174,024	2,763,591	1,188,155
Kenya	30	190,489,018	7,641,342	1,587,436	6,791	574,529	9,179	115,671	6,935,091	3,325,852	1,568,168	3,889,466	1,562,512
Tanzania	10	41,604,816	5,341,552	1,187,509	569	373,643	2,362	97,206	4,720,471	2,288,721	1,090,606	2,549,689	1,169,684
Uganda	8	78,520,157	5,630,251	1,252,970	409	380,028	176	97,125	5,000,781	2,424,790	1,140,230	2,543,400	1,234,064
Other	39	111,443,345	8,570,799	1,372,606	5,509	539,272	37,775	109,877	7,998,305	3,824,444	1,248,283	2,952,066	1,350,785
West and Central African countries, total	106	490,801,136	18,356,387	2,249,923	12,022	784,479	133,378	170,196	17,002,899	8,191,087	2,523,702	6,777,532	2,167,940
Ghana	18	134,910,060	10,331,304	1,487,874	2,458	567,176	63,607	108,402	9,695,880	4,670,386	1,429,963	3,233,358	1,451,222
Liberia	42	275,557,326	8,908,429	1,652,793	2,221	431,094	25,312	128,946	7,704,915	3,729,470	1,567,477	4,262,852	1,588,921
Nigeria	36	228,824,273	11,583,589	1,553,580	9,189	596,042	84,932	124,844	10,850,401	5,233,759	1,862,545	4,441,962	1,524,661
Zaire (formerly Congo-Kinshasa)	13	89,578,757	7,310,406	872,534	416	416,137	40,548	7,057	7,132,964	3,434,154	872,663	2,082,453	854,198
Other	58	303,266,068	14,677,982	1,972,614	3,608	709,391	102,982	143,340	13,515,515	6,531,131	2,140,115	5,706,361	1,934,411
Southern Africa, total	499	479,353,555	26,052,317	2,942,326	35,500	1,314,226	169,064	194,256	24,873,491	11,782,281	2,955,743	7,930,440	2,828,912
Malawi	6	14,473,645	432,561	115,543	—	24,245	914	7,893	371,161	177,853	82,948	191,396	109,126
Rhodesia	17	21,467,005	2,901,225	412,546	1,624	262,356	7,107	285	2,795,063	1,330,095	416,693	957,615	411,135
South Africa, Republic of (includes South-West Africa)	458	441,986,067	25,211,088	2,908,462	33,481	1,301,558	163,561	193,348	24,081,156	11,402,663	2,894,712	7,725,555	2,796,692
Zambia	34	57,786,656	4,108,452	705,800	6,944	371,117	27,780	9,400	4,008,537	1,885,968	619,448	1,561,810	695,962
Other	28	31,580,143	1,117,203	352,998	62	16,421	780	7,168	957,866	462,906	326,980	799,251	331,326
Africa, not allocable	14	35,060,173	603,281	6,026	—	4,152	1,183	722	587,651	282,018	28,744	99,561	4,950
Asia, total	1,542	1,051,446,337	44,666,804	4,103,292	59,347	1,744,813	242,104	266,962	42,252,470	20,087,793	5,923,890	15,350,762	3,915,189
Middle East, total	348	640,437,325	30,468,553	2,986,581	28,626	1,173,455	178,766	212,278	28,539,062	13,669,006	4,748,644	12,013,661	2,884,587
Bahrain	12	122,085,125	4,978,668	1,262,488	407	390,381	376	100,984	4,355,907	2,107,395	1,219,255	2,889,517	1,239,518
Iran	127	430,959,838	18,116,044	2,357,570	12,713	791,840	108,419	175,999	16,561,345	7,996,981	2,690,321	7,227,298	2,284,828
Iraq	10	57,427,968	4,754,763	1,173,659	5,271	370,827	511	99,575	4,107,767	1,988,285	1,104,813	2,454,154	1,155,767
Israel	224	442,673,578	19,054,679	1,935,588	9,885	863,403	94,881	131,320	18,106,531	8,627,939	2,000,393	5,258,682	1,864,186
Kuwait	21	109,997,680	10,206,514	1,416,859	1,639	534,692	44,245	112,220	9,539,192	4,617,235	1,566,571	3,544,516	1,394,667
Lebanon	56	255,909,360	9,488,426	1,529,027	4,823	588,442	39,777	119,790	8,642,665	4,138,852	1,615,171	4,150,310	1,488,266
Oman	9	82,762,436	4,741,624	1,166,107	—	367,284	176	97,215	4,118,577	1,996,241	1,137,270	2,682,332	1,146,360
Saudi Arabia	40	174,249,980	14,407,525	1,827,667	6,483	570,157	44,416	121,587	12,967,667	6,279,808	3,043,199	7,235,581	1,797,161
United Arab Emirates	16	180,017,622	7,764,685	858,361	2,950	423,216	41,786	11,786	7,573,328	3,650,594	1,075,769	2,704,407	838,715
Other Areas of Arabian peninsula	6	33,925,311	2,722,209	627,370	3,202	141,048	176	97,656	2,065,343	1,015,019	757,775	1,655,831	809,662
Other	33	206,576,277	11,022,368	1,543,741	2,650	650,260	48,537	100,861	10,297,535	4,957,483	1,564,882	3,793,619	1,524,061
Southern and Southeastern Asia, total	483	727,307,911	30,786,328	3,600,247	38,736	1,445,291	179,523	245,006	28,735,257	13,672,180	3,768,249	10,411,639	3,469,817
Bangladesh (formerly East Pakistan)	4	29,132,447	3,877,376	863,570	298	353,376	—	91,429	3,405,135	1,645,240	800,471	1,748,611	863,541
India	204	459,297,570	18,146,342	2,621,269	23,067	1,027,783	105,954	173,485	16,719,163	7,991,652	2,587,099	7,243,519	2,567,047
Indonesia	85	325,947,985	10,672,280	1,896,269	9,456	490,776	48,172	159,341	9,178,204	4,392,079	1,817,487	5,084,195	1,836,650
Malaysia	63	327,234,484	14,845,801	1,917,168	7,234	805,707	86,231	117,642	14,079,984	6,756,467	1,948,476	4,873,001	1,677,180
Pakistan	59	247,900,151	8,950,425	1,389,298	3,737	616,926	43,851	104,931	8,335,390	3,971,787	1,445,589	3,675,750	1,366,815
Philippines	308	602,085,014	25,644,399	2,871,639	31,863	1,284,075	166,571	175,507	24,501,898	11,610,948	1,158,150	8,376,655	2,777,372
Singapore	88	343,176,734	16,348,505	1,882,440	13,197	787,860	135,421	155,084	15,533,752	7,461,686	2,304,022	5,910,640	1,833,624
South Vietnam	23	160,419,581	6,751,054	1,099,862	2,653	460,736	5,579	90,722	6,233,091	2,989,810	1,065,646	2,293,182	1,098,537
Sri Lanka (formerly Ceylon)	8	30,066,468	2,239,703	363,564	670	238,874	—	188					

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 23.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Geographic area, subarea, country and DISC dividends	Income and taxes of domestic corporations from foreign sources reported on Form 1118—Continued				Income and taxes of domestic corporations from specific geographic area or country and DISC dividends							Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
	Foreign taxes				Taxable income			Foreign taxes, excluding carryover					
	Total	Paid or accrued	Deemed paid	Carryover	Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Interest for which separate credit was computed	Total	Paid or accrued		Deemed paid		
									Total	On interest for which separate credit was computed			
(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)	(25)	(26)	
All geographic areas and DISC Dividends	10,680,701	6,535,979	2,392,636	1,752,086	16,486,388	4,201,306	103,466	8,928,615	6,535,979	5,300	2,392,636	737,438	29,209
Canada	7,718,179	4,359,109	2,312,574	1,046,495	2,401,284	872,107	28,104	878,246	313,989	3,479	564,257	265,134	3,953
Latin America, total	7,212,564	4,164,802	2,237,010	810,752	1,962,819	438,211	11,919	1,149,064	997,792	636	151,273	36,144	4,386
Mexico	5,048,433	3,175,569	2,134,556	739,308	311,942	70,217	3,822	127,644	95,362	360	32,283	5,605	704
Central America, total	5,157,274	2,746,743	1,769,522	641,009	329,134	155,628	154	77,214	22,819	(1)	54,394	13,899	2,828
Costa Rica	3,602,837	1,967,230	1,165,170	470,436	19,714	1,255	(1)	5,577	5,139	—	43,371	332	—
El Salvador	3,045,119	1,701,619	994,980	348,520	3,999	567	—	1,482	1,519	—	66	—	—
Guatemala	3,657,199	1,967,721	1,323,532	365,944	20,159	3,021	1	4,061	3,085	(1)	976	561	—
Honduras	2,577,991	1,437,295	796,723	343,973	14,962	1,256	—	5,808	5,448	—	361	596	—
Nicaragua	3,147,964	1,771,793	1,030,836	345,344	4,174	732	54	819	728	—	91	—	—
Panama, excluding Canal Zone	4,658,978	2,551,943	1,478,469	628,566	265,259	148,798	98	59,439	6,976	—	52,463	12,408	2,828
Not allocable	13,173	7,156	6,017	—	866	—	—	28	28	—	—	—	—
Caribbean countries, total	4,576,005	2,540,911	1,457,789	577,305	109,017	1,624	—	49,455	48,849	—	607	4	(1)
Dominican Republic	2,957,586	1,562,266	898,843	496,478	29,539	78	—	16,294	16,267	—	28	—	—
Haiti	2,387,542	1,304,929	639,353	443,260	3,138	11	—	1,441	1,436	—	5	—	—
Jamaica	4,145,309	2,289,464	1,335,652	520,193	49,695	540	—	17,593	17,365	—	227	—	—
Trinidad	3,077,437	1,800,875	837,767	438,795	19,627	994	—	13,828	13,481	—	347	4	—
Other	792,236	301,593	482,977	7,666	7,017	—	—	300	300	—	—	—	—
South America, total	6,976,686	4,068,108	2,132,226	776,351	1,212,495	210,742	7,944	894,634	830,646	277	63,989	16,637	855
Argentina	5,525,382	2,982,804	1,844,554	698,004	107,182	29,369	2,261	49,970	41,761	27	8,209	2,531	216
Bolivia	1,695,354	1,010,713	652,870	31,771	8,257	97	—	1,873	1,844	—	29	—	—
Brazil	4,724,023	2,593,175	1,768,551	342,297	184,199	77,987	2,696	82,142	61,353	149	20,789	4,767	—
Chile	3,524,756	1,989,936	1,238,289	296,531	6,118	136	—	2,558	2,523	—	35	—	—
Colombia	5,649,059	3,277,279	1,710,471	661,309	56,069	19,076	92	22,878	15,775	4	7,102	661	(1)
Ecuador	3,072,047	2,043,645	906,645	121,756	9,446	985	11	5,700	5,473	4	227	334	—
Paraguay	1,816,544	996,894	707,561	112,090	4,129	470	—	843	703	—	140	—	—
Peru	4,848,061	2,883,424	1,673,269	291,367	82,384	9,868	2	45,953	42,541	1	3,412	—	—
Uruguay	2,663,566	1,469,921	1,097,487	96,258	5,248	2,083	—	1,867	1,427	—	239	—	—
Venezuela	6,372,030	3,846,529	1,843,389	682,112	745,292	70,613	2,892	679,560	655,784	92	23,777	9,344	638
Other	1,675,395	1,012,162	662,976	257	4,192	57	—	1,492	1,463	—	29	—	—
Latin American, not allocable	43,772	20,102	22,436	1,294	232	—	—	116	116	—	—	—	—
Other Western Hemisphere, total	3,780,524	2,056,513	1,277,484	446,528	207,171	81,981	2,714	20,354	9,313	—	11,041	9,083	—
The Bahamas	2,691,084	1,485,847	1,015,851	189,386	114,395	54,816	94	8,428	3,197	—	5,231	9,013	—
Bermuda	1,874,139	1,175,521	607,700	22,023	10,161	477	—	22	22	—	455	—	—
Netherlands Antilles	2,967,000	1,795,961	841,168	329,872	60,600	15,168	2,144	9,485	4,694	—	4,791	71	—
Other British West Indies	78,562	58,693	18,997	882	98	—	—	145	145	—	—	—	—
Other	1,640,967	927,876	700,493	12,598	10,555	1,837	476	1,819	1,255	—	564	—	—
Europe, total	7,685,764	4,379,313	2,282,727	1,023,724	4,215,419	1,805,138	24,199	1,575,295	368,527	176	1,206,768	335,445	14,897
Common Market countries, total	5,607,745	3,070,981	2,112,469	424,295	2,103,580	937,178	10,077	863,347	710,594	39	692,753	43,289	2,356
Belgium	4,406,810	2,623,813	1,586,290	196,707	145,223	57,191	2,250	52,496	17,129	11	35,368	1,106	108
France (includes Andorra)	4,952,809	2,757,457	1,863,470	331,883	467,349	152,322	3,431	160,376	25,006	23	135,370	19,299	—
Italy (includes San Marino)	4,565,652	2,441,668	1,762,734	361,251	188,832	67,830	2,169	85,757	81,978	4	70,769	763	7
Luxembourg	2,200,638	1,305,947	811,873	83,718	41,862	11,238	—	3,538	328	—	3,210	1,367	2,211
Netherlands	4,155,176	2,389,786	1,520,150	245,260	216,305	156,348	44	145,318	6,467	—	138,851	16,235	—
West Germany	4,222,940	2,091,599	1,814,012	317,329	1,044,002	492,249	2,183	415,789	106,603	(1)	309,186	4,500	—
Not allocable	40,819	29,566	11,253	—	8	—	—	73	73	—	—	—	—
Other Western European countries, total	7,547,399	4,325,264	2,223,389	998,746	2,063,487	847,241	14,122	694,433	191,862	137	502,571	292,156	12,541
Austria	2,697,569	1,484,279	1,114,026	99,264	36,294	11,083	1	14,823	5,678	—	9,145	240	—
Denmark	2,419,598	1,364,093	967,526	87,979	30,175	9,679	2,146	6,391	624	—	5,766	1,587	160
Finland	2,566,393	1,394,023	1,089,046	83,234	24,607	12,803	—	7,424	773	—	6,651	—	—
Greece	2,827,878	1,552,023	1,159,172	116,684	18,975	5,175	20	4,572	2,709	—	1,863	61	—
Ireland	2,111,067	1,117,383	937,576	56,109	9,503	2,522	13	2,339	813	1	1,526	—	—
Liechtenstein	81,169	41,149	23,902	16,118	7,796	4,216	—	68	49	—	19	—	—
Monaco	42,428	16,843	22,773	2,813	100	—	—	4	4	—	—	—	—
Norway	2,641,982	1,462,133	1,094,615	85,234	15,168	5,485	—	4,914	801	—	4,113	92	—
Portugal	2,810,607	1,597,874	1,102,966	109,766	14,515	8,483	—	4,430	1,644	—	2,586	—	—
Spain	5,948,302	3,492,896	1,893,788	761,618	91,871	39,966	2,207	27,381	13,023	9	14,358	4,331	—
Sweden	3,097,458	1,605,453	1,266,535	225,470	72,347	21,643	2,156	24,476	1,230	—	23,247	284	—
Switzerland	4,036,605	2,184,178	1,673,830	178,596	330,577	186,455	4,014	98,030	19,331	98	78,699	49,635	—
Turkey	3,515,440	2,130,302	943,617	441,521	10,464	2,612	34	6,539	5,689	13	850	—	—
United Kingdom	6,072,759	3,573,476	2,072,460	426,823	1,399,751	543,006	3,532	492,778	139,081	16	353,697	235,937	12,381
Other	1,430,428	835,529	591,735	3,163	1,341	112	—	215	215	—	50	—	—
East European countries, total	2,026,368	1,122,932	728,263	175,173	46,355	20,719	—	17,514	6,070	—	11,444	—	—
East Germany	490,196	175,369	287,948	26,879	30,495	20,632	—	15,114	3,721	—	11,393	—	—
Romania	497,932	179,597	313,877	4,459	—	—	—	(1)	(1)	—	—	—	—
Union of Soviet Socialist Republics	379,191	116,657	262,228	307	—	—	—	—	—	—	—	—	—
Other	1,866,595	1,048,329	674,038	144,228	15,047	87	—	2,400	2,350	—	51	—	—
Europe, not allocable	28,802	17,001	7,201	4,600	1,996	—	—	—	—	—	—	—	—
Africa, total	6,988,242	4,123,906	1,873,239	991,098	1,271,572	203,143	6,559	944,529	872,179	5	72,350	38,320	2,500
North Africa, total	4,879,865	2,913,373	1,141,280	825,212	837,150	3,685	2,149	777,852	775,940	(1)	1,913	—	—
Algeria	1,854,661	1,181,439	470,576	202,645	120,993	10,228	—	1,605	1,513	—	92	—	—
Egypt (formerly United Arab Republic)	2,147,846	1,275,730	751,129	745,046	747,213	815,938	—	5,102	4,754	—	348	—	—
Libya	4,031,469	2,539,210	1,475,046	75,296	—	—	2,144	768,459	768,459	—	—	—	—
Morocco	2,098,372	1,											

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 23.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Geographic area, subarea, country and DISC dividends	Income and taxes of domestic corporations from foreign sources reported on Form 1118—Continued				Income and taxes of domestic corporations from specific geographic area or country and DISC dividends						Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations	
	Foreign taxes				Taxable income			Foreign taxes, excluding carryover					
	Total	Paid or accrued	Deemed paid	Carryover	Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Interest for which separate credit was computed	Total	On interest for which separate credit was computed	Deemed paid			
	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)	(25)	(26)
Africa—Continued													
East Africa, total	2,604,907	1,507,437	946,634	150,836	6,325	3,338	2,144	4,126	2,771	—	1,356	—	—
Ethiopia	1,777,486	1,153,927	749,198	66,133	749	—	—	120	—	—	—	—	—
Kenya	2,217,491	1,337,434	768,077	111,980	3,974	2,034	—	1,753	1,028	—	725	—	—
Tanzania	1,689,411	1,087,345	535,301	65,765	2,799	—	2,144	263	161	—	—	—	—
Uganda	1,767,391	1,105,096	558,074	104,211	765	705	—	512	—	—	352	—	—
Other	1,726,916	939,990	711,914	75,012	—1,683	598	—	1,479	1,200	—	279	—	—
West and Central African countries, total	4,247,090	2,678,902	1,086,891	481,297	284,977	134,863	—	106,497	70,961	—	35,536	2,419	—
Ghana	2,057,944	1,242,612	749,198	66,133	744	—	—	408	—	—	—	—	—
Liberia	2,882,076	1,780,230	682,065	419,780	125,063	84,562	—	5,740	2,083	—	3,656	2,419	—
Nigeria	2,849,853	1,943,972	795,258	110,822	98,523	41,262	—	58,503	28,786	—	29,717	—	—
Zaire (formerly Congo-Kinshasa)	1,060,743	519,994	475,315	55,435	1,292	—	—	681	425	—	256	—	—
Other	3,770,760	2,367,473	987,105	416,182	59,354	8,430	—	41,166	39,259	—	1,906	—	—
Southern Africa, total	3,927,650	1,994,007	1,581,324	352,319	142,864	61,256	2,266	56,047	22,502	5	33,546	35,902	2,500
Malawi	119,646	40,180	43,627	35,839	—59	40	—	31	16	—	15	—	—
Rhodesia	434,859	147,639	278,667	8,553	—126	44	—	35	17	—	18	—	430
South Africa, Republic of (includes South-West Africa)	3,856,887	1,942,189	1,566,759	347,939	118,381	46,789	2,266	46,411	15,549	5	30,862	35,820	2,070
Zambia	689,862	224,084	416,867	49,312	23,670	12,120	—	8,673	6,783	—	1,891	23	—
Other	494,908	355,741	55,431	63,736	997	2,265	—	897	137	—	760	58	—
Africa, not allocable	28,822	24,526	4,156	140	256	—	—	6	6	—	—	—	—
Asia, total	10,190,786	6,315,529	2,209,649	1,665,608	5,546,845	681,206	17,065	4,109,003	3,808,616	620	300,388	19,801	(¹)
Middle East, total	8,503,793	5,587,042	1,573,891	1,342,859	4,090,797	108,064	2,200	3,536,654	3,495,104	10	41,550	3	—
Bahrain	1,854,877	1,184,597	568,201	102,079	51,688	51,000	—	15,278	—	—	15,278	—	—
Iran	5,050,893	3,266,469	1,155,656	628,769	813,970	1,812	2,144	693,872	693,491	—	391	3	—
Iraq	1,710,189	1,099,090	532,101	78,997	26,981	51,300	—	24,601	7,551	—	24,530	—	—
Israel	2,734,126	1,571,516	1,048,428	114,162	18,883	2,826	37	5,865	4,725	10	910	—	—
Kuwait	2,542,358	1,750,624	725,758	65,977	331,050	—	—	382,776	382,776	—	—	—	—
Lebanon	2,271,797	1,377,709	767,037	127,051	—32,971	677	13	1,663	1,366	(¹)	297	—	—
Qatar	1,734,557	1,141,681	527,441	65,435	—	—	—	12,068	12,068	—	—	—	—
Saudi Arabia	5,824,482	4,007,687	873,543	1,043,252	2,770,735	—	7	2,341,391	2,341,391	—	—	—	—
United Arab Emirates	1,393,052	838,727	475,188	69,736	65,569	1	—	37,716	37,716	(¹)	—	—	—
Other areas of Arabian Peninsula	1,361,416	997,174	289,525	74,718	33,546	—	—	20,789	20,789	—	—	—	—
Other	2,192,438	1,297,032	621,709	73,697	—	448	—	635	483	—	152	—	—
Southern and Southeastern Asia, total	6,144,349	3,508,105	1,893,957	742,286	575,634	406,628	6,685	352,674	184,899	786	167,774	1,823	(¹)
Bangladesh (formerly East Pakistan)	1,229,939	753,713	476,226	—	—645	—	—	348	348	—	—	—	—
India	4,023,185	2,160,047	1,340,778	522,359	72,908	11,530	2,145	48,739	41,430	(¹)	7,309	42	—
Indonesia	3,595,028	2,201,649	820,445	572,935	362,933	363,115	67	244,672	96,069	11	148,603	—	—
Malaysia	2,585,952	1,470,795	1,010,902	104,255	—7,539	2,913	28	3,178	2,058	10	1,120	—	—
Pakistan	1,919,430	1,077,065	785,775	56,590	5,590	1,410	—	5,225	4,419	—	806	—	—
Philippines	4,255,018	2,468,640	1,581,555	204,824	82,213	21,783	2,286	32,960	25,463	46	7,498	1,773	(¹)
Singapore	3,517,906	2,247,866	1,015,978	254,062	29,311	3,066	2,146	7,574	6,592	1	982	—	—
South Vietnam	1,533,385	885,863	607,274	40,248	12,156	—	—	3,485	3,363	—	122	—	—
Sri Lanka (formerly Ceylon)	375,575	123,372	252,139	65	471	1	—	217	217	—	(¹)	—	—
Thailand	2,857,866	1,600,250	1,119,955	137,662	13,220	4,593	12	5,034	3,700	2	1,335	8	—
Other	1,451,193	839,385	560,719	51,089	6,010	—	—	1,242	1,242	—	—	—	—
Eastern Asia, total	6,571,052	3,800,432	2,098,980	671,640	878,850	164,514	8,148	219,018	127,955	540	91,063	17,776	(¹)
China, Peoples Republic of	88,545	38,507	16,207	33,831	506	—	—	12	12	—	—	—	—
China, Republic of (Taiwan)	3,309,174	2,176,348	994,447	138,378	21,627	837	2,344	3,888	3,680	31	208	56	—
Hong Kong	2,792,514	1,579,698	1,024,974	187,842	90,285	45,346	—	10,883	3,758	1	7,125	7,551	(¹)
Japan	6,519,586	3,780,808	2,068,915	669,862	750,160	114,336	5,690	201,619	118,061	509	83,557	10,169	—
Okinawa and Ryukyu Islands	1,428,334	824,921	599,309	4,104	—4,670	—	—	255	255	—	—	—	—
South Korea, Republic of	2,642,992	1,696,409	936,548	10,035	18,561	2,246	20	1,902	1,750	—	152	—	—
Other	12,474	4,161	7,198	1,116	2,380	1,750	—	460	439	—	21	—	—
Asia, not allocable	79,857	19,890	59,537	430	1,565	—	31	657	657	—	—	—	—
Oceania, total	4,975,051	2,687,480	1,892,992	394,578	435,192	106,296	3,416	165,136	82,780	134	82,356	33,861	3,473
Australia	4,938,850	2,667,225	1,882,716	388,910	400,327	100,521	3,365	153,877	76,176	127	77,700	33,632	3,473
New Zealand	2,642,192	1,327,319	1,238,900	75,973	23,812	5,656	2	10,556	6,012	(¹)	4,544	13	—
Other	1,798,070	1,186,355	537,658	74,057	11,053	119	49	704	592	7	111	15	—
Puerto Rico and United States Possessions, total	5,008,249	3,017,148	1,688,778	302,323	122,248	11,757	2,717	52,815	48,810	186	4,005	—	—
Puerto Rico	4,341,844	2,400,616	1,639,683	301,546	98,260	8,309	2,607	42,300	39,855	186	2,445	—	—
U.S. Possessions, total	3,402,760	2,379,497	924,436	98,827	23,988	3,448	110	10,515	8,955	—	1,560	—	—
American Samoa	379,594	130,572	248,995	27	240	—	—	83	83	—	—	—	—
Guam	2,063,925	1,331,763	677,413	74,749	12,341	350	—	4,969	4,719	—	250	—	—
Panama Canal Zone	1,762,141	1,170,142	526,564	65,435	—	—	—	(¹)	(¹)	—	—	—	—
Virgin Islands, U.S.	2,283,539	1,641,609	558,342	83,588	10,240	2,898	110	5,351	4,153	—	1,198	—	—
Other	388,801	116,756	258,482	13,563	1,346	200	—	112	—	—	112	—	—
Country not stated or not allocable and other income from outside the United States	3,544,403	2,110,103	1,233,755	200,546	287,466	595	6,774	34,093	33,974	63	119	49	—
DISC dividends	210,834	70,244	130,696	9,894	36,390	873	—	81	—	—	81	—	—
Other geographic classifications (combinations of countries shown above)	7,963,704	4,480,481	2,386,440	1,096,782	7,871,892	2,937,464	63,654	2,833,802	883,960	4,283	1,949,843	887,703	24,393
Not economically less-developed countries	10,486,182	6,461,639	2,313,927	1,710,616	8,245,263	1,239,906	33,039	6,042,676	5,611,546	954	431,130	49,685	4,816
Economically less-developed countries	1,261,948	537,317	512,325	212,306	45,376	22,469	—	17,963	6,499	—	11,464	—	—
Sino-Soviet Bloc	9,616,559	6,142,391	1,891,391	1,582,777	6,065,606	529,263	7,265	5,250,923	5,023,596	107	227,327	8,681	638

¹Includes the "gross-up" of certain foreign dividends.

²Less than \$500 per return.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 24.—Number of Returns for Selected Items, by Geographic Area, Subarea, and Selected Country Where Foreign Taxes Were Paid

(All figures are estimates based on samples)

Geographic area, subarea, and selected country	Total number of returns	All sources—Domestic and foreign			Specific geographic area, subarea, or country		
		Dividends received from foreign corporations	Foreign dividend income resulting from foreign taxes deemed paid	Western Hemisphere Trade Corporation deduction	Dividends from related foreign corporations and from DISCs	Foreign taxes paid or accrued	Foreign taxes deemed paid
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All geographic areas	5,497	2,273	1,028	311	1,034	5,401	1,034
Canada	3,298	1,419	768	218	417	3,195	417
Latin America, total	1,498	752	558	251	322	1,437	322
Mexico	1,031	564	463	180	144	996	144
Central America, total	338	186	186	120	85	231	83
Costa Rica	119	87	79	54	13	87	13
El Salvador	55	55	46	25	9	44	8
Guatemala	121	106	90	42	21	88	21
Honduras	69	54	44	22	7	41	7
Nicaragua	74	66	57	32	6	32	6
Panama, excluding Canal Zone	206	161	131	76	51	101	48
Caribbean countries, total	200	148	133	68	16	157	16
Jamaica	112	94	88	45	9	75	9
Trinidad	92	64	55	28	6	70	6
South America, total	946	560	441	186	211	890	210
Argentina	388	247	217	107	56	344	55
Bolivia	54	46	38	18	4	54	4
Brazil	467	329	284	105	78	413	78
Chile	120	103	90	52	2	76	3
Colombia	293	223	177	92	53	238	53
Ecuador	111	90	76	43	8	80	8
Peru	251	196	176	81	37	225	37
Uruguay	85	64	59	25	5	64	5
Venezuela	495	332	274	132	88	449	87
Other Western Hemisphere, total	204	152	137	83	65	53	61
The Bahamas	79	63	57	23	13	8	10
Netherlands Antilles	104	89	83	31	50	29	50
Europe, total	1,826	1,224	769	185	623	1,682	623
Common Market countries, total	1,268	905	623	162	426	1,127	426
Belgium	309	241	225	89	75	196	75
France (includes Andorra)	539	397	351	109	122	463	121
Italy (includes San Marino)	403	316	293	106	80	324	79
Luxembourg	40	38	36	14	12	11	12
Netherlands	549	456	229	78	100	405	100
West Germany	555	446	426	111	274	385	274
Other West European countries, total	1,217	883	619	163	412	1,022	412
Austria	116	101	96	36	34	71	34
Denmark	112	94	89	31	25	31	25
Finland	80	70	65	27	15	23	15
Greece	91	83	74	34	10	38	10
Ireland	80	65	63	19	15	30	15
Liechtenstein	14	14	13	6	4	4	4
Norway	89	81	74	20	14	24	20
Portugal	101	88	78	36	18	65	18
Spain	308	242	221	79	67	262	67
Sweden	185	162	152	55	34	47	34
Switzerland	330	275	239	83	149	210	146
Turkey	84	71	60	27	10	55	10
United Kingdom	957	685	514	141	259	701	259
East European countries	96	68	58	22	9	35	9
Africa, total	571	466	309	118	110	504	109
North Africa, total	90	82	69	33	11	57	11
Morocco	32	30	27	11	9	13	9
East Africa, total	68	62	59	26	9	47	9
Ethiopia	12	12	11	5	4	—	—
Kenya	30	29	29	11	5	21	5
Tanzania	10	9	9	3	—	7	—
West and Central African countries, total	106	91	74	39	16	46	16
Ghana	19	18	18	9	—	5	—
Liberia	42	39	29	12	6	16	6
Nigeria	36	32	29	17	4	12	4
Southern Africa, total	499	413	271	98	88	448	87
South Africa, Republic of (includes South-West Africa)	458	373	249	95	72	413	71
Zambia	34	34	23	14	18	25	18
Asia, total	1,542	781	561	174	253	1,452	250
Middle East, total	348	240	171	81	25	265	25
Iran	127	127	83	46	6	73	6
Israel	224	148	95	36	12	187	12
Kuwait	21	17	17	4	—	4	—
Lebanon	56	51	46	21	4	28	4
Qatar	9	9	8	3	—	3	—
Saudi Arabia	40	35	30	14	—	20	—
Southern and Southeastern Asia, total	483	350	283	120	110	423	107
India	204	168	149	65	46	174	43
Indonesia	85	73	56	35	6	50	6
Malaysia	63	59	53	19	10	32	10
Pakistan	59	55	48	20	10	33	10
Philippines	308	222	177	78	55	279	55
Singapore	88	80	68	33	13	55	13
Thailand	97	84	73	34	14	70	14
Eastern Asia, total	1,291	656	510	153	180	1,229	179
China, Republic of (Taiwan)	118	90	78	36	6	95	6
Hong Kong	140	113	100	44	43	67	43
Japan	1,216	618	482	146	149	1,178	148
Chinese and Ryukyu Islands	25	21	16	4	—	15	—
South Korea, Republic of	72	60	51	23	3	19	3
Oceania, total	937	544	468	147	212	891	212
Australia	887	525	454	143	197	849	197
New Zealand	197	151	134	48	21	171	21
Puerto Rico and United States Possessions, total	508	332	237	113	29	465	29
Puerto Rico	478	313	227	108	22	430	22
Country not stated or not allocable and other income from outside the United States	370	270	193	89	5	188	5

NOTE: See text for explanatory statements and for "Description of the Sample and Limitations of the Data."

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED
Table 25.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Geographic Area and Selected Country where Foreign Taxes were Paid, and for DISC Dividends, and by Size of Total Assets

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

Geographic area, selected country, and DISC dividends, and size of total assets	Number of returns	Total assets	Income and taxes of domestic corporations from all sources									Income and taxes of domestic corporations from all foreign sources reported on Form 1118	
			Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Dividends received from DISCs	Western Hemisphere Trade Corporation deduction	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed	Taxable income	
												Total (less loss) ¹	Dividends from related foreign corporations and from DISCs
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
All Geographic Areas and DISC Dividends													
Total	5,497	1,407,096,996	56,149,288	4,434,803	73,450	1,913,268	265,676	304,800	53,028,432	25,135,019	6,306,232	16,486,368	4,201,306
Under \$10,000,000 ²	3,285	7,059,437	1,037,266	37,516	1,026	16,219	1,637	9,208	95,1934	424,812	53,485	195,638	26,750
\$10,000,000 under \$100,000,000	1,185	41,422,713	3,857,171	143,027	12,407	88,047	10,344	9,333	3,705,076	1,745,640	175,557	522,490	141,389
\$100,000,000 under \$250,000,000	387	63,169,822	4,597,925	267,545	14,027	161,469	18,250	8,274	4,416,069	2,060,312	263,588	752,610	255,222
\$250,000,000 or more	640	1,295,445,024	46,656,926	3,986,715	45,990	1,647,534	235,445	277,985	43,955,354	20,905,055	5,813,601	15,015,650	3,775,946
Canada													
Total	3,298	1,243,984,480	48,752,795	4,249,415	67,880	1,860,852	248,798	276,521	45,845,595	21,732,724	4,713,432	12,922,707	4,027,961
Under \$10,000,000 ²	1,738	3,474,349	567,387	17,208	320	7,971	862	5,332	516,162	229,148	27,209	97,321	12,973
\$10,000,000 under \$100,000,000	754	27,912,439	2,653,288	111,027	10,371	75,041	6,440	3,923	2,551,726	1,202,007	131,026	390,306	112,454
\$100,000,000 under \$250,000,000	294	47,738,834	3,678,042	233,726	11,807	143,916	11,186	6,211	3,535,773	1,645,291	229,949	648,366	221,768
\$250,000,000 or more	512	1,164,858,898	41,854,078	3,887,454	45,382	1,633,925	230,310	261,055	38,241,934	18,656,278	4,328,246	11,796,715	3,680,786
Latin America													
Total	1,498	1,084,257,264	40,984,416	4,167,875	62,024	1,776,960	246,786	294,206	38,529,660	18,295,350	4,529,517	12,484,378	3,946,798
Under \$10,000,000 ²	474	1,398,329	268,188	15,802	367	5,956	449	4,713	247,886	109,325	25,157	92,596	12,390
\$10,000,000 under \$100,000,000	384	14,803,230	1,582,025	83,718	7,461	47,338	4,068	7,183	1,540,521	726,648	105,198	312,235	84,423
\$100,000,000 under \$250,000,000	181	29,513,825	2,629,984	218,612	10,070	129,626	11,197	8,101	2,544,657	1,193,079	205,160	578,553	204,677
\$250,000,000 or more	459	1,038,541,670	36,504,219	3,849,743	44,126	1,594,041	231,072	274,209	34,196,596	16,266,298	4,194,002	11,500,994	3,645,306
Argentina													
Total	388	717,820,067	28,008,872	3,468,697	38,938	1,451,655	189,372	222,092	26,115,680	12,478,018	3,440,038	9,447,007	3,330,470
Under \$10,000,000 ²	37	100,364	77,853	2,533	94	2,139	—	181	67,563	30,062	7,735	34,771	2,610
\$10,000,000 under \$100,000,000	73	3,065,440	344,693	28,796	605	16,583	196	687	333,803	158,273	33,215	100,974	27,796
\$100,000,000 under \$250,000,000	47	7,797,072	711,519	98,832	8,577	60,932	4,250	4,568	694,238	330,584	85,719	265,156	90,699
\$250,000,000 or more	231	706,837,191	26,874,607	3,448,536	29,662	1,372,001	184,926	216,656	25,020,076	11,959,099	3,313,369	9,046,106	3,209,365
Brazil													
Total	467	727,647,815	28,854,375	3,284,040	45,656	1,459,528	203,369	206,996	27,249,781	12,957,302	3,358,143	9,003,373	3,138,963
Under \$10,000,000 ²	53	150,759	91,998	4,339	—	16,780	7	522	81,108	36,249	9,156	40,862	4,239
\$10,000,000 under \$100,000,000	81	3,423,283	322,137	26,216	709	30,009	1,083	249	352,620	167,506	35,337	102,757	27,746
\$100,000,000 under \$250,000,000	65	10,240,917	875,534	79,485	7,585	49,513	4,628	3,903	844,868	399,568	79,869	239,604	77,663
\$250,000,000 or more	268	713,826,656	27,520,706	3,172,001	37,362	1,390,227	197,651	202,322	25,971,185	12,353,879	3,233,780	8,620,149	3,029,314
Ecuador													
Total	111	314,848,480	13,231,811	1,827,875	17,438	675,695	66,249	141,277	12,328,768	5,894,610	2,092,922	5,424,965	1,784,577
Under \$10,000,000 ²	7	20,552	65,529	2,275	—	2,035	40	621	54,803	24,093	6,321	26,935	2,258
\$10,000,000 under \$100,000,000	14	611,956	45,188	2,443	—	1,840	—	267	43,699	20,736	7,014	22,861	2,013
\$100,000,000 under \$250,000,000	11	1,839,217	136,149	14,329	267	4,612	871	679	129,138	61,227	13,999	47,479	14,575
\$250,000,000 or more	79	312,376,755	12,984,945	1,808,828	17,171	667,208	65,296	139,710	12,101,128	5,788,554	2,065,588	5,325,690	1,765,730
Mexico													
Total	1,031	926,177,372	36,217,952	3,974,965	55,138	1,710,213	209,776	242,278	34,100,278	16,212,971	3,917,697	10,894,802	3,769,966
Under \$10,000,000 ²	252	764,539	193,464	11,416	142	5,670	280	2,565	178,413	78,713	19,083	68,559	10,841
\$10,000,000 under \$100,000,000	258	10,662,733	1,130,972	53,592	4,104	32,142	3,221	1,641	1,106,961	522,345	67,748	209,018	53,735
\$100,000,000 under \$250,000,000	143	23,017,122	2,152,827	204,796	8,785	118,515	7,326	7,271	2,092,089	993,748	197,282	531,757	190,482
\$250,000,000 or more	378	891,732,978	32,740,689	3,705,162	42,106	1,553,886	198,949	230,801	30,722,815	14,618,165	3,643,583	10,085,466	3,514,907
Panama, Excluding Canal Zone													
Total	206	536,024,674	20,940,834	2,930,765	36,894	1,112,818	99,682	194,080	19,129,857	9,098,751	2,819,452	7,842,284	2,832,754
Under \$10,000,000 ²	22	65,138	67,093	2,519	128	2,035	—	1,067	56,604	24,338	6,569	30,241	2,388
\$10,000,000 under \$100,000,000	26	1,215,568	100,066	18,809	2,982	8,114	29	2,476	94,292	44,053	19,743	51,239	18,965
\$100,000,000 under \$250,000,000	20	3,616,939	412,010	46,956	3,304	21,791	132	1,005	395,295	171,061	33,470	120,570	47,075
\$250,000,000 or more	138	531,127,029	20,361,665	2,864,482	30,480	1,080,878	99,521	189,532	18,584,666	8,859,299	2,759,670	7,640,334	2,764,327
Peru													
Total	251	569,911,484	25,312,769	3,036,639	28,304	1,337,867	160,312	205,180	23,806,715	11,366,707	3,291,956	8,524,508	2,956,169
Under \$10,000,000 ²	21	80,271	69,220	2,275	4	2,037	—	304	58,715	25,821	6,176	31,330	2,261
\$10,000,000 under \$100,000,000	37	1,883,965	163,592	10,556	248	5,193	342	736	156,387	73,774	15,808	51,177	10,153
\$100,000,000 under \$250,000,000	29	5,104,699	322,910	44,266	7,533	26,369	915	3,654	310,399	147,650	43,802	150,707	47,173
\$250,000,000 or more	164	562,842,549	24,757,047	2,979,542	20,519	1,304,269	159,055	200,486	23,281,214	11,119,462	3,226,170	8,291,294	2,896,582
Venezuela													
Total	495	758,749,566	30,290,291	3,499,743	41,749	1,405,215	148,647	225,809	28,297,109	13,490,439	3,825,554	10,345,436	3,359,191
Under \$10,000,000 ²	98	239,560	125,253	9,995	—	4,563	130	1,357	113,611	49,445	14,453	58,092	7,397
\$10,000,000 under \$100,000,000	93	4,193,935	461,410	17,658	638	9,352	390	3,494	446,197	208,896	29,231	86,620	16,397
\$100,000,000 under \$250,000,000	67	11,985,256	1,119,366	113,856	7,691	62,648	3,867	5,965	1,092,629	518,437	106,414	311,043	108,438
\$250,000,000 or more	237	742,920,815	28,584,262	3,358,834	33,420	1,328,652	144,260	214,993	26,644,672	12,713,761	3,675,397	9,889,681	3,226,960
Other Western Hemisphere													
Total	204	498,625,716	19,612,437	2,421,195	40,345	1,048,517	90,333	152,833	18,555,117	8,786,347	2,611,608	6,839,072	2,359,686
Under \$10,000,000 ²	25	30,816	68,121	3,060	—	2,562	—	—	58,013	25,523	6,382	30,070	2,658
\$10,000,000 under \$100,000,000	26	1,291,032	118,943	18,234	2,593	10,696	100	1,002	113,723	54,121	15,921	42,579	20,001
\$100,000,000 under \$250,000,000	15	2,548,101	238,738	21,324	12,964	12,964	300	1,766	235,147	111,321	17,763	81,728	21,162
\$250,000,000 or more	138	494,655,767	19,186,635	2,378,578	35,992	1,022,295	90,016	150,665	18,148,234	8,595,382	2,571,542	6,704,696	2,315,664
The Bahamas													
Total	79	350,444,408	13,868,823	1,946,245	19,883	819,542	69,722	126,006	12,982,030	6,161,334	1,973,338	5,073,943	1,898,599
Under \$10,000,000 ²	3	—	60,106	2,275	—	2,035	—	—	49,998	21,823	5,258	26,866	2,250
\$10,000,000 under \$100,000,000	4	163,550	26,123	12,769	1,630	8,065	—	—	26,121	12,513	9,859	20,669	14,399
\$100,000,000 under \$250,000,000	6	989,887	125,829	7,112	831	5,127	300	176	125,619	59,831			

Foreign Tax Credit on Corporation Returns, 1972

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 25.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Geographic Area and Selected Country where Foreign Taxes were Paid, and for DISC Dividends, and by Size of Total Assets—Continued

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

Table with 13 columns: Geographic area, selected country, and DISC dividends, and size of total assets; Number of returns; Total assets; Net income (less deficit); Dividends received from foreign corporations; Includable income of Controlled Foreign Corporations; Foreign dividend income resulting from foreign taxes deemed paid; Dividends received from DISCs; Western Hemisphere Trade Corporation deduction; Income subject to U.S. tax; U.S. income tax before credits; Foreign tax credit claimed; Taxable Income (Total (less losses)); Dividends from related foreign corporations and from DISCs. Rows include Europe, Austria, Belgium, Denmark, France (Includes Andorra), Italy (Includes San Marino), Liechtenstein, Luxembourg, Netherlands, Spain, Sweden, Switzerland.

Footnotes at end of table

Foreign Tax Credit on Corporation Returns, 1972

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 25.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Geographic Area and Selected Country where Foreign Taxes were Paid, and for DISC Dividends, and by Size of Total Assets—Continued

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

Geographic area, selected country, and DISC dividends, and size of total assets	Number of returns	Total assets	Income and taxes of domestic corporations from all sources									Income and taxes of domestic corporations from all foreign sources reported on Form 1118	
			Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Dividends received from DISCs	Western Hemisphere Trade Corporation deduction	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed	Taxable income	
												Total (less loss) ¹	Dividends from related foreign corporations and from DISCs
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	
Europe—Continued													
United Kingdom													
Total	957	868,540,690	34,570,608	3,762,985	52,641	1,702,118	199,135	238,544	32,789,370	15,542,228	4,161,030	11,096,087	3,576,555
Under \$10,000,000 ²	333	720,063	188,330	14,770	352	8,442	35	207	173,590	73,843	18,796	68,938	11,934
\$10,000,000 under \$100,000,000	219	8,806,441	984,426	72,322	1,146	47,191	1,435	958,990	454,396	82,468	182,796	241,311	71,399
\$100,000,000 under \$250,000,000	117	18,871,586	1,984,363	208,608	8,459	133,794	11,148	1,938,156	900,331	198,559	86,794	541,930	203,441
\$250,000,000 or more	288	940,142,600	31,413,489	3,467,285	39,790	1,512,691	186,806	233,395	29,718,634	14,113,658	3,861,206	10,243,908	3,289,780
West Germany													
Total	555	619,551,518	28,665,456	3,230,949	44,073	1,551,782	188,363	187,937	27,437,951	12,983,049	3,313,628	8,803,450	3,120,890
Under \$10,000,000 ²	120	436,310	151,402	15,748	199	8,392	30	26	139,355	61,408	18,556	62,066	13,295
\$10,000,000 under \$100,000,000	142	5,968,973	626,171	53,466	3,729	35,999	1,437	1,095	615,093	291,753	58,389	171,374	53,578
\$100,000,000 under \$250,000,000	76	12,175,403	1,327,442	172,173	6,262	112,476	4,791	3,496	1,307,718	622,015	160,337	448,146	167,530
\$250,000,000 or more	217	600,971,432	26,560,441	2,989,563	33,084	1,394,916	182,105	183,320	25,375,785	12,007,873	3,076,346	8,121,864	2,866,487
East European Countries													
Total	96	191,895,385	8,456,855	1,297,934	8,043	590,964	64,428	137,397	7,774,813	3,698,152	1,301,337	3,336,463	1,257,910
Under \$10,000,000 ²	18	33,520	67,119	2,313	—	2,035	—	—	56,977	24,837	6,657	30,762	2,258
\$10,000,000 under \$100,000,000	15	612,004	54,333	2,756	90	1,604	295	—	53,410	25,464	5,972	16,653	45,984
\$100,000,000 under \$250,000,000	7	1,274,079	108,729	16,557	25	9,389	212	57	107,302	51,530	12,466	42,366	13,627
\$250,000,000 or more	56	189,975,782	8,226,574	1,276,310	7,928	577,937	63,921	137,340	7,557,124	3,596,501	1,276,242	3,246,679	1,239,610
Africa													
Total	571	724,569,452	31,636,846	3,654,888	44,190	1,427,103	177,142	244,231	29,580,149	14,106,142	4,033,526	10,921,570	3,488,550
Under \$10,000,000 ²	142	392,583	120,913	7,372	—	4,495	15	—	106,013	45,025	11,333	44,546	6,903
\$10,000,000 under \$100,000,000	133	5,908,019	596,305	47,612	2,248	27,258	783	1,446	584,339	51,207	151,620	45,984	49,984
\$100,000,000 under \$250,000,000	69	11,999,390	1,141,520	117,871	4,876	69,866	4,680	4,890	1,113,209	526,306	114,094	323,265	112,840
\$250,000,000 or more	227	706,269,460	29,778,108	3,482,033	37,066	1,325,495	171,664	237,895	27,776,588	13,261,623	3,856,891	10,402,138	3,322,823
Libena													
Total	42	275,557,326	8,909,429	1,652,793	2,221	431,094	25,312	128,946	7,704,915	3,729,470	1,567,477	4,262,852	1,588,921
Under \$10,000,000 ²	5	83,487	66,140	2,298	—	2,035	—	—	55,695	24,532	5,536	27,670	2,258
\$10,000,000 under \$100,000,000	3	651,021	87,894	9,394	—	8,278	107	—	87,874	42,301	10,496	24,838	9,388
\$100,000,000 under \$250,000,000	34	274,822,818	8,755,395	1,641,101	2,221	420,781	25,205	128,946	7,561,348	3,662,637	1,551,445	4,210,344	1,577,275
South Africa, Republic of (Includes South-West Africa)													
Total	458	441,986,067	25,211,088	2,909,462	33,481	1,301,558	163,561	193,348	24,081,156	11,402,663	2,894,712	7,725,555	2,796,892
Under \$10,000,000 ²	115	319,485	112,756	6,778	—	4,454	15	—	98,390	41,542	10,071	40,410	6,394
\$10,000,000 under \$100,000,000	112	5,108,855	502,115	39,135	1,847	22,088	741	597	492,730	229,523	38,464	114,635	38,021
\$100,000,000 under \$250,000,000	55	9,556,330	917,100	95,820	4,814	61,295	3,379	3,090	894,036	421,687	96,756	261,935	93,542
\$250,000,000 or more	176	427,001,397	23,679,117	2,767,930	26,820	1,213,722	159,426	189,661	22,596,000	10,709,911	2,749,419	7,308,574	2,658,936
OPEC Countries													
Total	68	311,374,307	15,075,060	2,106,011	11,554	650,153	90,616	163,634	13,556,191	6,557,763	2,488,482	6,449,406	2,036,513
Under \$10,000,000 ²	9	229,962	87,755	4,059	264	3,330	—	90	76,264	34,384	11,232	47,986	4,305
\$10,000,000 under \$100,000,000	7	1,344,082	94,548	5,251	176	6,027	598	2,367	92,014	43,765	11,358	30,358	4,707
\$100,000,000 under \$250,000,000	52	309,800,263	14,892,757	2,096,701	11,114	640,796	90,018	161,177	13,387,913	6,479,614	2,465,892	6,371,061	2,027,500
Asia													
Total	1,542	1,051,446,337	44,666,804	4,103,292	59,347	1,744,813	242,104	266,962	42,252,470	20,087,793	5,923,890	15,350,762	3,915,919
Under \$10,000,000 ²	588	1,770,275	323,608	13,341	177	6,674	694	267	304,672	136,124	21,619	89,797	12,175
\$10,000,000 under \$100,000,000	383	14,509,502	1,445,793	75,413	5,845	48,349	3,919	2,595	1,412,996	864,864	94,043	285,548	74,908
\$100,000,000 under \$250,000,000	167	27,019,138	2,305,232	188,713	9,413	114,291	12,215	6,573	2,230,298	1,042,194	185,047	535,219	179,537
\$250,000,000 or more	404	1,008,147,422	40,592,171	3,825,825	43,912	1,575,499	225,276	257,527	38,304,504	18,244,611	5,623,161	14,440,109	3,649,298
Middle East													
Total	348	640,437,325	30,468,553	2,986,581	28,626	1,173,455	178,766	212,278	28,539,062	13,669,006	4,748,644	12,013,861	2,884,687
Under \$10,000,000 ²	83	223,598	107,790	7,144	136	4,365	410	—	95,971	40,838	10,207	40,460	6,737
\$10,000,000 under \$100,000,000	61	2,363,938	193,461	7,298	137	2,400	1,223	612	191,818	89,581	11,184	47,158	4,612
\$100,000,000 under \$250,000,000	36	6,070,296	528,304	32,195	3,127	19,550	1,449	3,373	495,780	232,113	40,985	122,979	30,154
\$250,000,000 or more	168	631,779,493	29,632,998	2,938,944	25,226	1,147,140	175,864	208,293	27,755,493	13,306,474	4,686,268	11,803,264	2,843,165
OPEC Countries													
Total	146	444,711,639	21,508,673	2,399,072	19,432	824,740	110,403	183,963	19,921,637	9,604,701	4,131,725	10,284,160	2,324,170
Under \$10,000,000 ²	21	32,398	64,957	2,281	—	2,035	—	—	54,676	23,924	5,361	27,347	2,259
\$10,000,000 under \$100,000,000	15	569,038	61,385	3,805	137	1,516	599	351	60,730	28,956	7,544	30,123	1,822
\$100,000,000 under \$250,000,000	18	3,123,259	293,617	29,642	2,577	17,771	876	3,216	266,992	133,844	34,938	106,661	19,565
\$250,000,000 or more	92	440,986,944	21,088,714	2,363,345	16,718	803,419	108,928	180,396	19,520,139	9,417,977	4,083,881	10,120,009	2,292,965
All Other Asia													
Total	1,416	1,038,448,186	41,201,711	4,098,367	59,160	1,743,728	239,003	261,438	38,818,725	18,444,535	4,490,137	12,328,977	3,912,206
Under \$10,000,000 ²	515	1,592,850	303,795	12,370	41	6,538	299	267	285,570	127,380	21,095	87,857	11,527
\$10,000,000 under \$100,000,000	349	13,473,614	1,359,894	73,395	5,845	47,929	2,827	2,519	1,328,443	626,125	91,917	274,791	72,992
\$100,000,000 under \$250,000,000	159	25,675,062	2,193,449	188,229	9,379	113,881	11,678	5,573	2,136,114	988,002	182,221	527,536	179,019
\$250,000,000 or more	393	997,706,660	37,344,573	3,824,373	43,895	1,575,380	224,199	252,079	35,068,598	16,693,028	4,194,904	11,438,793	3,648,670
Hong Kong													
Total	140	367,684,174	13,802,818	2,043,590	20,133	808,671	95,782	156,063	12,853,293	6,071,541	2,090,828	5,575,147	1,972,327
Under \$10,000,000 ²	17	35,307	65,816	3,937	—	2,345	—	—	55,678	24,508	6,541	31,570	3,911
\$10,000,000 under \$100,000,000	28	1,225,045	159,921	19,592	55	10,897	430	312	158,155	74,136	16,259	46,905	18,685
\$100,000,000 under \$250,000,000	14	2,468,869	274,670	28,443	27	19,655	388	1,078	271,393	130,098	28,702	73,807	27,622
\$250,000,000 or more	81	363,954,953	13,302,411	1,991,620	20,051	775,774	94,964	154,639	12,368,067	5,842,859	2,039,325	5,422,865	1,922,108

Footnotes at end of table

Foreign Tax Credit on Corporation Returns, 1972

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 25.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Geographic Area and Selected Country where Foreign Taxes were Paid, and for DISC Dividends, and by Size of Total Assets—Continued

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

Geographic area, selected country, and DISC dividends, and size of total assets	Number of returns	Total assets	Income and taxes of domestic corporations from all sources									Income and taxes of domestic corporations from all foreign sources reported on Form 1118	
			Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Dividends received from DISCs	Western Hemisphere Trade Corporation deduction	Income subject to U.S. tax	U.S. Income tax before credits	Foreign tax credit claimed	Taxable income	
												Total (less loss) ¹	Dividends from related foreign corporations and from DISCs
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	
Asia—Continued													
All Other Asia—Continued													
Indonesia													
Total	85	325,947,986	10,672,280	1,896,269	9,456	490,776	48,172	159,341	9,178,204	4,392,079	1,817,487	5,084,195	1,836,659
Under \$10,000,000 ²	8	31,880	63,188	2,289	—	2,035	82	—	52,822	23,021	5,321	27,497	2,258
\$10,000,000 under \$100,000,000	15	874,172	88,556	8,667	54	5,466	—	915	87,072	42,219	12,959	34,285	7,579
\$100,000,000 under \$250,000,000	8	1,656,238	152,628	15,194	—	4,604	535	2,121	145,297	66,848	15,626	42,935	10,271
\$250,000,000 or more	54	323,585,696	10,367,908	1,870,120	9,402	478,672	47,555	156,305	8,893,013	4,259,991	1,783,581	4,979,477	1,816,551
Japan													
Total	1,216	961,833,022	38,123,121	3,775,490	55,236	1,680,190	223,464	239,769	36,238,122	17,210,378	4,255,981	11,352,903	3,609,075
Under \$10,000,000 ²	464	1,400,436	275,792	8,015	41	4,821	217	233	259,404	115,447	17,302	71,723	7,394
\$10,000,000 under \$100,000,000	280	10,856,380	1,071,946	58,173	5,545	40,278	2,129	989	1,049,000	495,671	71,805	208,687	60,820
\$100,000,000 under \$250,000,000	133	21,333,873	1,849,075	156,516	9,180	96,221	11,143	3,677	1,802,933	840,702	151,045	445,260	155,013
\$250,000,000 or more	339	928,242,333	34,926,308	3,552,786	40,470	1,538,870	209,975	234,870	33,124,785	15,758,558	4,015,829	10,627,233	3,385,748
Philippines													
Total	308	602,085,014	25,644,399	2,871,639	31,863	1,284,075	166,571	175,507	24,501,898	11,610,948	3,158,150	8,376,655	2,777,372
Under \$10,000,000 ²	44	143,477	76,155	3,607	—	2,701	—	—	65,104	28,536	6,267	31,033	3,396
\$10,000,000 under \$100,000,000	42	1,625,430	162,353	7,927	245	3,066	42	628	157,654	72,281	7,979	31,355	6,056
\$100,000,000 under \$250,000,000	36	6,000,341	602,303	60,868	3,144	27,281	337	1,235	588,917	276,267	50,515	160,354	56,161
\$250,000,000 or more	186	594,315,766	24,803,588	2,799,236	28,474	1,251,027	166,192	173,644	23,690,223	11,233,864	3,093,389	8,153,913	2,711,760
Oceania													
Total	937	869,455,824	35,787,944	3,492,104	52,594	1,545,566	217,238	217,742	33,984,960	16,111,321	3,561,707	9,674,965	3,343,831
Under \$10,000,000 ²	232	688,960	199,598	9,667	—	5,317	265	104	180,638	79,872	14,636	55,897	9,034
\$10,000,000 under \$100,000,000	257	10,549,215	1,107,285	53,598	4,294	36,357	2,332	1,624	1,090,122	513,586	71,014	221,689	53,148
\$100,000,000 under \$250,000,000	133	21,676,882	2,234,860	198,201	9,410	126,295	8,118	6,711	2,173,933	1,025,843	192,783	530,050	192,931
\$250,000,000 or more	315	836,540,767	32,246,201	3,230,638	38,890	1,376,587	206,523	209,303	30,540,267	14,492,020	3,283,274	8,867,329	3,088,719
Australia													
Total	887	799,475,808	32,882,602	3,470,764	50,408	1,536,671	213,015	216,107	31,163,859	14,774,234	3,527,108	9,535,824	3,325,110
Under \$10,000,000 ²	218	640,541	196,222	9,667	—	5,317	265	104	177,261	76,334	14,623	55,805	9,034
\$10,000,000 under \$100,000,000	240	9,900,617	1,044,607	52,183	4,251	35,286	2,332	1,624	1,029,495	465,554	86,039	219,852	51,117
\$100,000,000 under \$250,000,000	125	20,383,257	2,170,622	191,328	7,056	121,932	7,447	6,328	2,117,225	988,663	183,896	495,545	185,075
\$250,000,000 or more	304	768,551,393	29,471,151	3,217,587	38,741	1,373,157	202,971	208,051	27,839,888	13,211,883	3,259,950	8,770,611	3,079,284
Puerto Rico and United States Possessions													
Total	508	809,962,639	32,859,558	3,077,917	37,391	1,347,421	165,537	217,060	31,034,443	14,783,639	3,416,910	9,038,075	2,975,918
Under \$10,000,000 ²	140	356,579	120,793	5,537	60	3,584	15	1,378	107,065	46,037	10,894	43,988	5,235
\$10,000,000 under \$100,000,000	77	3,281,604	316,579	13,837	1,323	9,668	440	1,728	297,426	141,289	18,213	50,044	14,419
\$100,000,000 under \$250,000,000	69	11,728,656	1,045,339	105,479	4,477	64,454	2,109	2,862	1,001,301	460,491	107,340	287,280	106,508
\$250,000,000 or more	222	794,595,800	31,376,847	2,953,065	31,531	1,269,715	162,973	211,092	29,626,651	14,135,922	3,280,462	8,656,782	2,849,757
Puerto Rico													
Total	478	720,326,030	29,153,339	2,987,995	36,952	1,331,668	161,092	202,036	27,462,401	13,053,606	3,086,756	8,243,792	2,690,472
Under \$10,000,000 ²	137	336,887	119,043	5,415	60	3,584	15	1,378	105,368	45,241	10,844	43,867	5,135
\$10,000,000 under \$100,000,000	72	3,077,503	290,136	12,794	1,323	9,462	440	1,728	271,334	128,804	17,548	48,567	13,377
\$100,000,000 under \$250,000,000	64	10,877,833	983,338	101,156	4,038	63,511	2,109	2,649	933,567	430,732	102,514	275,117	101,903
\$250,000,000 or more	205	706,033,707	27,760,822	2,868,631	31,531	1,255,111	158,528	196,282	26,146,132	12,448,829	2,955,850	7,876,240	2,770,058
U.S. Possessions													
Total	93	447,302,338	15,689,375	1,898,951	15,436	634,052	34,508	139,941	14,224,154	6,618,300	2,103,840	5,379,885	1,861,406
Under \$10,000,000 ²	5	19,591	61,389	2,396	—	2,035	—	—	51,230	22,402	5,240	26,600	2,358
\$10,000,000 under \$100,000,000	8	290,671	28,822	1,076	—	229	—	—	28,470	13,461	1,225	3,003	1,076
\$100,000,000 under \$250,000,000	8	1,349,225	123,071	6,669	659	2,761	—	214	122,171	58,778	7,582	18,938	7,151
\$250,000,000 or more	72	445,642,851	15,476,093	1,888,810	14,777	629,027	34,508	139,727	14,022,283	6,723,659	2,089,793	5,331,344	1,850,822
Country not stated or not allocable and other income from outside the United States													
Total	370	566,400,262	21,829,923	2,480,766	32,192	940,025	166,896	177,772	20,313,377	9,625,671	2,493,185	6,913,245	2,348,585
Under \$10,000,000 ²	94	191,448	92,280	2,936	—	2,575	—	—	78,351	35,480	10,362	41,299	2,885
\$10,000,000 under \$100,000,000	58	2,392,589	253,591	23,126	3,687	14,963	537	1,570	249,118	116,885	28,705	86,813	24,603
\$100,000,000 under \$250,000,000	44	7,863,110	755,379	74,789	3,962	47,918	2,768	4,664	740,446	353,120	76,058	204,646	70,742
\$250,000,000 or more	174	555,963,115	20,728,693	2,379,916	24,543	874,569	163,591	170,033	19,244,462	9,120,186	2,378,060	6,580,488	2,250,455

Footnotes at end of table

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 25.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Geographic Area and Selected Country where Foreign Taxes were Paid, and for DISC Dividends, and by Size of Total Assets—Continued

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

Geographic area, selected country, and DISC dividends, and size of total assets	Income and taxes of domestic corporations from all foreign sources reported on Form 1118—Continued				Income and taxes of domestic corporations from specific geographic area or country and DISC dividends							Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
	Foreign taxes				Taxable income			Foreign taxes, excluding carryover					
	Total	Paid or accrued	Deemed paid	Carryover	Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Interest for which separate credit was computed	Total	Paid or accrued				
									Total	On interest for which separate credit was computed	Deemed paid		
(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)	(25)	(26)	
All Geographic Areas and DISC Dividends	10,680,701	6,535,979	2,392,636	1,752,086	16,486,388	4,201,306	103,466	8,928,615	6,535,979	5,300	2,392,636	737,438	29,209
Under \$10,000,000 ²	79,092	37,870	17,638	23,584	195,638	28,750	2,271	55,508	37,870	334	17,638	303	—
\$10,000,000 under \$100,000,000	216,583	86,670	93,540	36,373	522,490	141,989	3,186	180,210	86,670	583	93,540	303	1,736
\$100,000,000 under \$250,000,000	296,383	95,072	176,800	24,511	752,610	255,222	2,681	271,872	95,072	364	176,800	43,986	4,679
\$250,000,000 or more	10,088,644	6,316,367	2,104,659	1,667,618	15,015,650	3,775,946	95,327	8,421,025	6,316,367	4,019	2,104,659	660,396	22,793
Canada	7,718,179	4,359,109	2,312,574	1,046,495	2,401,264	872,107	28,104	878,246	4,359,109	3,479	564,257	265,134	3,953
Under \$10,000,000 ²	39,372	18,944	8,019	12,409	50,958	6,273	396	15,013	10,573	50	4,440	—	—
\$10,000,000 under \$100,000,000	151,679	51,945	77,550	22,184	142,272	45,189	1,198	59,804	19,380	186	40,425	19,658	1,735
\$100,000,000 under \$250,000,000	252,066	76,479	158,266	17,321	60,857	60,857	892	74,979	18,458	122	56,521	2,278	—
\$250,000,000 or more	7,275,062	4,211,741	2,068,738	994,582	2,021,694	759,788	25,617	728,449	4,211,741	3,121	462,872	243,198	2,218
Latin America	7,212,564	4,164,802	2,237,010	810,752	1,962,819	438,211	11,919	1,149,064	997,792	636	151,273	36,144	4,386
Under \$10,000,000 ²	37,140	17,776	7,290	12,073	30,617	2,384	261	10,519	9,437	69	1,081	4	—
\$10,000,000 under \$100,000,000	137,470	57,205	51,837	28,429	70,031	13,269	572	30,246	25,895	209	4,351	758	(P)
\$100,000,000 under \$250,000,000	228,444	69,886	143,743	14,816	87,934	30,628	217	28,797	18,919	40	9,878	3,451	412
\$250,000,000 or more	6,809,509	4,019,935	2,034,141	755,434	1,774,236	391,930	10,869	1,079,502	943,540	319	135,963	31,900	3,974
Argentina	5,525,362	2,982,874	1,844,554	698,004	1,071,182	29,369	2,261	45,970	41,761	27	8,209	2,531	216
Under \$10,000,000 ²	12,656	5,784	2,233	4,639	3,649	197	3	1,785	1,690	1	94	—	—
\$10,000,000 under \$100,000,000	34,436	15,762	17,926	748	2,566	650	3	678	678	—	260	—	—
\$100,000,000 under \$250,000,000	103,264	29,863	64,264	9,137	3,455	904	—	1,669	1,415	—	254	—	—
\$250,000,000 or more	5,375,006	2,931,395	1,760,131	683,481	97,512	27,618	2,255	45,578	37,977	27	7,601	2,529	216
Brazil	4,724,023	2,593,175	1,788,551	342,297	184,198	77,987	2,686	82,142	61,353	149	20,789	4,767	—
Under \$10,000,000 ²	9,410	5,892	3,081	657	4,790	—	7	1,532	1,532	2	—	—	—
\$10,000,000 under \$100,000,000	41,235	18,237	16,057	6,942	4,519	1,319	148	2,104	1,722	63	381	7	—
\$100,000,000 under \$250,000,000	94,502	30,344	54,462	9,696	12,777	3,417	29	3,085	2,321	7	764	1,625	—
\$250,000,000 or more	4,578,876	2,540,902	1,712,971	325,003	162,111	73,251	2,501	75,421	55,777	76	19,644	3,135	—
Ecuador	3,072,047	2,043,845	906,645	121,756	9,446	985	11	5,700	5,473	4	227	334	—
Under \$10,000,000 ²	6,469	4,058	2,034	377	179	—	—	40	40	—	—	—	—
\$10,000,000 under \$100,000,000	7,445	5,409	1,857	179	1,682	10	11	318	316	4	2	—	—
\$100,000,000 under \$250,000,000	21,199	9,380	6,747	5,091	120	—	—	355	355	—	—	—	—
\$250,000,000 or more	3,036,934	2,024,817	896,007	116,110	7,466	975	—	4,986	4,761	—	225	334	—
Mexico	6,048,433	3,175,569	2,134,556	738,308	311,942	70,217	3,822	127,644	95,362	360	32,283	5,605	704
Under \$10,000,000 ²	24,844	12,020	6,812	6,012	9,011	1,944	195	4,036	3,101	57	934	—	—
\$10,000,000 under \$100,000,000	77,145	31,723	34,897	10,525	16,787	3,265	321	6,704	5,167	124	1,517	38	—
\$100,000,000 under \$250,000,000	208,798	63,108	132,506	13,185	30,221	5,478	156	11,767	9,019	30	2,748	48	—
\$250,000,000 or more	5,737,645	3,068,718	1,960,341	708,586	255,923	59,531	3,150	105,138	78,054	149	27,084	5,519	704
Panama, Excluding Canal Zone	4,658,978	2,551,943	1,478,469	628,566	265,259	148,798	98	59,439	6,976	—	52,463	12,408	2,828
Under \$10,000,000 ²	6,763	4,483	2,038	241	1,292	130	—	199	194	—	4	—	—
\$10,000,000 under \$100,000,000	36,888	15,196	9,496	12,256	3,763	1,833	—	1,087	841	—	246	—	—
\$100,000,000 under \$250,000,000	46,166	14,164	25,649	6,353	11,954	8,224	—	3,755	4	—	3,750	317	—
\$250,000,000 or more	4,569,161	2,518,100	1,441,345	609,716	248,250	138,610	98	54,399	5,937	—	48,462	12,091	2,828
Peru	4,848,061	2,883,424	1,673,269	291,367	82,364	9,868	2	45,953	42,541	1	3,412	—	(P)
Under \$10,000,000 ²	6,646	4,611	2,036	—	3,376	—	—	1,198	1,198	—	—	—	—
\$10,000,000 under \$100,000,000	17,614	10,336	6,086	1,191	2,309	1,489	(P)	1,652	1,087	(P)	565	(P)	—
\$100,000,000 under \$250,000,000	59,040	22,348	29,295	7,398	1,657	731	—	745	594	—	151	—	—
\$250,000,000 or more	4,764,761	2,846,130	1,635,852	282,779	75,021	7,648	1	42,358	39,663	1	2,695	—	—
Venezuela	6,372,030	3,846,529	1,843,389	682,112	745,292	70,613	2,892	679,560	655,794	92	23,777	8,344	638
Under \$10,000,000 ²	21,525	9,539	4,646	7,341	1,922	2	56	477	477	9	(P)	—	—
\$10,000,000 under \$100,000,000	44,036	21,480	10,244	12,312	25,802	2,141	80	13,269	12,719	17	351	46	—
\$100,000,000 under \$250,000,000	118,503	39,842	72,560	6,101	20,231	11,103	32	5,587	3,716	3	1,871	1,460	412
\$250,000,000 or more	6,187,966	3,775,669	1,755,939	656,358	697,337	57,387	2,725	660,227	638,872	62	21,355	6,838	227
Other Western Hemisphere	3,780,524	2,056,513	1,277,484	446,528	207,171	81,981	2,714	20,354	9,313	—	11,041	9,083	—
Under \$10,000,000 ²	7,119	3,878	2,560	681	1,833	742	—	620	32	—	587	71	—
\$10,000,000 under \$100,000,000	20,933	4,545	11,157	5,231	4,576	595	2	358	174	—	183	—	—
\$100,000,000 under \$250,000,000	22,340	7,868	14,064	408	6,747	2,138	—	881	36	—	645	—	—
\$250,000,000 or more	3,730,132	2,040,222	1,249,702	440,208	194,016	78,505	2,712	18,696	9,070	—	9,626	9,013	—
The Bahamas	2,691,084	1,485,847	1,015,851	189,386	114,395	54,816	94	8,428	3,197	—	5,231	9,013	—
Under \$10,000,000 ²	5,258	3,224	2,034	—	76	—	—	(P)	(P)	—	—	—	—
\$10,000,000 under \$100,000,000	14,718	1,634	8,180	4,904	627	38	2	2	—	—	2	—	—
\$100,000,000 under \$250,000,000	10,115	4,310	5,418	387	1,510	818	—	107	—	—	107	—	—
\$250,000,000 or more	2,660,993	1,476,679	1,000,219	184,095	112,182	53,960	92	8,318	3,197	—	5,122	9,013	—

Footnotes at end of table

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 25.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Geographic Area and Selected Country where Foreign Taxes were Paid, and for DISC Dividends, and by Size of Total Assets—Continued

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

Geographic area, selected country, and DISC dividends, and size of total assets	Income and taxes of domestic corporations from all foreign sources reported on Form 1118—Continued				Income and taxes of domestic corporations from specific geographic area or country and DISC dividends								Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
	Foreign taxes				Taxable income			Foreign taxes, excluding carryover						
	Total	Paid or accrued	Deemed paid	Carryover	Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Interest for which separate credit was computed	Total	Paid or accrued					
									Total	On interest for which separate credit was computed	Deemed paid			
Europe														
Total	7,685,764	4,378,313	2,282,727	1,023,724	4,215,419	1,805,138	24,199	1,575,295	368,527	178	1,208,768	335,445	14,897	
Under \$10,000,000 ²	38,646	15,243	12,351	11,051	55,221	14,666	68	15,942	6,608	9	9,333	133	—	
\$10,000,000 under \$100,000,000.....	147,134	48,754	77,669	20,710	176,523	84,871	890	57,311	17,147	51	40,165	11,517	2	
\$100,000,000 under \$250,000,000.....	252,851	73,385	163,177	16,290	329,488	141,166	45	123,780	27,685	3	96,095	36,571	4,222	
\$250,000,000 or more.....	7,247,134	4,241,931	2,029,590	975,673	3,654,166	1,584,435	23,197	1,378,262	317,087	113	1,061,175	287,224	10,874	
Austria														
Total	2,697,569	1,484,279	1,114,026	99,284	36,294	11,083	1	14,823	5,678	—	9,145	240	—	
Under \$10,000,000 ²	8,115	3,253	2,711	2,151	1,018	573	—	577	59	—	518	—	—	
\$10,000,000 under \$100,000,000.....	9,746	4,371	4,018	1,358	1,138	228	(?)	438	193	—	246	—	—	
\$100,000,000 under \$250,000,000.....	54,765	15,030	35,288	4,448	2,462	651	—	806	68	—	738	—	—	
\$250,000,000 or more.....	2,624,942	1,461,626	1,072,010	91,307	31,676	9,630	(?)	13,001	5,358	—	7,643	240	—	
Belgium														
Total	4,406,810	2,623,813	1,586,290	196,707	145,223	57,191	2,250	52,496	17,129	11	35,368	1,106	138	
Under \$10,000,000 ²	8,061	4,413	2,349	1,298	2,003	71	32	498	480	5	18	—	—	
\$10,000,000 under \$100,000,000.....	31,813	11,845	12,844	7,124	8,987	1,806	69	2,168	1,124	6	1,044	—	—	
\$100,000,000 under \$250,000,000.....	73,053	19,561	49,463	4,029	15,709	5,638	—	5,451	1,850	—	3,601	—	—	
\$250,000,000 or more.....	4,293,884	2,587,994	1,521,633	184,257	119,424	48,676	2,150	44,380	13,675	1	30,704	1,106	138	
Denmark														
Total	2,419,588	1,364,093	967,526	87,979	30,175	9,679	2,148	6,391	624	—	5,766	1,587	160	
Under \$10,000,000 ²	5,206	3,172	2,034	—	94	—	—	3	3	—	—	—	—	
\$10,000,000 under \$100,000,000.....	16,259	4,142	10,856	1,262	1,090	266	2	219	85	—	135	—	—	
\$100,000,000 under \$250,000,000.....	31,865	7,095	20,064	1,706	1,032	117	—	75	7	—	68	—	—	
\$250,000,000 or more.....	2,366,267	1,349,684	931,572	85,011	27,959	9,297	2,144	6,093	530	—	5,563	1,587	160	
France (Includes Andorra)														
Total	4,952,809	2,757,457	1,863,470	331,883	467,349	152,322	3,431	160,376	25,006	23	135,370	19,299	—	
Under \$10,000,000 ²	16,061	6,151	6,600	3,310	8,800	1,824	—	2,756	583	—	2,174	—	—	
\$10,000,000 under \$100,000,000.....	60,772	20,031	30,855	9,885	16,103	4,231	27	5,995	1,903	1	4,092	—	—	
\$100,000,000 under \$250,000,000.....	157,899	41,283	110,299	6,316	42,800	15,028	—	15,480	1,401	—	14,079	272	—	
\$250,000,000 or more.....	4,718,078	2,689,991	1,715,716	312,371	399,647	131,239	3,405	136,144	21,119	22	115,025	19,026	—	
Italy (Includes San Marino)														
Total	4,565,652	2,441,668	1,762,734	361,251	188,832	67,830	2,169	85,757	14,988	4	70,769	763	7	
Under \$10,000,000 ²	12,679	5,026	4,371	3,283	6,934	1,537	3	977	338	1	638	—	—	
\$10,000,000 under \$100,000,000.....	54,167	18,874	25,504	9,789	11,027	2,405	14	3,075	1,083	3	1,993	—	—	
\$100,000,000 under \$250,000,000.....	143,056	37,211	100,885	4,961	19,278	8,691	8	6,608	715	1	5,892	—	—	
\$250,000,000 or more.....	4,355,750	2,380,558	1,631,974	343,218	151,593	55,197	2,144	75,097	12,851	—	62,246	763	7	
Liechtenstein														
Total	81,169	41,149	23,902	16,118	7,798	4,216	—	68	49	—	19	—	—	
Under \$10,000,000 ²	420	162	255	2	336	6	—	30	14	—	16	—	—	
\$10,000,000 under \$100,000,000.....	2,905	760	259	1,886	2,696	—	—	35	35	—	3	—	—	
\$100,000,000 under \$250,000,000.....	77,844	40,227	23,367	14,230	4,766	4,210	—	—	—	—	—	—	—	
\$250,000,000 or more.....	—	—	—	—	—	—	—	—	—	—	—	—	—	
Luxembourg														
Total	2,200,638	1,305,047	811,873	83,718	41,862	11,238	—	3,538	328	—	3,210	1,367	2,211	
Under \$10,000,000 ²	3,618	2,609	954	57	624	275	—	220	29	—	191	—	—	
\$10,000,000 under \$100,000,000.....	9,140	2,420	6,673	48	580	66	—	17	—	—	17	—	—	
\$100,000,000 under \$250,000,000.....	2,187,879	1,300,019	804,246	83,613	40,659	10,897	—	3,301	299	—	3,002	1,367	2,211	
\$250,000,000 or more.....	—	—	—	—	—	—	—	—	—	—	—	—	—	
Netherlands														
Total	4,155,176	2,388,786	1,520,150	245,260	216,305	158,348	44	145,318	6,487	—	138,851	16,235	—	
Under \$10,000,000 ²	11,472	4,644	4,090	2,738	1,874	764	—	658	86	—	572	—	—	
\$10,000,000 under \$100,000,000.....	58,552	14,235	32,058	12,259	17,282	7,549	5	7,251	523	—	6,728	2,858	—	
\$100,000,000 under \$250,000,000.....	88,098	21,776	64,726	1,596	28,372	11,975	—	12,041	758	—	11,283	7,415	—	
\$250,000,000 or more.....	3,997,053	2,349,111	1,419,276	228,667	168,777	136,059	39	125,368	5,100	—	120,268	5,962	—	
Spain														
Total	5,948,302	3,492,896	1,693,768	761,618	91,871	33,966	2,207	27,381	13,023	9	14,358	4,331	—	
Under \$10,000,000 ²	12,495	5,004	4,342	3,148	724	3	—	77	75	—	2	—	—	
\$10,000,000 under \$100,000,000.....	22,131	10,858	10,602	671	2,402	470	—	842	411	—	232	—	—	
\$100,000,000 under \$250,000,000.....	80,348	24,179	49,464	6,725	3,814	1,692	—	815	424	—	392	—	—	
\$250,000,000 or more.....	5,833,329	3,452,854	1,629,400	751,075	84,931	31,800	2,207	25,847	12,113	9	13,734	4,331	—	
Sweden														
Total	3,097,458	1,605,453	1,286,535	225,470	72,347	21,843	2,156	24,476	1,230	—	23,247	284	—	
Under \$10,000,000 ²	8,759	4,258	2,832	1,669	429	—	—	—	—	—	—	—	—	
\$10,000,000 under \$100,000,000.....	8,039	3,632	3,964	442	1,217	208	12	202	21	—	181	46	—	
\$100,000,000 under \$250,000,000.....	73,514	16,805	54,056	2,852	7,823	1,825	—	2,376	91	—	2,284	—	—	
\$250,000,000 or more.....	3,007,147	1,580,958	1,205,683	220,506	63,078	19,610	2,144	21,898	1,117	—	20,781	238	—	
Switzerland														
Total	4,036,605	2,184,178	1,673,830	178,596	330,577	186,455	4,014	98,030	19,331	98	78,699	49,635	—	
Under \$10,000,000 ²	15,712	6,394	4,016	5,302	3,087	1,163	23	956	654	2	302	96	—	
\$10,000,000 under \$100,000,000.....	31,907	6,955	17,614	7,337	12,248	9,694	641	2,181	550	37	1,630	6,325	—	
\$100,000,000 under \$250,000,000.....	94,051	26,744	56,847	8,459	15,362	8,237	—	4,525	1,736	—	2,789	3,331	—	
\$250,000,000 or more.....	3,894,935	2,144,084	1,593,353	157,498	299,882	167,363	3,349	90,369	16,391	59	73,978	39,883	—	

Footnotes at end of table

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 25.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Geographic Area and Selected Country where Foreign Taxes were Paid, and for DISC Dividends, and by Size of Total Assets—Continued

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

Geographic area, selected country, and DISC dividends, and size of total assets	Income and taxes of domestic corporations from all foreign sources reported on Form 1118—Continued				Income and taxes of domestic corporations from specific geographic area or country and DISC dividends							Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations	
	Foreign taxes				Taxable income			Foreign taxes, excluding carryover						
	Total	Paid or accrued	Deemed paid	Carryover	Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Interest for which separate credit was computed	Total	Total	On interest for which separate credit was computed	Deemed paid			
(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)	(25)	(26)		
Europe—Continued														
United Kingdom														
Total	6,072,759	3,573,476	2,072,460	426,823	1,399,751	543,006	3,532	492,778	138,081	16	353,697	235,937	12,381	
Under \$10,000,000 ²	23,615	9,353	8,791	5,472	16,101	2,838	6	3,664	1,982	—	1,681	37	—	
\$10,000,000 under \$100,000,000	91,780	30,891	48,520	12,268	59,910	18,174	109	17,033	5,432	5	11,601	2,124	—	
\$100,000,000 under \$250,000,000	220,554	62,344	144,909	13,302	137,038	61,995	28	54,096	15,047	3	39,051	24,125	4,222	
\$250,000,000 or more	5,736,809	3,470,788	1,870,240	395,782	1,186,701	459,999	3,390	417,983	116,619	9	301,364	209,650	8,159	
West Germany														
Total	4,222,940	2,091,599	1,814,012	317,329	1,044,002	492,249	2,183	415,769	106,603	(*)	309,166	4,500	—	
Under \$10,000,000 ²	26,788	6,657	6,735	9,395	14,718	5,552	(*)	5,405	2,121	(*)	3,283	—	—	
\$10,000,000 under \$100,000,000	63,804	22,247	36,763	4,794	42,584	19,381	11	17,410	5,347	—	12,063	164	—	
\$100,000,000 under \$250,000,000	178,883	51,062	117,427	10,194	48,607	23,081	—	19,958	5,088	—	14,870	1,427	—	
\$250,000,000 or more	3,953,666	2,009,633	1,651,088	292,945	938,094	444,235	2,172	373,017	94,047	—	278,970	2,909	—	
East European Countries														
Total	2,026,368	1,122,932	728,263	175,173	48,355	20,719	—	17,514	6,070	—	11,444	—	—	
Under \$10,000,000 ²	6,658	4,152	2,034	472	523	—	—	6	6	—	—	—	—	
\$10,000,000 under \$100,000,000	9,432	2,656	1,637	5,139	644	89	—	97	40	—	57	—	—	
\$100,000,000 under \$250,000,000	18,888	4,156	10,841	3,889	842	265	—	181	44	—	136	—	—	
\$250,000,000 or more	1,991,392	1,111,969	713,751	165,672	44,345	20,355	—	17,231	5,981	—	11,250	—	—	
Africa														
Total	6,988,242	4,123,906	1,873,239	991,098	1,271,572	203,143	6,559	944,529	872,179	5	72,350	38,320	2,500	
Under \$10,000,000 ²	16,523	6,029	4,598	5,897	5,252	745	—	1,630	1,353	—	277	—	—	
\$10,000,000 under \$100,000,000	62,646	21,430	28,342	12,875	11,473	1,443	53	3,842	2,734	5	909	32	—	
\$100,000,000 under \$250,000,000	128,394	42,948	78,823	6,623	13,344	3,674	—	3,889	2,365	—	1,524	260	46	
\$250,000,000 or more	6,780,679	4,053,499	1,761,476	965,703	1,241,503	197,281	6,505	935,968	865,728	(*)	69,640	38,027	2,454	
Liberia														
Total	2,882,076	1,780,230	682,065	418,780	125,063	84,562	—	5,740	2,083	—	3,656	2,419	—	
Under \$10,000,000 ²	5,590	3,556	2,034	—	123	—	—	73	73	—	—	—	—	
\$10,000,000 under \$100,000,000	11,832	2,777	8,589	458	51	—	—	—	—	—	—	—	—	
\$100,000,000 under \$250,000,000	2,864,653	1,773,897	671,432	419,324	124,888	84,562	—	5,667	2,011	—	3,656	2,419	—	
South Africa, Republic of (Includes South-West Africa)														
Total	3,856,887	1,942,169	1,566,759	347,939	118,381	46,789	2,266	46,411	15,549	5	30,862	35,820	2,070	
Under \$10,000,000 ²	14,676	4,832	4,486	5,360	1,503	308	—	504	309	—	195	—	—	
\$10,000,000 under \$100,000,000	49,024	14,362	22,925	11,737	6,796	1,442	53	1,743	835	5	908	32	—	
\$100,000,000 under \$250,000,000	104,475	34,050	67,683	7,722	1,243	—	—	2,078	1,172	—	905	202	46	
\$250,000,000 or more	3,688,712	1,888,945	1,471,665	328,101	102,360	43,796	2,213	42,087	13,233	—	28,853	35,586	2,024	
OPEC Countries														
Total	5,178,360	3,393,387	995,134	789,840	924,459	41,437	2,144	828,567	798,758	—	29,809	—	—	
Under \$10,000,000 ²	12,185	7,682	3,341	1,161	3,335	—	—	1,579	1,579	—	—	—	—	
\$10,000,000 under \$100,000,000	12,931	6,160	701	1,091	1,091	—	—	561	561	—	—	—	—	
\$100,000,000 under \$250,000,000	5,153,245	3,379,544	985,723	787,977	920,033	41,437	2,144	826,427	796,618	—	29,809	—	—	
Asia														
Total	10,190,786	6,315,529	2,209,649	1,865,608	5,546,845	681,206	17,065	4,109,003	3,808,616	820	300,388	19,601	(*)	
Under \$10,000,000 ²	28,452	13,793	7,061	7,598	31,887	2,152	1,475	6,078	5,441	194	636	—	—	
\$10,000,000 under \$100,000,000	109,365	42,375	50,522	16,468	67,040	8,864	90	16,445	13,404	7	3,041	409	(*)	
\$100,000,000 under \$250,000,000	206,374	66,520	125,932	19,922	60,232	5,765	1,152	15,834	11,482	128	1,352	—	—	
\$250,000,000 or more	9,846,595	6,192,840	2,026,135	1,827,620	5,387,585	664,426	14,348	4,070,647	3,778,289	290	292,359	19,192	—	
Middle East														
Total	8,503,793	5,587,042	1,573,891	1,342,859	4,090,797	108,064	2,200	3,536,654	3,495,104	10	41,550	3	—	
Under \$10,000,000 ²	15,743	5,165	4,705	5,874	813	197	16	238	209	5	29	—	—	
\$10,000,000 under \$100,000,000	11,484	8,537	2,871	86	6,668	1,088	—	1,214	900	—	314	—	—	
\$100,000,000 under \$250,000,000	50,362	22,271	21,475	6,615	2,524	58	—	664	623	—	42	—	—	
\$250,000,000 or more	8,426,194	5,551,069	1,544,841	1,330,284	4,080,793	106,721	2,184	3,534,538	3,493,373	5	41,165	3	—	
OPEC Countries														
Total	7,749,947	5,284,800	1,190,543	1,274,605	4,023,476	53,113	2,151	3,492,424	3,487,512	—	24,912	3	—	
Under \$10,000,000 ²	5,840	3,501	2,034	304	237	—	—	42	42	—	—	—	—	
\$10,000,000 under \$100,000,000	7,851	6,186	1,627	98	3,021	—	—	143	143	—	—	—	—	
\$100,000,000 under \$250,000,000	41,134	17,340	19,454	4,340	2,305	—	—	495	495	—	—	—	—	
\$250,000,000 or more	7,695,123	5,257,773	1,167,428	1,269,922	4,017,912	53,113	2,151	3,491,745	3,466,833	—	24,912	3	—	
All Other Asia														
Total	7,430,403	4,200,599	2,207,728	1,022,076	1,456,049	573,143	14,865	572,349	313,512	610	258,838	19,599	(*)	
Under \$10,000,000 ²	26,959	13,266	6,617	7,076	31,076	1,954	1,459	5,839	5,233	190	607	—	—	
\$10,000,000 under \$100,000,000	107,236	41,008	49,772	16,456	60,372	7,776	90	15,231	12,504	7	2,727	409	(*)	
\$100,000,000 under \$250,000,000	291,725	63,630	125,511	12,567	57,709	5,707	1,152	15,170	10,859	128	4,310	—	—	
\$250,000,000 or more	7,094,500	4,062,694	2,025,928	985,977	1,306,892	557,705	12,163	536,110	284,916	285	251,194	19,189	—	
Hong Kong														
Total	2,792,514	1,579,898	1,024,974	187,842	90,285	45,346	94	10,883	3,758	1	7,125	7,551	(*)	
Under \$10,000,000 ²	6,558	4,214	2,344	—	3,675	1,653	—	547	237	—	310	—	—	
\$10,000,000 under \$100,000,000	17,215	5,044	11,556	615	7,824	4,195	—	825	131	—	694	296	(*)	
\$100,000,000 under \$250,000,000	28,791	8,467	20,297	28	2,021	740	—	164	30	—	134	—	—	
\$250,000,000 or more	2,739,950	1,561,973	990,777	167,199	76,765	38,757	94	9,347	3,360	—	5,987	7,255	—	

Footnotes at end of table

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED
Table 25.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Geographic Area and Selected Country where Foreign Taxes were Paid, and for DISC Dividends, and by Size of Total Assets—Continued

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

Geographic area, selected country, and DISC dividends, and size of total assets	Income and taxes of domestic corporations from all foreign sources reported on Form 1118—Continued				Income and taxes of domestic corporations from specific geographic area or country and DISC dividends							Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
	Foreign taxes				Taxable income			Foreign taxes, excluding carryover					
	Total	Paid or accrued	Deemed paid	Carryover	Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Interest for which separate credit was computed	Total	Paid or accrued				
									Total	On interest for which separate credit was computed	Deemed paid		
(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)	(25)	(26)	
Asia—Continued													
All Other Asia—Continued													
Indonesia													
Total	3,595,028	2,201,649	820,445	572,935	362,933	363,115	67	244,872	96,069	11	148,603	—	—
Under \$10,000,000 ²	5,319	3,285	2,034	—	371	—	67	29	29	11	—	—	—
\$10,000,000 under \$100,000,000	13,735	7,402	5,904	420	1,539	313	—	553	390	—	163	—	—
\$100,000,000 under \$250,000,000	15,765	6,770	8,850	145	1,566	—	—	337	337	—	—	—	—
\$250,000,000 or more	3,560,208	2,184,191	803,656	572,361	359,457	362,802	—	243,753	95,313	—	148,440	—	—
Japan													
Total	6,519,586	3,780,808	2,068,915	669,862	750,160	114,336	5,690	201,619	118,061	509	83,557	10,169	—
Under \$10,000,000 ²	20,826	11,798	4,821	4,206	18,714	293	1,392	4,254	3,960	179	294	—	—
\$10,000,000 under \$100,000,000	86,022	28,992	41,461	15,570	37,472	1,468	28	10,752	9,571	3	1,181	5	—
\$100,000,000 under \$250,000,000	168,403	52,355	106,094	9,954	42,627	9,240	1,148	9,719	5,892	127	3,827	—	—
\$250,000,000 or more	6,244,335	3,687,663	1,916,540	640,132	651,346	108,335	3,122	176,894	98,639	200	78,255	10,164	—
Philippines													
Total	4,255,018	2,468,640	1,581,555	204,824	82,213	21,783	2,286	32,960	25,463	46	7,498	1,773	(³)
Under \$10,000,000 ²	8,626	3,639	2,777	2,211	2,065	8	—	364	362	—	2	—	—
\$10,000,000 under \$100,000,000	9,089	4,694	3,785	609	3,288	1,395	—	1,286	780	—	506	109	—
\$100,000,000 under \$250,000,000	55,644	19,463	33,948	2,234	1,491	205	—	502	436	—	65	—	(³)
\$250,000,000 or more	4,181,658	2,440,844	1,541,045	199,770	75,370	20,175	2,286	30,806	23,884	46	6,924	1,664	—
Oceania													
Total	4,975,051	2,687,480	1,892,992	394,578	435,192	106,296	3,416	165,136	82,780	134	82,356	33,661	3,473
Under \$10,000,000 ²	19,724	7,510	6,356	5,857	8,017	1,689	54	2,950	1,712	7	1,238	95	—
\$10,000,000 under \$100,000,000	80,273	32,306	37,450	10,516	21,763	5,549	183	8,748	4,772	21	3,975	379	—
\$100,000,000 under \$250,000,000	214,232	64,614	136,763	12,855	34,680	7,213	247	14,712	8,502	28	6,210	1,425	—
\$250,000,000 or more	4,660,821	2,583,049	1,712,424	365,348	370,732	91,844	2,932	138,726	67,793	78	70,933	31,762	3,473
Australia													
Total	4,938,650	2,667,225	1,882,716	388,910	400,327	100,521	3,365	153,877	76,178	127	77,700	33,632	3,473
Under \$10,000,000 ²	19,709	7,499	6,356	5,854	7,807	1,687	54	2,918	1,680	7	1,238	95	—
\$10,000,000 under \$100,000,000	77,431	30,963	36,359	10,108	20,397	5,279	147	8,341	4,555	16	3,786	379	—
\$100,000,000 under \$250,000,000	204,829	60,260	132,400	12,169	31,250	7,009	236	13,873	7,846	26	6,026	1,425	—
\$250,000,000 or more	4,636,882	2,568,502	1,707,802	360,779	340,873	86,545	2,929	128,745	62,095	78	66,650	31,734	3,473
Puerto Rico and United States Possessions													
Total	5,008,249	3,017,148	1,688,778	302,323	122,248	11,757	2,717	52,815	48,810	186	4,005	—	—
Under \$10,000,000 ²	13,470	6,383	3,628	3,459	5,815	100	16	1,511	1,466	5	44	—	—
\$10,000,000 under \$100,000,000	19,256	8,472	10,112	672	8,666	877	198	3,095	2,677	103	418	—	—
\$100,000,000 under \$250,000,000	118,095	39,832	69,874	8,388	18,450	3,743	128	7,728	6,165	43	1,563	—	—
\$250,000,000 or more	4,857,429	2,962,461	1,605,164	289,804	89,316	7,037	2,374	40,481	38,502	35	1,979	—	—
Puerto Rico													
Total	4,341,844	2,400,616	1,639,683	301,546	98,260	8,309	2,607	42,300	39,855	186	2,445	—	—
Under \$10,000,000 ²	13,360	6,378	3,584	3,399	5,649	—	16	1,455	1,455	5	—	—	—
\$10,000,000 under \$100,000,000	18,429	8,121	9,636	672	7,969	627	198	2,786	2,574	103	212	—	—
\$100,000,000 under \$250,000,000	113,174	37,232	67,554	8,388	15,295	935	128	5,843	5,242	43	401	—	—
\$250,000,000 or more	4,196,881	2,348,884	1,558,909	289,088	69,326	6,747	2,265	32,417	30,584	35	1,832	—	—
U.S. Possessions													
Total	3,402,760	2,379,497	924,436	98,827	23,988	3,448	110	10,515	8,955	—	1,560	—	—
Under \$10,000,000 ²	5,299	3,160	2,078	61	165	100	—	56	12	—	44	—	—
\$10,000,000 under \$100,000,000	1,538	1,008	499	31	678	250	—	309	103	—	206	—	—
\$100,000,000 under \$250,000,000	7,677	3,402	4,275	—	3,155	2,808	—	2,085	923	—	1,162	—	—
\$250,000,000 or more	3,388,247	2,371,928	917,584	98,735	19,990	290	110	8,064	7,917	—	147	—	—
Country not stated or not allocable and other income from outside the United States													
Total	3,544,403	2,110,103	1,233,755	200,546	287,466	595	6,774	34,093	33,974	63	119	49	—
Under \$10,000,000 ²	10,936	7,701	2,574	660	6,036	—	—	1,246	1,246	—	—	—	—
\$10,000,000 under \$100,000,000	34,647	13,256	15,682	5,709	19,052	—	1	487	487	—	—	—	—
\$100,000,000 under \$250,000,000	80,687	25,469	52,233	3,194	14,174	37	—	1,474	1,461	—	13	—	—
\$250,000,000 or more	3,417,933	2,063,685	1,163,265	190,983	248,204	558	6,773	30,886	30,781	63	106	49	—

¹Includes the "gross-up" of certain foreign dividends.

²Includes returns with zero assets.

³Less than \$500 per return.

NOTE: See text for explanatory statements, including Geographic classification under "Explanation of Terms" and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 26.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends

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

Selected major industry and selected area, subarea, country, and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Total	Paid or accrued	Deemed paid		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
All Industries								
All geographic areas and DISC dividends	5,497	16,486,388	4,201,306	8,928,615	6,535,979	2,392,636	737,438	29,209
Canada	3,298	2,401,264	872,107	878,246	313,989	564,257	265,134	3,953
Latin America, total	1,498	1,962,819	438,211	1,149,064	997,792	151,273	36,144	4,386
Mexico	1,031	311,942	70,217	127,644	95,362	32,283	5,605	704
Central America, total	398	329,134	155,628	77,214	22,819	54,394	13,899	2,828
Costa Rica	119	19,714	1,255	5,577	5,139	437	332	—
El Salvador	65	3,989	567	1,482	1,417	66	—	—
Guatemala	121	20,159	3,021	4,061	3,085	976	561	—
Honduras	69	14,962	1,256	5,808	5,448	361	598	—
Nicaragua	74	4,174	732	819	728	91	—	—
Panama, excluding Canal Zone	206	265,259	148,798	59,439	6,976	52,463	12,408	2,828
Not allocable	8	866	—	28	—	—	—	—
Caribbean countries, total	200	109,017	1,624	49,455	48,849	607	4	(¹)
Dominican Republic	77	29,539	78	16,294	16,267	28	—	—
Haiti	21	3,138	11	1,441	1,436	5	—	—
Jamaica	112	49,695	540	17,593	17,365	227	—	—
Trinidad	92	19,627	994	13,828	13,481	347	4	—
Other	26	7,017	—	300	—	—	—	—
South America, total	946	1,212,495	210,742	894,634	830,646	63,989	16,637	855
Argentina	388	107,182	29,369	49,970	41,761	8,208	2,531	216
Bolivia	54	8,257	97	1,873	1,844	29	—	—
Brazil	467	184,198	77,987	82,142	61,353	20,789	4,767	—
Chile	120	6,118	136	2,556	2,523	35	—	—
Colombia	293	56,069	19,076	22,878	15,775	7,102	661	(¹)
Ecuador	111	9,446	985	5,700	5,473	227	334	—
Paraguay	32	4,129	470	843	703	140	—	—
Peru	251	82,364	9,868	45,953	42,541	3,412	—	—
Uruguay	85	5,248	2,083	1,667	1,427	239	—	—
Venezuela	495	745,292	70,613	679,560	655,784	23,777	8,344	638
Other	32	4,192	57	1,492	1,463	29	—	—
Latin American, not allocable	5	232	—	116	—	—	—	—
Other Western Hemisphere, total	204	207,171	81,981	20,354	9,313	11,041	9,083	—
The Bahamas	79	114,395	54,816	8,428	3,197	5,231	9,013	—
Bermuda	30	22,023	10,161	477	22	455	—	—
Netherlands Antilles	104	60,800	15,168	9,485	4,694	4,791	71	—
Other	46	10,055	1,837	1,819	1,255	564	—	—
Europe, total	1,826	4,215,419	1,805,138	1,575,295	368,527	1,206,768	335,445	14,897
Common Market countries, total	1,268	2,103,580	937,178	863,347	170,594	692,753	43,289	2,356
Belgium	309	145,223	57,191	52,496	17,129	35,368	1,106	138
France (includes Andorra)	539	467,349	152,322	160,376	25,006	135,370	19,299	—
Italy (includes San Marino)	409	188,832	67,830	85,757	14,988	70,769	763	7
Luxembourg	40	41,862	11,238	3,538	328	3,210	1,387	2,211
Netherlands	549	216,305	156,348	145,318	6,467	138,851	16,235	—
West Germany	555	1,044,002	492,249	415,789	106,603	309,186	4,500	—
Other West European countries, total	1,217	2,063,487	847,241	694,433	191,862	502,571	292,156	12,541
Austria	116	36,294	11,083	14,823	5,678	9,145	240	—
Denmark	112	30,175	9,679	6,391	624	5,766	1,587	160
Finland	80	24,607	12,803	7,424	773	6,651	—	—
Greece	91	18,875	5,175	4,572	2,709	1,863	61	—
Ireland	80	9,503	2,522	2,339	813	1,526	—	—
Liechtenstein	14	7,798	4,216	68	49	19	—	—
Monaco	6	100	—	4	—	—	—	—
Norway	89	15,168	5,485	4,914	801	4,113	82	—
Portugal	101	14,515	8,483	4,430	1,844	2,586	—	—
Spain	308	91,871	33,966	27,381	13,023	14,358	4,331	—
Sweden	185	72,347	21,643	24,476	1,230	23,247	284	—
Switzerland	330	330,577	186,455	98,030	19,331	78,699	49,635	—
Turkey	84	10,464	2,612	6,539	5,689	850	—	—
United Kingdom	957	1,399,751	543,006	492,778	139,081	353,697	235,937	12,381
Other	28	1,341	112	265	215	50	—	—
East European countries, total	96	46,355	20,719	17,514	6,070	11,444	—	—
East Germany	24	30,495	20,632	15,114	3,721	11,393	—	—
Rumania	20	—163	—	(¹)	(¹)	—	—	—
Union of Soviet Socialist Republics	6	975	—	—	—	—	—	—
Other	70	15,047	87	2,400	2,350	51	—	—
Europe, not allocable	9	1,996	—	—	—	—	—	—
Africa, total	571	1,271,572	203,143	944,529	872,179	72,350	38,320	2,500
North Africa, total	90	837,150	3,685	777,852	775,940	1,913	—	—
Algeria	24	9,998	175	1,605	1,513	92	—	—
Egypt (formerly United Arab Republic)	39	10,228	731	5,102	4,754	348	—	—
Libya	36	815,938	—	768,459	768,459	—	—	—
Morocco	32	—1,580	1,930	1,770	630	1,140	—	—
Other	27	2,566	849	917	583	334	—	—

Footnotes at end of table.

Foreign Tax Credit on Corporation Returns, 1972

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 26.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Selected major industry and selected area, subarea, country, and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Total	Paid or accrued	Deemed paid		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
All Industries—Continued								
Africa—Continued								
East Africa, total	66	6,325	3,338	4,126	2,771	1,356	—	
Ethiopia	12	470	—	120	120	—	—	
Kenya	30	3,974	2,034	1,753	1,028	725	—	
Tanzania	10	2,799	—	263	263	—	—	
Uganda	8	765	705	512	161	352	—	
Other	39	-1,683	598	1,479	1,200	279	—	
West and Central African countries, total	106	284,977	134,863	106,497	70,961	35,536	2,419	
Ghana	18	744	—	408	408	—	—	
Liberia	42	125,063	84,562	5,740	2,083	3,656	2,419	
Nigeria	36	98,523	41,262	58,503	28,786	29,717	—	
Zaire (formerly Congo-Kinshasa)	13	1,292	608	681	425	256	—	
Other	58	59,354	8,430	41,166	39,259	1,906	—	
Southern Africa, total	499	142,864	61,258	56,047	22,502	33,546	35,902	
Malawi	6	-59	40	31	16	15	—	
Rhodesia	17	-126	44	35	17	18	—	
South Africa, Republic of (Includes South-West Africa)	456	118,381	46,789	46,411	15,549	30,862	35,820	
Zambia	34	23,670	12,120	8,573	6,783	1,891	23	
Other	28	897	2,265	897	137	760	58	
Africa, not allocable	14	256	—	6	6	—	—	
Asia, total	1,542	5,546,845	681,206	4,109,003	3,808,616	300,388	19,601	
Middle East, total	348	4,090,797	108,064	3,536,654	3,495,104	41,550	3	
Bahrain	12	51,898	15,000	15,278	—	15,278	—	
Iran	127	813,370	1,812	693,872	693,491	381	3	
Iraq	10	26,981	51,300	24,801	71	24,530	—	
Israel	224	19,883	2,826	5,865	4,955	910	—	
Kuwait	21	331,050	—	382,776	382,776	—	—	
Lebanon	56	-32,971	677	1,663	1,366	297	—	
Oatar	9	15,171	—	12,068	—	—	—	
Saudi Arabia	40	2,770,735	—	2,341,391	2,341,391	—	—	
United Arab Emirates	16	65,569	1	37,716	37,716	(*)	—	
Other areas of Arabian peninsula	6	33,546	—	20,789	20,789	—	—	
Other	33	-3,826	448	635	483	-152	—	
Southern and Southeastern Asia, total	483	575,634	408,628	352,674	184,899	167,774	1,823	
Bangladesh (formerly East Pakistan)	4	-645	—	348	—	—	—	
India	204	72,908	11,530	48,739	41,430	7,309	42	
Indonesia	85	362,933	363,115	244,672	96,069	148,603	—	
Malaysia	63	-7,538	2,913	3,178	2,058	1,120	—	
Pakistan	59	4,595	1,410	5,225	4,419	806	—	
Philippines	308	82,213	21,783	32,960	25,463	7,498	1,773	
Singapore	68	29,311	3,066	7,574	6,592	982	—	
South Vietnam	23	12,156	217	3,485	3,363	122	—	
Sri Lanka (formerly Ceylon)	8	471	1	217	217	(*)	—	
Thailand	97	13,220	4,593	5,034	3,700	1,335	8	
Other	37	6,010	—	1,242	1,242	—	—	
Eastern Asia, total	1,291	878,850	164,514	219,018	127,955	91,063	17,776	
China, Peoples Republic of	9	506	—	12	12	—	—	
China, Republic of (Taiwan)	118	21,627	837	3,888	3,680	208	56	
Hong Kong	140	90,285	45,346	10,883	3,758	7,125	7,551	
Japan	1,216	750,160	114,336	201,619	118,061	83,557	10,169	
Okinawa and Ryukyu Islands	26	-4,670	—	255	255	—	—	
South Korea, Republic of	72	18,961	2,246	1,902	1,750	152	—	
Other	16	2,380	1,750	460	439	21	—	
Asia, not allocable	12	1,565	—	657	657	—	—	
Oceania, total	937	435,192	106,296	165,136	82,780	82,356	33,661	
Australia	887	400,327	100,521	153,877	76,176	77,700	33,632	
New Zealand	197	23,812	5,656	10,556	6,012	4,544	13	
Other	65	11,053	119	704	592	111	15	
Puerto Rico and United States Possessions, total	508	122,248	11,757	52,815	48,810	4,005	—	
Puerto Rico	478	98,260	8,309	42,300	39,855	2,445	—	
U.S. Possessions, total	93	23,988	3,448	10,515	8,955	1,560	—	
American Samoa	11	240	—	83	83	—	—	
Guam	49	12,341	350	4,969	4,719	250	—	
Panama Canal Zone	8	-178	—	(*)	(*)	—	—	
Virgin Islands, U.S.	56	10,240	2,898	5,351	4,153	1,198	—	
Other	6	1,346	200	112	—	112	—	
Country not stated or not allocable and other income from outside the United States	370	287,466	595	34,093	33,974	119	49	
DISC dividends	25	36,390	873	81	—	61	—	
Other geographic classifications (combinations of countries shown above):								
Not economically less-developed countries	4,708	7,871,892	2,937,464	2,833,802	883,960	1,949,843	687,703	
Economically less-developed countries	2,021	8,245,263	1,239,906	6,042,676	5,611,546	431,130	49,685	
Sino-Soviet Bloc	98	45,376	22,469	17,963	6,499	11,464	—	
OPEC countries	573	6,065,606	529,263	5,250,923	5,023,596	227,327	638	

Footnotes at end of table.

Foreign Tax Credit on Corporation Returns, 1972

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 26.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Selected major industry and selected area, subarea, country, and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Total	Paid or accrued	Deemed paid		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
Mining								
All geographic areas and DISC dividends	126	3,046,384	29,965	2,069,590	2,050,271	19,319	32,368	
Canada	98	62,009	15,232	16,120	5,279	10,841	40	
Latin America, total	30	44,959	1,182	28,904	28,469	435	—	
Mexico	16	1,602	123	349	329	20	—	
Central America, total	5	2,751	—	1,355	1,355	—	—	
Honduras	3	2,485	—	1,344	1,344	—	—	
Caribbean countries, total	3	685	—	68	68	—	—	
Trinidad	3	685	—	68	68	—	—	
South America, total	16	39,921	1,059	27,133	26,717	416	—	
Argentina	3	1,203	458	473	257	216	—	
Brazil	7	1,881	—	817	817	—	—	
Colombia	3	1,246	—	591	591	—	—	
Ecuador	3	1,200	—	387	397	—	—	
Peru	8	30,455	126	23,539	23,494	44	—	
Venezuela	3	2,271	476	1,195	1,039	155	—	
Other Western Hemisphere, total	3	133	—	13	13	—	—	
Europe, total	14	10,087	3,775	3,185	767	2,419	—	
Common Market countries, total	8	5,329	2,241	2,237	425	1,812	—	
Italy (includes San Marino)	3	2,217	791	842	44	797	—	
Netherlands	4	526	240	277	65	212	—	
Other West European countries, total	9	4,758	1,534	948	341	607	—	
United Kingdom	9	3,747	1,089	624	206	418	—	
Africa, total	11	21,157	9,622	9,683	4,135	5,548	2,328	
North Africa, total	4	5,369	—	2,402	2,402	—	—	
Algeria	3	2,672	—	1,500	1,500	—	—	
Egypt (formerly United Arab Republic)	4	1,842	—	675	675	—	—	
West and Central African countries, total	4	505	—	187	187	—	—	
Nigeria	3	472	—	177	177	—	—	
Southern Africa	4	15,234	9,622	7,091	1,543	5,548	—	
Asia, total	20	2,875,814	96	1,999,330	1,999,291	39	—	
Middle East, total	7	2,872,136	—	1,998,121	1,998,121	—	—	
Iran	3	—315	—	350	350	—	—	
Saudi Arabia	3	2,872,209	—	1,997,680	1,997,680	—	—	
Southern and Southeastern Asia, total	10	3,532	96	1,196	1,157	39	—	
Indonesia	7	2,230	—	407	407	—	—	
Singapore	3	146	96	119	80	39	—	
Eastern Asia, total	8	146	—	14	14	—	—	
Japan	8	146	—	14	14	—	—	
Oceania, total	15	25,256	57	12,347	12,309	38	—	
Australia	15	25,256	57	12,184	12,146	38	—	
Country not stated or not allocable and other income from outside the United States	4	6,613	—	—	—	—	—	
Other geographic classifications (combinations of countries shown above):								
Not economically less-developed countries	109	112,707	28,686	38,632	19,786	18,846	32,368	
Economically less-developed countries	36	2,927,064	1,279	2,030,958	2,030,484	474	—	
OPEC countries	12	2,882,315	476	2,001,919	2,001,764	155	—	

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 26.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Selected major industry and selected area, subarea, country, and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Total	Paid or accrued	Deemed paid		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
Mining—Continued								
Crude petroleum and natural gas								
All geographic areas and DISC dividends	73	2,921,000	4,667	2,012,904	2,010,342	2,561	—	
Canada	54	7,137	—	1,850	1,850	—	—	
Latin America, total	20	14,198	1,160	5,457	5,033	424	—	
Mexico	13	1,447	101	284	275	9	—	
Central America	3	278	—	18	18	—	—	
Caribbean countries, total	3	685	—	68	68	—	—	
Trinidad	3	685	—	68	68	—	—	
South America, total	11	11,787	1,059	5,087	4,672	416	—	
Brazil	4	1,288	—	773	773	—	—	
Ecuador	3	1,200	—	397	397	—	—	
Peru	6	2,939	126	1,536	1,492	44	—	
Venezuela	3	2,271	476	1,195	1,039	155	—	
Europe, total	7	9,250	3,411	2,724	626	2,099	—	
Common Market countries, total	4	4,608	1,877	1,833	341	1,492	—	
Italy (includes San Marino)	3	2,217	791	842	44	797	—	
Other West European countries, total	5	4,641	1,534	892	285	607	—	
United Kingdom	5	3,819	1,099	624	206	418	—	
Africa, total	7	5,923	—	2,592	2,592	—	—	
North Africa, total	4	5,369	—	2,402	2,402	—	—	
Algeria	3	2,672	—	1,500	1,500	—	—	
Egypt (formerly United Arab Republic)	4	1,842	—	675	675	—	—	
West and Central African countries, total	4	505	—	187	187	—	—	
Nigeria	3	472	—	177	177	—	—	
Asia, total	10	2,874,570	96	1,998,566	1,998,527	39	—	
Middle East, total	5	2,872,604	—	1,998,032	1,998,032	—	—	
Iran	3	—315	—	350	350	—	—	
Saudi Arabia	3	2,872,209	—	1,997,680	1,997,680	—	—	
Southern and Southeastern Asia, total	4	1,836	96	522	483	39	—	
Indonesia	4	1,347	—	353	353	—	—	
Eastern Asia, total	5	131	—	12	12	—	—	
Japan	5	131	—	12	12	—	—	
Oceania, total	8	3,190	—	1,701	1,701	—	—	
Australia	8	3,135	—	1,701	1,701	—	—	
Country not stated or not allocable and other income from outside the United States	3	6,692	—	—	—	—	—	
Other geographic classifications (combinations of countries shown above):								
Not economically less-developed countries	61	19,601	3,411	6,228	4,129	2,099	—	
Economically less-developed countries	22	2,894,707	1,256	2,006,676	2,006,213	463	—	
OPEC countries	9	2,881,432	476	2,001,865	2,001,710	155	—	
Coal and nonmetallic minerals (except fuels) mining								
All geographic areas and DISC dividends	38	63,464	8,296	19,713	11,754	7,960	40	
Canada	33	42,120	8,114	9,679	1,865	7,814	40	
Latin America, total	5	—110	—	13	13	—	—	
South America	3	—148	—	3	3	—	—	
Europe, total	6	386	125	189	81	108	—	
Common Market countries	3	269	125	132	24	108	—	
Other West European countries, total	4	117	—	57	57	—	—	
Asia, total	6	668	—	668	668	—	—	
Southern and Southeastern Asia	4	821	—	667	667	—	—	
Oceania, total	3	20,420	57	9,164	9,126	38	—	
Australia	3	20,145	57	9,001	8,963	38	—	
Other geographic classifications (combinations of countries shown above):								
Not economically less-developed countries	37	62,743	8,296	18,977	11,017	7,960	40	
Economically less-developed countries	6	800	—	736	736	—	—	

Footnotes at end of table.

Foreign Tax Credit on Corporation Returns, 1972

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 26.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Selected major industry and selected area, subarea, country, and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Total	Paid or accrued	Deemed paid		
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Contract Construction								
All geographic areas and DISC dividends	75	87,255	17,094	27,228	13,289	13,939	1,100	(²)
Canada	36	20,896	5,770	11,125	1,809	9,316	1,100	(²)
Latin America, total	16	17,750	7,726	5,174	1,927	3,247	—	—
Mexico	3	909	400	588	429	159	—	—
Central America, total	10	11,335	7,059	3,386	360	3,027	—	—
Guatemala	5	864	33	103	98	5	—	—
Panama, excluding Canal Zone	4	10,452	7,026	3,284	262	3,022	—	—
South America, total	10	4,608	267	1,160	1,099	61	—	—
Argentina	4	—119	267	147	86	61	—	—
Brazil	3	676	—	186	186	—	—	—
Peru	4	2,255	—	374	374	—	—	—
Other Western Hemisphere	3	1,534	—	57	57	—	—	—
Europe, total	24	4,314	1,027	1,862	1,291	571	—	—
Common Market countries, total	11	5,607	1,027	1,350	779	571	—	—
Belgium	6	771	—	358	358	—	—	—
France (includes Andorra)	7	2,513	902	781	270	511	—	—
Italy (includes San Marino)	4	1,424	26	67	62	5	—	—
Netherlands	5	759	100	138	82	55	—	—
West Germany	3	140	—	7	7	—	—	—
Other West European countries, total	20	—1,293	—	512	512	—	—	—
Spain	5	851	—	24	24	—	—	—
Turkey	3	—2,709	—	233	233	—	—	—
United Kingdom	15	631	—	212	212	—	—	—
Africa, total	16	5,314	2,000	1,337	861	476	—	—
West and Central African countries	3	2,541	2,000	482	6	476	—	—
Southern Africa, total	14	1,720	—	708	708	—	—	—
South Africa, Republic of (includes South-West Africa)	11	333	—	48	48	—	—	—
Asia, total	19	26,470	153	1,349	1,293	56	—	—
Middle East, total	5	11,960	—	211	211	—	—	—
Iran	3	1,550	—	211	211	—	—	—
Southern and Southeastern Asia, total	10	13,021	153	828	772	56	—	—
Pakistan	5	470	—	—	—	—	—	—
Singapore	3	833	100	143	103	40	—	—
Eastern Asia, total	12	1,489	—	310	310	—	—	—
Japan	6	697	—	105	105	—	—	—
South Korea, Republic of	5	671	—	186	186	—	—	—
Oceania, total	12	4,044	39	977	961	16	—	—
Australia	11	2,085	39	576	560	16	—	—
Puerto Rico and United States Possessions, total	14	4,943	379	5,246	4,989	257	—	—
Puerto Rico	13	4,486	129	5,040	4,989	51	—	—
Country not stated or not allocable and other income from outside the United States	4	1,991	—	101	101	—	—	—
Other geographic classifications (combinations of countries shown above):								
Not economically less-developed countries	52	31,332	6,836	13,489	3,586	9,903	1,100	—
Economically less-developed countries	40	53,931	10,257	13,637	9,601	4,036	—	—
OPEC countries	7	15,278	—	1,094	1,094	—	—	—

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 26.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Selected major industry and selected area, subarea, country, and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less losses) ¹	Dividends from related foreign corporations and from DISCs	Total	Paid or accrued	Deemed paid		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
Manufacturing								
All geographic areas and DISC dividends	2,344	10,898,549	3,835,568	6,046,576	3,876,374	2,170,202	597,660	20,354
Canada	1,487	1,691,137	771,725	658,097	183,749	474,348	220,110	2,342
Latin America, total	855	1,583,591	398,280	1,009,617	874,826	134,790	30,239	4,170
Mexico	658	226,781	62,025	103,847	75,548	28,299	2,671	704
Central America, total	187	282,662	144,306	64,554	16,303	48,251	12,868	2,828
Costa Rica	70	16,269	1,004	5,241	4,838	404	332	—
El Salvador	46	2,992	420	1,132	1,077	54	—	—
Guatemala	76	16,857	2,858	3,564	2,640	923	27	—
Honduras	34	11,093	958	4,184	3,863	321	101	—
Nicaragua	46	1,543	595	434	360	74	—	—
Panama, excluding Canal Zone	113	232,971	138,471	49,977	3,502	46,474	12,408	2,828
Not allocable	4	836	—	22	22	—	—	—
Caribbean countries, total	116	89,443	841	46,292	45,941	352	—	—
Dominican Republic	48	27,497	78	15,804	15,776	28	—	—
Haiti	11	3,122	—	1,385	1,385	—	—	—
Jamaica	74	43,429	502	16,241	16,042	199	—	—
Trinidad	47	14,906	261	12,683	12,558	125	—	—
Other	15	489	—	181	181	—	—	—
South America, total	573	984,648	191,109	794,865	736,977	57,889	14,700	638
Argentina	248	79,044	27,821	37,482	29,802	7,679	1,839	—
Bolivia	27	2,728	73	896	873	23	—	—
Brazil	286	116,987	72,700	52,607	32,732	19,876	4,144	—
Chile	79	3,451	91	2,056	2,036	20	—	—
Colombia	211	43,144	17,051	19,786	13,408	6,378	438	(*)
Ecuador	66	—1,226	975	3,820	3,596	225	334	—
Paraguay	15	2,803	470	425	285	140	—	—
Peru	158	38,376	7,220	18,246	15,885	2,361	—	—
Uruguay	54	2,833	2,082	921	682	239	—	—
Venezuela	300	693,263	62,626	657,258	636,309	20,949	7,945	638
Other	13	3,243	—	1,369	—	—	—	—
Other Western Hemisphere, total	111	126,850	72,501	13,633	5,411	8,223	9,008	—
The Bahamas	38	41,619	47,264	3,127	7	3,120	8,938	—
Bermuda	17	21,859	10,161	455	—	455	—	—
Netherlands Antilles	69	53,225	13,239	8,089	4,006	4,083	71	—
Other British West Indies	4	134	—	75	75	—	—	—
Other	31	9,961	1,837	1,887	1,324	564	—	—
Europe, total	1,008	3,539,506	1,693,584	1,410,183	270,890	1,139,292	285,508	10,397
Common Market countries, total	771	1,888,359	906,528	807,865	137,441	670,424	38,245	2,211
Belgium	226	117,301	55,037	47,702	13,462	34,240	666	—
France (includes Andorra)	408	411,019	146,559	148,123	18,195	129,927	18,602	—
Italy (includes San Marino)	334	153,658	63,677	77,386	11,449	65,937	201	—
Luxembourg	26	39,875	10,857	3,327	169	3,158	1,387	2,211
Netherlands	215	205,001	151,051	141,123	4,763	136,360	13,479	—
West Germany	434	961,505	479,348	390,131	89,329	300,802	3,909	—
Other West European countries, total	745	1,630,951	783,623	596,642	130,678	465,964	247,262	8,186
Austria	89	33,724	10,148	13,588	5,272	8,316	240	—
Denmark	74	28,048	9,550	6,229	542	5,687	1,587	160
Finland	54	22,712	12,759	7,386	768	6,618	—	—
Greece	57	11,396	5,010	3,128	1,295	1,833	—	—
Ireland	64	6,160	2,448	2,213	700	1,513	—	—
Liechtenstein	9	7,142	4,216	56	37	19	—	—
Norway	67	14,343	5,432	4,863	794	4,069	82	—
Portugal	76	13,798	8,269	4,314	1,782	2,532	—	—
Spain	237	73,715	32,321	25,378	11,735	13,643	4,331	—
Sweden	144	69,849	21,585	24,307	1,124	23,183	284	—
Switzerland	242	284,065	172,869	88,600	15,494	73,106	43,647	—
Turkey	59	12,734	2,607	6,186	5,336	850	—	—
United Kingdom	563	1,042,347	496,296	410,160	85,617	324,543	97,093	8,025
East European countries, total	63	18,205	3,432	5,675	2,771	2,904	—	—
East Germany	13	4,248	3,432	3,438	534	2,904	—	—
Rumania	9	—228	—	—	—	—	—	—
Union of Soviet Socialist Republics	41	966	—	—	—	—	—	—
Other	47	13,219	—	2,237	2,237	—	—	—
Europe, not allocable	7	1,991	—	—	—	—	—	—
Africa, total	356	1,085,410	178,006	772,893	715,194	57,699	5,969	2,500
North Africa, total	59	710,096	3,655	627,339	625,436	1,903	—	—
Algeria	11	6,752	175	94	2	92	—	—
Egypt (formerly United Arab Republic)	22	7,874	731	4,273	3,926	348	—	—
Libya	25	695,072	—	620,362	620,362	—	—	—
Morocco	23	—1,398	1,900	1,759	629	1,130	—	—
Other	14	1,795	849	851	517	334	—	—

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 26.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Selected major industry and selected area, subarea, country, and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Total	Paid or accrued	Deemed paid		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
Manufacturing—Continued								
Africa—Continued								
East Africa, total	42	4,625	2,505	3,441	2,443	998	—	
Ethiopia	8	410	—	118	118	—	—	
Kenya	23	3,174	1,399	1,320	853	466	—	
Tanzania	7	2,587	—	154	154	—	—	
Uganda	5	522	527	400	133	267	—	
Other	23	-2,068	578	1,450	1,185	265	—	
West and Central African countries, total	57	270,673	132,507	104,819	69,907	34,912	2,419	
Ghana	15	741	—	406	406	—	—	
Liberia	20	117,517	84,562	5,593	1,937	3,656	2,419	
Nigeria	20	96,949	41,034	57,589	27,975	29,614	—	
Zaire (formerly Congo-Kinshasa)	8	1,250	608	670	414	256	—	
Other	33	54,217	6,302	40,561	39,176	1,385	—	
Southern Africa, total	322	99,967	39,339	37,288	17,402	19,886	3,551	
Malawi	3	-124	—	—	—	—	—	
South Africa, Republic of (includes South-West Africa)	311	79,970	25,802	28,978	11,477	17,501	3,493	
Zambia	20	19,627	11,228	7,487	5,880	1,607	—	
Asia, total	933	2,243,674	615,631	1,991,549	1,711,635	279,914	19,338	
Middle East, total	199	1,119,816	54,944	1,505,080	1,479,370	25,710	3	
Bahrain	6	267	—	—	—	—	—	
Iran	76	795,267	1,229	679,591	679,357	235	3	
Iraq	6	26,980	51,300	24,601	71	24,530	—	
Israel	123	12,357	1,330	—	4,213	3,708	504	
Kuwait	12	322,666	—	382,776	382,776	—	—	
Lebanon	33	-36,463	638	984	695	289	—	
Qatar	5	14,930	—	12,041	12,041	—	—	
Saudi Arabia	20	-107,777	—	342,169	342,169	—	—	
United Arab Emirates	8	61,650	—	37,372	37,372	—	—	
Other areas of Arabian peninsula	4	33,701	—	20,789	20,789	—	—	
Other	17	-3,762	448	544	392	152	—	
Southern and Southeastern Asia, total	295	473,154	405,966	316,598	149,865	166,723	1,706	
Bangladesh (formerly East Pakistan)	3	-965	—	114	114	—	—	
India	157	58,612	11,485	39,701	32,394	7,308	42	
Indonesia	40	348,267	363,115	239,998	91,395	148,603	—	
Malaysia	39	-11,947	2,913	1,553	432	1,120	—	
Pakistan	33	270	1,088	2,713	2,086	627	—	
Philippines	184	47,578	19,868	20,842	14,086	6,756	1,664	
Singapore	60	13,729	2,869	3,272	2,368	903	—	
South Vietnam	12	6,312	217	2,967	2,845	122	—	
Sri Lanka (formerly Ceylon)	4	227	1	191	191	(?)	—	
Thailand	56	9,194	4,408	4,042	2,760	1,282	—	
Other	13	1,857	—	1,194	1,194	—	—	
Eastern Asia, total	841	649,427	154,721	169,264	81,783	87,481	17,629	
China, Peoples Republic	5	422	—	(?)	(?)	—	—	
China, Republic of (Taiwan)	74	14,773	606	2,284	2,123	161	—	
Hong Kong	77	59,088	39,978	8,126	1,857	6,268	7,551	
Japan	817	566,280	110,225	158,181	77,285	80,896	10,078	
Okinawa and Ryukyu Islands	12	-5,032	—	67	67	—	—	
South Korea, Republic of	36	12,143	2,161	412	277	135	—	
Other	4	1,752	1,750	194	174	21	—	
Oceania, total	719	345,688	94,370	132,725	60,217	72,507	27,439	
Australia	679	323,719	88,972	123,221	55,129	68,092	27,411	
New Zealand	152	20,300	5,280	9,285	4,981	4,304	13	
Other	32	1,669	117	218	107	111	15	
Puerto Rico and United States Possessions, total	234	61,677	10,344	31,651	28,406	3,245	—	
Puerto Rico	223	46,350	7,246	24,303	22,368	1,936	—	
U.S. Possessions, total	39	15,328	3,098	7,348	6,038	1,309	—	
Guam	15	6,727	—	2,908	2,908	—	—	
Virgin Islands, U.S.	26	7,216	2,898	4,328	3,130	1,198	—	
Country not stated or not allocable and other income from outside the United States	195	185,173	256	26,147	26,045	102	49	
DISC dividends	22	35,843	873	81	—	81	—	
Other geographic classifications (combinations of countries shown above):								
Not economically less-developed countries	2,122	6,192,185	2,700,929	2,366,939	592,538	1,774,401	554,163	
Economically less-developed countries	1,022	4,467,136	1,128,329	3,647,541	3,254,849	392,693	43,448	
Sino-Soviet Bloc	59	18,213	5,182	5,868	2,943	2,925	—	
OPEC countries	335	2,952,815	520,453	3,057,672	2,833,425	224,246	6,282	

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 26.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country, where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Selected major industry and selected area, subarea, country, and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Total	Paid or accrued	Deemed paid		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
Manufacturing—Continued								
Food and kindred products								
All geographic areas and DISC dividends	153	579,703	229,094	240,867	89,741	151,126	19,766	457
Canada	100	103,566	45,211	53,578	9,988	43,591	5,916	—
Latin America, total	56	94,678	29,767	41,740	32,234	9,505	3,277	412
Mexico	37	27,366	2,579	14,455	12,810	1,645	225	—
Central America, total	27	42,361	10,086	13,857	11,148	2,709	3,045	—
Costa Rica	11	10,542	339	4,300	4,108	192	200	—
Guatemala	12	4,145	291	1,752	1,498	254	—	—
Honduras	4	10,457	958	3,815	3,494	321	101	—
Nicaragua	10	851	280	114	75	39	—	—
Panama, excluding Canal Zone	14	16,273	8,218	3,840	1,938	1,903	2,743	—
Caribbean countries, total	15	358	405	403	266	138	—	—
Dominican Republic	5	178	—	21	21	—	—	—
Jamaica	10	—100	237	275	212	63	—	—
Trinidad	6	239	168	108	33	75	—	—
South America, total	39	24,593	16,697	13,025	8,011	5,014	7	412
Argentina	16	5,816	4,209	3,476	1,869	1,606	—	—
Brazil	14	6,165	5,826	3,352	1,830	1,522	7	412
Chile	5	672	—	262	262	—	—	—
Colombia	10	886	517	719	517	201	—	—
Ecuador	7	—626	112	294	248	45	—	—
Peru	12	4,064	1,647	2,056	1,590	466	—	—
Uruguay	5	—202	—	90	90	—	—	—
Venezuela	28	7,087	4,385	2,498	1,325	1,173	—	—
Other Western Hemisphere, total	10	7,184	5,105	1,141	7	1,134	—	—
The Bahamas	4	281	2	7	6	(¹)	—	—
Bermuda	4	2,992	2,161	—	—	—	—	—
Netherlands Antilles	6	2,904	1,943	787	—	787	—	—
Europe, total	45	222,113	95,227	84,720	23,299	61,422	10,369	—
Common Market countries, total	34	102,838	44,065	37,291	9,513	27,778	2,361	—
Belgium	14	6,689	864	1,967	1,503	464	—	—
France (includes Andorra)	19	14,943	5,317	6,112	601	5,511	—	—
Italy (includes San Marino)	14	13,628	4,339	4,926	1,373	3,552	—	—
Netherlands	14	9,770	3,722	4,152	682	3,470	2,361	—
West Germany	19	49,519	29,822	20,135	5,354	14,780	—	—
Other West European countries, total	37	118,255	51,121	47,409	13,781	33,621	8,007	—
Austria	3	538	174	151	18	133	—	—
Denmark	8	2,237	901	528	76	452	—	—
Finland	4	391	15	5	1	5	—	—
Ireland	8	971	413	297	88	209	—	—
Norway	4	884	—	391	391	—	—	—
Portugal	5	287	136	30	19	11	—	—
Spain	19	11,158	6,237	3,863	1,240	2,623	—	—
Sweden	3	333	40	28	2	26	—	—
Switzerland	16	16,200	5,660	5,517	1,004	4,512	1,357	—
Turkey	3	—535	—	1	1	—	—	—
United Kingdom	25	85,854	37,544	36,591	10,940	25,651	6,650	—
East European countries, total	5	920	42	27	4	23	—	—
Africa, total	16	12,696	1,867	5,387	4,491	896	199	46
North Africa, total	5	654	—	466	466	—	—	—
Morocco	3	631	—	463	463	—	—	—
East Africa, total	4	228	308	316	192	124	—	—
Kenya	4	380	308	316	192	124	—	—
Southern Africa, total	15	11,806	1,559	4,602	3,830	772	199	46
South Africa, Republic of (includes South-West Africa)	15	11,789	1,559	4,602	3,830	772	199	46
Asia, total	39	94,202	43,111	39,373	11,458	27,915	5	(¹)
Middle East, total	11	237	—	19	19	—	—	—
Iran	5	140	—	2	2	—	—	—
Southern and Southeastern Asia, total	23	10,244	2,634	6,758	5,775	982	—	(¹)
Malaysia	3	352	150	82	11	70	—	—
Pakistan	3	—592	—	430	430	—	—	—
Philippines	21	5,693	2,060	2,733	1,949	784	—	—
Thailand	5	907	405	342	221	121	—	—
Eastern Asia, total	30	83,722	40,477	32,597	5,664	26,933	5	—
China, Republic of (Taiwan)	3	4,077	—	603	603	—	—	—
Hong Kong	4	3,339	442	106	7	99	—	—
Japan	28	74,534	38,345	31,690	4,876	26,813	5	—
Oceania, total	36	25,677	8,605	10,447	3,896	6,552	—	—
Australia	34	23,756	8,429	9,848	3,438	6,409	—	—
New Zealand	6	1,562	176	600	458	142	—	—

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED
 Table 26.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Selected major industry and selected area, subarea, country, and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Total	Paid or accrued	Deemed paid		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
Manufacturing—Continued								
Food and kindred products—Continued								
Puerto Rico and United States Possessions, total	31	15,410	200	4,173	4,062	112	—	
Puerto Rico	30	14,982	—	4,043	4,043	—	—	
U.S. Possessions	3	428	200	131	19	112	—	
Country not stated or not allocable and other income from outside the United States	15	3,161	—	307	307	—	—	
DISC dividends	3	1,016	—	—	—	—	—	
Other geographic classifications (combinations of countries shown above):								
Not economically less-developed countries	126	438,592	168,783	184,784	45,783	139,001	16,489	
Economically less-developed countries	71	136,503	40,270	55,750	43,647	12,102	3,277	
Sino-Soviet Bloc	3	432	42	27	4	23	—	
OPEC countries	30	6,601	4,497	2,795	1,576	1,219	—	
Chemicals and allied products								
All geographic areas and DISC dividends	308	1,347,428	486,681	482,022	171,956	310,066	64,111	
Canada	178	215,577	74,898	90,722	25,671	65,051	3,746	
Latin America, total	167	245,190	98,069	106,825	58,895	47,730	10,748	
Mexico	127	59,470	22,149	33,198	22,660	10,538	2,162	
Central America, total	49	84,457	38,530	28,112	1,945	26,167	4,586	
Costa Rica	17	3,443	303	480	385	95	132	
El Salvador	11	314	—	105	105	—	—	
Guatemala	21	1,127	334	424	333	91	4	
Honduras	9	210	—	35	35	—	—	
Nicaragua	12	1,158	315	183	148	35	—	
Panama, excluding Canal Zone	31	77,377	37,578	26,864	918	25,947	4,450	
Not Allocable	3	829	—	21	21	—	—	
Caribbean countries, total	35	2,591	133	804	717	87	—	
Dominican Republic	20	814	35	237	224	13	—	
Jamaica	17	1,204	38	349	307	42	—	
Trinidad	10	214	61	60	28	33	—	
South America, total	122	98,459	37,257	44,511	33,573	10,938	3,960	
Argentina	52	15,594	5,230	6,027	4,029	1,997	—	
Bolivia	6	813	10	668	666	3	—	
Brazil	58	14,069	5,398	5,609	3,956	1,652	857	
Chile	19	—2,680	84	244	224	20	—	
Colombia	68	14,769	3,901	7,000	5,171	1,829	438	
Ecuador	17	716	154	390	352	38	334	
Peru	41	5,791	1,832	4,165	3,589	576	—	
Uruguay	13	287	—	64	64	—	—	
Venezuela	67	49,085	20,647	20,341	15,518	4,823	2,350	
Other Western Hemisphere, total	20	15,972	10,306	2,343	1,069	1,273	—	
The Bahamas	8	1,265	610	224	—	224	—	
Bermuda	3	7,441	8,000	455	—	455	—	
Netherlands Antilles	12	5,032	1,696	596	2	594	—	
Europe, total	138	823,982	236,572	189,636	34,465	155,172	44,379	
Common Market countries, total	121	355,458	117,595	115,644	18,135	97,509	11,436	
Belgium	40	40,893	12,363	11,898	2,255	9,643	666	
France (includes Andorra)	82	89,917	30,104	32,564	2,946	29,619	4,540	
Italy (includes San Marino)	68	44,259	14,294	12,341	2,134	10,206	201	
Luxembourg	7	11,791	1,514	1,711	10	1,702	987	
Netherlands	46	46,072	13,169	12,521	853	11,866	3,113	
West Germany	76	122,527	46,151	44,537	10,065	34,471	1,927	
Other West European countries, total	99	260,824	118,078	72,481	15,338	57,143	32,944	
Austria	23	754	216	242	42	200	—	
Denmark	21	3,399	491	350	17	333	160	
Finland	12	1,037	342	262	81	182	—	
Greece	16	1,949	190	255	202	52	—	
Ireland	14	3,973	1,151	1,129	378	751	—	
Liechtenstein	4	4,043	4,210	3	—	3	—	
Norway	16	1,174	124	249	101	148	75	
Portugal	21	1,675	323	247	144	103	—	
Spain	47	9,441	2,922	2,486	1,242	1,243	364	
Sweden	37	5,751	934	534	54	480	—	
Switzerland	46	99,131	58,913	27,947	3,760	24,187	26,171	
Turkey	15	222	21	52	40	11	—	
United Kingdom	86	128,206	48,240	38,725	9,277	29,449	6,173	
East European countries, total	9	7,700	899	1,511	992	519	—	
East Germany	4	1,855	899	666	147	519	—	
Africa, total	61	29,714	9,065	17,011	12,508	4,503	71	
North Africa, total	6	11,110	717	10,839	10,308	531	—	
Libya	3	9,807	—	10,298	10,298	—	—	
Morocco	3	1,258	717	532	1	531	—	

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 26.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Selected major industry and selected area, subarea, country, and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Total	Paid or accrued	Deemed paid		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
Manufacturing—Continued								
Chemicals and allied products—Continued								
Africa—Continued								
East Africa, total	10	1,208	340	511	365	146	—	
Kenya	5	596	336	248	105	142	—	
West and Central African countries	10	2,869	2,610	654	315	338	—	
Southern Africa, total	56	14,427	5,398	5,008	1,520	3,488	71	
South Africa, Republic of (Includes South-West Africa)	54	14,283	5,398	4,960	1,492	3,488	71	
Asia, total	126	106,239	41,010	43,908	19,617	24,292	623	
Middle East, total	40	2,695	337	311	234	78	3	
Iran	14	1,645	241	134	99	36	3	
Israel	22	675	58	155	114	42	—	
Lebanon	7	314	38	18	17	(7)	—	
Southern and Southeastern Asia, total	65	25,442	16,939	16,014	8,301	7,713	192	
India	30	10,183	5,280	6,630	3,150	3,481	42	
Indonesia	9	4,567	313	241	78	163	—	
Malaysia	9	1,961	1,655	904	158	745	—	
Pakistan	14	850	549	483	105	377	—	
Philippines	46	10,267	5,591	5,528	3,550	1,978	150	
Singapore	12	2,054	1,232	240	34	206	—	
Thailand	14	3,871	2,103	1,597	958	640	—	
Eastern Asia, total	113	78,102	23,734	27,583	11,082	16,501	429	
China, Republic of (Taiwan)	12	1,478	606	317	156	181	—	
Hong Kong	20	7,903	2,136	1,637	1,176	461	100	
Japan	111	68,324	20,992	25,623	9,745	15,879	329	
South Korea, Republic of	9	395	—	5	5	—	—	
Oceania, total	126	52,326	14,227	24,141	12,764	11,377	4,544	
Australia	126	49,857	13,823	23,335	12,289	11,046	4,544	
New Zealand	29	2,422	404	796	465	331	—	
Puerto Rico and United States Possessions, total	45	36,450	2,365	6,615	5,967	648	—	
Puerto Rico	43	35,976	2,365	6,420	5,772	648	—	
U.S. Possessions, total	6	474	—	195	195	—	—	
Virgin Islands, U.S.	5	474	—	1	1	—	—	
Country not stated or not allocable and other income from outside the United States	40	18,095	28	1,013	1,000	13	—	
DISC dividends	4	3,883	141	7	—	7	—	
Other geographic classifications (combinations of countries shown above):								
Not economically less-developed countries	263	965,790	351,296	333,274	83,465	249,809	53,169	2,372
Economically less-developed countries	178	352,587	134,314	146,217	86,499	59,718	10,943	704
Sino-Soviet Bloc	9	6,972	899	1,511	992	519	—	—
OPEC countries	70	56,789	21,356	31,405	26,346	5,060	2,687	—
Petroleum refining and related industries								
All geographic areas and DISC dividends	28	3,839,227	1,288,537	3,402,013	2,938,264	463,750	267,403	—
Canada	23	374,218	284,674	79,892	45,011	34,682	192,222	—
Latin America, total	22	687,204	104,967	636,462	617,881	18,581	168	—
Mexico	15	9,804	1,952	2,571	1,750	821	—	
Central America, total	6	89,229	84,189	14,750	1,306	13,444	—	
Costa Rica	4	242	—	112	112	—	—	
El Salvador	3	843	—	267	267	—	—	
Guatemala	3	—2,413	—	508	508	—	—	
Nicaragua	3	—742	—	99	99	—	—	
Panama, excluding Canal Zone	6	90,992	84,189	13,482	38	13,444	—	
Caribbean countries, total	6	10,754	—	13,718	13,718	—	—	
Dominican Republic	3	167	—	1,119	1,119	—	—	
Haiti	3	631	—	376	376	—	—	
Jamaica	5	203	—	458	458	—	—	
Trinidad	4	9,754	—	11,765	11,765	—	—	
South America, total	18	577,417	18,827	605,424	601,107	4,316	168	
Argentina	12	6,490	—	9,300	9,300	—	—	
Brazil	8	10,755	11,797	6,292	3,177	3,115	168	
Chile	4	779	—	22	22	—	—	
Colombia	9	9,938	4,155	4,773	4,126	647	—	
Ecuador	3	—4,524	—	1,404	1,404	—	—	
Peru	6	—839	203	138	51	87	—	
Uruguay	2	1,829	1,726	383	193	190	—	
Venezuela	15	551,740	476	582,833	582,694	138	—	

Footnotes at end of table.

Foreign Tax Credit on Corporation Returns, 1972

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED
 Table 26.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Selected major industry and selected area, subarea, country, and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Total	Paid or accrued	Deemed paid		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
Manufacturing—Continued								
Petroleum refining and related industries—Continued								
Other Western Hemisphere, total	5	76,972	47,282	6,774	3,566	3,208	8,938	—
Netherlands Antilles	5	30,916	1,134	3,902	3,566	336	—	—
Europe, total	21	317,431	316,493	214,398	26,727	187,670	53,335	—
Common Market countries, total	16	84,190	141,553	106,452	6,122	100,330	11,279	—
Belgium	9	—13,864	6,544	2,008	694	1,314	—	—
France (includes Andorra)	9	33,090	25,792	9,396	1,123	8,272	11,141	—
Italy (includes San Marino)	11	—42,006	4,241	3,439	1,786	1,653	—	—
Netherlands	5	42,466	93,034	84,835	37	84,798	138	—
West Germany	6	57,776	6,578	6,192	2,481	3,710	—	—
Other West European countries, total	20	227,351	174,894	106,551	19,250	87,301	42,056	—
Denmark	3	3,459	—	—	—	—	—	—
Portugal	4	3,917	3,285	1,595	446	1,149	—	—
Spain	11	3,318	6,095	2,318	761	1,557	507	—
Switzerland	6	—1,172	529	396	33	363	540	—
Turkey	5	5,215	572	2,941	2,741	200	—	—
United Kingdom	15	207,686	157,794	95,859	15,158	80,700	41,004	—
East European countries, total	4	5,546	47	1,395	1,355	40	—	—
Africa, total	17	890,588	81,012	715,549	680,683	34,866	—	—
North Africa, total	11	690,924	1,710	613,994	613,268	726	—	—
Algeria	4	5,826	—	—	—	—	—	—
Egypt (formerly United Arab Republic)	4	7,075	731	4,033	3,686	348	—	—
Libya	9	681,261	—	609,223	609,223	—	—	—
West and Central African countries, total	7	193,898	74,246	97,019	66,190	30,829	—	—
Liberia	5	47,924	31,000	591	178	413	—	—
Nigeria	5	96,481	40,935	57,339	27,784	29,555	—	—
Southern Africa, total	7	7,620	4,071	3,343	486	2,857	—	—
South Africa, Republic of (includes South-West Africa)	6	7,124	3,557	3,084	477	2,608	—	—
Asia, total	22	1,466,781	451,456	1,745,834	1,562,592	183,242	12,741	—
Middle East, total	15	1,065,919	51,669	1,474,862	1,450,180	24,682	—	—
Iran	13	767,979	—	661,841	661,841	—	—	—
Israel	4	2,714	—	481	481	—	—	—
Kuwait	3	309,587	—	375,283	375,283	—	—	—
Lebanon	3	—38,576	—	456	456	—	—	—
Saudi Arabia	6	—108,491	—	341,703	341,703	—	—	—
United Arab Emirates	3	61,598	—	37,372	37,372	—	—	—
Southern and Southeastern Asia, total	12	341,736	366,305	255,590	106,369	149,221	—	—
India	8	14,281	1,793	12,012	11,014	999	—	—
Indonesia	6	346,298	361,025	237,484	90,483	147,001	—	—
Philippines	6	—608	1,513	1,972	1,395	577	—	—
Singapore	7	712	1,024	580	173	407	—	—
Eastern Asia, total	19	59,126	33,481	15,382	6,043	9,340	12,741	—
China, Republic of (Taiwan)	4	673	—	260	260	—	—	—
Hong Kong	3	21,857	23,626	3,357	(¹)	3,356	7,155	—
Japan	18	35,063	7,635	11,457	5,609	5,848	5,586	—
Oceania, total	10	36,318	2,653	1,966	467	1,499	—	—
Australia	9	35,871	2,653	1,954	455	1,499	—	—
Puerto Rico and United States Possessions, total	8	—15,410	—	1,337	1,337	—	—	—
Puerto Rico	7	—16,254	—	362	362	—	—	—
U.S. Possessions, total	4	845	—	975	975	—	—	—
Virgin Islands, U.S.	3	—1,806	—	24	24	—	—	—
Country not stated or not allocable and other income from outside the United States	5	5,125	—	—	—	—	—	—
Other geographic classifications (combinations of countries shown above):								
Not economically less-developed countries	26	772,614	628,906	305,633	73,678	231,954	258,298	—
Economically less-developed countries	24	3,054,187	657,835	3,094,792	2,863,057	231,735	9,105	—
Sino-Soviet Bloc	4	7,301	1,797	1,589	1,529	60	—	—
OPEC countries	18	2,749,445	453,736	2,941,053	2,739,829	201,224	—	—

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED
 Table 26.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Selected major industry and selected area, subarea, country, and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Total	Paid or accrued	Deemed paid		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
Manufacturing—Continued								
Primary metal industries								
All geographic areas and DISC dividends	101	488,768	115,515	149,779	118,796	30,983	51,738	8,810
Canada	62	49,529	10,398	18,998	9,467	9,532	1,616	—
Latin America, total	40	179,947	8,883	69,573	67,533	2,040	350	—
Mexico	30	6,975	2,737	3,261	2,406	855	—	—
Central America, total	9	50,046	63	184	177	7	—	—
El Salvador	3	419	63	167	160	7	—	—
Panama, excluding Canal Zone	5	49,565	—	16	16	—	—	—
Caribbean countries	3	64,902	—	28,924	28,924	—	—	—
South America, total	26	58,024	6,083	37,204	36,026	1,178	350	—
Argentina	13	5,799	3,439	1,215	698	517	350	—
Bolivia	3	606	20	101	96	6	—	—
Brazil	15	6,003	1,515	2,480	2,208	273	—	—
Chile	8	1,449	—	654	654	—	—	—
Colombia	9	630	185	159	67	92	—	—
Peru	8	17,569	735	6,572	6,301	271	—	—
Venezuela	12	23,891	56	25,453	25,439	14	—	—
Other Western Hemisphere, total	9	1,168	826	121	—	121	—	—
The Bahamas	4	374	—	—	—	—	—	—
Netherlands Antilles	4	824	626	121	—	121	—	—
Europe, total	48	60,140	14,942	13,384	3,215	10,169	28,561	8,025
Common Market countries, total	43	28,725	7,342	7,176	777	6,399	239	—
Belgium	11	548	30	69	47	22	—	—
France (includes Andorra)	26	11,653	3,184	3,450	133	3,318	—	—
Italy (includes San Marino)	16	4,619	9	168	166	3	—	—
Netherlands	10	6,294	2,479	2,182	126	2,056	75	—
West Germany	21	4,661	1,639	1,300	299	1,001	164	—
Other West European countries, total	29	35,599	7,600	6,208	2,438	3,770	28,322	8,025
Spain	8	2,370	1,249	799	414	385	—	—
Sweden	8	765	136	133	7	126	—	—
Switzerland	10	6,429	109	709	633	76	—	—
Turkey	3	272	104	83	38	26	—	—
United Kingdom	25	25,656	5,876	4,440	1,287	3,153	28,322	8,025
East European countries	3	-4,184	—	—	—	—	—	—
Africa, total	27	84,500	65,117	12,621	7,808	4,813	2,300	785
West and Central African countries, total	6	65,578	52,236	4,324	1,928	2,396	2,300	—
Liberia	4	64,430	50,300	3,640	1,675	1,965	2,300	—
Southern Africa, total	25	19,005	12,880	8,297	5,880	2,417	—	—
South Africa, Republic of (includes South-West Africa)	24	3,050	2,237	1,534	464	1,069	—	—
Zambia	4	18,228	10,643	6,763	5,416	1,348	—	—
Asia, total	62	14,337	807	4,028	3,287	741	—	—
Middle East, total	12	866	4	109	107	2	—	—
Iran	4	512	—	65	65	—	—	—
Southern and Southeastern Asia, total	14	3,759	162	2,211	2,136	75	—	—
India	7	3,300	154	2,013	1,940	73	—	—
Indonesia	3	-3,646	—	—	3	—	—	—
Malaysia	4	2,494	—	45	45	—	—	—
Philippines	6	559	7	87	85	3	—	—
Singapore	3	1,095	—	18	18	—	—	—
Eastern Asia, total	57	9,691	641	1,707	1,044	663	—	—
China, Republic of (Taiwan)	3	1,412	—	26	26	—	—	—
Japan	56	8,251	641	1,660	996	663	—	—
Oceania, total	40	46,808	14,742	10,253	6,686	3,567	18,911	—
Australia	40	47,675	14,742	10,244	6,677	3,567	18,911	—
Puerto Rico and United States Possessions, total	8	2,344	—	1,094	1,094	—	—	—
Puerto Rico	8	392	—	172	172	—	—	—
Country not stated or not allocable and other income from outside the United States	10	49,995	—	19,707	19,707	—	—	—
Other geographic classifications (combinations of countries shown above):								
Not economically less-developed countries	93	172,542	42,731	45,706	20,735	24,971	49,088	8,810
Economically less-developed countries	45	270,454	72,784	84,366	78,354	6,012	2,650	—
Sino-Soviet Bloc	4	-4,223	—	—	—	—	—	—
OPEC countries	16	21,697	189	25,608	25,589	19	—	—

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 26.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Selected major industry and selected area, subarea, country, and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Total	Paid or accrued	Deemed paid		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
Manufacturing—Continued								
Machinery, except electrical								
All geographic areas and DISC dividends	371	1,672,418	672,954	582,028	199,069	482,959	127,397	—
Canada	230	218,635	69,715	90,662	26,831	63,830	2,702	—
Latin America, total	123	112,514	34,254	39,881	27,882	11,999	2,295	—
Mexico	102	39,590	4,643	11,140	9,151	1,990	—	—
Central America, total	20	4,887	2,848	1,737	661	1,075	70	—
Costa Rica	9	532	305	204	89	115	—	—
El Salvador	6	794	280	431	392	39	—	—
Guatemala	8	520	337	187	55	132	22	—
Honduras	4	142	—	35	35	—	—	—
Nicaragua	6	109	—	29	29	—	—	—
Panama, excluding Canal Zone	14	2,783	1,926	849	61	789	48	—
Caribbean countries, total	16	1,704	86	819	779	40	—	—
Dominican Republic	6	222	44	120	105	15	—	—
Jamaica	10	826	42	463	438	25	—	—
Trinidad	8	647	—	236	236	—	—	—
South America, total	75	66,491	26,677	26,127	17,233	8,894	2,225	—
Argentina	40	10,591	169	5,013	4,959	54	—	—
Brazil	41	28,932	14,109	9,776	5,837	3,938	1,625	—
Chile	12	—111	7	47	47	(*)	—	—
Colombia	20	2,361	989	1,310	972	338	—	—
Ecuador	9	260	—	99	99	—	—	—
Peru	21	2,907	1,397	1,651	1,223	428	—	—
Uruguay	7	155	25	85	94	1	—	—
Venezuela	41	21,173	9,937	7,980	3,859	4,121	600	—
Other Western Hemisphere, total	18	7,740	2,760	1,205	347	858	71	—
Netherlands Antilles	14	3,763	2,335	1,130	272	858	71	—
Europe, total	180	1,024,569	491,921	427,430	78,218	349,212	120,637	—
Common Market countries, total	132	511,899	235,673	208,607	34,133	174,474	2,676	—
Belgium	34	24,447	9,388	8,644	2,369	6,275	—	—
France (includes Andorra)	70	161,788	62,414	71,124	7,651	63,473	1,906	—
Italy (includes San Marino)	47	64,236	19,447	30,558	2,655	27,902	—	—
Luxembourg	3	942	174	72	5	66	—	—
Netherlands	29	37,749	16,525	15,621	845	14,775	22	—
West Germany	73	222,735	127,724	82,589	20,607	61,982	748	—
Other West European countries, total	129	505,087	253,890	216,133	43,705	172,429	117,961	—
Austria	18	18,385	3,170	6,504	4,763	1,841	—	—
Denmark	6	8,535	4,566	2,655	228	2,426	—	—
Finland	9	16,084	8,558	5,110	428	4,682	—	—
Greece	9	1,267	—	562	562	—	—	—
Ireland	6	2,049	465	453	35	418	—	—
Liechtenstein	3	400	6	18	2	16	—	—
Norway	9	4,826	1,929	1,786	106	1,681	—	—
Portugal	6	1,334	743	472	249	224	—	—
Spain	30	17,233	8,707	6,655	2,644	4,011	—	—
Sweden	20	31,190	13,518	15,137	683	14,454	238	—
Switzerland	35	98,281	66,614	33,159	4,520	28,639	9,281	—
Turkey	6	807	56	636	833	4	—	—
United Kingdom	106	304,396	145,557	142,743	28,710	114,033	108,442	—
East European countries, total	10	7,403	2,358	2,690	380	2,309	—	—
East Germany	3	4,759	2,350	2,663	354	2,309	—	—
Africa, total	70	21,257	6,403	8,188	4,529	3,659	36	—
North Africa, total	10	1,297	—	753	753	—	—	—
Egypt (formerly United Arab Republic)	6	427	—	178	178	—	—	—
Libya	5	755	—	526	526	—	—	—

Footnotes at end of table.

Foreign Tax Credit on Corporation Returns, 1972

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED
 Table 26.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Selected major industry and selected area, subarea, country, and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Total	Paid or accrued	Deemed paid		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
Manufacturing—Continued								
Machinery, except electrical—Continued								
Africa—Continued								
East Africa, total	7	1,060	755	495	296	200	—	
Kenya	4	817	755	280	80	200	—	
West and Central African countries, total	10	2,073	4	1,270	1,267	3	—	
Nigeria	5	250	—	191	191	—	—	
Southern Africa, total	68	16,826	5,643	5,670	2,214	3,456	36	
South Africa, Republic of (Includes South-West Africa)	65	13,992	3,789	4,735	1,910	2,825	36	
Zambia	5	750	293	443	292	151	—	
Asia, total	165	168,342	34,995	64,830	41,514	23,316	1,485	
Middle East, total	28	9,499	78	5,729	5,729	(?)	—	
Iran	9	4,310	—	3,020	3,020	—	—	
Israel	16	3,860	—	2,179	2,179	—	—	
Saudi Arabia	4	645	—	251	251	—	—	
Southern and Southeastern Asia, total	42	25,073	3,058	15,073	13,712	1,361	1,485	
India	28	12,333	431	8,916	8,645	272	—	
Indonesia	4	794	—	398	398	—	—	
Malaysia	5	411	130	213	152	61	—	
Philippines	16	4,116	2,026	2,165	1,310	855	1,485	
Singapore	8	3,124	273	1,540	1,428	112	—	
South Vietnam	3	2,001	—	431	431	—	—	
Thailand	8	1,722	198	671	610	61	—	
Eastern Asia, total	148	133,770	31,859	44,028	22,073	21,955	—	
China, Republic of (Taiwan)	5	1,107	—	282	282	—	—	
Hong Kong	8	5,813	1,903	686	291	395	—	
Japan	146	126,207	29,955	42,999	21,439	21,560	—	
Okinawa and Ryukyu Islands	3	242	—	61	61	—	—	
South Korea, Republic of	3	401	—	—	—	—	—	
Oceania, total	127	82,504	30,315	45,143	15,509	29,634	172	
Australia	121	75,612	29,592	41,987	12,902	29,085	172	
New Zealand	19	6,362	610	3,018	2,576	442	—	
Other	7	530	112	138	32	106	—	
Puerto Rico and United States Possessions, total	28	14,487	2,591	3,188	2,736	451	—	
Puerto Rico	27	13,615	2,591	2,996	2,544	451	—	
U.S. Possessions, total	4	872	—	192	—	—	—	
Virgin Islands, U.S.	3	136	—	58	58	—	—	
Country not stated or not allocable and other income from outside the United States	20	21,894	—	1,503	1,503	—	—	
DISC dividends	3	476	—	—	—	—	—	
Other geographic classifications (combinations of countries shown above):								
Not economically less-developed countries	343	1,441,767	615,306	601,451	141,798	459,713	123,546	
Economically less-developed countries	151	201,553	55,290	76,385	55,448	20,937	3,850	
Sino-Soviet Bloc	10	6,728	2,358	2,690	380	2,309	—	
OPEC countries	47	28,446	9,937	12,537	8,417	4,121	600	

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED
Table 26.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Selected major industry and selected area, subarea, country, and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Total	Paid or accrued	Deemed paid		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
Manufacturing—Continued								
Electrical equipment and supplies								
All geographic areas and DISC dividends	177	708,874	201,897	210,846	91,890	118,957	31,099	417
Canada	113	92,689	31,725	31,411	10,411	20,999	5,005	—
Latin America	65	51,413	19,789	23,147	15,291	7,856	1,308	(¹)
Mexico	59	25,962	5,748	10,026	7,439	2,587	—	—
Central America, total	15	—305	540	1,094	133	960	—	—
Costa Rica	9	289	—	35	35	—	—	—
El Salvador	5	168	—	52	52	—	—	—
Guatemala	8	—722	—	10	10	—	—	—
Panama, excluding Canal Zone	10	127	540	996	36	960	—	—
Caribbean countries, total	10	1,400	74	478	450	26	—	—
Dominican Republic	6	121	—	64	64	—	—	—
Haiti	3	29	—	26	26	—	—	—
Jamaica	9	716	74	216	188	28	—	—
Trinidad	7	475	—	150	150	—	—	—
South America, total	45	24,352	13,427	11,549	7,269	4,280	1,308	(¹)
Argentina	27	1,666	198	670	613	57	—	—
Bolivia	5	163	—	6	6	—	—	—
Brazil	30	12,089	6,634	4,471	3,324	1,147	505	—
Chile	9	—960	—	149	149	—	—	—
Colombia	16	2,379	1,200	1,376	717	659	—	—
Ecuador	8	686	—	274	274	—	—	—
Peru	20	1,823	68	814	786	29	—	—
Uruguay	9	290	—	120	120	—	—	—
Venezuela	25	5,856	5,326	3,572	1,184	2,388	802	—
Other Western Hemisphere, total	11	4,105	882	347	93	254	—	—
The Bahamas	7	2,062	50	24	(¹)	24	—	—
Bermuda	4	302	—	—	—	—	—	—
Netherlands Antilles	6	1,510	832	238	8	230	—	—
Europe, total	83	310,314	129,772	106,101	25,895	80,206	19,684	—
Common Market countries, total	70	202,989	88,348	72,822	15,623	57,198	8,685	—
Belgium	20	11,570	5,706	5,556	1,666	3,891	—	—
France (includes Andorra)	37	27,817	5,626	6,115	2,049	6,067	603	—
Italy (includes San Marino)	28	32,591	7,829	9,035	1,263	7,772	—	—
Luxembourg	4	6,284	1,479	352	2	351	400	—
Netherlands	18	14,977	5,219	5,259	442	4,817	7,392	—
West Germany	40	109,750	61,490	44,504	10,202	34,301	290	—
Other West European countries, total	65	107,066	41,424	33,274	10,267	23,007	10,999	—
Austria	7	3,015	1,982	1,773	14	1,759	240	—
Denmark	6	682	193	101	10	92	—	—
Finland	5	251	—	66	66	—	—	—
Greece	5	313	—	202	202	—	—	—
Ireland	7	596	196	95	—	95	—	—
Norway	8	2,534	1,227	791	61	730	—	—
Spain	23	11,046	3,309	5,187	2,986	2,202	3,343	—
Sweden	11	2,584	—	4	4	—	—	—
Switzerland	21	17,555	13,839	8,198	2,364	5,833	3,635	—
Turkey	8	1,902	912	1,379	1,129	249	—	—
United Kingdom	54	66,468	18,713	14,991	3,085	11,906	3,781	—
East European countries, total	8	249	—	5	5	—	—	—
Africa, total	28	7,371	1,299	2,381	1,661	720	58	—
North Africa, total	8	724	747	575	150	425	—	—
Egypt (formerly United Arab Republic)	5	—121	—	20	20	—	—	—
Morocco	3	543	564	459	128	331	—	—

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 26.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Selected major industry and selected area, subarea, country, and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Total	Paid or accrued	Deemed paid		
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Manufacturing—Continued								
Electrical equipment and supplies—Continued								
Africa—Continued								
East Africa, total	6	1,270	105	832	765	67	—	—
Ethiopia	3	231	—	116	116	—	—	—
West and Central African countries, total	7	531	—	155	155	—	—	—
Ghana	3	147	—	115	115	—	—	—
Southern Africa, total	28	4,843	446	819	591	228	58	—
South Africa, Republic of (Includes South-West Africa)	27	4,630	249	677	482	195	—	—
Zambia	3	276	8	107	103	4	—	—
Asia, total	83	162,218	13,116	31,527	25,297	6,230	4,173	—
Middle East, total	21	3,500	179	731	642	89	—	—
Iran	11	1,281	—	299	299	—	—	—
Israel	14	2,148	179	381	292	89	—	—
Southern and Southeastern Asia, total	26	18,712	3,224	5,188	4,421	766	29	—
India	18	2,300	422	1,606	1,351	256	—	—
Indonesia	5	1,530	—	65	65	—	—	—
Pakistan	3	—575	—	8	8	—	—	—
Philippines	17	7,618	2,027	1,776	1,531	245	29	—
Singapore	8	2,862	156	537	400	107	—	—
Thailand	6	1,650	619	407	249	158	—	—
Eastern Asia, total	77	140,005	9,714	25,608	20,233	5,375	4,144	—
China, Republic of (Taiwan)	13	2,446	—	515	515	—	—	—
Hong Kong	10	4,834	3,738	528	39	489	—	—
Japan	73	132,468	5,975	24,563	19,677	4,886	4,144	—
South Korea, Republic of	6	255	—	1	1	—	—	—
Oceania, total	68	17,882	3,780	6,574	4,175	2,399	873	417
Australia	66	17,057	3,730	6,264	3,906	2,358	873	417
New Zealand	18	832	50	301	261	41	—	—
Puerto Rico and United States Possessions, total	17	24,156	660	8,276	8,097	179	—	—
Puerto Rico	17	17,789	570	5,622	5,478	143	—	—
U.S. Possessions, total	7	6,368	90	2,654	2,619	36	—	—
Guam	5	1,406	—	535	535	—	—	—
Virgin Islands, U.S.	5	5,052	90	2,119	2,084	36	—	—
Country not stated or not allocable and other income from outside the United States	21	13,176	142	1,008	968	40	—	—
DISC dividends	4	25,552	732	73	—	73	—	—
Other geographic classifications (combinations of countries shown above):								
Not economically less-developed countries	171	559,365	173,079	167,610	58,922	108,688	29,705	417
Economically less-developed countries	80	110,753	27,944	42,151	31,996	10,155	1,395	(?)
Sino-Soviet Bloc	5	28	—	4	4	—	—	—
OPEC countries	28	9,619	5,501	4,302	1,822	2,480	802	—

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED
Table 26.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Selected major industry and selected area, subarea, country, and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Total	Paid or accrued	Deemed paid		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
Manufacturing—Continued								
Motor vehicles and equipment								
All geographic areas and DISC dividends	72	757,717	357,248	378,712	78,960	299,752	10,884	227
Canada	57	324,355	156,658	177,874	26,239	151,635	5,137	—
Latin America, total	40	35,876	22,123	20,198	11,586	8,612	4,078	227
Mexico	32	17,081	8,842	9,379	5,780	3,600	—	—
Central America, total	7	2,001	320	1,387	84	1,303	1,141	—
El Salvador	3	147	—	5	5	—	—	—
Guatemala	3	247	223	74	32	42	—	—
Panama, excluding Canal Zone	3	1,599	97	1,304	44	1,261	1,141	—
South America, total	32	16,773	12,961	9,430	5,721	3,709	2,937	227
Argentina	15	8,257	5,607	2,719	2,133	586	1,489	—
Brazil	13	-1,007	747	1,556	1,329	227	—	—
Colombia	8	268	18	46	38	8	—	—
Peru	8	381	—	379	379	—	—	—
Venezuela	22	7,660	6,500	4,212	1,345	2,866	1,448	227
Europe, total	28	338,274	176,099	170,408	32,403	138,005	1,469	—
Common Market countries, total	24	291,409	160,075	159,684	29,941	129,743	—	—
Belgium	7	15,823	8,830	7,908	1,497	6,412	—	—
France (includes Andorra)	14	2,142	104	252	170	82	—	—
Italy (includes San Marino)	13	-230	3,714	7,372	240	7,132	—	—
Netherlands	8	2,578	664	1,143	683	460	—	—
West Germany	14	271,089	149,762	143,009	27,352	115,657	—	—
Other West European countries, total	24	46,455	16,024	10,724	2,462	8,262	1,469	—
Finland	4	2,455	2,408	1,282	120	1,172	—	—
Portugal	4	1,510	1,393	611	162	449	—	—
Spain	12	4,124	15	915	810	5	—	—
Sweden	7	2,515	68	64	3	61	—	—
Switzerland	8	9,617	4,383	1,552	156	1,396	43	—
United Kingdom	16	22,159	4,654	4,493	926	3,567	—	—
Africa, total	12	1,492	—	282	282	—	—	—
Southern Africa, total	9	733	—	238	238	—	—	—
South Africa, Republic of (includes South-West Africa)	9	733	—	238	238	—	—	—
Asia, total	35	18,040	1,092	2,212	1,776	443	—	—
Middle East, total	7	1,943	—	68	68	—	—	—
Iran	3	1,580	—	49	49	—	—	—
Southern and Southeastern Asia, total	12	2,481	264	667	555	112	—	—
India	10	930	92	389	329	60	—	—
Philippines	6	900	172	207	155	53	—	—
Eastern Asia, total	32	13,616	828	1,478	1,147	330	—	—
China, Republic of (Taiwan)	4	215	—	36	36	—	—	—
Japan	31	12,463	365	1,358	1,109	249	—	—
Oceania, total	29	18,708	1,275	6,059	5,002	1,057	—	—
Australia	29	16,448	57	4,866	4,805	61	—	—
New Zealand	6	2,260	1,218	1,194	197	996	—	—
Puerto Rico and United States Possessions, total	5	2,205	—	756	756	—	—	—
Puerto Rico	5	2,108	—	721	721	—	—	—
Country not stated or not allocable and other income from outside the United States	9	16,759	—	922	922	—	—	—
Other geographic classifications (combinations of countries shown above):								
Not Economically less-developed countries	67	690,600	331,059	354,118	64,712	289,407	6,606	—
Economically less-developed countries	41	48,351	26,189	23,672	13,326	10,345	4,078	227
OPEC countries	23	9,534	6,500	4,288	1,422	2,866	1,448	227

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 26.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Selected major industry and selected area, subarea, country, and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Total	Paid or accrued	Deemed paid		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
Transportation, Communication, Electric, Gas, and Sanitary Services								
All geographic areas and DISC dividends	111	213,150	36,593	55,846	29,150	26,696	12,851	590
Canada	68	79,048	22,129	29,408	11,546	17,862	10,213	590
Latin America	52	33,585	3,927	7,275	6,179	1,096	979	—
Mexico	31	8,352	1,037	1,847	1,387	460	—	—
Central America, total	13	2,822	681	548	491	57	535	—
Costa Rica	5	110	18	25	21	4	—	—
Guatemala	4	565	65	158	130	28	535	—
Honduras	4	151	15	13	10	3	—	—
Panama excluding Canal Zone	9	1,507	574	336	317	20	—	—
Caribbean countries, total	9	3,483	19	648	640	8	4	—
Jamaica	6	2,701	—	305	305	—	—	—
Trinidad	5	450	8	205	201	4	4	—
South America, total	29	18,929	2,190	4,232	3,661	571	440	—
Argentina	9	1,844	493	359	245	114	—	—
Bolivia	4	2,600	23	469	463	6	—	—
Brazil	10	2,479	1,373	1,209	839	370	88	—
Chile	7	451	45	106	91	15	—	—
Colombia	8	552	56	182	164	18	—	—
Ecuador	6	7,892	—	297	297	—	—	—
Peru	8	240	11	94	88	6	—	—
Venezuela	19	2,679	186	1,465	1,424	41	353	—
Other Western Hemisphere	4	1,738	139	424	406	18	—	—
Europe, total	33	25,576	7,031	9,601	4,258	5,343	160	—
Common Market countries, total	19	416	363	1,205	984	222	—	—
Belgium	5	1,688	—	14	14	—	—	—
France (includes Andorra)	13	2,735	20	154	139	15	—	—
Italy (includes San Marino)	8	—3,335	36	174	153	20	—	—
Netherlands	5	—2,468	—	100	100	—	—	—
West Germany	12	1,796	307	764	577	186	—	—
Other West European countries, total	24	25,079	6,668	8,307	3,185	5,122	160	—
Spain	8	995	—	137	137	—	—	—
Switzerland	14	11,923	6,121	5,586	801	4,785	160	—
United Kingdom	12	11,717	487	2,542	2,224	318	—	—
Africa, total	11	4,443	526	636	282	354	—	—
West and Central African countries	5	2,725	—	—	—	—	—	—
Southern Africa, total	6	1,562	526	569	215	354	—	—
South Africa, Republic of (Includes South-West Africa)	6	1,562	526	569	215	354	—	—
Asia, total	27	38,242	803	4,653	4,226	427	—	—
Middle East, total	10	2,857	290	585	523	62	—	—
Israel	7	579	290	203	140	62	—	—
Southern and Southeastern Asia, total	9	4,540	197	1,573	1,519	54	—	—
Philippines	6	3,583	154	1,304	1,251	54	—	—
Singapore	3	470	—	186	186	—	—	—
Eastern Asia, total	23	30,845	316	2,495	2,183	311	—	—
Hong Kong	7	13,839	—	53	53	—	—	—
Japan	20	16,666	231	2,326	2,031	294	—	—
Okinawa and Ryukyu Islands	3	199	—	99	99	—	—	—
South Korea, Republic of	3	120	85	16	—1	17	—	—
Oceania, total	17	14,139	1,898	2,410	871	1,539	1,500	—
Australia	15	7,024	1,898	2,293	753	1,539	1,500	—
New Zealand	7	233	—	53	53	—	—	—
Puerto Rico and United States Possessions, total	21	4,025	140	1,305	1,250	55	—	—
Puerto Rico	18	2,852	140	1,086	1,031	55	—	—
U.S. Possessions, total	7	1,173	—	218	218	—	—	—
Country not stated or not allocable and other income from outside the United States	12	11,966	—	133	133	—	—	—
Other geographic classifications (combinations of countries shown above):								
Not economically less-developed countries	80	143,746	31,815	44,193	18,800	25,394	11,873	590
Economically less-developed countries	65	56,967	4,777	11,430	10,127	1,303	979	—
Sino-Soviet Bloc	3	84	—	90	90	—	—	—
OPEC countries	25	12,342	186	2,143	2,102	41	353	—

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED
 Table 26.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Selected major industry and selected area, subarea, country, and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Total	Paid or accrued	Deemed paid		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
Wholesale and Retail Trade								
All geographic areas and DISC dividends	629	492,118	159,058	300,606	216,329	64,278	11,166	1,157
Canada	291	65,760	20,406	28,973	6,967	22,007	6,867	1,021
Latin America, total	122	53,024	17,198	26,335	19,834	6,501	3,518	—
Mexico	63	11,917	3,770	6,319	4,252	2,067	2,934	—
Central America, total	32	4,344	463	1,244	1,081	163	—	—
Costa Rica	3	421	—	161	161	—	—	—
Honduras	5	133	33	46	31	15	—	—
Nicaragua	4	842	—	196	196	—	—	—
Panama, excluding Canal Zone	23	2,765	430	760	612	148	—	—
Caribbean countries, total	8	1,416	726	390	171	219	—	—
Dominican Republic	3	128	—	3	3	—	—	—
Jamaica	3	112	—	20	20	—	—	—
Trinidad	3	1,129	726	335	116	219	—	—
South America, total	68	35,347	12,239	18,382	14,330	4,052	584	—
Argentina	18	796	197	287	193	94	—	—
Brazil	13	5,226	2,947	1,975	1,466	509	370	—
Colombia	17	2,434	1,871	1,009	340	669	214	—
Ecuador	4	299	—	153	153	—	—	—
Peru	14	4,909	2,439	2,071	1,077	994	—	—
Venezuela	27	21,127	4,674	12,812	11,055	1,756	—	—
Other Western Hemisphere, total	8	3,230	2,797	1,563	351	1,212	75	—
Netherlands Antilles	4	839	605	293	7	286	—	—
Europe, total	99	72,746	44,109	32,986	7,625	25,361	546	136
Common Market countries, total	59	7,862	2,646	2,332	443	1,889	532	136
Belgium	9	3,195	692	451	83	367	440	136
France (includes Andorra)	11	2,201	387	445	146	299	—	—
Italy (includes San Marino)	7	528	—	21	21	—	—	—
Netherlands	35	1,610	781	805	42	763	93	—
West Germany	16	329	787	610	150	460	—	—
Other West European countries, total	60	39,186	24,264	19,046	4,063	14,983	14	—
Denmark	8	354	42	71	40	31	—	—
Spain	8	1,877	961	681	243	437	—	—
Switzerland	10	2,392	958	486	314	172	—	—
United Kingdom	46	34,066	22,063	17,692	3,448	14,244	14	—
East European countries	3	25,699	17,199	11,608	3,119	8,489	—	—
Africa, total	23	140,135	11,447	157,771	150,182	7,589	23	—
North Africa	3	120,112	—	147,873	147,873	—	—	—
East Africa	3	835	833	510	153	357	—	—
Southern Africa, total	19	18,036	10,613	8,828	1,596	7,232	23	—
South Africa, Republic of (includes South-West Africa)	19	17,564	10,142	8,621	1,596	7,025	—	—
Asia, total	211	117,871	58,817	41,948	23,919	18,029	91	—
Middle East	41	65,707	51,021	28,535	13,251	15,284	—	—
Southern and Southeastern Asia, total	45	7,492	1,535	2,830	2,175	655	—	—
India	3	1,283	—	331	331	—	—	—
Indonesia	5	544	—	114	114	—	—	—
Philippines	33	4,411	1,212	1,700	1,224	476	—	—
Thailand	5	107	—	18	18	—	—	—
Eastern Asia, total	150	44,426	6,261	10,544	8,454	2,090	91	—
Hong Kong	19	4,480	3,444	910	422	488	—	—
Japan	129	39,299	2,817	9,395	7,793	1,602	91	—
Asia, not allocable	8	247	—	40	40	—	—	—
Oceania, total	45	9,017	3,921	4,799	1,375	3,424	46	—
Australia	43	8,241	3,544	4,474	1,290	3,184	46	—
New Zealand	7	693	376	313	72	240	—	—
Puerto Rico and United States Possessions, total	77	13,739	364	4,378	4,223	155	—	—
Puerto Rico	73	13,296	265	4,199	4,088	111	—	—
U.S. Possessions, total	9	443	100	179	135	44	—	—
Guam	5	261	100	118	74	44	—	—
Virgin Islands, U.S.	4	182	—	61	61	—	—	—
Country not stated or not allocable and other income from outside the United States	40	16,436	—	1,854	1,854	—	—	—
Other geographic classifications (combinations of countries shown above):								
Not economically less-developed countries	460	182,733	67,431	73,998	22,630	51,368	7,550	1,157
Economically less-developed countries	264	266,693	74,428	212,908	188,486	24,421	3,616	—
Sino-Soviet Bloc	10	26,097	17,199	11,847	3,358	8,489	—	—
OPEC countries	33	157,544	4,695	174,716	172,954	1,762	—	—

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 26.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Selected major industry and selected area, subarea, country, and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Total	Paid or accrued	Deemed paid		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
Finance, Insurance, and Real Estate								
All geographic areas and DISC dividends	1,760	1,626,491	96,088	393,257	333,411	59,846	79,049	7,108
Canada	1,048	462,324	33,411	128,716	101,836	26,879	26,265	—
Latin America, total	261	206,936	6,664	63,679	61,601	2,078	1,363	216
Mexico	193	58,245	2,587	13,026	11,859	1,167	—	—
Central America, total	64	19,012	1,143	3,283	3,140	143	497	—
Costa Rica	20	1,452	213	70	48	22	—	—
El Salvador	11	840	139	266	257	8	—	—
Guatemala	26	1,672	65	221	201	20	—	—
Honduras	20	1,080	250	225	204	21	497	—
Nicaragua	18	1,263	137	176	158	18	—	—
Panama, excluding Canal Zone	51	12,701	339	2,326	2,272	54	—	—
Caribbean countries, total	44	12,284	—	1,899	1,899	—	—	—
Dominican Republic	19	1,340	—	471	471	—	—	—
Jamaica	22	2,875	—	944	944	—	—	—
Trinidad	22	1,825	—	466	466	—	—	—
South America, total	140	117,222	2,935	45,413	44,645	768	866	216
Argentina	79	21,446	96	9,634	9,602	32	692	216
Bolivia	16	1,513	—	235	235	—	—	—
Brazil	104	53,498	967	24,518	24,483	34	165	—
Chile	18	660	—	327	327	—	—	—
Colombia	44	8,005	97	1,250	1,213	37	8	—
Ecuador	26	1,258	—	1,026	1,026	—	—	—
Paraguay	11	1,157	—	368	368	—	—	—
Peru	44	5,469	—	1,547	1,547	—	—	—
Uruguay	17	1,289	—	564	564	—	—	—
Venezuela	84	22,509	1,774	5,880	5,216	664	—	—
Other	8	417	—	62	62	—	—	—
Other Western Hemisphere, total	54	73,214	6,185	4,631	3,044	1,587	—	—
The Bahamas	35	69,888	5,000	4,050	2,867	1,183	—	—
Netherlands Antilles	25	3,638	1,185	596	192	404	—	—
Europe, total	527	513,587	39,817	104,095	79,685	24,410	47,056	4,384
Common Market countries, total	310	162,555	12,116	38,499	27,348	11,151	3,938	9
Belgium	39	19,512	1,251	3,674	3,059	615	—	—
France (includes Andorra)	64	41,230	3,576	9,553	5,770	3,783	696	—
Italy (includes San Marino)	28	25,576	2,446	5,622	2,330	3,292	562	7
Luxembourg	11	1,985	381	211	158	52	—	—
Netherlands	249	10,363	791	1,697	1,277	420	2,541	—
West Germany	51	63,883	3,670	17,743	14,754	2,989	139	—
Other West European countries, total	292	349,005	27,701	65,530	52,271	13,259	43,119	4,355
Austria	17	1,907	599	901	379	522	—	—
Denmark	19	873	—	2	2	—	—	—
Finland	19	1,554	14	23	3	20	—	—
Greece	21	7,763	165	1,416	1,386	30	61	—
Ireland	13	3,137	—	69	69	—	—	—
Liechtenstein	5	656	—	12	12	—	—	—
Norway	16	406	—	(?)	(?)	—	—	—
Portugal	14	336	—	1	1	—	—	—
Spain	36	13,172	593	936	692	245	—	—
Sweden	19	1,057	—	102	102	—	—	—
Switzerland	46	20,694	5,850	3,165	2,657	508	5,828	—
Turkey	14	315	5	47	47	(?)	—	—
United Kingdom	255	296,942	20,473	58,856	46,322	11,934	37,229	4,355
East European countries, total	22	2,021	—	65	65	—	—	—
East Germany	6	504	—	65	65	—	—	—
Africa, total	129	10,012	725	1,232	880	352	—	—

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED
Table 26.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Selected major industry and selected area, subarea, country, and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Total	Paid or accrued	Deemed paid		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
Finance, Insurance, and Real Estate—Continued								
Africa—Continued								
East Africa, total	12	315	—	51	51	—	—	
Kenya	6	165	—	45	45	—	—	
West and Central African countries, total	29	7,128	356	367	219	148	—	
Liberia	16	6,118	—	68	68	—	—	
Nigeria	8	413	229	170	66	103	—	
Southern Africa, total	114	2,200	339	773	578	195	—	
South Africa, Republic of (Includes South-West Africa)	97	1,798	316	660	476	184	—	
Zambia	5	214	23	64	53	11	—	
Africa, not allocable	3	324	—	—	—	—	—	
Asia, total	245	232,648	4,782	66,453	65,156	1,297	173	
Middle East, total	56	17,103	1,808	3,929	3,435	493	—	
Bahrain	3	220	—	—	—	—	—	
Iran	20	3,075	562	450	309	141	—	
Israel	47	5,484	1,206	1,308	965	343	—	
Lebanon	18	3,367	39	674	666	8	—	
Saudi Arabia	9	2,457	—	1,125	1,125	—	—	
United Arab Emirates	5	2,039	1	344	344	(P)	—	
Southern and Southeastern Asia, total	82	72,532	669	29,255	29,011	244	116	
India	26	12,834	—	8,488	8,488	—	—	
Indonesia	24	8,783	—	3,495	3,495	—	—	
Malaysia	18	3,470	—	1,019	1,019	—	—	
Pakistan	16	3,291	—	2,266	2,266	—	—	
Philippines	67	26,076	485	8,849	8,657	192	109	
Singapore	15	14,013	—	3,832	3,832	—	—	
South Vietnam	7	572	—	105	105	—	—	
Thailand	27	3,096	185	905	852	53	8	
Eastern Asia, total	203	142,973	2,304	33,270	32,710	560	56	
China, Republic of (Taiwan)	28	5,934	231	1,471	1,424	47	56	
Hong Kong	30	12,681	1,922	1,781	1,412	368	—	
Japan	185	118,626	151	28,618	28,473	145	—	
Okinawa and Ryukyu Islands	8	113	—	118	118	—	—	
South Korea, Republic of	23	5,378	—	1,266	—	—	—	
Oceania, total	96	28,997	3,736	9,143	6,173	2,970	4,193	
Australia	92	26,450	3,736	8,421	5,451	2,970	4,193	
New Zealand	24	2,052	—	699	699	—	—	
Other	11	494	—	23	23	—	—	
Puerto Rico and United States Possessions, total	137	35,785	429	9,537	9,281	257	—	
Puerto Rico	127	29,282	429	7,003	6,747	257	—	
U.S. Possessions, total	33	6,503	—	2,534	2,534	—	—	
American Samoa	6	220	—	81	81	—	—	
Guam	19	4,784	—	1,682	1,682	—	—	
Panama Canal Zone	4	—202	—	—	—	—	—	
Virgin Islands, U.S.	25	1,702	—	771	771	—	—	
Country not stated or not allocable and other income from outside the United States	104	62,988	339	5,771	5,754	17	—	
Other geographic classifications (combinations of countries shown above):								
Not economically less-developed countries	1,513	1,122,196	79,168	271,368	216,462	54,906	77,453	
Economically less-developed countries	412	440,562	16,581	116,037	111,113	4,924	1,597	
Sino-Soviet Bloc	19	745	—	81	81	—	—	
OPEC countries	91	40,832	2,565	12,516	11,607	909	—	

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 26.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Selected major industry and selected area, subarea, country, and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Total	Paid or accrued	Deemed paid		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
Services								
All geographic areas and DISC dividends	397	118,353	26,849	34,878	16,552	18,326	3,243	
Canada	238	17,982	3,433	5,483	2,480	3,003	539	
Latin America, total	131	22,377	3,234	7,905	4,780	3,125	46	
Mexico	49	3,895	276	1,606	1,495	111	—	
Central America, total	11	5,991	1,977	2,781	27	2,753	—	
Costa Rica	5	1,049	20	13	6	8	—	
Panama, excluding Canal Zone	6	4,863	1,957	2,756	11	2,746	—	
Caribbean countries, total	18	808	38	119	90	28	—	
Jamaica	6	163	38	43	15	28	—	
Trinidad	12	632	—	72	—	—	—	
South America, total	109	11,683	943	3,400	3,168	232	46	
Argentina	26	2,830	38	1,539	1,527	12	—	
Brazil	42	3,450	—	830	830	—	—	
Colombia	10	688	—	59	59	—	—	
Peru	15	659	19	83	77	7	—	
Uruguay	12	1,082	—	173	—	—	—	
Venezuela	60	2,843	876	690	478	212	46	
Other Western Hemisphere, total	21	473	360	33	31	2	—	
The Bahamas	3	365	360	2	—	—	—	
Europe, total	111	48,888	15,727	13,335	3,975	9,360	2,175	
Common Market countries, total	81	32,847	12,214	9,830	3,151	6,679	574	
Belgium	24	2,757	212	298	152	146	—	
France (includes Andorra)	31	7,020	879	1,210	375	835	—	
Italy (includes San Marino)	23	8,451	811	1,624	912	712	—	
Netherlands	30	508	3,385	1,178	137	1,041	122	
West Germany	37	14,109	6,927	5,520	1,575	3,946	452	
Other West European countries, total	66	15,731	3,426	3,433	803	2,630	1,601	
Austria	6	196	104	136	15	121	—	
Denmark	8	586	87	63	15	48	—	
Finland	4	328	30	15	11	14	—	
Greece	6	152	—	24	24	—	—	
Norway	3	399	54	50	7	43	—	
Spain	13	1,132	64	199	172	27	—	
Sweden	18	1,266	26	17	2	15	—	
Switzerland	17	1,216	392	170	66	104	—	
United Kingdom	57	10,280	2,588	2,692	451	2,241	1,601	
East European countries	4	310	87	72	22	51	—	
Africa, total	26	5,101	818	976	645	331	—	
North Africa	5	516	—	55	55	—	—	
East Africa	6	181	—	48	48	—	—	
West and Central African countries, total	7	252	—	82	82	—	—	
Liberia	3	113	—	73	73	—	—	
Southern Africa, total	21	4,146	818	791	461	331	—	
South Africa, Republic of (Includes South-West Africa)	13	1,979	382	452	203	249	—	
Zambia	7	2,167	437	339	257	82	—	

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 26.—Foreign Income and Taxes, by Selected Major Industry, and by Selected Geographic Area, Subarea, and Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Selected major industry and selected area, subarea, country, and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Total	Paid or accrued	Deemed paid		
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Services—Continued								
Asia, total	85	11,685	925	3,674	3,049	626	—	—
Middle East, total	31	1,217	—	193	193	—	—	—
Iran	21	153	—	54	54	—	—	—
Israel	9	315	—	113	113	—	—	—
Lebanon	4	103	—	3	3	—	—	—
Saudi Arabia	3	592	—	22	—	—	—	—
Southern and Southeastern Asia, total	30	1,359	13	404	399	5	—	—
India	8	184	2	135	134	1	—	—
Indonesia	7	372	—	36	36	—	—	—
Philippines	15	350	11	151	147	4	—	—
Singapore	3	119	—	23	23	—	—	—
Thailand	4	152	—	48	48	—	—	—
Eastern Asia, total	52	9,109	912	3,077	2,457	621	—	—
China, Republic of (Taiwan)	8	630	—	93	93	—	—	—
Hong Kong	6	157	1	7	6	(?)	—	—
Japan	49	8,011	911	2,936	2,315	621	—	—
South Korea, Republic of	4	248	—	22	—	—	—	—
Oceania, total	30	7,496	2,251	2,695	851	1,844	483	—
Australia	29	7,326	2,251	2,668	824	1,844	483	—
New Zealand	4	169	—	27	27	—	—	—
Puerto Rico and United States Possessions, total	23	2,053	100	690	654	36	—	—
Puerto Rico	22	1,968	100	660	624	36	—	—
Country not stated or not allocable and other income from outside the United States	11	2,298	—	87	87	—	—	—
Other geographic classifications (combinations of countries shown above):								
Not economically less-developed countries	335	83,548	22,507	24,730	9,734	14,996	3,197	—
Economically less-developed countries	150	32,308	4,256	9,988	6,709	3,279	46	—
Sino-Soviet Bloc	4	199	87	72	22	51	—	—
OPEC countries	70	4,460	886	863	649	214	46	—

¹Includes the "gross-up" of certain foreign dividends.

²Less than \$500 per return.

NOTE: See text for explanatory statements including Geographic classification under "Explanation of Terms" and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

Foreign Tax Credit on Corporation Returns, 1972

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED AND WITH PER-COUNTRY LIMITATION METHOD Table 27.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Industrial Division, and by Size of Total Assets

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

Table with 13 columns: (1) Industrial division and size of total assets, (2) Number of returns, (3) Total assets, (4) Net income (less deficit), (5) Dividends received from foreign corporations, (6) Includable income of Controlled Foreign Corporations, (7) Foreign dividend income resulting from foreign taxes deemed paid, (8) Dividends received from DISCs, (9) Income subject to U.S. tax, (10) U.S. income tax before credits, (11) Foreign tax credit claimed, (12) Foreign income and taxes of domestic corporations reported on Form 1118 (Total (less loss), Dividends from related foreign corporations, Dividends from DISCs), (13) Dividends from DISCs.

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED AND WITH PER-COUNTRY LIMITATION METHOD
Table 27.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Industrial Division, and by Size of Total Assets—
Continued

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

Industrial division and size of total assets	Foreign income and taxes of domestic corporations reported on Form 1118—Continued										Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
	Total foreign taxes				Foreign taxes			Foreign tax credit computed				
	Total	Equal to foreign tax credit computed	Greater than foreign tax credit computed	Paid or accrued	Deemed paid		Carryover	Total	For taxes on—			
					Total	On DISC dividends			DISC dividends	Interest for which separate credit was computed		
(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)	(25)	
All Industrial Divisions	3,367,637	119,955	3,246,997	2,261,617	299,143	73	806,877	1,419,121	73	2,559	70,733	6,164
Under \$10,000,000 ¹	33,179	8,202	24,978	15,880	5,976	—	11,323	19,115	—	279	96	—
\$10,000,000 under \$100,000,000	50,117	18,430	31,687	21,915	19,998	73	8,205	39,729	73	281	2,631	1,736
\$100,000,000 under \$250,000,000	49,745	26,668	23,077	18,370	24,038	—	7,337	42,200	—	111	23,014	4,267
\$250,000,000 or more	3,234,595	66,655	3,167,266	2,205,452	249,131	—	780,012	1,318,077	—	1,888	44,992	160
Agriculture, Forestry, and Fishery	286	19	267	256	30	—	—	223	—	—	—	—
Under \$10,000,000 ¹	121	8	113	121	—	—	—	64	—	—	—	—
\$10,000,000 under \$100,000,000	165	11	154	135	30	—	—	160	—	—	—	—
\$100,000,000 under \$250,000,000	—	—	—	—	—	—	—	—	—	—	—	—
\$250,000,000 or more	—	—	—	—	—	—	—	—	—	—	—	—
Mining	69,459	311	69,148	39,761	191	—	29,508	31,428	—	42	—	—
Under \$10,000,000 ¹	4,102	142	3,959	2,098	—	—	2,003	1,571	—	(²)	—	—
\$10,000,000 under \$100,000,000	6,120	36	6,083	2,181	146	—	3,793	1,531	—	7	—	—
\$100,000,000 under \$250,000,000	3,938	80	3,858	2,529	45	—	1,365	1,931	—	7	—	—
\$250,000,000 or more	55,300	52	55,247	32,953	—	—	22,347	26,395	—	27	—	—
Contract Construction	1,945	811	1,133	760	288	—	896	1,129	—	—	—	—
Under \$10,000,000 ¹	317	117	200	139	—	—	178	234	—	—	—	—
\$10,000,000 under \$100,000,000	486	401	84	204	282	—	—	470	—	—	—	—
\$100,000,000 under \$250,000,000	1,142	292	849	417	6	—	719	426	—	—	—	—
\$250,000,000 or more	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	3,001,788	58,329	2,943,459	1,996,706	250,696	73	754,386	1,228,208	73	1,568	43,728	1,941
Under \$10,000,000 ¹	8,695	2,915	5,779	5,270	2,664	—	761	6,921	—	61	96	—
\$10,000,000 under \$100,000,000	26,581	13,981	12,600	11,549	13,639	73	1,394	25,038	73	138	2,232	1,735
\$100,000,000 under \$250,000,000	31,011	24,055	6,957	10,792	18,844	—	1,378	29,981	—	86	7,802	46
\$250,000,000 or more	2,935,501	17,378	2,918,124	1,969,096	215,549	—	750,856	1,166,267	—	1,303	33,597	160
Transportation, Communication, Electric, Gas, and Sanitary Services	19,312	2,644	16,669	9,321	3,615	—	6,377	12,077	—	14	—	—
Under \$10,000,000 ¹	4,841	1,272	3,568	1,367	1,005	—	2,469	2,374	—	1	—	—
\$10,000,000 under \$100,000,000	875	496	380	602	175	—	98	760	—	13	—	—
\$100,000,000 under \$250,000,000	857	73	784	855	—	—	2	718	—	—	—	—
\$250,000,000 or more	12,739	803	11,937	6,497	2,435	—	3,808	8,226	—	—	—	—
Wholesale and Retail Trade	209,810	35,409	174,400	177,950	28,539	—	3,321	99,682	—	208	1,167	—
Under \$10,000,000 ¹	5,464	2,099	3,365	3,285	874	—	1,305	3,629	—	153	—	—
\$10,000,000 under \$100,000,000	4,574	1,781	2,793	2,892	969	—	712	3,761	—	8	—	—
\$100,000,000 under \$250,000,000	1,268	498	770	828	383	—	57	1,265	—	—	—	—
\$250,000,000 or more	198,504	31,032	167,472	170,944	26,314	—	1,246	91,026	—	47	1,167	—
Finance, Insurance, and Real Estate	50,094	20,985	28,424	30,956	11,668	—	7,471	37,306	—	662	25,440	4,223
Under \$10,000,000 ¹	3,351	899	2,452	1,226	1,127	—	998	2,049	—	64	—	—
\$10,000,000 under \$100,000,000	3,573	1,341	2,232	1,696	978	—	899	2,052	—	59	—	2
\$100,000,000 under \$250,000,000	11,344	1,638	9,706	2,798	4,728	—	3,818	7,698	—	28	15,212	4,222
\$250,000,000 or more	31,826	17,106	14,034	25,236	4,834	—	1,756	25,507	—	510	10,228	—
Services	14,667	1,170	13,497	5,830	4,118	—	4,919	8,789	—	65	399	—
Under \$10,000,000 ¹	6,012	471	5,541	2,095	307	—	3,610	1,994	—	(²)	—	—
\$10,000,000 under \$100,000,000	7,893	382	7,511	2,775	3,808	—	1,309	6,104	—	56	399	—
\$100,000,000 under \$250,000,000	762	317	445	759	3	—	(²)	691	—	9	—	—
\$250,000,000 or more	—	—	—	—	—	—	—	—	—	—	—	—
Nature of Business not Allocable	278	278	—	278	—	—	—	278	—	—	—	—
Under \$10,000,000 ¹	278	278	—	278	—	—	—	278	—	—	—	—
\$10,000,000 under \$100,000,000	—	—	—	—	—	—	—	—	—	—	—	—
\$100,000,000 under \$250,000,000	—	—	—	—	—	—	—	—	—	—	—	—
\$250,000,000 or more	—	—	—	—	—	—	—	—	—	—	—	—

¹Includes the "gross-up" of certain foreign dividends.

²Includes returns with zero assets.

³Less than \$500 per return.

NOTE: See text for explanatory statements and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

Foreign Tax Credit on Corporation Returns, 1972

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED AND WITH OVERALL LIMITATION METHOD
 Table 28.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Industrial Division, and by Size of Total Assets
 [All figures are estimates based on samples—money amounts are in thousands of dollars]

Industrial division and size of total assets	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Include income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Dividends received from DISCs	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed	Foreign income and taxes of domestic corporations reported on Form 1118		
											Taxable income from foreign sources		
											Total (less loss) ¹	Dividends from related foreign corporations	Dividends from DISCs
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	
All Industrial Divisions													
Total	2,447	1,100,379,427	44,850,708	3,718,085	62,258	1,790,303	240,662	42,957,732	20,304,097	5,195,117	13,343,152	3,546,482	141
Under \$10,000,000 ²	1,131	2,909,768	512,403	22,859	207	11,486	780	473,159	211,785	34,505	117,644	16,748	—
\$10,000,000 under \$100,000,000	629	22,653,282	2,223,378	110,032	10,628	69,257	5,909	1,016,049	135,898	135,898	407,304	112,222	—
\$100,000,000 under \$250,000,000	235	38,235,061	3,268,897	229,579	11,720	136,012	10,581	3,148,996	1,462,771	221,409	632,748	219,775	—
\$250,000,000 or more	452	1,036,581,296	38,645,031	3,355,816	39,702	1,571,549	223,392	37,181,082	17,613,512	4,803,304	12,185,455	3,197,717	141
Agriculture, Forestry, and Fishery													
Total	11	239,396	34,844	33	—	—	—	33,928	15,167	69	661	—	—
Under \$10,000,000 ²	8	27,888	5,596	20	—	—	—	5,232	2,387	2	22	—	—
\$10,000,000 under \$100,000,000	3	211,508	29,248	13	—	—	—	28,696	12,770	67	639	—	—
\$100,000,000 under \$250,000,000	—	—	—	—	—	—	—	—	—	—	—	—	—
\$250,000,000 or more	—	—	—	—	—	—	—	—	—	—	—	—	—
Mining													
Total	33	6,290,625	3,058,422	31,326	365	18,515	7,528	3,041,133	1,461,032	1,410,710	2,959,736	29,584	—
Under \$10,000,000 ²	15	34,259	5,938	15	—	(³)	—	5,599	2,596	367	792	—	—
\$10,000,000 under \$100,000,000	7	294,213	30,742	1,392	264	1,051	—	27,915	13,357	6,564	21,002	1,654	—
\$100,000,000 under \$250,000,000	5	905,709	34,945	908	—	—	335	31,800	14,894	3,426	10,917	96	—
\$250,000,000 or more	6	5,056,444	2,986,797	29,011	101	17,464	7,193	2,975,819	1,430,185	1,400,353	2,927,024	27,833	—
Contract Construction													
Total	32	1,979,400	178,233	20,056	33	12,321	222	171,574	81,544	22,550	82,366	16,742	—
Under \$10,000,000 ²	10	55,728	7,615	73	—	31	—	6,942	3,281	1,842	5,722	73	—
\$10,000,000 under \$100,000,000	14	378,455	44,385	1,717	—	15	—	43,201	19,964	2,452	12,920	1,581	—
\$100,000,000 under \$250,000,000	8	1,545,217	126,233	18,266	33	12,275	222	121,431	58,299	18,256	63,725	15,087	—
\$250,000,000 or more	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing													
Total	1,260	369,617,919	31,146,128	3,401,116	53,081	1,647,906	222,688	30,040,489	14,201,169	3,249,291	8,382,918	3,261,406	141
Under \$10,000,000 ²	444	1,699,026	331,508	11,487	41	6,251	417	316,985	143,554	17,222	65,605	8,838	—
\$10,000,000 under \$100,000,000	427	15,652,001	1,733,898	72,642	7,128	50,723	4,804	1,704,224	806,829	38,199	261,989	75,295	—
\$100,000,000 under \$250,000,000	159	25,260,250	2,529,257	198,765	11,473	117,871	9,824	2,466,460	1,161,291	185,347	527,015	193,430	—
\$250,000,000 or more	230	327,006,642	26,551,465	3,118,222	34,439	1,473,062	207,643	25,552,820	12,089,495	2,958,524	7,526,309	2,983,944	141
Transportation, Communication, Electric, Gas, and Sanitary Services													
Total	59	91,913,303	3,257,631	42,251	1,519	21,547	1,589	3,121,198	1,498,372	39,488	180,740	32,891	—
Under \$10,000,000 ²	22	56,518	10,274	3,308	—	652	—	9,238	4,354	1,168	2,585	1,628	—
\$10,000,000 under \$100,000,000	9	424,144	41,424	2,725	1,086	443	—	36,904	17,187	2,140	7,941	2,403	—
\$100,000,000 under \$250,000,000	9	1,524,772	63,842	753	59	387	—	52,523	24,740	1,371	5,847	785	—
\$250,000,000 or more	19	89,907,869	3,142,091	35,465	374	20,066	1,589	3,022,533	1,452,091	34,809	164,367	27,874	—
Wholesale and Retail Trade													
Total	249	29,331,598	1,598,942	115,658	430	31,967	8,613	1,536,137	726,126	95,008	257,069	112,896	—
Under \$10,000,000 ²	156	380,422	41,523	1,719	94	705	363	37,512	16,991	4,165	12,342	1,417	—
\$10,000,000 under \$100,000,000	57	1,721,111	127,811	5,405	58	905	1,083	120,087	56,679	12,616	39,623	4,955	—
\$100,000,000 under \$250,000,000	14	2,635,865	117,567	2,589	155	1,363	200	114,990	53,992	4,713	21,421	2,833	—
\$250,000,000 or more	22	24,594,200	1,312,041	105,944	123	28,994	6,967	1,263,548	598,464	73,514	183,683	103,891	—
Finance, Insurance, and Real Estate													
Total	660	585,762,520	5,225,986	88,202	5,276	45,021	22	4,872,229	2,164,157	355,749	1,390,267	72,485	—
Under \$10,000,000 ²	377	488,392	74,300	4,110	72	2,725	—	58,276	23,750	7,063	19,102	2,981	—
\$10,000,000 under \$100,000,000	77	2,982,321	118,878	20,266	2,092	11,982	22	98,382	44,584	16,066	39,185	20,555	—
\$100,000,000 under \$250,000,000	36	5,877,347	302,651	5,211	—	4,238	—	270,149	108,766	8,630	17,728	4,692	—
\$250,000,000 or more	170	586,514,460	4,730,157	58,614	3,112	26,076	—	4,245,422	1,987,057	325,969	1,314,253	44,258	—
Services													
Total	143	5,244,667	350,523	19,444	1,553	13,026	—	341,045	156,531	22,253	89,394	20,658	—
Under \$10,000,000 ²	99	167,536	35,649	1,826	—	1,122	—	33,378	14,843	2,677	11,474	1,810	—
\$10,000,000 under \$100,000,000	36	1,217,213	116,339	5,871	—	4,139	—	114,217	53,469	7,812	24,189	5,779	—
\$100,000,000 under \$250,000,000	4	660,670	78,516	3,120	—	1,908	—	74,899	33,179	2,787	6,116	3,085	—
\$250,000,000 or more	4	3,199,248	120,019	6,527	1,553	5,857	—	118,553	55,040	8,977	47,615	9,983	—

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED AND WITH OVERALL LIMITATION METHOD
Table 28.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Industrial Division, and by Size of Total Assets—
Continued

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

Industrial division and size of total assets	Foreign income and taxes of domestic corporations reported on Form 1118—Continued										Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
	Total foreign taxes			Foreign taxes			Foreign tax credit computed					
	Total ¹	Equal to foreign tax credit computed	Greater than foreign tax credit computed	Paid or accrued	Deemed paid		Carryover	Total	For taxes on			
					Total	On DISC Dividends			DISC dividends	interest for which separate credit was computed		
(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)	(25)	
All Industrial Divisions	7,313,064	1,963,291	5,349,772	4,274,361	2,093,493	7	945,209	5,197,386	7	2,804	666,706	23,045
Under \$10,000,000 ²	45,913	17,816	28,097	21,989	11,662	—	12,262	34,740	—	55	207	—
\$10,000,000 under \$100,000,000	166,465	78,396	88,069	64,755	73,543	—	28,166	136,441	—	256	30,123	(f)
\$100,000,000 under \$250,000,000	246,638	156,473	90,165	76,702	152,762	—	17,174	221,721	—	264	20,971	412
\$250,000,000 or more	6,854,048	1,710,606	5,143,442	4,110,915	1,855,528	7	887,606	4,804,485	7	2,229	815,404	22,633
Agriculture, Forestry, and Fishery	71	71	—	71	—	—	—	71	—	—	—	—
Under \$10,000,000 ²	3	3	—	3	—	—	—	3	—	—	—	—
\$10,000,000 under \$100,000,000	68	68	—	68	—	—	—	68	—	—	—	—
\$100,000,000 under \$250,000,000	—	—	—	—	—	—	—	—	—	—	—	—
\$250,000,000 or more	—	—	—	—	—	—	—	—	—	—	—	—
Mining	2,670,017	14,769	2,655,248	2,010,510	19,129	—	640,378	1,410,712	—	84	32,368	—
Under \$10,000,000 ²	513	2	512	512	—	—	—	370	—	—	—	—
\$10,000,000 under \$100,000,000	7,311	5,879	1,432	5,112	1,060	—	1,138	6,564	—	—	—	—
\$100,000,000 under \$250,000,000	3,525	3,242	293	3,411	39	—	86	3,425	—	—	—	—
\$250,000,000 or more	2,658,657	5,646	2,653,011	2,001,474	18,030	—	639,153	1,400,352	—	84	32,368	—
Contract Construction	28,906	14,452	14,454	12,528	13,651	—	2,726	22,677	—	—	1,100	(f)
Under \$10,000,000 ²	2,716	589	2,126	1,237	31	—	1,447	1,844	—	—	—	—
\$10,000,000 under \$100,000,000	2,676	2,022	653	2,023	414	—	239	2,570	—	—	—	—
\$100,000,000 under \$250,000,000	23,514	11,840	11,674	9,268	13,206	—	1,040	18,255	—	—	1,100	(f)
\$250,000,000 or more	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	4,014,093	1,566,714	2,447,379	1,879,667	1,919,507	7	214,919	3,250,720	7	1,729	553,933	18,413
Under \$10,000,000 ²	20,803	9,980	10,824	9,466	6,254	—	5,083	17,425	—	9	193	—
\$10,000,000 under \$100,000,000	98,806	57,926	40,880	33,656	52,461	—	12,688	88,622	—	187	7,322	(f)
\$100,000,000 under \$250,000,000	205,725	137,031	68,694	60,922	131,281	—	13,522	185,561	—	102	17,786	412
\$250,000,000 or more	3,688,758	1,361,777	2,326,961	1,775,623	1,729,510	7	183,625	2,959,112	7	1,432	528,631	18,001
Transportation, Communication, Electric, Gas, and Sanitary Services	47,947	35,061	12,886	19,829	23,062	—	5,037	39,483	—	284	12,851	590
Under \$10,000,000 ²	1,947	112	1,835	755	652	—	540	1,164	—	—	—	—
\$10,000,000 under \$100,000,000	2,733	1,123	1,610	1,626	783	—	322	2,139	—	37	535	—
\$100,000,000 under \$250,000,000	1,386	293	1,093	952	404	—	30	1,370	—	2	—	—
\$250,000,000 or more	41,881	33,534	8,347	16,493	21,242	—	4,145	34,810	—	245	12,317	590
Wholesale and Retail Trade	143,212	23,024	120,188	38,379	55,739	—	49,094	95,006	—	669	10,000	1,157
Under \$10,000,000 ²	4,715	1,857	2,858	3,555	839	—	321	4,168	—	41	14	—
\$10,000,000 under \$100,000,000	24,448	3,509	20,939	14,997	1,913	—	7,538	12,614	—	12	(f)	—
\$100,000,000 under \$250,000,000	5,040	1,305	3,734	3,229	1,677	—	134	4,712	—	147	48	—
\$250,000,000 or more	109,010	16,354	92,656	16,600	51,309	—	41,101	73,513	—	466	9,938	1,157
Finance, Insurance, and Real Estate	380,724	302,276	78,448	302,455	48,178	—	30,091	356,462	—	34	53,610	2,885
Under \$10,000,000 ²	10,861	3,688	7,171	4,711	2,758	—	3,393	7,094	—	5	—	—
\$10,000,000 under \$100,000,000	21,729	4,738	16,991	3,362	12,559	—	5,809	16,065	—	16	21,687	—
\$100,000,000 under \$250,000,000	8,811	2,297	6,514	2,709	4,243	—	1,859	6,731	—	13	—	—
\$250,000,000 or more	339,323	291,552	47,772	291,674	28,619	—	19,031	326,583	—	—	31,922	2,885
Services	28,094	6,924	21,170	10,921	14,208	—	2,964	22,255	—	4	2,845	—
Under \$10,000,000 ²	4,355	1,585	2,770	1,751	1,127	—	1,477	2,682	—	—	—	—
\$10,000,000 under \$100,000,000	8,713	3,150	5,563	3,927	4,353	—	433	7,809	—	4	579	—
\$100,000,000 under \$250,000,000	3,451	445	3,005	1,006	1,941	—	503	2,787	—	—	2,037	—
\$250,000,000 or more	11,575	1,744	9,831	4,238	6,787	—	551	8,976	—	—	229	—

¹Includes the "gross-up" of certain foreign dividends.

²Includes returns with zero assets.

³Less than \$500 per return.

NOTE: See text for explanatory statements and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

Foreign Tax Credit on Corporation Returns, 1972

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED AND WITH PER-COUNTRY LIMITATION METHOD
Table 29.—Foreign Income and Taxes, by Geographic Area, Subarea, and Selected Country where Foreign Taxes were Paid, and for DISC Dividends

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

Geographic area, subarea, selected country and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less loss) ¹	Dividends from related foreign corporations and from DISC's	Total	Paid or accrued	Deemed paid		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
All geographic areas and DISC dividends	3,051	3,143,235	654,703	2,560,760	2,261,617	299,143	70,733	6,164
Canada	1,721	357,901	81,639	134,133	84,149	49,984	25,884	1,735
Latin America, total	456	440,461	47,990	302,270	295,036	7,234	480	(¹)
Mexico	267	34,034	6,540	10,059	7,396	2,663	—	—
Central America, total	67	68,088	31,844	15,377	13,692	1,685	433	—
Costa Rica	29	10,789	305	4,168	4,064	104	332	—
El Salvador	8	1,200	63	391	384	7	—	—
Guatemala	17	5,382	60	2,160	1,992	168	—	—
Honduras	13	13,348	990	5,452	5,115	337	101	—
Nicaragua	12	1,495	238	321	288	32	—	—
Panama, excluding Canal Zone	22	35,878	30,188	2,886	1,848	1,037	—	—
Caribbean countries, total	28	34,057	35	22,597	22,569	27	—	—
Dominican Republic	6	303	—	1,123	1,123	—	—	—
Haiti	3	831	—	376	376	—	—	—
Jamaica	17	22,968	35	9,276	9,249	27	—	—
Trinidad	10	10,156	—	11,821	11,821	—	—	—
South America, total	214	304,282	9,570	254,238	251,380	2,859	46	(¹)
Argentina	61	14,491	4,079	12,043	10,765	1,278	—	—
Bolivia	5	828	—	9	—	—	—	—
Brazil	69	7,919	741	3,231	3,113	118	—	—
Chile	16	229	—	60	60	—	—	—
Colombia	46	4,600	24	3,947	3,941	7	—	—
Ecuador	11	—6,031	133	1,326	1,320	5	—	—
Paraguay	3	2,297	—	126	126	—	—	—
Peru	34	47,083	1,141	29,073	28,633	440	—	—
Uruguay	11	1,157	—	169	169	—	—	—
Venezuela	99	231,647	3,451	204,247	203,236	1,011	46	(¹)
Other Western Hemisphere, total	20	7,875	3,952	1,933	765	1,168	—	—
The Bahamas	4	611	34	1	—	1	—	—
Netherlands Antilles	14	6,228	2,918	1,584	764	820	—	—
Europe, total	705	168,604	105,099	110,740	46,380	64,360	24,489	4,384
Common Market countries, total	392	—53,611	25,470	26,904	8,950	17,954	343	2
Belgium	46	—5,766	2,433	3,314	1,927	1,387	—	—
France (includes Andorra)	95	27,268	6,089	8,570	1,816	6,754	163	—
Italy (includes San Marino)	48	—5,786	122	1,292	1,218	74	—	—
Netherlands	208	—107,754	1,428	1,242	219	1,024	160	—
West Germany	101	37,643	15,398	12,485	3,770	8,716	—	—
Other West European countries, total	389	194,765	62,474	70,940	32,953	37,987	24,146	4,382
Austria	6	292	73	82	12	71	—	—
Denmark	11	1,425	186	200	41	159	160	160
Finland	5	1,189	339	198	17	181	—	—
Greece	9	2,109	128	64	60	4	—	—
Ireland	19	2,411	99	255	216	39	—	—
Liechtenstein	3	677	6	16	—	16	—	—
Norway	7	381	79	78	5	74	—	—
Portugal	10	606	394	161	67	94	—	—
Spain	39	5,160	4,244	2,264	904	1,361	620	—
Sweden	14	962	14	118	105	13	—	—
Switzerland	37	5,973	2,933	1,455	673	782	1,654	—
Turkey	20	2,622	675	689	463	226	—	—
United Kingdom	319	170,932	53,301	65,360	30,391	34,969	21,711	4,222
East European countries, total	11	27,450	17,155	12,697	4,478	8,419	—	—
East Germany	6	22,614	17,155	11,549	3,130	8,419	—	—
Other	4	4,832	—	1,348	1,348	—	—	—
Africa, total	121	773,022	40,693	713,952	684,505	29,447	257	46
North Africa, total	13	679,114	—	646,030	646,030	—	—	—
Algeria	3	(¹)	—	—	—	—	—	—
Egypt (formerly United Arab Republic)	5	6,816	—	3,492	3,492	—	—	—
Libya	9	672,292	—	642,538	642,538	—	—	—

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED AND WITH PER-COUNTRY LIMITATION METHOD
Table 29.—Foreign Income and Taxes, by Geographic Area, Subarea, and Selected Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Geographic area, subarea, selected country and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less loss) ¹	Dividends from related foreign corporations and from DISC's	Total	Paid or accrued	Deemed paid		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
Africa—Continued								
East Africa	4	-32	—	27	27	—	—	
West and Central African countries, total	13	88,389	39,481	66,660	37,723	28,936	—	
Liberia	7	1,694	—	188	—	—	—	
Nigeria	4	34,591	39,481	28,693	-243	28,936	—	
Other	5	52,101	—	37,778	37,778	—	—	
Southern Africa, total	105	5,549	1,212	1,235	724	510	257	
South Africa, Republic of (includes South-West Africa)	77	2,689	510	733	370	363	199	
Zambia	10	2,341	513	387	268	119	—	
Other	18	519	189	116	86	29	58	
Asia, total	435	1,375,572	356,874	1,266,106	1,124,817	141,290	—	
Middle East, total	66	963,664	1,187	1,022,351	1,022,031	320	—	
Iran	17	501,322	21	449,800	449,794	6	—	
Israel	46	6,548	1,088	1,527	1,212	314	—	
Lebanon	5	-128	—	—	9	—	—	
Saudi Arabia	5	70,165	—	212,053	212,053	—	—	
United Arab Emirates	4	22,747	—	10,943	10,943	—	—	
Other	4	-114	78	89	88	(7)	—	
Southern and Southeastern Asia, total	69	335,724	345,002	231,254	93,211	138,042	—	
India	20	1,622	312	598	412	186	—	
Indonesia	12	330,422	343,625	227,988	90,522	137,466	—	
Malaysia	6	765	—	601	601	—	—	
Pakistan	3	291	163	115	24	91	—	
Philippines	39	-454	536	1,287	1,096	191	—	
Singapore	9	2,377	—	427	427	—	—	
Thailand	14	565	367	234	125	109	—	
Eastern Asia, total	361	76,184	10,685	12,502	9,575	2,927	—	
China, Republic of (Taiwan)	11	421	—	251	251	—	—	
Hong Kong	17	7,912	3,455	643	59	584	—	
Japan	348	58,572	3,319	11,079	8,892	2,188	—	
South Korea, Republic of	7	7,459	2,161	309	174	135	—	
Oceania, total	213	46,706	17,034	23,664	18,478	5,188	19,574	
Australia	202	45,997	17,016	23,400	18,230	5,169	19,574	
New Zealand	24	672	18	255	238	16	—	
Other	23	38	—	9	9	—	—	
Puerto Rico and United States Possessions, total	140	-31,142	615	7,194	6,841	353	—	
Puerto Rico	130	-32,717	365	5,821	5,675	147	—	
U.S. Possessions, total	15	1,575	250	1,372	1,166	206	—	
Guam	8	2,507	250	1,162	956	206	—	
Virgin Islands, U.S.	9	-939	—	207	207	—	—	
Country not stated or not allocable and other income from outside of the United States	67	3,430	77	695	646	49	49	
Other geographic classifications (combinations of countries shown above):								
Not economically less-developed countries	2,555	605,935	192,264	266,719	153,018	113,701	70,146	
Economically less-developed countries	694	2,504,393	442,726	2,280,182	2,103,301	176,880	538	
Sino-Soviet Bloc	12	28,673	18,905	13,091	4,651	8,439	—	
OPEC countries	113	2,220,191	386,711	2,125,518	1,958,094	167,424	46	

¹Includes the "gross-up" of certain foreign dividends.

²Less than \$500 per return.

NOTE: See text for explanatory statements, including Geographic classification under "Explanation of Terms," and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED AND WITH OVERALL LIMITATION METHOD
 Table 30.—Foreign Income and Taxes, by Geographic Area, Subarea, and Selected Country where Foreign Taxes were Paid, and for DISC Dividends

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

Geographic area, subarea, selected country, and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends					Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover				
		Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Total	Paid or accrued	Deemed paid		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
All geographic areas and DISC dividends	2,447	13,343,152	3,546,603	6,367,855	4,274,361	2,093,493	666,706	23,045
Canada	1,578	2,043,363	790,468	744,113	229,840	514,273	239,250	2,218
Latin America, total	1,042	1,522,358	390,221	846,794	702,755	144,039	35,665	4,386
Mexico	764	277,908	63,677	117,585	87,966	29,619	5,605	704
Central America, total	271	261,046	123,784	61,837	9,128	52,709	13,466	2,828
Costa Rica	90	8,925	951	1,409	1,075	334	—	—
El Salvador	57	2,799	504	1,091	1,033	59	—	—
Guatemala	104	14,776	2,961	1,900	1,093	808	561	—
Honduras	56	1,614	265	356	332	24	497	—
Nicaragua	62	2,680	494	498	439	59	—	—
Panama, excluding Canal Zone	185	229,381	118,609	56,553	5,127	51,426	12,408	2,828
Not allocable	7	870	—	28	28	—	—	—
Caribbean countries, total	172	74,960	1,588	26,859	26,279	580	4	(²)
Dominican Republic	71	29,237	78	15,172	15,144	28	—	—
Haiti	18	2,507	11	1,064	1,060	5	—	—
Jamaica	95	26,727	505	8,317	8,116	200	—	—
Trinidad	82	9,471	994	2,006	1,659	347	4	—
Other	25	7,017	—	300	—	—	—	—
South America, total	732	908,213	201,172	640,396	579,266	61,130	16,590	855
Argentina	328	92,691	25,290	37,927	30,996	6,931	2,531	216
Bolivia	49	7,429	97	1,864	1,835	29	—	—
Brazil	398	176,280	77,246	78,911	58,239	20,672	4,767	—
Chile	104	5,889	136	2,498	2,463	35	—	—
Colombia	247	51,469	19,052	18,930	11,834	7,096	661	—
Ecuador	100	15,477	851	4,374	4,153	221	334	—
Paraguay	29	1,832	470	717	577	140	—	—
Peru	217	35,281	8,727	16,879	13,908	2,972	—	—
Uruguay	75	4,091	2,083	1,498	1,259	239	—	—
Venezuela	395	513,644	67,162	475,313	452,548	22,765	8,298	698
Other	30	4,130	57	1,485	1,456	29	—	—
Latin American, not allocable	5	232	—	116	116	—	—	—
Other Western Hemisphere, total	184	199,296	78,029	18,421	8,548	9,873	9,083	—
The Bahamas	75	113,785	54,782	8,427	3,197	5,230	9,013	—
Bermuda	29	21,989	10,161	477	22	455	—	—
Netherlands Antilles	90	54,372	12,250	7,902	3,930	3,971	71	—
Other British West Indies	25	98	—	144	144	—	—	—
Other	44	9,052	837	1,472	1,255	217	—	—
Europe, total	1,121	4,046,814	1,700,039	1,464,554	322,146	1,142,408	310,957	10,513
Common Market countries, total	875	2,157,191	911,708	836,443	161,644	674,799	42,946	2,355
Belgium	283	150,889	54,758	49,183	15,202	33,981	1,106	136
France (includes Andorra)	443	440,081	146,233	151,805	23,190	128,616	19,116	—
Italy (includes San Marino)	361	194,618	67,708	84,465	13,770	70,695	763	7
Luxembourg	39	41,078	11,298	3,538	328	3,210	1,387	2,211
Netherlands	341	324,059	154,919	144,078	6,249	137,827	16,775	—
West Germany	454	1,006,359	476,851	403,303	102,833	300,470	4,900	—
Not allocable	5	8	—	73	73	—	—	—
Other West European countries, total	828	1,868,722	784,768	623,493	158,909	464,584	268,010	8,159
Austria	110	36,002	11,009	14,740	5,666	9,074	240	—
Denmark	101	28,750	9,493	6,190	583	5,607	1,426	—
Finland	75	23,418	12,464	7,226	756	6,471	—	—
Greece	82	16,866	5,047	4,508	2,649	1,859	61	—
Ireland	61	7,092	2,423	2,084	597	1,487	—	—
Liechtenstein	11	7,121	4,210	52	49	3	—	—
Monaco	6	100	—	4	4	—	—	—
Norway	82	14,786	5,406	4,835	796	4,039	82	—
Portugal	91	13,909	8,089	4,270	1,777	2,492	—	—
Spain	269	86,711	29,722	25,117	12,119	12,998	3,711	—
Sweden	171	71,384	21,628	24,359	1,125	23,234	284	—
Switzerland	293	324,604	183,522	96,575	18,658	77,917	47,981	—
Turkey	64	7,842	1,937	5,850	5,225	625	—	—
United Kingdom	637	1,228,819	489,704	427,417	108,689	318,728	214,226	8,159
Other	27	1,316	112	265	215	50	—	—
East European countries	85	18,904	3,564	4,618	1,593	3,025	—	—
East Germany	18	7,882	3,477	3,565	591	2,974	—	—
Rumania	18	—118	—	(³)	(³)	—	—	—
Union of Soviet Socialist Republics	51	575	—	—	—	—	—	—
Other	66	10,565	87	1,052	1,002	51	—	—
Europe, not allocable	9	1,996	—	—	—	—	—	—
Africa, total	451	498,550	162,450	230,577	187,674	42,903	38,063	2,454
North Africa, total	77	158,036	3,685	131,822	129,910	1,913	—	—
Algeria	21	9,998	175	1,805	1,513	92	—	—
Egypt (formerly United Arab Republic)	34	3,411	731	1,610	1,263	348	—	—
Libya	27	143,646	—	125,921	125,921	—	—	—
Morocco	31	—1,585	1,930	1,769	629	1,140	—	—
Other	26	2,565	849	917	583	334	—	—

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED AND WITH OVERALL LIMITATION METHOD
Table 30.—Foreign Income and Taxes, by Geographic Area, Subarea, and Selected Country where Foreign Taxes were Paid, and for DISC Dividends—Continued

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

Geographic area, subarea, selected country, and DISC dividends	Number of returns	Income and taxes of domestic corporations from specific geographic area, subarea, or country and DISC dividends				Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
		Taxable income		Foreign taxes, excluding carryover			
		Total (less loss) ¹	Dividends from related foreign corporations and from DISCs	Total	Paid or accrued		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Africa—Continued							
East Africa, total	64	6,357	3,338	4,099	2,744	1,356	—
Ethiopia	12	470	—	120	—	—	—
Kenya	28	3,866	2,034	1,729	1,004	725	—
Tanzania	9	2,786	—	260	260	—	—
Uganda	8	765	705	512	161	352	—
Other	37	-1,530	598	1,479	1,200	279	—
West and Central countries, total	93	196,588	95,382	39,837	33,238	6,600	2,419
Ghana	17	742	—	406	406	—	—
Liberia	35	123,368	84,562	5,552	1,896	3,656	2,419
Nigeria	32	63,932	1,781	29,810	29,029	781	—
Zaire (formerly Congo-Kinshasa)	12	1,292	608	681	425	256	—
Other	53	7,253	8,430	3,388	1,482	1,906	—
Southern Africa, total	395	137,315	60,046	54,813	21,777	33,035	35,645
Malawi	6	-59	40	31	16	15	—
Rhodesia	18	-125	44	35	17	18	430
South Africa, Republic of (includes South-west Africa)	381	115,692	46,279	45,679	15,179	30,500	35,621
Zambia	24	21,329	11,607	8,287	6,515	1,772	23
Other	10	478	2,076	781	51	731	—
Africa, not allocable	13	254	—	6	6	—	—
Asia, total	1,106	4,171,274	324,332	2,842,897	2,883,799	159,098	19,601
Middle East, total	283	3,127,132	106,877	2,514,303	2,473,073	41,230	3
Bahrain	11	51,445	51,000	15,278	—	15,278	—
Iran	110	312,648	1,791	244,072	243,696	376	3
Iraq	10	26,981	51,300	24,601	71	24,530	—
Israel	178	12,335	1,739	4,338	3,742	596	—
Kuwait	19	-31,985	—	34,845	34,845	—	—
Lebanon	51	-32,843	677	1,654	1,357	297	—
Qatar	9	15,171	—	12,068	12,068	—	—
Saudi Arabia	35	2,700,570	—	2,129,338	2,129,338	—	—
United Arab Emirates	12	42,822	1	26,773	26,773	—	—
Other areas of Arabian peninsula	5	33,700	—	20,789	20,789	—	—
Other	29	-3,712	369	546	394	152	—
Southern and Southeastern Asia, total	414	239,909	63,626	121,420	91,688	29,732	1,823
Bangladesh (formerly East Pakistan)	4	-645	—	348	348	—	—
India	184	71,296	11,218	48,141	41,018	7,123	42
Indonesia	73	32,511	19,490	16,884	5,547	11,337	—
Malaysia	57	-8,304	2,913	2,576	1,456	1,120	—
Pakistan	56	4,304	1,247	5,110	4,395	715	—
Philippines	269	82,668	21,247	31,673	24,366	7,307	1,773
Singapore	79	26,934	3,066	7,147	6,165	982	—
South Vietnam	22	12,138	217	3,485	3,363	122	—
Sri Lanka (formerly Ceylon)	8	471	1	217	217	—	—
Thailand	83	12,655	4,226	4,800	3,575	1,225	8
Other	35	5,892	—	1,238	1,238	—	—
Eastern Asia, total	830	802,667	153,830	206,517	118,381	88,136	17,776
China, Peoples Republic of	8	506	—	12	—	—	—
China, Republic of (Taiwan)	107	21,205	837	3,637	3,429	208	56
Hong Kong	123	82,373	41,891	10,241	3,700	6,541	7,551
Japan	868	691,588	111,017	190,539	109,169	81,370	10,169
Okinawa and Ryukyu Islands	24	-4,737	—	229	229	—	—
South Korea, Republic of	65	11,102	85	1,593	1,576	17	—
Other	15	630	—	266	266	—	—
Asia, not allocable	12	1,565	—	657	657	—	—
Oceania, total	723	388,486	89,261	141,473	64,302	77,170	14,086
Australia	684	354,330	83,505	130,477	57,946	72,531	14,058
New Zealand	173	23,140	5,638	10,301	5,773	4,528	13
Other	42	11,016	119	694	583	111	15
Puerto Rico and United States Possessions, total	368	153,390	11,142	45,821	41,969	3,652	—
Puerto Rico	348	130,977	7,944	36,478	34,180	2,298	—
U.S. Possessions, total	78	22,413	3,198	9,142	7,789	1,354	—
American Samoa	10	233	—	80	80	—	—
Guam	41	9,834	100	3,807	3,763	44	—
Panama Canal Zone	8	-178	—	—	—	—	—
Virgin Islands, U.S.	47	11,179	2,898	5,144	3,946	1,198	—
Other	6	1,346	200	112	—	112	—
Country not stated or not allocable and other income from outside the United States	303	284,036	518	33,398	33,328	70	—
DISC dividends	24	35,585	141	7	—	7	—
Other geographic classifications (combinations of countries shown above):							
Not economically less-developed countries	2,152	7,265,957	2,745,200	2,567,083	730,941	1,836,142	617,558
Economically less-developed countries	1,328	5,740,870	787,180	3,762,494	3,508,245	254,249	18,229
Sino-Soviet Bloc	86	16,703	3,564	4,872	1,848	3,025	—
OPEC countries	459	3,845,415	142,551	3,125,405	3,065,502	59,903	638

¹Includes the "gross-up" of certain foreign dividends.

²Less than \$500 per return.

NOTE: See text for explanatory statements, including Geographic classification under "Explanation of Terms," and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 31.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Industrial Division, and by Percent of Foreign Tax Credit Claimed to Total Foreign Taxes

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

Selected major industry and foreign tax credit claimed as a percent of total foreign taxes	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Dividends received from DISCs	Income subject to U.S. Tax	U.S. income tax before credits	Foreign tax credit claimed	Foreign income and taxes of domestic corporations reported on Form 1118		
											Taxable income from foreign sources		
											Total (less loss) ¹	Dividends from related foreign corporations	Dividends from DISCs
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	
All Industries													
Total	5,497	1,407,096,996	56,149,288	4,434,803	73,450	1,913,268	265,676	53,028,432	25,135,819	6,306,232	16,486,388	4,200,434	873
Under 20 percent	121	22,645,899	1,135,808	245,730	515	12,241	628	710,150	353,126	219,978	853,012	230,095	—
20 under 40 percent	101	49,417,932	1,532,732	250,312	868	15,998	2,100	1,087,297	537,266	226,317	734,905	210,491	—
40 under 50 percent	55	34,374,909	1,248,459	112,264	2,659	12,717	3,400	1,194,080	597,579	470,180	1,143,465	102,017	—
50 under 60 percent	104	42,405,627	5,230,894	625,147	5,943	146,343	509	4,725,117	2,273,370	1,931,360	4,074,032	610,060	—
60 under 70 percent	97	28,963,157	1,262,462	370,538	8,257	40,919	2,518	986,333	463,897	357,194	855,132	342,705	—
70 under 80 percent	122	19,647,930	427,433	28,744	661	18,929	3,024	412,193	192,816	34,614	76,197	28,084	—
80 under 90 percent	146	54,242,766	2,318,213	293,115	6,458	182,483	14,706	2,214,077	1,034,819	268,325	622,455	258,258	—
90 under 95 percent	78	41,932,156	4,891,829	275,067	3,117	195,317	40,599	4,861,547	2,311,371	279,071	663,990	270,140	—
95 under 100 percent	101	91,657,315	5,577,503	466,478	6,994	285,952	63,883	5,456,841	2,586,062	476,229	1,155,217	464,003	—
100 percent	4,549	1,021,805,259	32,523,753	1,767,408	37,978	1,002,371	134,309	31,380,620	14,785,462	2,042,963	6,307,975	1,684,581	873
No percent computed	25	4,046	202	—	—	—	—	177	51	(*)	10	—	—
Agriculture, Forestry, and Fishery													
Total	40	536,502	56,164	183	—	30	—	53,418	23,989	287	2,270	92	—
Under 20 percent	7	7,540	625	—	—	—	—	—	—	—	—	—	—
20 under 40 percent	—	—	—	—	—	—	—	—	—	—	—	—	—
40 under 50 percent	—	—	—	—	—	—	—	—	—	—	—	—	—
50 under 60 percent	—	—	—	—	—	—	—	—	—	—	—	—	—
60 under 70 percent	17	145,925	4,201	—	—	—	—	3,015	1,006	51	238	—	—
70 under 80 percent	—	—	—	—	—	—	—	—	—	—	—	—	—
80 under 90 percent	—	—	—	—	—	—	—	—	—	—	—	—	—
90 under 95 percent	—	—	—	—	—	—	—	—	—	—	—	—	—
95 under 100 percent	17	383,137	51,338	163	—	30	—	50,336	22,963	230	1,697	92	—
100 percent	—	—	—	—	—	—	—	—	—	—	—	—	—
No percent computed	—	—	—	—	—	—	—	—	—	—	—	—	—
Mining													
Total	126	10,948,690	3,279,387	32,126	385	18,661	7,537	3,216,762	1,544,074	1,442,137	3,046,384	29,965	—
Under 20 percent	6	854,845	33,675	622	264	254	—	17,185	8,024	7,896	39,410	886	—
20 under 40 percent	—	—	—	—	—	—	—	—	—	—	—	—	—
40 under 50 percent	—	—	—	—	—	—	—	—	—	—	—	—	—
50 under 60 percent	15	4,672,348	2,974,131	14,666	—	6,981	—	2,946,863	1,416,048	1,409,019	2,935,758	14,582	—
60 under 70 percent	5	226,099	7,467	185	—	—	—	5,604	2,703	1,330	3,647	—	—
70 under 80 percent	—	—	—	—	—	—	—	—	—	—	—	—	—
80 under 90 percent	5	1,207,833	57,431	8,336	101	7,960	5,648	57,421	27,470	8,734	18,752	8,296	—
90 under 95 percent	—	—	—	—	—	—	—	—	—	—	—	—	—
95 under 100 percent	95	3,987,564	206,682	8,317	—	3,466	1,889	189,689	89,828	15,157	48,817	6,201	—
100 percent	—	—	—	—	—	—	—	—	—	—	—	—	—
No percent computed	—	—	—	—	—	—	—	—	—	—	—	—	—
Contract Construction													
Total	75	3,594,128	249,524	21,045	99	12,609	222	236,583	111,130	23,679	87,255	17,094	—
Under 20 percent	3	157,759	7,193	6	—	5	—	6,672	2,757	133	831	6	—
20 under 40 percent	3	426,045	7,257	39	—	31	—	4,973	2,411	1,148	20,228	39	—
40 under 50 percent	3	16,518	4,040	(*)	—	—	—	3,280	1,387	650	1,376	—	—
50 under 60 percent	—	—	—	—	—	—	—	—	—	—	—	—	—
60 under 70 percent	4	212,641	15,778	3,267	—	4,493	27	15,778	7,667	4,888	10,342	3,261	—
70 under 80 percent	—	—	—	—	—	—	—	—	—	—	—	—	—
80 under 90 percent	4	251,375	19,851	1,498	—	87	—	19,852	9,387	2,641	6,261	1,375	—
90 under 95 percent	—	—	—	—	—	—	—	—	—	—	—	—	—
95 under 100 percent	58	2,529,790	195,405	16,235	99	7,993	195	186,028	87,521	14,219	48,218	12,413	—
100 percent	—	—	—	—	—	—	—	—	—	—	—	—	—
No percent computed	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing													
Total	2,344	486,810,308	38,576,409	3,999,595	60,189	1,724,190	244,950	36,541,844	17,368,392	4,170,516	10,898,549	3,834,696	873
Under 20 percent	22	19,109,288	1,072,915	231,508	515	7,053	628	675,943	338,525	218,231	840,348	222,197	—
20 under 40 percent	44	28,614,736	1,162,168	218,305	810	14,620	2,100	753,055	379,624	156,046	449,284	206,695	—
40 under 50 percent	26	25,450,694	1,186,651	101,644	2,277	10,879	3,385	1,119,989	565,749	457,398	1,108,313	91,938	—
50 under 60 percent	31	25,590,574	1,950,345	524,955	4	120,987	24	1,479,974	722,761	470,365	990,849	508,793	—
60 under 70 percent	36	23,016,207	1,059,727	342,280	6,463	26,252	2,506	875,492	414,554	329,244	791,203	315,259	—
70 under 80 percent	56	2,348,284	146,814	18,613	456	10,674	1,094	145,363	67,304	17,269	39,486	18,901	—
80 under 90 percent	85	38,995,714	1,935,801	260,343	5,471	153,891	5,406	1,867,391	875,743	227,354	527,783	225,583	—
90 under 95 percent	46	35,472,828	4,509,929	264,026	3,083	190,928	40,359	4,487,440	2,133,418	264,859	629,052	259,720	—
95 under 100 percent	66	52,341,638	5,103,413	410,037	6,593	252,869	63,760	5,052,001	2,396,148	412,004	983,189	407,897	—
100 percent	1,932	235,870,345	20,468,647	1,627,885	34,517	936,036	125,688	20,085,198	9,474,578	1,617,745	4,539,042	1,577,713	873
No percent computed	—	—	—	—	—	—	—	—	—	—	—	—	—

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 31.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Industrial Division, and by Percent of Foreign Tax Credit Claimed to Total Foreign Taxes—Continued

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

Selected major industry and foreign tax credit claimed as a percent of total foreign taxes	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Dividends received from DISCs	Income subject to U.S. Tax	U.S. income tax before credits	Foreign tax credit claimed	Foreign income and taxes of domestic corporation reported on Form 1118		
											Taxable income from foreign sources		
											Total (less loss) ¹	Dividends from related foreign corporations	Dividends from DISCs
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	
Transportation, Communication, Electric, Gas, and Sanitary Services													
Total	111	130,088,947	4,128,256	48,751	4,848	25,159	2,076	3,971,443	1,901,239	51,527	213,150	36,593	—
Under 20 percent	9	1,997,165	18,180	13,269	—	4,576	—	796	721	238	4,331	7,102	—
20 under 40 percent	5	2,941,571	41,471	1,294	—	1,183	—	37,620	17,419	2,463	6,854	1,295	—
40 under 50 percent	11	5,527,500	135,623	2,954	4,297	1,089	485	133,349	58,657	4,464	16,031	4,004	—
50 under 60 percent	4	4,653,277	105,073	707	—	175	—	103,351	48,982	2,712	-3,064	201	—
60 under 70 percent	7	1,154,851	33,222	1,318	—	568	2	28,358	11,857	1,631	3,996	1,306	—
70 under 80 percent	5	1,180,930	35,438	1,425	—	1,151	—	22,691	10,581	2,890	11,199	1,424	—
80 under 90 percent	71	112,633,653	3,759,251	27,784	551	16,417	1,589	3,645,279	1,753,023	37,129	173,802	21,261	—
90 under 95 percent													
95 under 100 percent													
100 percent													
No percent computed													
Wholesale and Retail Trade													
Total	629	44,066,647	2,370,963	191,173	622	60,167	10,659	2,292,272	1,081,026	193,939	492,118	159,058	—
Under 20 percent	4	51,525	885	144	—	70	—	798	373	14	245	146	—
20 under 40 percent	14	5,117,916	237,415	30,201	58	662	—	236,933	113,835	55,885	134,462	2,722	—
40 under 50 percent	10	4,461,648	50,132	7,105	118	134	15	47,245	19,435	9,521	23,252	6,777	—
50 under 60 percent	23	2,760,620	127,378	75,415	94	13,394	—	127,138	60,699	41,014	94,293	74,263	—
60 under 70 percent	21	114,469	10,330	1,186	—	780	12	9,570	4,499	1,386	4,139	1,038	—
70 under 80 percent	12	561,258	8,904	—	—	76	1,903	7,327	3,487	1,215	2,960	1,162	—
80 under 90 percent	22	2,025,949	93,717	7,723	3	9,515	3,650	90,345	41,267	13,866	30,791	7,996	—
90 under 95 percent	14	5,204,579	338,067	7,173	34	1,248	240	330,426	158,421	9,570	23,950	6,557	—
95 under 100 percent	10	1,587,907	79,586	41,542	25	25,109	—	77,363	36,907	32,938	69,634	41,543	—
100 percent	500	22,180,776	1,424,550	19,512	291	9,179	4,839	1,362,127	642,104	28,709	108,392	17,454	—
No percent computed													
Finance, Insurance, and Real Estate													
Total	1,760	721,878,599	6,878,627	115,657	5,528	55,562	145	6,126,969	2,833,261	392,839	1,626,491	96,088	—
Under 20 percent	49	1,219,369	31,706	743	—	536	—	22,486	9,474	144	1,257	585	—
20 under 40 percent	21	13,552,019	59,532	1,744	—	685	—	42,627	18,036	5,372	91,180	1,012	—
40 under 50 percent	12	2,312,763	12,993	1,215	—	—	—	11,901	5,631	1,072	4,083	735	—
50 under 60 percent	19	3,554,387	30,918	5,292	—	1	—	26,033	10,911	3,081	28,300	5,007	—
60 under 70 percent	17	4,869,410	156,158	23,693	1,636	11,899	—	67,987	29,460	22,449	49,399	23,091	—
70 under 80 percent	18	11,643,990	118,812	3,050	117	2,517	—	109,879	51,078	6,623	21,246	2,932	—
80 under 90 percent	14	9,671,423	104,351	7,182	883	5,795	—	77,383	34,663	7,984	20,129	7,845	—
90 under 95 percent	6	973,214	23,134	3,425	—	2,859	—	20,227	9,685	3,442	8,279	3,422	—
95 under 100 percent	13	35,018,184	296,062	5,221	376	4,083	123	241,776	112,229	21,250	68,746	5,187	—
100 percent	1,565	639,059,793	6,044,759	64,093	2,515	27,186	22	5,506,493	2,552,043	321,422	1,333,770	46,272	—
No percent computed	25	4,046	202	—	—	—	—	177	51	(²)	10	—	—
Services													
Total	397	9,171,478	607,737	26,292	1,798	16,890	87	586,920	271,679	31,025	118,353	26,849	—
Under 20 percent	25	46,537	1,389	59	—	—	—	971	304	281	2,772	59	—
20 under 40 percent	14	79,541	10,689	(³)	—	(³)	—	10,225	4,837	446	1,011	(³)	—
40 under 50 percent	5	321,458	10,583	2,273	1,548	4,158	—	10,522	3,713	2,948	10,520	3,821	—
50 under 60 percent	16	559,560	24,753	2,920	157	1,782	—	24,043	11,318	2,767	7,297	3,041	—
60 under 70 percent	13	260,067	31,878	2,210	88	1,199	—	31,117	14,656	1,873	4,434	1,902	—
70 under 80 percent	12	1,368,133	102,407	6,754	—	4,681	—	101,887	48,311	6,880	16,081	6,491	—
80 under 90 percent	10	43,959	3,577	442	—	282	—	3,575	1,666	807	1,785	442	—
90 under 95 percent	5	1,229,292	39,657	8,123	—	2,695	—	39,477	18,847	6,813	21,097	7,826	—
95 under 100 percent	299	5,262,930	382,804	3,511	5	2,094	87	365,104	168,026	8,211	53,357	3,268	—
100 percent													
No percent computed													
Nature of Business not Allocable													
Total	15	1,699	2,220	—	—	—	—	2,220	1,028	283	1,817	—	—
Under 20 percent													
20 under 40 percent													
40 under 50 percent													
50 under 60 percent													
60 under 70 percent													
70 under 80 percent													
80 under 90 percent													
90 under 95 percent													
95 under 100 percent													
100 percent	15	1,699	2,220	—	—	—	—	2,220	1,028	283	1,817	—	—
No percent computed													

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED
 Table 31.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Industrial Division, and by Percent of Foreign Tax Credit Claimed to Total Foreign Taxes—Continued

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

Selected major industry and foreign tax credit claimed as a percent of total foreign taxes	Foreign income and taxes of domestic corporations reported on Form 1118—Continued										Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
	Foreign taxes					Foreign tax credit computed						
	Total foreign taxes			Paid or accrued	Deemed paid		Carryover	For taxes on-				
	Total	Equal to foreign tax credit computed	Greater than foreign tax credit computed		Total	On DISC dividends		Total	DISC dividends	Interest with separate credit computed		
(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)	(25)	
All Industries												
Total	10,680,701	2,083,246	8,596,769	6,535,979	2,392,636	81	1,752,086	6,616,507	81	5,363	737,438	29,209
Under 20 percent	1,369,033	136	1,368,897	606,647	83,508	—	678,877	366,648	—	3	18,861	300
20 under 40 percent	829,072	958	828,113	614,277	88,015	—	126,780	345,574	—	471	2,142	—
40 under 50 percent	1,012,689	473	1,012,216	943,904	47,415	—	21,370	512,388	—	109	22,007	1,669
50 under 60 percent	3,706,745	86	3,706,659	2,705,564	274,593	—	726,588	1,931,606	—	151	114,497	—
60 under 70 percent	567,775	3	567,772	379,879	82,032	—	105,864	357,216	—	120	214,058	4,222
70 under 80 percent	45,257	47	45,210	20,660	20,436	—	4,161	34,634	—	13	3,897	46
80 under 90 percent	317,082	3,968	312,449	114,357	187,982	—	14,743	269,077	—	615	19,847	1,088
90 under 95 percent	304,269	610	303,659	82,911	205,672	—	15,685	279,815	—	479	5,357	1,735
95 under 100 percent	485,704	36,580	449,124	167,910	308,814	—	8,979	476,530	—	309	32,077	160
100 percent	2,043,076	2,040,386	2,670	899,869	1,094,168	81	49,038	2,043,019	81	3,093	304,693	19,990
No percent computed	—	—	—	—	—	—	—	—	—	—	—	—
Agriculture, Forestry, and Fishery												
Total	357	90	267	327	30	—	—	295	—	—	—	—
Under 20 percent	50	—	50	50	—	—	—	8	—	—	—	—
20 under 40 percent	—	—	—	—	—	—	—	—	—	—	—	—
40 under 50 percent	—	—	—	—	—	—	—	—	—	—	—	—
50 under 60 percent	—	—	—	—	—	—	—	—	—	—	—	—
60 under 70 percent	73	—	73	73	—	—	—	54	—	—	—	—
70 under 80 percent	—	—	—	—	—	—	—	—	—	—	—	—
80 under 90 percent	—	—	—	—	—	—	—	—	—	—	—	—
90 under 95 percent	—	—	—	—	—	—	—	—	—	—	—	—
95 under 100 percent	233	90	143	204	30	—	—	232	—	—	—	—
100 percent	—	—	—	—	—	—	—	—	—	—	—	—
No percent computed	—	—	—	—	—	—	—	—	—	—	—	—
Mining												
Total	2,739,476	15,080	2,724,396	2,050,271	19,319	—	669,885	1,442,140	—	126	32,368	—
Under 20 percent	—	—	—	—	—	—	—	—	—	—	—	—
20 under 40 percent	27,060	—	27,060	5,814	274	—	20,572	7,896	—	—	—	—
40 under 50 percent	—	—	—	—	—	—	—	—	—	—	—	—
50 under 60 percent	2,685,390	—	2,685,390	2,030,513	6,981	—	647,896	1,408,020	—	84	32,328	—
60 under 70 percent	—	—	—	—	—	—	—	—	—	—	—	—
70 under 80 percent	1,927	—	1,927	1,916	—	—	11	1,331	—	—	—	—
80 under 90 percent	—	—	—	—	—	—	—	—	—	—	—	—
90 under 95 percent	9,934	80	9,854	1,018	7,960	—	956	8,735	—	7	40	—
95 under 100 percent	—	—	—	—	—	—	—	—	—	—	—	—
100 percent	15,165	15,000	165	11,010	4,105	—	51	15,160	—	34	—	—
No percent computed	—	—	—	—	—	—	—	—	—	—	—	—
Contract Construction												
Total	30,850	15,263	15,587	13,289	13,939	—	3,622	23,806	—	—	1,100	(1)
Under 20 percent	885	—	885	173	5	—	707	133	—	—	—	—
20 under 40 percent	4,887	—	4,887	4,823	31	—	32	1,148	—	—	—	—
40 under 50 percent	—	—	—	—	—	—	—	—	—	—	—	—
50 under 60 percent	1,268	—	1,268	260	—	—	1,009	649	—	—	—	—
60 under 70 percent	—	—	—	—	—	—	—	—	—	—	—	—
70 under 80 percent	6,583	—	6,583	1,338	4,544	—	701	4,888	—	—	1,100	—
80 under 90 percent	—	—	—	—	—	—	—	—	—	—	—	—
90 under 95 percent	3,005	1,042	1,963	2,407	379	—	219	2,766	—	—	—	—
95 under 100 percent	—	—	—	—	—	—	—	—	—	—	—	—
100 percent	14,221	14,221	—	4,287	8,979	—	955	14,221	—	—	—	(1)
No percent computed	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing												
Total	7,015,881	1,625,042	5,390,838	3,876,374	2,170,202	81	969,305	4,478,928	81	3,297	597,660	20,354
Under 20 percent	1,346,712	—	1,346,712	801,458	78,241	—	667,013	364,732	—	2	10,755	—
20 under 40 percent	614,138	378	613,760	434,492	86,008	—	93,639	274,337	—	371	2,001	—
40 under 50 percent	984,137	214	983,923	926,175	42,717	—	15,244	499,463	—	72	21,794	1,669
50 under 60 percent	928,618	53	928,565	663,526	230,651	—	34,441	470,592	—	18	60,005	—
60 under 70 percent	523,812	3	523,809	366,457	66,419	—	90,936	329,263	—	120	177,606	—
70 under 80 percent	22,228	3	22,225	9,555	11,595	—	1,078	17,273	—	2	2,889	—
80 under 90 percent	269,053	2,926	266,126	100,361	158,676	—	10,015	227,871	—	532	15,822	227
90 under 95 percent	289,041	174	288,868	75,002	199,715	—	14,324	265,561	—	44	2,471	1,735
95 under 100 percent	420,362	4,824	415,539	137,819	274,180	—	8,363	412,082	—	300	31,752	160
100 percent	1,617,780	1,616,467	1,313	561,528	1,022,000	81	34,252	1,617,753	81	1,836	252,766	16,517
No percent computed	—	—	—	—	—	—	—	—	—	—	—	—

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 31.—Total Assets, Income, and Tax, and Foreign Income, Taxes, and Credit, by Industrial Division, and by Percent of Foreign Tax Credit Claimed to Total Foreign Taxes—Continued

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

Selected major industry and foreign tax credit claimed as a percent of total foreign taxes	Foreign income and taxes of domestic corporations reported on Form 1118—Continued										Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
	Foreign taxes						Foreign tax credit computed					
	Total foreign taxes			Paid or accrued	Deemed paid		Carryover	Total	For taxes on-			
	Total	Equal to foreign tax credit computed	Greater than foreign tax credit computed		Total	On DISC dividends			DISC dividends	Interest with separate credit computed		
(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)	(25)	
Transportation, Communication, Electric, Gas, and Sanitary Services												
Total	67,259	37,705	29,554	29,150	26,696	—	11,413	51,560	—	298	12,851	590
Under 20 percent	7,049	—	7,049	1,547	4,640	—	862	240	—	(7)	8,106	300
20 under 40 percent	6,537	—	6,537	1,907	1,183	—	3,447	2,462	—	37	—	—
40 under 50 percent	8,061	—	8,061	3,789	1,484	—	2,789	4,462	—	—	535	—
50 under 60 percent	3,636	—	3,636	2,462	175	—	999	2,712	—	8	—	—
60 under 70 percent	1,919	—	1,919	1,229	686	—	4	1,630	—	—	541	—
70 under 80 percent	2,931	579	2,352	1,699	1,152	—	80	2,929	—	—	—	—
80 under 90 percent	37,127	37,127	—	16,516	17,377	—	3,234	37,127	—	253	3,669	290
90 under 95 percent	—	—	—	—	—	—	—	—	—	—	—	—
95 under 100 percent	—	—	—	—	—	—	—	—	—	—	—	—
100 percent	—	—	—	—	—	—	—	—	—	—	—	—
No percent computed	—	—	—	—	—	—	—	—	—	—	—	—
Wholesale and Retail Trade												
Total	353,021	58,433	294,588	216,329	84,278	—	52,415	194,688	—	877	11,166	1,157
Under 20 percent	962	—	962	53	70	—	840	15	—	—	—	—
20 under 40 percent	166,196	—	166,196	158,001	1,248	—	6,947	56,413	—	34	141	—
40 under 50 percent	21,490	—	21,490	16,122	2,645	—	2,722	9,522	—	—	214	—
50 under 60 percent	72,377	—	72,377	5,077	30,402	—	36,898	41,021	—	49	1,402	—
60 under 70 percent	2,178	—	2,178	939	781	—	458	1,388	—	—	14	—
70 under 80 percent	1,671	—	1,671	1,155	346	—	170	1,215	—	—	—	—
80 under 90 percent	15,961	—	15,961	3,212	9,774	—	2,975	13,662	—	21	1,035	861
90 under 95 percent	10,267	—	10,267	6,440	2,798	—	1,029	9,571	—	434	2,886	—
95 under 100 percent	33,216	30,491	2,724	7,793	25,423	—	—	33,158	—	1	48	—
100 percent	28,705	27,942	763	17,537	10,791	—	377	28,703	—	337	5,427	296
No percent computed	—	—	—	—	—	—	—	—	—	—	—	—
Finance, Insurance, and Real Estate												
Total	430,818	323,261	106,872	333,411	59,846	—	37,562	393,768	—	696	79,049	7,108
Under 20 percent	3,431	136	3,295	537	536	—	2,357	267	—	—	—	—
20 under 40 percent	18,261	580	17,681	10,794	717	—	6,751	5,806	—	67	—	—
40 under 50 percent	2,418	259	2,159	975	340	—	1,103	1,215	—	—	—	—
50 under 60 percent	5,873	33	5,840	1,668	1,184	—	3,021	3,096	—	—	—	—
60 under 70 percent	35,391	—	35,391	9,774	12,702	—	12,915	22,454	—	—	36,086	4,222
70 under 80 percent	8,789	44	8,745	4,901	2,692	—	1,196	6,637	—	—	109	—
80 under 90 percent	9,701	—	9,036	3,704	5,804	—	193	6,096	—	18	—	—
90 under 95 percent	3,652	32	3,620	793	2,859	—	—	3,445	—	—	—	—
95 under 100 percent	21,796	1,011	20,786	17,369	4,199	—	228	21,251	—	—	24	—
100 percent	321,507	321,167	320	282,897	28,813	—	9,797	321,500	—	611	42,831	2,886
No percent computed	—	—	—	—	—	—	—	—	—	—	—	—
Services												
Total	42,761	8,094	34,667	16,552	18,326	—	7,883	31,043	—	69	3,243	—
Under 20 percent	4,675	—	4,675	1,354	16	—	3,306	323	—	—	—	—
20 under 40 percent	1,481	—	1,481	462	(7)	—	1,019	448	—	—	—	—
40 under 50 percent	5,583	—	5,583	823	4,159	—	601	2,949	—	—	229	—
50 under 60 percent	4,335	—	4,335	1,197	1,924	—	1,213	2,764	—	—	352	—
60 under 70 percent	2,410	—	2,410	772	1,288	—	349	1,871	—	3	—	—
70 under 80 percent	8,101	—	8,101	2,782	4,720	—	600	6,881	—	43	2,409	—
80 under 90 percent	876	—	876	244	300	—	332	808	—	—	—	—
90 under 95 percent	7,096	—	7,096	3,191	3,816	—	90	6,812	—	1	253	—
95 under 100 percent	8,203	8,094	109	5,727	2,103	—	373	8,168	—	22	—	—
100 percent	—	—	—	—	—	—	—	—	—	—	—	—
No percent computed	—	—	—	—	—	—	—	—	—	—	—	—
Nature of Business not Allocable												
Total	278	278	—	278	—	—	—	278	—	—	—	—
Under 20 percent	—	—	—	—	—	—	—	—	—	—	—	—
20 under 40 percent	—	—	—	—	—	—	—	—	—	—	—	—
40 under 50 percent	—	—	—	—	—	—	—	—	—	—	—	—
50 under 60 percent	—	—	—	—	—	—	—	—	—	—	—	—
60 under 70 percent	—	—	—	—	—	—	—	—	—	—	—	—
70 under 80 percent	—	—	—	—	—	—	—	—	—	—	—	—
80 under 90 percent	—	—	—	—	—	—	—	—	—	—	—	—
90 under 95 percent	—	—	—	—	—	—	—	—	—	—	—	—
95 under 100 percent	—	—	—	—	—	—	—	—	—	—	—	—
100 percent	278	278	—	278	—	—	—	278	—	—	—	—
No percent computed	—	—	—	—	—	—	—	—	—	—	—	—

*Includes the "gross-up" of certain foreign dividends.

*Less than \$500 per return.

NOTE: See text for explanatory statements and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

Western Hemisphere Trade Corporation Returns, 1968 and 1972

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QUALIFICATIONS AND BENEFITS OF WESTERN HEMISPHERE TRADE CORPORATIONS

Section 921 of the Internal Revenue Code defined the four conditions a corporation had to satisfy to qualify as a Western Hemisphere Trade Corporation eligible to take the special additional deduction which effectively reduced the U.S. tax rate applicable to these corporations. These conditions were:

(1) The corporation had to be a domestic corporation, i.e., one incorporated in the United States or under the laws of the United States or of any State or Territory. Section 1504(d) of the Code also provided that when a corporation was incorporated and maintained in a contiguous foreign country solely to comply with the laws of that country, such foreign corporations, if 100 percent owned by a domestic corporation, could be treated as a domestic corporation. Therefore, some corporations incorporated in Canada or Mexico were able to qualify as Western Hemisphere Trade Corporations.

(2) The corporation had to do all of its business, other than incidental purchases, in the

Western Hemisphere, including the United States. This did not preclude incidental contacts with countries outside the Western Hemisphere, so that sales to customers outside the Western Hemisphere were permitted if the title and risk of ownership passed to the buyer in the Western Hemisphere.

(3) At least 95 percent of the corporation's gross income for the 3-year period immediately preceding the close of the current taxable year had to be derived from sources outside the United States. However, if a corporation had been in existence for less than 3 years, the period in which it had to meet the "source of income" test started at the time it was created and ended with the close of the current taxable year.

(4) At least 90 percent of the corporation's gross income for the 3-year period immediately preceding the close of the current taxable year had to be derived from the active conduct of a trade or business. The purpose of this condition was to exclude corporations whose chief income was mostly from passive investment and occasional sales. For example, dividends, interest, or gains from sales of capital assets were not

usually regarded as income from the active conduct of a business. In general, therefore, a corporation operating solely through foreign subsidiaries would be precluded from obtaining Western Hemisphere Trade Corporation status since the income of the domestic corporation would be in the form of dividends received from its foreign subsidiaries, rather than income from the operation of a business.

The special deduction in computing the taxable income of corporations qualifying as Western Hemisphere Trade Corporations was allowed under Code section 922. The deduction was equal to taxable income (computed without regard to the deduction, i.e., net income minus the statutory special deductions for net operating losses and for intercorporate dividends received and for certain dividends paid) multiplied by a fraction having a numerator of 14 percent and a denominator equal to the combined U.S. normal tax rate and surtax rate. As a result, the Western Hemisphere Trade Corporation deduction was not allowed when net income was completely

offset by other statutory special deductions or when the corporation had no net income. Section 922 also specified that for any year in which a corporation was a Domestic International Sales Corporation (DISC) or in which at any time it owned, directly or indirectly, stock in a DISC or former DISC, the corporation was not allowed to take the Western Hemisphere Trade Corporation deduction. This provision was effective for tax years beginning on or after January 1, 1972.

For 1965 through 1967, the combined U.S. normal tax and surtax rate was 48 percent. Effective January 1968 through December 1969, the tax rate of 48 percent was augmented by a surcharge of 10 percent making the corporate tax rate including surcharge equal to 52.8 percent. From January 1970 through June 1970, the surcharge was reduced to 5 percent and was finally discontinued after June 1970, so that the combined normal tax and surtax rate was restored to 48 percent, the rate in effect prior to 1968. For 1972, therefore, the Western Hemisphere Trade Corporation deduction fraction equaled 14/48 or approximately 29 percent. Thus, taxable income computed for Western Hemisphere Trade Corporations claiming the special deduction was about 29 percent less than the taxable income computed for other domestic corporations. As a result, Western Hemisphere Trade Corporations were able to lower their effective tax rate from 48 to 34 percent, a reduction of 14 percentage points. This 14-percentage point reduction was applicable to any year regardless of the statutory tax rate.

Since provisions of the Code permitted U.S. corporations to take credit for foreign income taxes, Western Hemisphere Trade Corporations were able to take the foreign tax credit as well as the deduction. A Western Hemisphere Trade Corporation taking the deduction was able to take a foreign tax credit equal to its foreign taxes up to a maximum of its U.S. income tax liability, which, as explained above, was 34 percent of taxable income for 1972.

However, for Western Hemisphere Trade Corporations included in a consolidated return for which the overall limitation was used for computing the foreign tax credit, the portion of foreign taxes greater than 34 percent and up to and including 48 percent of taxable income could not be used in computing the foreign tax credit in the current year or be used as a carryover or carryback to other years [Code section 1503(b)]. This restriction was

imposed so that the foreign taxes of Western Hemisphere Trade Corporations could not be used as a credit against the U.S. tax attributable to the other foreign income of the affiliated group included in the consolidated return.

SUMMARY OF THE DATA

Chart 2A shows the Western Hemisphere Trade Corporation deduction taken on returns for 1964 through 1972. Since the amount of the deduction was a percentage of taxable income, it changed in proportion to changes in taxable income.

Industrial Activity and Size of Total Assets

The predominance of a relatively small number of large corporations taking the Western Hemisphere Trade Corporation deduction is quite evident from the data in tables 33 and 36 for 1968 and 1972, respectively. Chart 2A shows that during the period 1968 through 1972, around 90 percent or more of the total deduction was reported on returns with total assets of \$100 million or more. The number of such returns was 170 for 1972, out of a total of 723 returns with the deduction.

Table 2A provides information about the industrial activity of domestic corporations taking the deduction for the years 1968-1972. The predominance of manufacturing corporations was accounted for, in part, by the inclusion of Western Hemisphere Trade Corporations whose principal activity was other than manufacturing in consolidated returns for which the principal industrial activity of the affiliated group taken as a whole was manufacturing. Since a consolidated return was classified as a Western Hemisphere Trade Corporation return if at least one such corporation was included in the affiliated group represented in the return, in many instances the industrial classification of the return did not reflect the industrial activity of the Western Hemisphere Trade Corporation component.

Table 36 shows that for 1972, almost 90 percent of the total deduction was taken on consolidated returns. This was also the case for 1968. Based on industry data available for that year only, table 32 shows that about \$137 million of the deduction on consolidated returns was in petroleum refining and related industries and about \$122 million in the primary metal industries. Together these two industry groups accounted for about three-fourths

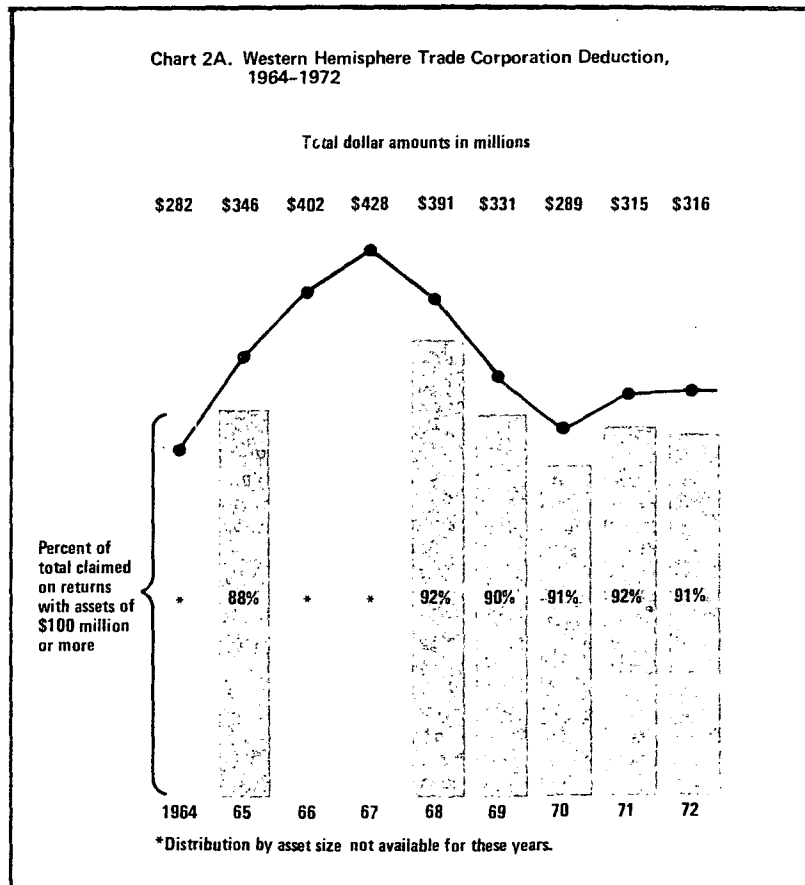


Table 2A.--Western Hemisphere Trade Corporation Deduction, by Selected Industry, 1968-1972

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

Selected industry	1968		1969		1970		1971		1972	
	Amount	Per- cent of total	Amount	Per- cent of total	Amount	Per- cent of total	Amount	Per- cent of total	Amount	Per- cent of total
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
All industries.....	390,710	100	331,030	100	288,959	100	315,494	100	315,892	100
Mining.....	42,858	11	41,243	12	48,417	17	32,551	10	19,431	6
Contract construction.....	4,039	1	3,905	1	3,069	1	3,544	1	2,846	1
Manufacturing.....	311,444	80	262,240	79	215,549	75	258,548	82	267,905	85
Petroleum refining and related industries.....	138,258	35	106,596	32	120,921	42	168,591	53	148,633	47
Transportation, communication, electric, gas, and sanitary services.....	3,345	1	3,650	1	5,620	2	5,501	2	6,984	2
Wholesale and retail trade.....	17,091	4	13,757	4	14,125	5	13,520	4	16,148	5

of the deduction taken on consolidated returns. These consolidated returns, in turn, dominated the overall industry totals so that, for 1968, petroleum refining and related industries and primary metal industries predominated. Thus, although almost two-thirds of the returns with a Western Hemisphere Trade Corporation deduction were classified in wholesale trade, this industrial activity accounted for less than 4 percent of the total deduction.

Foreign Tax Credit Claimed

Table 36 shows that for 1972, of the 723 Western Hemisphere Trade Corporation returns with a deduction, 317 had \$2.7 billion in foreign tax credit claimed. Although these Western Hemisphere Trade Corporation returns comprised only about 5 percent of all returns with a foreign tax credit, they accounted for 43 percent of the \$6.3 billion total foreign tax credit. This was primarily attributable to a relatively small number of large consolidated returns.

LIMITATIONS OF THE WESTERN HEMISPHERE TRADE CORPORATION STATISTICS

Coverage

All Western Hemisphere Trade Corporations identified as such

during statistical processing were included in the data. A statement had to accompany the corporation's tax return providing information sufficient to determine whether the requirements of section 921 of the Code were met. When a corporation qualified for this status but was unable to take the special deduction, it was not always possible to ascertain whether or not the corporation was in fact a Western Hemisphere Trade Corporation since not all such returns included the accompanying statement. Because of this, the statistics on the total number of these corporations are somewhat understated.

The understatement in number of corporations was no doubt concentrated among returns without net income, since without taxable income to reduce, no special deduction could be taken. Another group of corporations contributing to this understatement were those with net income but having "net operating losses" for the year after taking the additional deductions for intercorporate dividends received and for certain dividends paid; in this case the Western Hemisphere Trade Corporation deduction could also not be taken.

A third source of understatement in the number of corporations was the consolidated Western Hemisphere Trade Corporation return. A consolidated return could include more than one Western

Hemisphere Trade Corporation. Therefore, since the statistics were based on returns, not companies, the number of Western Hemisphere Trade Corporations was understated as a result.

Data Include

The major limitation of these data resulted from the aforementioned classification of a consolidated return as a Western Hemisphere Trade Corporation return if at least one such corporation was included in the affiliated group included in the return. Thus, when the Western Hemisphere Trade Corporations included in the affiliated group accounted for only a small part of total operations, statistics by industrial activity and size of total assets should be used with caution.

There was some understatement of foreign taxes reported on the foreign tax credit computation schedules filed with Western Hemisphere Trade Corporation returns because corporations that filed consolidated returns who took both the Western Hemisphere Trade Corporation deduction and the foreign tax credit using the overall limitation method, were subject to an additional restriction in taking the credit according to Code section 1503(b). This is discussed above under "Qualifications and benefits of Western Hemisphere Trade Corporations."

ALL RETURNS

Table 32.—Total Assets, Income, Western Hemisphere Trade Corporation Deduction, Tax, and Credits, by Selected Major Industry

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

Selected major industry	Number of Western Hemisphere Trade Corporation returns	Returns with net income								
		Number of returns	Total assets	Net income	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Western Hemisphere Trade Corporation deduction		Income subject to U.S. tax	U.S. income tax before credits
							Number of returns	Amount		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	
All industries ¹	1,291	1,187	247,910,154	19,651,289	1,094,951	18,301	994	390,710	18,375,048	9,543,686
Agriculture, forestry, and fishery ¹	4	4	492,943	58,596	2,277	7	4	9,839	48,548	25,586
Mining ¹	41	40	1,697,370	200,930	5,837	68	39	42,858	157,768	82,839
Metal mining ¹	6	6	757,707	113,481	3,566	68	5	29,046	84,147	44,281
Crude petroleum and natural gas ¹	32	32	388,376	33,833	2,025	—	32	1,575	32,255	16,810
Contract construction ¹	51	33	2,158,115	86,247	6,822	1,895	28	4,039	40,182	20,393
Manufacturing ¹	223	220	172,434,493	14,555,596	1,065,209	12,677	192	311,444	13,510,494	7,022,909
Food and kindred products ¹	46	46	5,911,127	597,834	50,536	303	42	4,784	589,103	301,181
Paper and allied products ¹	4	4	1,832,725	92,849	4,960	356	4	687	90,235	40,820
Printing and publishing ¹	23	23	740,861	52,945	371	330	9	646	52,224	22,032
Chemicals and allied products ¹	32	32	17,794,215	1,826,444	170,325	7,345	32	22,513	1,771,684	919,093
Petroleum refining and related industries ¹	18	18	60,696,361	3,634,914	466,600	298	18	138,258	2,870,981	1,481,333
Stone, clay, and glass products ¹	5	5	1,154,618	87,775	6,030	239	4	920	66,122	44,680
Primary metal industries ¹	14	14	24,394,130	877,882	56,666	1,062	13	122,166	733,359	377,187
Fabricated metal products, except machinery and transportation equipment ¹	10	10	2,069,661	200,119	24,665	147	9	3,015	191,565	99,333
Machinery, except electrical ¹	18	17	4,577,170	538,551	23,825	406	14	8,040	524,437	272,432
Electrical equipment and supplies ¹	13	12	8,693,172	608,349	62,397	177	11	5,548	598,480	300,848
Motor vehicles and equipment ¹	10	10	36,416,303	4,917,449	166,040	—	9	2,958	4,889,996	2,581,502
Transportation equipment, except motor vehicles ¹	6	5	4,350,852	277,009	4,588	9	5	313	273,576	141,325
Scientific instruments, photographic equipment, watches and clocks ¹	8	8	2,467,027	707,755	27,508	—	8	1,023	706,678	371,417
Transportation, communication, electric, gas, and sanitary services ¹	18	17	54,427,931	4,432,279	10,600	3,654	17	3,345	4,360,292	2,267,436
Transportation ¹	9	8	1,550,293	45,655	39	3,498	8	2,305	33,088	15,158
Communication ¹	7	7	48,902,519	4,254,885	10,318	141	7	880	4,203,345	2,204,874
Wholesale and retail trade ¹	726	718	2,372,540	86,241	380	—	661	17,091	67,245	31,221
Wholesale trade ¹	676	668	2,303,107	75,485	380	—	640	14,879	59,203	27,297
Machinery, equipment, and supplies ¹	210	210	219,544	15,667	—	—	210	3,605	12,047	5,306
Miscellaneous wholesale trade ¹	343	335	2,039,973	55,126	—	—	308	10,378	43,353	20,358
Finance, insurance, and real estate ¹	173	131	13,270,462	196,689	1,466	—	29	1,019	160,574	78,213
Banking ¹	7	7	115,531	747	—	—	—	—	745	336
Credit agencies other than banks ¹	69	26	9,368,523	99,273	220	—	23	483	94,208	48,324
Services ¹	55	23	1,056,300	34,711	2,780	—	23	1,075	29,945	15,089

Footnotes at end of table.

ALL RETURNS

Table 32.—Total Assets, Income, Western Hemisphere Trade Corporation Deduction, Tax, and Credits, by Selected Major Industry—
Continued

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

Selected major industry	Returns with net income—Continued									
	Investment credit	Consolidated returns							Returns with foreign tax credit	
		Total assets	Net income	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Western Hemisphere Trade Corporation deduction	Income subject to U.S. tax	U.S. income tax before credits	Western Hemisphere Trade Corporation deduction	Foreign tax credit claimed
(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	
All industries ¹	560,252	246,602,039	19,435,698	1,091,067	18,011	345,856	18,205,687	9,458,437	343,869	1,899,103
Agriculture, forestry, and fishery ¹	234	488,629	56,956	2,277	7	9,405	47,344	24,931	9,405	14,571
Mining ¹	8,840	1,249,212	122,358	3,607	68	23,479	98,863	51,920	23,479	24,912
Metal mining ¹	1	497,413	44,520	3,561	66	11,044	33,472	17,539	11,044	17,538
Crude petroleum and natural gas ¹	1,382	223,944	24,982	—	—	399	24,583	12,927	399	809
Contract construction ¹	1,634	2,119,831	80,786	6,622	1,895	2,575	36,333	18,384	1,065	8,123
Manufacturing ¹	378,825	172,165,110	14,501,112	1,063,735	12,387	306,715	13,460,743	6,997,155	306,244	1,826,489
Food and kindred products ¹	14,354	5,898,345	595,084	50,536	303	4,460	586,677	300,162	4,314	69,161
Paper and allied products ¹	6,892	1,832,725	92,849	4,960	356	687	90,235	40,820	637	7,934
Printing and publishing ¹	900	707,023	50,286	71	40	231	49,976	21,000	213	567
Chemicals and allied products ¹	70,152	17,652,793	1,793,499	169,153	7,345	19,905	1,741,356	903,124	19,905	163,474
Petroleum refining and related industries ¹	103,529	60,681,841	3,629,703	466,600	298	136,876	2,867,151	1,479,318	136,876	1,009,576
Stone, clay, and glass products ¹	2,609	1,128,487	86,657	6,030	239	920	85,004	44,305	890	6,759
Primary metal industries ¹	40,243	24,394,130	877,882	56,666	1,062	122,166	733,359	377,187	122,166	207,681
Fabricated metal products, except machinery and transportation equipment ¹	3,986	2,069,661	200,119	24,665	147	3,015	191,565	99,333	3,015	32,357
Machinery, except electrical ¹	16,387	4,565,862	537,386	23,825	406	8,040	523,272	271,817	8,017	32,691
Electrical equipment and supplies ¹	24,342	8,693,172	608,349	62,397	177	5,548	598,480	300,848	5,454	63,742
Motor vehicles and equipment ¹	68,771	36,416,303	4,917,449	166,040	—	2,958	4,889,996	2,581,502	2,940	176,505
Transportation equipment, except motor vehicles ¹	15,575	4,350,852	277,009	4,588	9	313	273,576	141,325	313	7,083
Scientific instruments, photographic equipment, watches and clocks ¹	8,692	2,467,027	707,755	27,508	—	1,023	706,678	371,417	996	46,743
Transportation, communication, electric, gas, and sanitary services ¹	150,835	54,387,326	4,426,215	10,600	3,654	1,803	4,355,801	2,265,138	1,803	13,116
Transportation ¹	3,863	1,514,124	40,082	39	3,498	766	29,055	13,079	766	1,079
Communication ¹	127,501	48,898,083	4,254,394	10,318	141	877	4,202,887	2,204,655	877	11,448
Wholesale and retail trade ¹	2,874	2,040,182	20,803	—	—	430	19,324	8,855	425	1,334
Wholesale trade ¹	2,860	2,040,182	20,803	—	—	430	19,324	8,855	425	1,334
Machinery, equipment, and supplies ¹	221	175,564	3,241	—	—	220	2,974	1,471	220	1,045
Miscellaneous wholesale trade	2,614	1,846,808	16,899	—	—	205	15,692	7,044	205	289
Finance, insurance, and real estate ¹	16,876	13,101,454	193,433	1,466	—	551	157,833	77,110	550	5,169
Banking ¹	1	—	—	—	—	—	—	—	—	—
Credit agencies other than banks ¹	14,043	9,328,319	97,463	220	—	75	92,807	47,729	74	1,227
Services ¹	234	1,050,295	34,035	2,760	—	898	29,446	14,944	898	5,389

¹Includes consolidated returns where one or more of the affiliated corporations within the group was a Western Hemisphere Trade Corporation.

NOTE: See text for explanatory statements and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

ALL RETURNS

Table 33.—Total Assets, Income, Western Hemisphere Trade Corporation Deduction, Tax and Credits, by Size of Total Assets

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

Size of total assets	Number of Western Hemisphere Trade Corporation returns	Returns with net income									Investment credit
		Number of returns	Total assets	Net income	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Western Hemisphere Trade Corporation deduction		Income subject to U. S. tax	U. S. income tax before credits	
							Number of returns	Amount			
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	
Total ¹	1,291	1,187	247,910,154	19,651,289	1,094,951	18,301	994	390,710	18,375,048	9,543,686	560,252
Under \$1,000,000 ²	970	880	191,932	60,984	—	—	711	8,873	47,805	21,642	4,303
\$1,000,000 under \$5,000,000 ²	98	82	161,502	35,046	—	—	78	8,014	25,834	13,066	255
\$5,000,000 under \$10,000,000 ²	22	22	146,073	21,051	3,607	290	16	5,405	15,510	8,031	23
\$10,000,000 under \$25,000,000 ²	31	31	503,901	56,478	—	—	23	6,014	49,749	25,459	713
\$25,000,000 under \$50,000,000 ²	20	19	675,695	65,596	—	398	15	2,417	62,665	32,109	1,296
\$50,000,000 under \$100,000,000 ²	16	13	1,030,095	88,520	3,797	3,513	11	1,435	85,802	44,189	1,828
\$100,000,000 under \$250,000,000 ²	37	36	5,714,976	700,399	44,753	547	35	26,825	659,509	344,713	11,303
\$250,000,000 under \$1,000,000,000 ²	58	57	27,826,583	2,832,626	191,911	4,965	56	59,924	2,710,127	1,399,462	78,885
\$1,000,000,000 or more ²	50	49	211,659,397	15,790,589	850,883	8,588	49	271,803	14,718,047	7,655,015	461,646

Size of total assets	Returns with net income—Continued								
	Consolidated returns								
	Total assets	Net income	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Western Hemisphere Trade Corporation deduction	Income subject to U. S. tax	U. S. income tax before credits	Returns with foreign tax credit	
								Western Hemisphere Trade Corporation deduction	Foreign tax credit claimed
(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	
Total ¹	246,602,039	19,435,698	1,091,067	18,011	345,856	18,205,687	9,458,437	343,869	1,899,103
Under \$1,000,000 ²	—	—	—	—	—	—	—	—	—
\$1,000,000 under \$5,000,000 ²	305,494	55,170	—	—	1,484	48,695	24,610	1,275	3,561
\$5,000,000 under \$10,000,000 ²	—	—	83	—	—	—	—	—	—
\$10,000,000 under \$25,000,000 ²	—	—	—	—	—	—	—	—	—
\$25,000,000 under \$50,000,000 ²	546,707	63,178	2,840	398	2,182	60,482	31,010	2,146	5,194
\$50,000,000 under \$100,000,000 ²	1,030,095	88,520	3,797	3,513	1,435	85,802	44,189	1,368	4,126
\$100,000,000 under \$250,000,000 ²	5,233,763	605,615	41,553	547	9,028	582,534	304,151	8,797	45,036
\$250,000,000 under \$1,000,000,000 ²	27,826,583	2,832,626	191,911	4,965	59,924	2,710,127	1,399,462	59,924	276,027
\$1,000,000,000 or more ²	211,659,397	15,790,589	850,883	8,588	271,803	14,718,047	7,655,015	270,359	1,565,159

¹ Includes consolidated returns where one or more of the affiliated corporations within the group was a Western Hemisphere Trade Corporation.² Includes returns with zero assets.

NOTE: See text for explanatory statements and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

RETURNS WITH FOREIGN TAX CREDIT CLAIMED

Table 34.—Total Assets, Income, Western Hemisphere Trade Corporation Deduction, Tax, and Credits, and Foreign Income, Taxes, and Credit, by Selected Major Industry

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

Selected major industry	Returns with net income														
	Returns with foreign tax credit									Returns with Form 1118 filed in support of credit claimed					
	Number of returns	Total assets	Net income	Western Hemisphere Trade Corporation deduction		Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed	Investment credit	Number of returns	Total assets	Net income	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid
				Number of returns	Amount										
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	
All Industries	426	242,157,191	19,406,086	418	379,723	18,185,411	9,447,223	1,942,355	554,556	419	241,493,818	19,348,895	1,088,753	16,229	443,893
Mining	40	1,897,370	200,930	39	42,858	157,768	82,839	53,751	8,840	40	1,897,370	200,930	5,637	68	104
Metal mining	5	757,707	113,481	5	29,046	84,147	44,281	43,795	1	6	757,707	113,481	3,566	68	91
Crude petroleum and natural gas	32	388,376	33,833	32	1,575	32,255	16,810	3,097	1,382	32	388,376	33,833	2,025	—	13
Contract construction	12	666,236	46,619	12	2,502	39,909	20,249	9,593	1,583	12	666,236	46,619	2,687	—	2,280
Manufacturing	148	188,846,670	14,389,030	142	310,649	13,350,305	6,939,791	1,832,000	373,088	142	187,994,067	14,333,716	1,062,948	12,500	433,103
Food and kindred products	9	5,780,055	565,594	9	4,314	557,334	284,676	69,161	13,903	9	5,780,055	565,594	50,536	303	35,954
Paper and allied products	4	1,832,725	92,849	4	687	90,235	40,820	7,934	6,892	4	1,832,725	92,849	4,960	356	6,602
Printing and publishing	8	691,300	50,795	8	626	50,099	21,078	1,135	787	7	579,048	39,773	300	330	—
Chemicals and allied products	32	17,794,215	1,826,444	32	22,513	1,771,664	919,093	166,399	70,152	31	17,581,123	1,803,160	169,155	7,345	85,439
Petroleum refining and related industries	18	60,696,361	3,634,914	18	138,258	2,870,981	1,481,333	1,011,591	103,529	17	60,460,080	3,630,468	466,600	298	61,325
Stone, clay, and glass products	3	1,103,503	83,771	3	890	82,374	42,948	6,759	2,316	3	1,103,503	83,771	6,030	239	4,694
Primary metal industries	12	21,397,201	856,211	11	122,166	716,949	368,982	207,681	36,988	12	21,397,201	856,211	56,665	1,062	8,947
Fabricated metal products, except machinery and transportation equipment	9	2,040,805	196,343	9	3,015	187,817	97,357	32,357	3,866	9	2,040,805	196,343	24,665	147	13,637
Machinery, except electrical	14	4,491,451	535,296	12	8,017	521,226	270,850	32,691	18,256	14	4,491,451	535,296	23,825	406	17,559
Electrical equipment and supplies	9	8,411,563	524,457	9	5,454	514,666	256,832	63,742	23,707	7	8,236,695	515,769	61,376	—	29,035
Motor vehicles and equipment	8	36,291,870	4,909,313	8	2,940	4,881,881	2,577,333	176,505	60,331	8	36,291,870	4,909,313	166,040	—	127,600
Transportation equipment, except motor vehicles	5	4,350,852	277,009	5	313	273,576	141,325	7,083	15,575	5	4,350,852	277,009	4,588	9	3,208
Scientific instruments, photographic equipment, watches and clocks	3	2,462,095	707,591	3	996	706,542	371,384	46,743	8,687	3	2,462,095	707,591	27,508	—	38,472
Transportation, communication, electric, gas, and sanitary services	14	54,423,495	4,431,788	14	3,342	4,359,834	2,267,217	15,171	150,902	14	54,423,495	4,431,788	10,800	3,654	4,854
Transportation	8	1,550,293	45,655	8	2,305	33,088	15,158	3,134	3,863	8	1,550,293	45,655	39	2,498	160
Communication	4	48,898,083	4,254,394	4	877	4,202,887	2,204,655	11,448	127,468	4	48,898,083	4,254,394	10,318	141	4,595
Wholesale and retail trade	178	2,173,736	53,686	177	9,282	43,416	20,388	8,503	2,825	177	2,164,966	51,809	380	—	100
Wholesale trade	174	2,160,851	50,567	173	8,446	41,129	19,212	5,662	2,825	173	2,152,081	48,690	380	—	100
Finance, insurance, and real estate	8	13,002,755	192,366	8	610	156,890	76,719	5,232	16,850	8	13,002,755	192,366	1,468	—	1,007
Credit agencies other than banks	3	9,222,150	96,177	3	74	91,705	47,275	1,227	14,018	3	9,222,150	96,177	220	—	81
Services	23	1,056,300	34,711	23	1,075	29,945	15,089	5,534	234	23	1,056,300	34,711	2,760	—	1,732

Footnote at end of table.

RETURNS WITH FOREIGN TAX CREDIT CLAIMED

Table 34.—Total Assets, Income, Western Hemisphere Trade Corporation Deduction, Tax, and Credits, and Foreign Income, Taxes, and Credit, by Selected Major Industry—Continued

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

Selected major industry	Returns with net income—Continued															
	Returns with Form 1118 filed in support of credit claimed—Continued															
	Western Hemisphere Trade Corporation deductions		Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed	Taxable income from foreign sources			Foreign taxes				Foreign tax credit computed		Dividends paid to related foreign corporations by subsidiaries	
	Number of returns	Amount				Total (less loss) ¹	Dividends from related foreign corporations	Interest for which separate credit was computed	Total	Paid or accrued		Deemed paid	Carryover	Total		For taxes on interest for which separate credit was computed
(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)	(25)	(26)	(27)	(28)	(29)	(30)	(31)	
All Industries	412	378,940	18,129,014	9,418,111	1,940,786	4,363,091	1,028,745	9,063	2,962,620	1,863,165	623	651,871	447,587	1,943,313	601	117,361
Mining	39	42,858	157,768	82,839	53,751	132,486	5,496	653	111,341	65,200	—	328	45,814	53,882	—	—
Metal mining	5	29,046	84,147	44,281	43,795	84,115	3,557	653	86,083	52,750	—	225	33,108	43,795	—	—
Crude petroleum and natural gas	32	1,575	32,255	16,810	3,097	10,295	1,909	—	18,319	5,582	—	90	12,648	3,228	—	—
Contract construction	12	2,502	20,249	20,249	9,593	28,547	2,804	—	10,394	6,983	—	2,351	1,060	6,777	—	—
Manufacturing	137	310,371	13,295,280	6,911,388	1,830,826	3,960,397	1,002,949	6,767	2,780,904	1,750,955	556	638,974	390,976	1,833,021	556	114,354
Food and kindred products	9	4,314	557,334	284,676	69,161	151,751	50,702	—	69,904	32,072	—	37,374	458	69,161	—	576
Paper and allied products	4	687	90,235	40,820	7,934	18,224	5,066	—	9,420	1,668	—	6,862	890	7,934	—	14
Printing and publishing	7	581	39,125	15,297	1,073	3,962	630	—	1,765	1,157	—	58	550	1,073	—	—
Chemicals and allied products	31	22,486	1,748,435	906,824	166,258	439,658	159,019	1,314	174,409	71,244	209	98,777	4,369	166,258	209	33,060
Petroleum refining and related industries	17	138,184	2,866,609	1,479,464	1,011,397	1,994,622	429,970	1,662	1,666,567	1,319,558	169	232,235	114,774	1,013,581	169	47,148
Stone, clay, and glass products	3	890	82,374	42,948	6,759	15,617	6,252	275	7,686	1,482	47	4,835	1,369	6,759	47	—
Primary metal industries	11	122,166	716,949	368,982	207,681	493,649	56,019	176	478,802	208,570	11	19,804	250,428	207,686	11	7,029
Fabricated metal products, except machinery and transportation equipment	9	3,015	187,817	97,357	32,357	79,508	20,613	2,285	32,794	16,925	56	14,257	1,612	32,358	56	1,440
Machinery, except electrical	12	8,017	521,226	270,850	32,691	104,673	23,842	229	35,367	12,378	38	19,318	3,671	32,692	38	1,785
Electrical equipment and supplies	7	5,324	506,130	252,493	62,968	167,271	58,674	119	68,891	29,550	26	30,671	8,670	62,969	26	3,664
Motor vehicles and equipment	8	2,840	4,881,881	2,577,333	176,505	364,010	157,461	—	179,033	43,228	—	132,161	3,644	176,508	—	18,979
Transportation equipment, except motor vehicles	5	313	273,576	141,325	7,083	24,223	4,596	—	7,223	3,279	—	3,448	496	7,083	—	103
Scientific instruments, photographic equipment, watches, and clocks	3	996	706,542	371,384	46,743	94,740	27,403	707	46,823	8,286	—	38,537	—	46,743	—	556
Transportation, communication, electric, gas, and sanitary services	14	3,342	4,359,834	2,267,217	15,171	132,968	11,801	—	20,114	9,746	—	5,962	4,405	15,187	—	1,541
Transportation	8	2,305	33,088	15,158	3,134	10,508	3,505	—	7,413	3,585	—	160	3,667	3,150	—	—
Communication	4	877	4,202,887	2,204,655	11,448	116,703	7,957	—	11,448	5,690	—	5,703	55	11,448	—	1,541
Wholesale and retail trade	176	8,777	42,044	19,879	6,108	22,178	312	68	6,846	5,874	22	182	812	6,109	—	—
Wholesale trade	172	7,941	39,757	18,503	5,267	20,228	312	68	5,954	5,077	22	162	717	5,268	—	—
Credit agencies other than banks	3	74	91,705	47,275	1,227	5,915	100	1,575	1,231	1,114	45	81	36	1,227	45	—
Finance, insurance, and real estate	8	610	156,890	76,719	5,232	22,975	1,346	1,575	6,322	5,239	45	1,007	76	5,232	45	—
Services	23	1,075	29,945	15,089	5,534	24,508	2,453	—	11,859	5,507	—	2,008	4,444	5,534	—	1,417

¹ Includes the "gross-up" of certain foreign dividends.
NOTE: See text for explanatory statements and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

RETURNS WITH FOREIGN TAX CREDIT CLAIMED

Table 35.—Total Assets, Income, Western Hemisphere Trade Corporation Deduction, Tax, and Credits, and Foreign Income, Taxes, and Credit, by Size of Total Assets

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

Size of total assets	Returns with foreign tax credit								
	Number of returns	Total assets	Net income	Western Hemisphere Trade Corporation deduction		Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed	Investment credit
				Number of returns	Amount				
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Total	426	242,157,191	19,406,086	418	379,723	18,185,411	9,447,223	1,942,355	554,556
Under \$1,000,000 ^a	185	48,376	37,167	184	3,586	30,928	14,921	4,373	4,161
\$1,000,000 under \$5,000,000	48	101,171	23,755	47	5,508	17,080	8,646	4,570	174
\$5,000,000 under \$10,000,000	16	107,534	16,206	14	4,171	11,900	6,156	4,274	23
\$10,000,000 under \$25,000,000	17	279,111	38,303	16	5,832	31,995	16,350	6,989	392
\$25,000,000 under \$50,000,000	13	472,355	54,021	13	2,381	51,163	26,242	5,488	845
\$50,000,000 under \$100,000,000	10	812,011	83,171	9	1,368	80,583	41,582	4,126	1,271
\$100,000,000 under \$250,000,000	33	5,246,337	589,085	32	26,594	548,610	286,353	71,399	10,398
\$250,000,000 under \$1,000,000,000	57	27,826,583	2,832,626	56	59,924	2,710,127	1,399,462	276,027	78,885
\$1,000,000,000 or more	47	207,263,713	15,731,752	47	270,359	14,703,024	7,647,511	1,565,159	458,407

Size of total assets	Returns with Form 1118 filed in support of credit claimed										
	Number of returns	Total assets	Net income	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from Foreign taxes deemed paid	Western Hemisphere Trade Corporation deduction		Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed
							Number of returns	Amount			
	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)
Total	419	241,493,818	19,348,895	1,088,753	16,229	443,893	412	378,940	18,129,014	9,418,111	1,940,786
Under \$1,000,000 ^a	185	48,376	37,167	—	—	100	184	3,586	30,928	14,921	4,373
\$1,000,000 under \$5,000,000	48	101,171	23,755	—	—	—	47	5,508	17,080	8,646	4,570
\$5,000,000 under \$10,000,000	15	98,764	14,329	3,607	290	—	13	3,666	10,528	5,447	3,829
\$10,000,000 under \$25,000,000	16	260,801	30,429	—	—	—	16	5,832	24,122	12,205	6,986
\$25,000,000 under \$50,000,000	12	441,271	50,167	—	398	1,924	12	2,348	47,343	24,233	5,373
\$50,000,000 under \$100,000,000	10	812,011	83,171	3,797	3,513	1,132	9	1,368	80,583	41,582	4,126
\$100,000,000 under \$250,000,000	29	4,641,128	545,499	42,491	370	13,827	28	26,349	505,279	264,104	70,343
\$250,000,000 under \$1,000,000,000	57	27,826,583	2,832,626	191,911	4,965	124,576	56	59,924	2,710,127	1,399,462	276,027
\$1,000,000,000 or more	47	207,263,713	15,731,752	846,947	5,693	302,334	47	270,359	14,703,024	7,647,511	1,565,159

Size of total assets	Returns with Form 1118 filed in support of credit claimed—Continued										
	Taxable income from foreign sources			Foreign taxes					Foreign tax credit computed		Dividends paid to related foreign corporations by subsidiaries
	Total (less loss) ¹	Dividends from related foreign corporations	Interest for which separate credit was computed	Total	Paid or accrued		Deemed paid	Carryover	Total	For taxes on interest for which separate credit was computed	
				Total	On interest for which separate credit was computed						
	(21)	(22)	(23)	(24)	(25)	(26)	(27)	(28)	(29)	(30)	(31)
Total	4,363,091	1,028,745	9,063	2,962,620	1,863,165	623	651,871	447,587	1,943,313	601	117,361
Under \$1,000,000 ^a	13,297	312	89	36,441	6,352	13	162	29,929	4,504	13	—
\$1,000,000 under \$5,000,000	12,859	—	—	6,880	4,423	—	—	—	4,570	—	—
\$5,000,000 under \$10,000,000	9,951	290	—	5,373	4,653	—	9	3,169	3,829	—	—
\$10,000,000 under \$25,000,000	16,166	300	1	13,077	7,896	—	19	5,162	7,170	—	—
\$25,000,000 under \$50,000,000	15,643	3,069	330	23,895	6,450	49	1,927	15,518	5,389	49	213
\$50,000,000 under \$100,000,000	15,911	7,182	—	5,532	2,129	—	1,933	1,470	4,126	—	766
\$100,000,000 under \$250,000,000	181,652	32,818	749	83,199	58,555	27	16,434	8,210	70,343	5	12,828
\$250,000,000 under \$1,000,000,000	711,661	194,642	3,241	317,057	147,062	219	134,890	35,105	276,033	219	13,514
\$1,000,000,000 or more	3,385,951	790,132	4,653	2,471,166	1,625,645	315	496,497	349,024	1,567,349	315	90,040

^aIncludes the "gross-up" of certain foreign dividends.

¹Includes returns with zero assets.

NOTE: See text for explanatory statements and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

ALL RETURNS

Table 36.—Total Assets, Income, Western Hemisphere Trade Corporation Deduction, Tax, and Credits, by Selected Major Industry, and by Consolidation Status and by Size of Total Assets for All Industries

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

Selected major industry, consolidation status and size of total assets for all industries	Returns with net income											
	Number of Western Hemisphere Trade Corporations	Number of returns	Total assets	Net income	Dividends received from foreign corporations	Includable income of Controlled foreign Corporations	Western Hemisphere Trade Corporation deduction		Dividends received from DISCs	Income subject to U.S. tax	U.S. income tax before credits	Investment credit
							Number of returns	Amount				
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	
All Industries												
All returns												
Total	980	897	347,393,578	21,630,328	2,550,291	27,711	723	315,892	123,026	19,763,605	9,479,279	793,609
Under \$10,000,000	697	619	502,372	86,740	1,351	—	463	16,263	40	67,295	29,755	361
\$10,000,000 under \$100,000,000	105	103	3,729,878	337,857	11,523	1,953	90	12,541	952	319,110	150,649	7,354
\$100,000,000 under \$250,000,000	37	37	6,209,643	526,666	59,578	4,178	35	8,288	3,303	506,305	238,093	12,039
\$250,000,000 or more	141	138	336,951,685	20,679,065	2,477,840	21,580	135	278,800	118,731	18,870,895	9,060,782	773,855
Consolidated returns												
Total	303	298	345,722,956	21,376,917	2,549,135	27,711	289	284,292	121,889	19,545,313	9,376,815	791,302
Under \$10,000,000	38	38	128,608	19,356	1,319	—	38	1,709	40	17,029	7,912	186
\$10,000,000 under \$100,000,000	90	88	3,455,146	316,257	11,523	1,953	82	6,864	952	303,306	143,126	7,332
\$100,000,000 under \$250,000,000	36	36	6,014,733	515,663	59,116	4,178	35	8,288	2,984	496,139	233,254	11,566
\$250,000,000 or more	139	136	336,124,469	20,525,641	2,477,178	21,580	134	267,431	117,913	18,728,840	8,992,523	772,218
Nonconsolidated returns												
Total	678	599	1,670,622	253,411	1,156	—	434	31,601	1,137	218,292	102,464	2,307
Under \$10,000,000	680	581	373,764	67,384	32	—	425	14,555	—	50,267	21,843	175
\$10,000,000 under \$100,000,000	18	18	1,296,858	186,027	1,124	—	9	17,046	1,137	168,025	80,621	2,132
\$250,000,000 or more												
Selected major industry¹												
Agriculture, forestry, and fishery	18	18	326,573	18,054	92	—	17	630	—	13,276	6,726	217
Mining	18	17	1,312,114	81,114	980	—	17	19,431	335	59,985	28,287	1,794
Metal mining	3	3	303,024	43,906	84	—	3	12,458	—	31,446	14,876	—
Crude petroleum and natural gas	14	13	377,422	23,252	896	—	13	2,924	335	18,881	8,882	1,784
Contract construction	23	23	896,439	84,318	9,804	33	14	2,846	—	80,294	38,312	882
Manufacturing	238	235	246,470,271	18,193,070	2,507,409	20,666	220	267,905	120,073	16,492,810	7,919,466	426,723
Food and kindred products	16	16	9,829,544	800,569	93,814	702	16	7,189	592	788,610	376,427	17,378
Chemicals and allied products	48	47	28,771,527	2,692,050	313,285	8,130	46	35,114	18,090	2,625,947	1,240,809	74,974
Petroleum refining and related industries	17	16	63,146,710	5,205,347	1,313,188	171	16	148,633	2,368	3,813,501	1,915,880	80,717
Primary metal industries	17	17	31,973,336	891,877	165,495	1,286	16	39,121	—	594,140	282,849	45,992
Machinery, except electrical	28	27	10,029,693	835,820	85,293	1,656	26	14,202	2,128	815,943	389,495	22,464
Electrical equipment and supplies	15	15	18,059,392	914,973	105,803	4,546	14	7,127	15,979	864,521	390,174	37,227
Motor vehicles and equipment	10	10	33,357,818	4,355,017	226,067	1,268	10	3,696	37,658	4,340,778	2,085,599	71,738
Scientific instruments, photographic equipment, watches and clocks	6	6	3,566,787	916,663	86,319	—	6	1,535	34,564	914,527	437,148	9,970
All other manufacturing	82	82	27,735,464	1,780,754	118,154	2,907	70	12,289	8,694	1,734,843	801,085	66,263
Transportation, communication, electric, gas, and sanitary services	12	12	80,516,304	2,839,744	13,931	4,470	11	6,984	1,883	2,764,373	1,324,934	342,533
Wholesale and retail trade	542	538	2,058,943	125,807	2,515	34	418	16,148	612	104,531	48,046	2,453
Finance, insurance, and real estate	52	36	13,245,829	129,121	8,017	802	10	1,210	123	93,954	-43,718	10,450
Services	78	18	2,567,106	159,099	7,543	1,705	17	736	—	154,382	69,790	8,567

Footnotes at end of table.

ALL RETURNS

Table 36.—Total Assets, Income, Western Hemisphere Trade Corporation Deduction, Tax, and Credits, by Selected Major Industry, and by Consolidation Status and by Size of Total Assets for All Industries—Continued

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

Selected major industry, consolidation status and size of total assets for all industries	Returns with net income and foreign tax credit								
	Number of returns	Total assets	Net income	Western Hemisphere Trade Corporation deduction		Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed	Invest- ment credit
				Number of returns	Amount				
	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)
All Industries									
All returns									
Total	317	342,120,674	21,394,252	312	305,172	19,558,365	9,390,431	2,691,792	778,559
Under \$10,000,000 ²	76	196,667	37,363	76	9,208	27,604	12,916	7,904	105
\$10,000,000 under \$100,000,000	73	2,843,115	291,062	71	9,333	277,890	131,263	20,260	5,964
\$100,000,000 under \$250,000,000	33	5,597,217	513,351	32	8,274	497,214	233,292	52,307	10,466
\$250,000,000 or more	135	333,383,675	20,552,476	133	278,357	18,755,657	9,012,960	2,611,321	760,024
Consolidated returns									
Total	252	340,910,331	21,190,911	249	282,599	19,378,966	9,304,513	2,667,563	774,435
Under \$10,000,000 ²	19	73,755	9,620	19	1,261	8,338	3,882	1,630	104
\$10,000,000 under \$100,000,000	68	2,877,810	279,891	66	6,076	269,978	127,477	16,716	5,951
\$100,000,000 under \$250,000,000	32	5,402,307	502,348	32	8,274	487,048	228,453	51,822	9,993
\$250,000,000 or more	133	332,556,459	20,399,052	132	266,988	18,613,602	8,944,701	2,597,395	758,387
Nonconsolidated returns									
Total	65	1,210,343	203,341	63	22,574	179,399	85,918	24,229	2,124
Under \$10,000,000 ²	57	122,912	27,743	57	7,948	19,266	9,034	6,274	1
\$10,000,000 under \$100,000,000	8	1,087,431	175,598	6	14,626	160,133	76,884	17,955	2,123
\$250,000,000 or more									
Selected major industry¹									
Agriculture, forestry, and fishery	16	109,850	12,619	16	136	12,076	5,697	187	217
Mining	15	1,232,379	74,981	15	19,297	54,890	25,895	22,546	1,280
Metal mining	3	303,024	43,906	3	12,456	31,446	14,876	14,810	—
Crude petroleum and natural gas	11	297,687	17,119	11	2,790	13,786	6,490	3,207	1,280
Contract construction	8	844,826	80,157	8	2,143	77,156	36,928	10,592	729
Manufacturing	198	243,437,035	18,035,704	194	266,472	16,349,128	7,856,341	2,605,220	412,778
Food and kindred products	16	9,829,544	800,569	16	7,188	788,610	376,427	112,549	17,378
Chemicals and allied products	47	28,771,527	2,692,050	46	35,114	2,625,947	1,240,809	304,390	74,974
Petroleum refining and related industries	15	80,772,337	5,098,659	15	148,200	3,713,835	1,875,511	1,457,240	68,006
Primary metal industries	16	31,949,762	689,855	15	38,101	592,138	281,894	125,860	45,948
Machinery, except electrical	25	9,939,882	832,591	25	14,105	813,497	388,328	83,371	22,402
Electrical equipment and supplies	13	18,037,086	911,383	12	6,630	861,428	388,699	93,176	37,209
Motor vehicles and equipment	9	33,347,593	4,354,805	9	3,678	4,340,583	2,085,512	234,004	71,705
Scientific instruments, photographic equipment, watches and clocks	4	3,541,906	914,808	4	1,464	912,745	436,328	85,619	9,947
All other manufacturing	53	27,247,398	1,740,984	52	11,992	1,700,345	784,833	109,011	65,209
Transportation, communication, electric, gas, and sanitary services	10	80,393,784	2,833,089	10	6,983	2,757,719	1,321,789	23,552	341,025
Wholesale and retail trade	46	1,434,636	76,242	46	8,232	86,051	31,168	7,492	1,928
Finance, insurance, and real estate	9	12,112,438	122,405	9	1,186	86,895	40,829	12,074	10,041
Services	16	2,555,727	159,056	15	722	154,350	69,784	10,130	8,561

¹Includes consolidated returns where one or more of the affiliated corporations within the group was a Western Hemisphere Trade Corporation.²Includes returns with zero assets

NOTE: See text for explanatory statements and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 37.—Total Assets, Income, Western Hemisphere Trade Corporation Deduction, and Tax, and Foreign Income, Taxes, and Credit, by Selected Major Industry, and by Consolidation Status and by Size of Total Assets for All Industries

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

Selected major industry, consolidation status, and size of total assets for all industries	Returns with Form 1118 statements filed in support of credit claimed									
	Number of returns	Total assets	Net income (less deficit)	Dividends received from foreign corporations	Includable income of Controlled Foreign Corporations	Foreign dividend income resulting from foreign taxes deemed paid	Dividends received from DISCs	Income subject to U.S. tax	U.S. income tax before credits	Foreign tax credit claimed
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
All Industries										
All returns										
Total	315	341,843,920	21,372,510	2,548,386	27,565	833,719	122,332	19,536,995	9,380,231	2,691,767
Under \$10,000,000 ^a	76	196,667	37,363	1,351	—	595	40	27,604	12,916	7,904
\$10,000,000 under \$100,000,000	72	2,928,428	290,092	11,522	1,953	6,881	709	276,920	130,804	20,259
\$100,000,000 under \$250,000,000	33	5,597,217	513,251	59,578	4,178	36,352	3,245	497,214	233,292	52,307
\$250,000,000 or more	134	333,121,608	20,531,704	2,475,936	21,434	789,891	118,338	18,735,257	9,003,219	2,611,297
Consolidated returns										
Total	250	340,633,577	21,169,169	2,547,230	27,565	833,195	121,195	19,357,596	9,294,313	2,667,538
Under \$10,000,000 ^a	19	73,755	9,620	1,319	—	595	40	8,338	3,882	1,630
\$10,000,000 under \$100,000,000	67	2,863,123	278,921	11,522	1,953	6,881	709	269,006	127,018	16,715
\$100,000,000 under \$250,000,000	32	5,402,307	502,348	59,116	4,178	35,951	2,926	487,048	228,453	51,822
\$250,000,000 or more	132	332,294,392	20,378,280	2,475,274	21,434	789,768	117,520	18,593,202	8,934,960	2,597,371
Nonconsolidated returns										
Total	65	1,210,343	203,341	1,156	—	524	1,137	179,399	85,918	24,229
Under \$10,000,000 ^a	57	122,912	27,743	32	—	—	—	19,266	9,034	6,274
\$10,000,000 under \$100,000,000	8	1,089,431	175,598	1,124	—	524	1,137	160,133	76,884	17,955
\$250,000,000 or more										
Selected major industry										
Agriculture, forestry, and fishery	16	109,850	12,619	92	—	30	—	12,076	5,697	187
Mining	15	1,232,379	74,981	980	—	—	335	54,890	25,895	22,546
Metal mining	3	303,024	43,906	84	—	—	—	31,446	14,876	14,810
Crude petroleum and natural gas	11	297,687	17,119	896	—	—	335	13,786	6,490	3,207
Contract construction	8	844,826	80,157	9,804	33	5,235	—	77,156	36,928	10,592
Manufacturing	196	243,160,281	18,013,962	2,505,504	20,520	809,345	119,680	16,327,758	7,848,141	2,605,195
Food and kindred products	16	9,829,544	800,569	93,814	702	57,361	532	786,610	376,427	112,549
Chemicals and allied products	46	28,509,460	2,671,278	313,285	8,130	154,560	18,090	2,605,547	1,231,068	304,966
Petroleum refining and related industries	15	80,772,337	5,098,659	1,312,242	25	142,954	1,975	3,713,835	1,875,511	1,457,240
Primary metal industries	15	31,935,075	688,885	165,495	1,286	10,838	—	591,168	281,435	125,859
Machinery, except electrical	25	9,939,882	832,591	85,283	1,656	48,654	2,128	813,497	388,328	83,371
Electrical equipment and supplies	13	18,037,086	911,383	105,803	4,546	60,687	15,979	861,428	398,699	83,176
Motor vehicles and equipment	9	33,347,593	4,354,805	226,067	1,268	216,783	37,658	4,340,583	2,085,512	234,004
Scientific instruments, photographic equipment, watches and clocks	4	3,541,996	914,808	86,318	—	67,347	34,564	912,745	436,328	85,619
All other manufacturing	53	27,247,398	1,740,984	117,196	2,907	50,161	8,694	1,700,345	784,833	109,011
Transportation, communication, electric, gas, and sanitary services	10	80,393,784	2,833,089	13,931	4,470	8,162	1,883	2,757,719	1,321,789	23,552
Wholesale and retail trade	46	1,434,636	76,242	2,515	34	1,026	311	66,051	31,168	7,492
Finance, insurance, and real estate	9	12,112,438	122,405	8,017	802	2,355	123	86,995	40,829	12,074
Services	16	2,555,727	159,056	7,543	1,705	7,566	—	154,350	69,784	10,130

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 37.—Total Assets, Income, Western Hemisphere Trade Corporation Deduction, and Tax, and Foreign Income, Taxes, and Credits, by Selected Major Industry, and by Consolidation Status and by Size of Total Assets for All Industries—Continued

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

Selected major industry, consolidation status, and size of total assets for all industries	Returns with Form 1118 statements filed in support of credit claimed—Continued									
	Western Hemisphere Trade Corporation deduction		Foreign income and taxes of domestic corporations reported on Form 1118							
	Number of returns	Amount	Total (less loss) ¹	Taxable income			Foreign taxes			
				Dividends from related foreign corporations	Dividends received from DISCs	Interest for which separate credit was computed	Total	Paid or accrued		
(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)		
All Industries										
All returns										
Total	311	304,800	7,203,452	2,414,898	141	74,005	5,188,237	3,300,584	1,547	
Under \$10,000,000 ²	76	9,208	22,652	1,345	—	141	18,730	9,126	19	
\$10,000,000 under \$100,000,000	71	9,333	57,875	12,364	—	280	27,134	13,025	13	
\$100,000,000 under \$250,000,000	32	8,274	168,460	57,944	—	252	64,693	20,661	22	
\$250,000,000 or more	132	277,985	6,954,464	2,343,245	141	73,331	5,077,680	3,257,773	1,493	
Consolidated returns										
Total	248	282,227	7,148,530	2,414,155	141	73,916	5,144,270	3,267,049	1,537	
Under \$10,000,000 ²	19	1,261	6,619	1,312	—	52	5,827	2,081	8	
\$10,000,000 under \$100,000,000	66	6,076	49,898	12,364	—	280	23,151	9,194	13	
\$100,000,000 under \$250,000,000	32	8,274	167,070	57,482	—	252	64,207	20,576	22	
\$250,000,000 or more	131	266,616	6,924,944	2,342,996	141	73,331	5,051,084	3,235,198	1,493	
Nonconsolidated returns										
Total	63	22,574	54,922	744	—	89	43,968	33,536	11	
Under \$10,000,000 ²	57	7,948	16,034	33	—	89	12,903	7,044	11	
\$10,000,000 under \$250,000,000	6	14,626	38,888	711	—	—	31,064	26,492	—	
\$250,000,000 or more										
Selected major industry										
Agriculture, forestry, and fishery	16	136	1,156	92	—	—	206	176	—	
Mining	15	19,297	72,400	96	—	—	51,801	29,403	—	
Metal mining	3	12,458	31,431	—	—	—	33,889	24,311	—	
Crude petroleum and natural gas	11	2,790	8,901	96	—	—	3,347	3,309	—	
Contract construction	8	2,143	45,939	8,882	—	198	14,896	7,849	—	
Manufacturing	193	266,100	6,867,347	2,373,720	141	72,208	5,052,281	3,228,808	1,309	
Food and kindred products	16	7,188	259,134	90,414	—	283	114,362	54,189	57	
Chemicals and allied products	45	34,742	866,363	291,914	141	3,371	313,421	123,008	186	
Petroleum refining and related industries	15	148,200	3,660,074	1,280,259	—	3,097	3,761,751	2,753,733	409	
Primary metal industries	15	38,101	403,961	94,079	—	1,909	197,659	108,881	120	
Machinery, except electrical	25	14,105	298,654	86,001	—	1,811	90,646	34,383	155	
Electrical equipment and supplies	12	6,630	265,257	102,257	—	1,442	110,312	45,192	180	
Motor vehicles and equipment	9	3,678	498,456	227,566	—	—	261,016	43,615	—	
Scientific instruments, photographic equipment, watches and clocks	4	1,454	210,288	86,289	—	—	193	19,136	7	
All other manufacturing	52	11,992	405,160	114,941	—	—	60,103	46,671	194	
Transportation, communication, electric, gas, and sanitary services	10	6,983	98,328	12,188	—	1,510	28,863	13,955	228	
Wholesale and retail trade	46	8,232	22,949	2,352	—	89	9,255	6,897	11	
Finance, insurance, and real estate	9	1,186	49,223	8,426	—	—	13,759	8,272	—	
Services	15	722	46,110	9,141	—	—	17,177	5,223	—	

Footnotes at end of table.

RETURNS WITH FORM 1118 FILED IN SUPPORT OF FOREIGN TAX CREDIT CLAIMED

Table 37.—Total Assets, Income, Western Hemisphere Trade Corporation Deduction, and Tax, and Foreign Income, Taxes, and Credit, by Selected Major Industry, and by Consolidation Status and by Size of Total Assets for All Industries—Continued

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

Selected major industry, consolidation status, and size of total assets for all industries	Returns with Form 1118 statements filed in support of credit claimed—Continued						Dividends paid to related foreign corporations by second-tier foreign corporations	Dividends paid by third-tier foreign corporations to second-tier foreign corporations
	Foreign income and taxes of domestic corporations reported on Form 1118—Continued							
	Foreign taxes—Continued			Foreign tax credit computed				
	Deemed paid		Carryover	Total	For taxes on			
	Total	On DISC dividends			DISC dividends	Interest for which separate credit was computed		
	(20)	(21)	(22)	(23)	(24)	(25)	(26)	(27)
All Industries								
All returns								
Total	1,199,584	7	688,069	2,998,963	7	1,541	387,787	5,388
Under \$10,000,000 ^a	612	—	8,993	7,942	—	19	205	—
\$10,000,000 under \$100,000,000	7,725	—	6,384	20,489	—	13	994	(^b)
\$100,000,000 under \$250,000,000	39,221	—	4,810	52,309	—	22	5,055	—
\$250,000,000 or more	1,152,026	7	667,881	2,918,223	7	1,487	380,532	5,388
Consolidated returns								
Total	1,199,018	7	678,203	2,974,542	7	1,530	387,583	5,388
Under \$10,000,000 ^a	596	—	3,149	1,669	—	8	205	—
\$10,000,000 under \$100,000,000	7,725	—	6,232	16,751	—	13	994	(^b)
\$100,000,000 under \$250,000,000	38,821	—	4,810	51,824	—	22	5,851	—
\$250,000,000 or more	1,151,876	7	664,011	2,904,297	7	1,487	380,532	5,388
Nonconsolidated returns								
Total	566	—	9,865	24,422	—	11	204	—
Under \$10,000,000 ^a	15	—	5,844	6,272	—	11	—	—
\$10,000,000 under \$100,000,000	—	—	—	—	—	—	—	—
\$100,000,000 under \$250,000,000	551	—	4,022	18,149	—	—	204	—
\$250,000,000 or more	—	—	—	—	—	—	—	—
Selected major industries								
Agriculture, forestry, and fishery	30	—	—	190	—	—	—	—
Mining	39	—	22,359	22,544	—	—	—	—
Metal mining	—	—	9,578	14,811	—	—	—	—
Crude petroleum and natural gas	39	—	—	3,204	—	—	—	—
Contract construction	5,531	—	1,515	10,591	—	—	—	—
Manufacturing	1,172,873	7	650,599	2,912,319	7	1,302	384,667	5,388
Food and kindred products	59,861	—	313	113,238	—	57	6,199	—
Chemicals and allied products	176,038	7	14,376	304,358	7	186	55,832	3,075
Petroleum refining and related industries	460,183	—	547,835	1,756,634	—	408	267,403	—
Primary metal industries	15,942	—	72,837	132,703	—	120	18,961	—
Machinery, except electrical	51,685	—	4,578	83,568	—	155	18,769	—
Electrical equipment and supplies	62,090	—	3,030	93,175	—	180	10,851	417
Motor vehicles and equipment	217,392	—	9	234,005	—	—	1,592	227
Scientific instruments, photographic equipment, watches and clocks	67,860	—	—	85,618	—	3	972	—
All other manufacturing	61,824	—	7,622	109,009	—	194	4,388	1,669
Transportation, communication, electric, gas, and sanitary services	8,706	—	6,202	23,589	—	228	634	—
Wholesale and retail trade	1,045	—	1,313	7,489	—	11	14	—
Finance, insurance, and real estate	3,626	—	1,861	12,073	—	—	—	—
Services	7,735	—	4,219	10,168	—	—	2,473	—

^aIncludes the "gross-up" of certain foreign dividends.

^bIncludes returns with zero assets.

^cLess than \$500 per return.

NOTE: See text for explanatory statements and for "Description of the Sample and Limitations of the Data." Detail may not add to totals because of rounding.

The following explanations include definitions and limitations of data items and of classifications used, as well as descriptions of adjustments made in processing the statistics shown in this report. These explanations are designed as an aid in interpreting the statistical content of this report and should not be construed as interpretations of the Internal Revenue Code or related regulations, procedures, or policies. Code sections cited are those in effect during the period 1968-1972.

Active corporation returns

These returns were the basis for all financial statistics in this report. They comprised the vast majority of the returns filed and were defined for the statistics as returns of corporations reporting any income or deduction items.

Carryback or carryover

This was the remaining amount of subsequent or prior years' creditable foreign taxes in excess of the limitation, per-country or overall ("excess taxes"), for the year in which the taxes were paid, accrued, or deemed paid. These excess taxes were carried back or over and included with current-year creditable foreign taxes. Excess foreign taxes could be carried back 2 years and forward 5 years. They were applied against any "excess limitation" which was the amount by which the limitation on the credit was higher than creditable foreign taxes in a given year.

Excess taxes were first applied against excess limitation, if any, of the second preceding year, then of the first preceding year, and were then carried over to the first, second, and succeeding years through the fifth year. If they could not be included in the foreign tax credit by the fifth year, they could not be used. There is no information provided in the statistics on carrybacks because the excess tax carried back was reported only on amended returns and amended returns were not used for the statistics.

Neither the carryover nor carryback of excess taxes distinguished between taxes paid or accrued and taxes deemed paid. Rather, both of these were combined and reported as one figure on Form 1118.

Taxpayers could not credit excess taxes for a year in which one method of limitation was used against excess limitation for a year for which the other method was used. Also, a taxpayer could not carry back or carry over eligible foreign taxes in excess of the limitation to a year in which foreign taxes were taken as a deduction.

For purposes of determining the foreign tax credit, corporations using the per-country limitation were required to compute the carryback and carryover for each country separately. When the overall limitation was used, taxpayers were not required to report the amount of carryback or carryover on a country basis. However, it should be noted that the per-country limitation had to be used and a separate credit computed for taxes with respect to certain interest income, no matter which limitation method the corporation otherwise used (see "Interest for which separate credit was computed"). In addition, for taxable years beginning after December 31, 1971, the foreign tax credit limitation had to be computed separately with respect to the aggregate dividends received from all Domestic International Sales Corporations (DISC's).

Certain interest income

See "Interest for which separate credit was computed."

Consolidated returns

Consolidated returns were income tax returns which contained the combined financial data of two or more corporations meeting the following requirements: (1) a common parent corporation owned at least 80 percent of the voting power of all classes of stock and at least 80 percent of each class of nonvoting stock (except stock

which was limited and preferred as to dividends) of at least one member of the group, and (2) these same proportions of stock of each other member of the group were owned within the group.

The filing of a consolidated return for a parent corporation and its subsidiaries constituted an election of group reporting, which, with certain exceptions, had to be followed in subsequent years. The consolidated filing privilege could be granted to all affiliated domestic corporations connected through stock ownership with a common parent corporation except: (1) regulated investment companies, (2) real estate investment trusts, (3) corporations deriving a large percentage of their gross income from sources within a U.S. possession (including Puerto Rico), (4) corporations designated tax-exempt under Code section 501, (5) China Trade Act corporations, and (6) beginning with 1972, Domestic International Sales Corporations (DISC's). Affiliated insurance companies were allowed to file a consolidated return if they were taxable under the same provisions of the Code; however, noninsurance companies with which they also may have been affiliated could not be included in the same return.

A consolidated return, filed by the common parent company, was treated as a unit, each statistical classification being determined on the basis of the combined data of the affiliated group. Therefore, filing changes to or from a consolidated return basis affect year-to-year comparability of the statistics.

Creditable foreign taxes

Foreign taxes paid or accrued to foreign countries or U.S. possessions (including Puerto Rico) and to their political subdivisions eligible for the foreign tax credit against the U.S. income tax had to be either: (1) a tax on income, war profits, or excess profits, or (2) a tax in lieu of an income tax (Code section 903).

As in the case of taxable income from foreign sources, foreign income taxes paid, accrued, and deemed paid after 1966 included, for the first time, foreign income taxes attributable to a foreign corporation's foreign source income "effectively connected" with a trade or business in the United States. However, it should be noted that Code section 906(b) excluded taxes imposed by a foreign country or U.S. possession on the U.S. source income of a foreign corporation solely on the basis of the corporation's being created or organized under the laws of, or domiciled for tax purposes in, that country or U.S. possession.

For taxable years beginning after 1969, foreign income taxes paid or accrued to a foreign country or U.S. possession on foreign mineral income from sources within the country or possession had to be reduced, for foreign tax credit purposes, to the extent that the foreign taxes (or, if smaller, the amount of U.S. tax that would be computed on such income without the percentage depletion deduction) exceeded the U.S. tax on such income.

Creditable foreign taxes included both (1) foreign taxes directly paid or accrued by the U.S. corporation on profits of branch operations and withholding taxes on dividends, royalties, and like income; and (2) foreign taxes indirectly, or deemed, paid by the U.S. corporation, which were the taxes paid or accrued by a related (or first-tier) foreign corporation on the profits from which dividends were paid or constructive distributions were made to the U.S. corporation (see "Foreign taxes deemed paid"). Also included were the taxes paid by (1) second-tier foreign corporations which were deemed paid by the related foreign corporation and (2) third-tier foreign corporations which were deemed paid by the second-tier foreign corporation (1972 statistics only), when the second- and third-tier corporations were in the same chain of ownership (see the discussion under Public Law 91-684 in Section 1). Creditable taxes could also include amounts carried over of taxes paid or accrued and of taxes deemed paid in prior years.

Taxpayers could take creditable taxes as well as noncreditable taxes as a deduction in lieu of the foreign tax credit. However, since a U.S. corporation usually obtained a greater tax benefit by electing to take foreign taxes as a credit against U.S. income tax rather than as a deduction from gross income, only a negligible amount of creditable foreign taxes

was likely to have been excluded from coverage in this report.

Credit-limitation method

The limitation established a ceiling on the amount of foreign taxes which could actually be claimed as a credit in any one year, so that the taxpayer was subject to the higher of the U.S. or foreign tax rate on taxable income from foreign sources. The ceiling on the foreign tax credit prevented the credit from reducing that portion of the U.S. tax attributable to income derived from within the United States. Taxpayers were permitted to choose from two alternative limitations: (1) the per-country limitation and (2) the overall limitation.

The per-country limitation method applied unless the corporation specifically elected to use the overall limitation by indicating this on its Form 1118 for the taxable year to which the election applied. The initial election could be made without the consent of the Internal Revenue Service at any time before the end of the 3-year period prescribed by Code section 6511(a) for claiming a credit or refund of taxes for the year for which the election was made. The initial election could be revoked at any time without the Service's consent before the expiration of this 3-year period. If a proper and timely revocation was made, the corporation could make the initial election of the overall limitation for a later taxable year without Internal Revenue consent. However, once the corporation elected initially to use the overall limitation, and once the time had expired for revoking it without Internal Revenue consent, the corporation had to continue using the overall limitation for all subsequent years until revoked with Service consent.

As a result of the Tax Reform Act of 1969, such consent, however, was not required for the corporation's first taxable year beginning after December 31, 1969. If the corporation did change over to the per-country limitation, it could, nevertheless, later make a new election, without the Service's consent, to use the overall limitation.

Generally, a request for consent to revoke an election or make a new election would be granted if the basic nature of the corporation's business changed or if there were changes in conditions in a foreign country which substantially affected the taxpayer's business. For example, a corporation that entered substantial operations in a new foreign

country or that lost existing investment due to nationalization, expropriation, or war would be granted consent to revoke an election or to make a new election.

Under the per-country limitation, the tax credit was computed separately for each foreign country or U.S. possession (including Puerto Rico). The credit for foreign taxes paid to each country was limited to that proportion of U.S. income tax which taxable income from the country or possession bore to total taxable income. The formula used was:

$$\text{U. S. income tax before credits} \times \frac{\text{Taxable income from sources within the foreign country or U. S. possession}}{\text{Taxable income from all sources, foreign and domestic}}$$

This fraction could never exceed 1; Code section 904(a)(1) specifically provided that the numerator could not exceed the denominator.

In the case of foreign corporations with income "effectively connected" with a U.S. business, the taxable income from foreign sources in the numerator was the taxable income from foreign sources which was "effectively connected" with the U.S. trade or business.

Under the overall limitation, the amount of credit was computed based on the sum of foreign taxes paid to all foreign countries and U.S. possessions. As a result, the foreign tax credit computed under this method was not reported by country. The credit could not exceed the proportion of U.S. income tax which taxable income from all foreign sources bore to total taxable income. The formula used was:

$$\text{U. S. income tax before credits} \times \frac{\text{Taxable income from all foreign sources and U. S. possessions}}{\text{Taxable income from all sources, foreign and domestic}}$$

As was true for the per-country limitation, this fraction could never exceed 1; section 904(a)(2) specifically provided that the numerator could not exceed the denominator.

No matter which limitation method was elected, the total foreign tax credit claimed could not exceed the U.S. income tax before credits and, therefore, result in a refund of U.S. taxes.

The Revenue Act of 1962 provided special rules for the limitation computation in the year

of actual receipt of previously taxed undistributed profits of Controlled Foreign Corporations in order to avoid a reduction in foreign tax credit that would otherwise result. Under Code section 960(b), in cases where constructive taxable income was reported for a prior year under the "includable income" provisions of Subpart F of the Code and this income was distributed as dividends in a subsequent year, foreign taxes paid or accrued or deemed paid with respect to the dividends which were incurred in the year of actual distribution, could be credited notwithstanding the fact that the dividends were excluded from income for U.S. tax purposes in the year they were actually distributed. In order to prevent such eligible taxes from exceeding the limitation (because the dividends on which they were based were excluded from taxable income from foreign sources, thereby lowering the ceiling or limitation on foreign taxes), the taxpayer was allowed to raise the ceiling or limitation as follows: The limitation on the foreign tax credit in the year the dividend was received was increased by the amount of the limitation of the prior year attributable to the constructive taxable income (see "Includable income of Controlled Foreign Corporations") for that year less the amount of foreign taxes credited with respect to this constructive income. However, the increase in the limitation could not exceed the foreign income taxes paid or deemed paid on the dividend distribution in the current year.

A separate computation was required to obtain the credit limitation for foreign taxes on certain interest income. This computation was on a per-country basis, regardless of the limitation method used for other foreign source income (see "Interest for which separate credit was computed"). In addition, for dividends received from Domestic International Sales Corporations (DISC's), the credit limitation was computed separately with respect to the aggregate amount of such dividends.

See also "Foreign tax credit claimed" for a discussion of the limitation on the credit attributable to the "minimum distribution" election in the case of Controlled Foreign Corporation profits.

Dividends paid by related foreign corporations

These dividends were paid by related (or first-tier) foreign corporations, i.e., foreign

corporations in which a U.S. corporation directly owned 10 percent or more of the voting stock. The U.S. corporation, upon receipt of these dividends, included them in its taxable income, and the dividends thereby became subject to the U.S. income tax.

As a result of the Revenue Act of 1962, dividends had to be "grossed-up" for U.S. tax purposes by the foreign taxes deemed paid with respect to them, in the case of economically developed country corporations (see "Foreign dividend income resulting from foreign taxes deemed paid"). A proportionate share of the foreign taxes attributable to the dividends paid by related foreign corporations were deemed paid by the U.S. corporation and could be credited against the corporation's U.S. tax liability.

In order to determine the foreign taxes for which the tax credit could be taken, the dividends had to be traced to the particular year's profits from which they were paid (see Schedule B, Form 1118). Dividends were treated as having been paid from the most recently earned profits. Dividends paid in the first 60 days of any year were deemed to be from profits earned in the immediately preceding year.

In Schedule B, Form 1118, the dividends paid and the foreign taxes deemed paid were shown as if they were entirely for the country where the related foreign corporation was incorporated. However, if the dividends and the related taxes were derived from, or associated with, a country of operation or a principal place of business (as shown in Schedule A, Form 1118) other than the country of incorporation, these dividends and taxes were attributed to the country of principal place of business rather than the country of incorporation for purposes of the statistics. For a further discussion, see "Country classification" in Section 1.

As discussed under "Foreign taxes deemed paid," the computation of the credit for taxes deemed paid in regard to constructively received income of U.S. corporations attributable to the profits of both first- and second-tier foreign corporations that were Controlled Foreign Corporations was made in Schedule B of Form 1118, in the same manner as for dividends received by the U.S. corporation from related (or first-tier) foreign corporations. Both the dividends and the constructive distributions were reported in column 7 of Schedule B and, consequently, for purposes of the statistics, they were both

included in "Dividends paid by related foreign corporations." However, it should be noted that constructively received income of U.S. corporations was reported separately in the dividend schedule of the corporation income tax return and is shown in the statistics as "Includable income of Controlled Foreign Corporations."

Dividends paid by third-tier foreign corporations to second-tier foreign corporations

As a result of Public Law 91-684, Code section 902 was amended to include third-tier foreign corporation distributions, if at least 10 percent of the voting stock of the third-tier foreign corporation was owned by a second-tier foreign corporation and the U.S. corporation had at least a 5 percent indirect ownership in the third-tier foreign corporation. Thus, after January 12, 1971, foreign income taxes paid by third-tier foreign corporations to second-tier foreign corporations could be included in the foreign tax credit computation at the second-tier level as taxes deemed paid by the second-tier foreign corporation. The dividends paid by third-tier to second-tier foreign corporations, which were used in the computation of taxes deemed paid at that level, were reported in Schedule D of Form 1118 (see "Foreign taxes deemed paid").

Dividends paid to related foreign corporations by subsidiaries (1968 statistics)

and

Dividends paid to related foreign corporations by second-tier foreign corporations (1972 statistics)

Section 902 of the Code provided that a proportionate share of the foreign taxes attributable to the dividends paid by related (or first-tier) foreign corporations to a U.S. corporation was deemed paid by the U.S. corporation. In addition, a related foreign corporation was deemed to have paid a proportionate share of the foreign taxes attributable to the dividends paid to it by a subsidiary (or second-tier) foreign corporation in which the related foreign corporation owned 50 percent or more of the voting stock, or at least 10 percent of the voting stock after January 12, 1971, if the U.S. corporation had at least a 5 percent indirect ownership in the second-tier foreign corporation.

As a result, the computation of foreign taxes deemed paid by the U.S. corporation in Schedule B of Form 1118 included both the taxes paid or accrued and the taxes deemed paid by related foreign corporations. The dividends paid to related foreign corporations by subsidiaries, i.e., foreign corporations in which the related foreign corporation owned at least 50 percent or more of the voting stock (1968 statistics) and by second-tier foreign corporations i.e., foreign corporations in which the related foreign corporation owned at least 10 percent of the voting stock (1972 statistics), were used in the computation of foreign taxes deemed paid by related foreign corporations, and were reported in Schedule C of Form 1118.

Dividends received from DISC's
(Domestic International Sales
Corporations)

See the discussion on the Revenue Act of 1971 relating to Domestic International Sales Corporations (DISC's) in Section 1. For 1972, the tables with data classified by country show an additional grouping called "DISC dividends." This is explained under "Country classification" in Section 1.

Dividends received from foreign
corporations

These dividends were paid from current as well as prior years' profits of companies incorporated in foreign countries.

Dividends from foreign corporations included:

(1) dividends, subject to the 85 percent deduction, received by U.S. corporations from those foreign corporations at least 50 percent or more of whose gross income was "effectively connected" with business conducted in the United States,

(2) dividends, subject to the 100 percent deduction, received by U.S. corporations from wholly-owned foreign subsidiaries, all of whose gross income was "effectively connected" with the conduct of a U.S. trade or business, and

(3) any other foreign dividends, not subject to a deduction, which included--

(a) "minimum distributions" of Controlled Foreign Corporation profits under Subpart F of the Code, and

(b) certain gains from the sale, exchange, or redemption of Controlled Foreign Corporation stock.

Excluded from the statistics for dividends received from foreign corporations was the "gross-up" of

foreign taxes paid or deemed paid on the profits from which the dividends of related foreign corporations incorporated in economically developed countries were distributed. This was done even though the "gross-up" was considered by law to be part of the dividends received. Also excluded was income only constructively received from foreign corporations controlled by U.S. stockholders, which was reported in the dividend schedule of the corporation income tax return as "Includable income of Controlled Foreign Corporations," along with the "gross-up" associated with this income. If these amounts were actually distributed at a later date, they were neither retaxed nor reported.

Two measures of foreign dividends received by U.S. corporations are shown in this report. The first discussed above relates to the total dividends received from foreign corporations reported in the dividend schedule of the corporation income tax return. The second pertains to the dividends paid by related foreign corporations (reported in Schedule B of Form 1118) and is discussed under that term in this section.

Economically developed and
less-developed countries

In the tables presenting data on the geographic location of U.S. corporate operations abroad, the countries are not only grouped into subareas and areas, but also into categories based on the stage of their economic development. These groupings are "Not economically less-developed countries," i.e., economically developed countries, "Economically less-developed countries," and "Sino-Soviet Bloc."

On the basis of the provisions of Code section 955(c)(3) and Executive Order 11071, effective December 31, 1962, the following areas were designated as economically less-developed countries:

(1) all foreign countries (including trust territories) other than Australia, Austria, Belgium, Canada, Denmark, France, Italy, Japan, Liechtenstein, Luxembourg, Monaco, Netherlands, New Zealand, Norway, San Marino, South Africa, Spain, Sweden, Switzerland, United Kingdom, West Germany, and any country within the "Sino-Soviet Bloc;"

(2) each overseas territory, department, province, and possession (other than Hong Kong) of any foreign country other than of a country within the "Sino-Soviet Bloc;" and

(3) Puerto Rico and U.S. possessions.

As a result, the category "economically developed countries" included those listed in (1) above (excluding the "Sino-Soviet Bloc") and Hong Kong. However, it should be noted that while "Sino-Soviet Bloc" countries were not included in the statistics for economically developed countries, they were treated as such under the Code in determining whether or not a foreign corporation was an economically developed country corporation.

The Revenue Act of 1962 provided certain tax advantages for operations in economically less-developed countries.

(1) Under Subpart F of the Code certain undistributed profits of Controlled Foreign Corporations were included in the gross income of U.S. corporations for tax purposes (see "Includable income of Controlled Foreign Corporations"). The U.S. corporation's pro rata share of the Controlled Foreign Corporation's dividends, interest, and net gains from sales or exchanges of property attributable to qualified investments in economically less-developed countries was excluded from "foreign base company income," the major component of Subpart F income. This advantage was maintained unless the investment was withdrawn from the economically less-developed country.

(2) The U.S. corporation electing to receive a "minimum distribution" of dividends from all of its Controlled Foreign Corporations (in order to avoid including Subpart F income in gross income) could elect to exclude the profits of all such foreign corporations which qualified as economically less-developed country corporations from the computation of the minimum distribution. There was one exception though. The profits of an economically less-developed country corporation could not be excluded if the U.S. corporation had indirect control of an economically developed country corporation through ownership in the economically less-developed country corporation.

(3) When dividends were paid by an economically less-developed country corporation, the foreign taxes deemed paid with respect to these dividends for which a foreign tax credit was claimed were not used to "gross-up" the dividends and thereby increase U.S. taxable income as they were in the case of economically developed country corporations. Accordingly, the credit for foreign taxes deemed paid was computed in the same manner for economically less-developed

country corporations as it was for all corporations prior to the 1962 Act when there was no "gross-up" provision.

It is important to note that incorporation in an economically less-developed country did not automatically qualify the foreign corporation as an economically less-developed country corporation. To qualify as an economically less-developed country corporation under Code section 955(c)(1) the foreign corporation (not necessarily incorporated in an economically less-developed country) had to be engaged in the active conduct of a trade or business and:

(1) at least 80 percent of its gross income for the taxable year had to be derived from sources within economically less-developed countries; and

(2) at least 80 percent or more of the value of its assets on each day of the taxable year had to consist of property used in such trades or businesses and be located in economically less-developed countries. Money, bank deposits, stock of other economically less-developed country corporations, and certain other types of property could be counted in with the qualifying assets, even though not located in an economically less-developed country.

In addition, for foreign tax credit purposes, Code section 902(d) provided that a foreign corporation owning at least 10 percent or more of the voting stock of an economically less-developed country corporation was also itself considered to be an economically less-developed country corporation if it met both of the 80 percent tests specified above.

A shipping or aircraft company could qualify as an economically less-developed country corporation under section 955(c)(2) if it was a foreign corporation (not necessarily incorporated in an economically less-developed country) which:

(1) derived at least 80 percent of its gross income for the taxable year from the use in foreign commerce of aircraft or vessels registered under the laws of an economically less-developed country, or the performance of services directly related to the use of such aircraft or vessels, or the sale or exchange of such aircraft or vessels; and from dividends and interest received from foreign corporations which were themselves economically less-developed country corporations, in which the foreign corporation owned at least 10 percent of the voting stock, and gain from the

sale or exchange of stock of such economically less-developed country corporations; and

(2) had at least 80 percent of its assets on each day of the taxable year consisting of assets used, or held for use, in connection with the production of income described above in (1) and of property which was not considered "U.S. property," although located in the United States, because it was used in foreign commerce as described in section 956(b)(2).

Foreign dividend income resulting from foreign taxes deemed paid ("Foreign dividend gross-up")

This term applied to certain foreign taxes on profits of related foreign corporations that did not qualify as less-developed country corporations (see "Economically developed and less-developed countries"). Section 78 of the Code provided that when dividends were distributed to a U.S. corporation from these foreign profits, the U.S. corporation was required to increase (or "gross-up") such dividends received by the amount of the foreign taxes deemed paid with respect to these dividends if the U.S. corporation claimed a foreign tax credit for these taxes. Also, foreign taxes deemed paid with respect to includable income of Controlled Foreign Corporations were used to "gross-up" this constructively received income and thus constituted a part of the foreign dividend income resulting from foreign taxes deemed paid.

The computation of foreign taxes deemed paid is discussed under that term in this section.

Although the foreign taxes deemed paid, described above, were treated as dividend income for U.S. tax purposes, they are shown separately in the statistics as "Foreign dividend income resulting from foreign taxes deemed paid" and have been excluded from the statistics for foreign dividends and includable income of Controlled Foreign Corporations.

Foreign tax credit claimed

Foreign tax credit claimed was based on Code sections 901-906, 960, and 963(f) and could only be claimed by U.S. corporations against their normal tax, surtax and alternative tax and any "surcharge" based on those taxes for income, war profits, and excess profits taxes paid, accrued, or deemed paid to foreign countries or U.S. possessions (including Puerto Rico).

Whenever the foreign tax credit was taken, the alternative option, a business deduction from gross

income for foreign taxes could not be taken in computing taxable income. Also, a business deduction could not be taken for excess taxes carried over from a year in which the foreign tax credit was claimed.

The amount of the foreign tax credit was limited. Code section 904 provided two alternative methods of computing the credit: (1) the per-country limitation and (2) the overall limitation (see "Credit-limitation method").

Generally, income of all types could be combined for purposes of computing the foreign tax credit. However, there were exceptions for certain interest income (see "Interest for which separate credit was computed") and after 1971, for dividends received from Domestic International Sales Corporations ("DISC dividends"). The credit was computed separately for the taxes on the certain interest referred to above, using the per-country limitation, regardless of the limitation method used for the corporation's other foreign income. For DISC dividends, the foreign tax credit limitation was computed separately with respect to aggregate dividends received from all DISC's.

Some corporations were not permitted to claim the entire amount of their computed foreign tax credit because the income tax regulations under section 963(f) provided that, under certain circumstances, there had to be a partial deferral of the credit to a future year. The reason for this was that when the U.S. corporation elected to receive a "minimum distribution" from Controlled Foreign Corporations in order to exclude certain undistributed profits of these foreign corporations from its gross income, the foreign tax credit for taxes deemed paid with respect to these dividend distributions generally could not reduce the overall U.S. and foreign income tax liability on the dividends to less than 90 percent of the U.S. normal tax and surtax rates applied to the total pretax and predistribution foreign profits from which the dividends were paid.

The Foreign Investors Tax Act of 1966 allowed foreign corporations to claim the foreign tax credit starting with 1967 for foreign taxes on income "effectively connected" with business operations in the United States.

Foreign taxes in excess of the limitation for any one year could be carried back, chronologically, to the 2 preceding years and then carried over, chronologically, to the 5 succeeding years, subject to the foreign tax credit limitation of the years to which they were carried. (Foreign corporations

doing business in the United States could not carry unused taxes either to or from taxable years beginning before 1967.) Any excess foreign taxes remaining at the end of the carryover period could not be claimed.

With the exception of foreign corporations doing business in the United States, the statistics for each year, therefore, include excess foreign taxes carried over from the 5 preceding years. However, because Statistics of Income is based on returns as originally filed, the amount of excess foreign taxes carried back from the 2 succeeding years for inclusion in a recomputed foreign tax credit for the year shown is not available. Therefore, the statistics for the credit for each year are necessarily incomplete.

Foreign tax credit computed

This is the amount shown on the Form 1118, "Computation of Foreign Tax Credit--Corporations." The tables show both total foreign tax credit computed and the separate foreign tax credit computed for taxes on (1) DISC dividends (1972 statistics only) and (2) certain interest. In some instances, the total foreign tax credit computed was greater than the foreign tax credit claimed on the corporation income tax return (Forms 1120, 1120F, 1120L, and 1120M) which limited the credit claimed to U.S. income tax before credits.

For the most part, this situation occurred on returns with the per-country limitation method of computing the credit, when there was a net loss from the operations in one or more foreign countries. Under this limitation method, the tax credit was computed separately for each country or U.S. possession (including Puerto Rico) for which there was both taxable income and eligible foreign taxes, using the following formula:

$$\begin{array}{r} \text{U. S. income} \\ \text{tax before} \\ \text{credits} \end{array} \times \begin{array}{l} \text{Taxable income from} \\ \text{sources within the} \\ \text{foreign country or} \\ \text{U. S. possession} \\ \text{Taxable income from} \\ \text{all sources, foreign} \\ \text{and domestic} \end{array}$$

Consequently, when countries with loss operations were involved, the sum of the taxable income from each country with profitable operations (which was used in the numerator of the formula for computing the credit limitation for each country as shown above) exceeded the corporation's total net taxable income from foreign sources, which included the corporation's foreign loss operations. As a result, the

foreign tax credit computed on the Form 1118 could exceed the corporation's U.S. tax liability on total income subject to U.S. tax, an amount that reflected losses as well as income. Foreign tax credit computed on Form 1118 in excess of foreign tax credit claimed on the corporation income tax return could also occur when a corporation using the per-country limitation had an overall loss from its domestic operations which was less than the overall profits from its foreign operations.

In addition, under either limitation method, some taxpayers were not permitted to claim the full foreign tax credit computed because the income tax regulations under Code section 963(f) provided that, under certain circumstances, there had to be a partial deferral of the credit to a future year (see "Foreign tax credit claimed").

Foreign taxes

Foreign taxes for foreign tax credit purposes consisted of (1) foreign taxes paid or accrued, (2) foreign taxes deemed paid, and (3) carryback or carryover of excess taxes from other years. See the discussion of these terms and also "Creditable foreign taxes" in this section.

Foreign taxes deemed paid

When a U.S. corporation received a dividend from a foreign corporation in which it owned 10 percent or more of the voting stock, it could claim a credit for a proportionate amount of the foreign taxes paid by the related foreign corporation on the profits out of which the dividends were paid. In addition, when a U.S. corporation was required to include in its gross income certain undistributed profits of a Controlled Foreign Corporation (see "Includable income of Controlled Foreign Corporations"), it could also claim a credit for a proportionate amount of the foreign taxes paid on these profits.

A. Foreign taxes deemed paid in regard to dividends

When dividends were received by a U.S. corporation from a related (or first-tier) foreign corporation, Code section 902 provided that the U.S. corporation was deemed to have paid a proportionate share of the foreign taxes paid (or accrued) or deemed paid by the related foreign corporation on the profits out of which the dividends were paid. The related (or first-tier) foreign corporation was, in turn, deemed to have

paid a proportionate share of the foreign taxes paid or deemed paid by a second-tier foreign corporation in which the related foreign corporation owned (a) at least 50 percent of the voting stock or (b) after January 12, 1971, at least 10 percent of the voting stock, if the U.S. corporation had at least a 5 percent indirect voting stock interest in the second-tier foreign corporation. Also, after January 12, 1971, if the second-tier foreign corporation had at least a 10 percent voting stock interest in a third-tier foreign corporation and the U.S. corporation had at least a 5 percent indirect voting stock interest in the third-tier foreign corporation, then the second-tier foreign corporation was deemed to have paid a proportionate share of the foreign taxes paid by the third-tier foreign corporation. The taxes of lower-tier foreign corporations were not eligible for the credit for foreign taxes deemed paid.

The U.S. corporation could, therefore, claim a credit for the foreign taxes of a related foreign corporation and of second- and third-tier foreign corporations in the same chain of ownership, as if the U.S. corporation itself had paid the foreign taxes. However, the credit for foreign taxes deemed paid did not apply until foreign dividends were paid out of the profits of the related foreign corporation to the U.S. corporation.

Different rules for computing foreign taxes deemed paid were prescribed depending on whether the related foreign corporation was an economically developed or an economically less-developed country corporation (see the discussion under "Economically developed and less-developed countries"). It was the status of the related (or first-tier) foreign corporation that determined the computation used for both the first-tier and lower-tier foreign corporations in the same chain of ownership.

When dividends were paid, the credit of the U.S. corporation was based upon the dividends distributed to it by the first-tier foreign corporation. In the case of second- and third-tier foreign corporations, the credit resulted from dividends distributed (a) by the third-tier foreign corporation to the second-tier foreign corporation and (b) by the second-tier foreign corporation to the first-tier foreign corporation. The profits of the first-tier foreign corporation out of which dividends were paid to the U.S. corporation, thereby, included the dividends it received from the second-tier

foreign corporation. Likewise, the profits of the second-tier foreign corporation out of which dividends were paid to the first-tier foreign corporation included the dividends it received from the third-tier foreign corporation. When foreign taxes deemed paid by the U.S. corporation were computed, the computation included not only the direct taxes paid by the related (or first-tier) foreign corporation, but also the indirect taxes, i.e., the taxes deemed paid by the related foreign corporation. The latter included both the direct taxes paid by the second-tier foreign corporation as well as the indirect taxes it was deemed to have paid. The taxes it was deemed to have paid, in turn, represented the direct taxes of the third-tier foreign corporation.

To determine foreign taxes deemed paid, the dividends paid first had to be attributed to a particular year's profits. If the dividends were from the profits of more than 1 year, the taxes deemed paid had to be computed separately for each year. The results of each separate calculation were then aggregated to determine total foreign taxes deemed paid.

In general, dividends paid in the first 60 days of the year were deemed paid from the profits of the preceding year. In all other cases dividends were deemed paid from the profits most recently earned. The dividends paid were attributed first to the extent of profits of the current year, and then to the profits of each prior year, starting with the latest year, to the extent that there were profits in those years. For example, if a related foreign corporation had profits of \$1,000,000 in 1972 against which \$300,000 in taxes were paid, profits of \$800,000 in 1971 against which \$225,000 in taxes were paid, and profits of \$700,000 in 1970 against which \$200,000 in taxes were paid, profits after taxes for the three years would amount to \$700,000, \$575,000, and \$500,000, respectively. If dividends of \$1,200,000 were declared in 1972 after the 60-day period, they were first attributed to the \$700,000 of profits after taxes for 1972, and then to \$500,000 of the profits after taxes for 1971. Profits after taxes of \$75,000 for 1971, and \$500,000 for 1970, remained as amounts against which future dividends could be attributed and for which a credit for foreign taxes deemed paid could be claimed. Since the dividends were paid out of the profits for 1972 and then 1971, the foreign taxes eligible for credit were those

paid and deemed paid for 1972 and 1971 by the related foreign corporation. Similar calculations were made based on the profits and taxes of second- and third-tier foreign corporations to determine the foreign taxes deemed paid by first- and second-tier foreign corporations, respectively.

The computation of foreign taxes deemed paid by the U.S. corporation when there were only two tiers of foreign corporations, a related (or first-tier) foreign corporation and a second-tier foreign corporation, involved, were separated into the several steps shown below as indicated in Schedules B and C of Form 1118. (Schedule B pertained to related, or first-tier, foreign corporations and Schedule C, to second-tier foreign corporations).

(1) To determine foreign taxes deemed paid by a related (or first-tier) foreign corporation, which was an economically less-developed country corporation on dividends received from a second-tier foreign corporation, which was either an economically developed country corporation or an economically less-developed country corporation:

(a) Profits after taxes (from which dividends were paid) of second-tier foreign corporation
Profits before taxes

X

Foreign taxes paid on profits before taxes by second-tier foreign corporation

=

Foreign taxes paid on profits after taxes (from which dividends were paid) of second-tier foreign corporation

(b) Dividends paid by second-tier foreign corporation to related foreign corporation
Profits after taxes (from which dividends were paid)

X

Foreign taxes paid on profits after taxes (from which dividends were paid), the result obtained in (a)

=

Foreign taxes deemed paid by related foreign corporation on dividends received from second-tier foreign corporation

(2) To determine foreign taxes deemed paid by the U.S. corporation on dividends received from a related (or first-tier) foreign corporation:

(a) The related foreign corporation's taxes paid on its profits after taxes was computed in the same manner as in (1)(a) above, except that in place of the taxes of the second-tier foreign corporation the taxes of the related (or first-tier) foreign corporation was used.

(b) Dividends paid by related foreign corporation to U. S. corporation
Profits after taxes (from which dividends were paid)

X

Foreign taxes paid on profits after taxes (from which dividends were paid), from (2)(a) above, plus foreign taxes deemed paid by related foreign corporation, from (1)(b) above

=

Foreign taxes deemed paid by U. S. corporation on dividends received from related foreign corporation

(3) To determine foreign taxes deemed paid by a related (or first-tier) foreign corporation, which was an economically developed country corporation, on dividends received from a second-tier foreign corporation, which was either an economically developed country corporation or an economically less-developed country corporation:

Dividends paid by second-tier foreign corporation to related foreign corporation
Profits after taxes (from which dividends were paid)

X

Foreign taxes paid on profits before taxes by second-tier foreign corporation

=

Foreign taxes deemed paid by related foreign corporation on dividends received from second-tier foreign corporation

(4) To determine foreign taxes deemed paid by the U.S. corporation on dividends received from a related (or first-tier) foreign corporation:

Dividends paid by related foreign corporation to U. S. corporation
Profits after taxes (from which dividends were paid)

X

Foreign taxes paid on profits before taxes plus foreign taxes deemed paid by related foreign corporation, from (3) above

=

Foreign taxes deemed paid by U. S. corporation on dividends received from related foreign corporation

The above computations illustrate the steps required when there were two tiers of foreign corporations, a related (or first-tier) foreign corporation and a second-tier foreign corporation. When there were no dividends paid by the second-tier foreign corporation to the related foreign corporation, the step involving the second-tier corporation was omitted.

Schedule D, which was added to the Form 1118 as a result of Public Law 91-684, provided for the computation of foreign taxes deemed paid by a second-tier foreign corporation on dividends received from a third-tier foreign corporation after January 12, 1971. The computation was similar to that described above for Schedule C, which was used for the computation of foreign taxes deemed paid by a related foreign corporation on dividends received from a second-tier foreign corporation.

The two-step computation for economically less-developed country corporations was the computation applicable to all corporations prior to the Revenue Act of 1962. The first step was to determine the proportion of total foreign taxes that was attributable to profits after taxes (from which dividends were paid). The second step was to determine the proportion of dividends that was paid out of profits after taxes and then to apply that proportion against taxes on the after-tax profits from which dividends were paid to determine the foreign taxes deemed paid with respect to the dividends. The effective result was:

<u>Dividends paid</u> Profits before taxes	X	Foreign taxes paid on profits before taxes
---	---	--

For economically less-developed country corporations only the profits after taxes (from which dividends were paid), and not the profits before taxes, were subject to the U.S. income tax when the profits were remitted to the U.S. corporation as dividends. As the computation for foreign taxes deemed paid shows, only that proportionate share of foreign

taxes paid by the related (or first-tier) foreign corporation based on the ratio of profits after taxes (from which dividends were paid) to profits before taxes was included in the computation.

However, as a result of the Revenue Act of 1962, the definition of foreign taxes deemed paid with respect to dividends received from economically developed country corporations was changed. This was accomplished by changing the definition of the profits used in the computation for these corporations so that it was before taxes. Consequently, it was no longer necessary to determine the proportion of total foreign taxes attributable to profits after taxes (as had to be done for economically less-developed country corporations). Therefore, the first step of the computation used for economically less-developed country corporations was eliminated and the remaining step in the computation of foreign taxes deemed paid became:

<u>Dividends paid</u> Profits after taxes (out of which dividends were paid)	X	Foreign taxes paid on profits before taxes
---	---	--

As can be seen by the above computation, under the 1962 Act, the credit for foreign taxes deemed paid was greater in the case of economically developed country corporations than it was prior to the Act. However, the Act also provided that U.S. corporations increase their taxable income by "grossing-up" the dividends received from economically developed country corporations by the amount of foreign taxes deemed paid. As a result, the profits before taxes and not just the profits after taxes were subject to the U.S. income tax when the after-tax profits were distributed as dividends. Thus, while the credit for foreign taxes deemed paid by U.S. corporations in the case of dividends received from economically developed country corporations was greater as a result of the 1962 Act, the increase in credit was more than offset by the Act's requirement for also including the foreign taxes deemed paid in U.S. taxable income. (These new provisions did not apply to economically less-developed country corporations so as not to discourage investment in these countries.)

B. Foreign taxes deemed paid in regard to certain undistributed profits

Code section 960 provided special rules regarding the credit for foreign taxes deemed paid when undistributed profits of Controlled Foreign Corporations were constructively received by a U.S. corporation. The credit was only allowed in regard to taxes on profits of first- and second-tier foreign corporations and, in addition, a second-tier foreign corporation was treated for purposes of computing foreign taxes deemed paid as if it were a first-tier foreign corporation. (The computation of the deemed paid credit for both the first- and second-tier foreign corporations was made in Schedule B of Form 1118).

Consequently, constructive income attributable to the profits of the second-tier foreign corporation did not pass through the related (or first-tier) foreign corporation as was the case when dividends were paid by second-tier foreign corporations. Also, while the ownership requirement of the U.S. corporation in the first-tier foreign corporation was at least 10 percent of the voting stock, in the case of the second-tier foreign corporation, the first-tier foreign corporation had to own at least 50 percent of the voting stock. Finally, special rules were provided for the computation of the foreign tax credit in the year of actual receipt in the form of dividends of the previously taxed profits of Controlled Foreign Corporations (see "Credit-limitation method").

The method of computing foreign taxes deemed paid on constructive income attributable to the profits of economically developed and less developed country corporations was the same as that described above for dividends. Likewise, constructive income from economically developed country corporations was required to be "grossed-up" by the amount of foreign taxes deemed paid.

Foreign taxes paid or accrued

Foreign taxes paid or accrued by the U.S. corporation were income, war profits, and excess profits taxes paid or accrued to foreign countries or U.S. possessions (including Puerto Rico) and to their political subdivisions. These taxes included (1) taxes withheld on dividends, interest, royalties, and similar remittances; (2) taxes paid or accrued on profits of foreign branches; and (3)

qualifying amounts paid or accrued in lieu of a foreign income or profits tax.

Under Code section 901, the computation of a U.S. corporation's foreign tax credit included foreign taxes paid or accrued by the U.S. corporation if these taxes met certain requirements (see "Creditable foreign taxes"). Under Code sections 902 and 960, taxes paid or accrued by a related foreign corporation could be "creditable" as foreign taxes deemed paid by the U.S. corporation, provided such taxes otherwise qualified as creditable taxes. The U.S. corporation had to receive a dividend from a related foreign corporation or a constructive distribution from a Controlled Foreign Corporation before taking the credit for taxes deemed paid (see "Foreign taxes deemed paid"). Moreover, all of the taxes referred to above must actually have been paid, or normally have been accrued in a way that fixed the amount of the tax and established the liability of the taxpayer to pay it, before they qualified as creditable. If later payment of the tax differed from the amount of the tax formerly accrued, the foreign tax credit had to be adjusted accordingly for the year the credit was taken.

Form 1118

The Form 1118, "Computation of Foreign Tax Credit--Corporations," was required to be filed by any

corporation claiming a credit for (1) income, war profits, or excess profits tax paid or accrued during the taxable year to any foreign country or U.S. possession (including Puerto Rico) and (2) foreign taxes deemed paid under Code sections 902 and 960. A facsimile of this form is provided in Section 5. Taxpayers sometimes provided their own equivalent statements in lieu of the prescribed form. The statistics from these statements are included in the data for "Returns with Form 1118 filed in support of foreign tax credit claimed."

Geographic classification: area or country

Corporations claiming a foreign tax credit were required to report, on Form 1118, the foreign countries and U.S. possessions (including Puerto Rico) to which taxable income was attributed or to which foreign taxes were paid, accrued, or deemed paid. The grouping of the countries into areas and subareas in the tables was based on the classification of country designations used by the Department of Commerce in compiling U.S. foreign trade statistics.

The various components of taxable income from foreign sources were attributed to specific foreign countries in accordance with the "source of income" rules in Code sections 861-864 which are summarized below.

Although there were tax treaties with various countries, the source rules in most treaties were generally similar to those found in the Code.

It should be noted that while most dividend income which the U.S. corporation received from a related foreign corporation, and the foreign taxes paid or deemed paid on this income, was derived from the country in which the related foreign corporation was incorporated, the foreign corporation may have conducted business in other countries as well. In certain instances, the principal place of business of the foreign corporation was outside the country of incorporation and, when this was shown on the Form 1118, the dividends and related taxes were attributed to the country of principal place of business rather than to the country of incorporation. In addition, the 1968 statistics for "Dividends paid to related foreign corporations by subsidiaries" and the 1972 statistics for both "Dividends paid to related foreign corporations by second-tier foreign corporations" and "Dividends paid by third-tier foreign corporations to second-tier foreign corporations" were classified by the related foreign corporation's country of incorporation, even though these lower-tier foreign corporations may have been incorporated in countries different from that of the related foreign corporation. (For further

Component of taxable income	Origin of income	Attribution of income rule
Branch profits.....	(a) Purchase and resale of personal property.	Country in which property was sold.
	(b) Production and sale of personal property except natural deposits when sale took place outside country of production.	Part to country of production and part to country in which property was sold.
	(c) Extraction and sale of natural deposits.	Generally to the country in which extraction took place.
Dividend income.....	Ownership of stock of a foreign corporation.	Country in which the foreign corporation was incorporated.
Rental income.....	Rental of real and personal property.	Country of location of real and personal property.
Royalty income.....	Patents, copyrights, or licenses.....	Country where patents, copyrights, or privileges were used.
Interest.....	Interest-bearing obligations.....	Country of residence of the payer.
Income from sale of real property.....	Sale of real property.....	Country of location of real property.
Compensation for labor or personal services.	Personal services.....	Country where services were performed.

discussion of this, see "Country classification" in Section 1.)

Corporations using the overall limitation method did not report on a country basis excess taxes carried over from prior years that were included in their total creditable foreign taxes, nor did they determine the foreign tax credit on a country basis. Therefore, data for foreign tax carry-over, total foreign taxes, and foreign tax credit are not available by country or area when the overall limitation method was used.

The amounts of foreign income and taxes shown in the statistics for "Country not stated or not allocable and other income from outside the United States" include foreign income earned on the high seas and, therefore, not related to any specific country, as well as income and taxes which could not be allocated to a geographic area or a specific country.

In addition to the geographic classification of the data by area, subarea, and country, the countries are grouped for the statistics into categories based on their stage of economic development (see "Economically developed and less-developed countries") and, also, for 1972, into a new classification, "OPEC countries." For 1972, the members of the Organization of Petroleum Exporting Countries (OPEC) were:

Algeria	Libya
Ecuador	Nigeria
Indonesia	Qatar
Iran	Saudi Arabia
Iraq	United Arab Emirates
Kuwait	Venezuela

(See also the discussion under "Relationship of U.S. corporation statistics to country statistics" in Section 1.)

Gross-up

See "Foreign dividend income resulting from foreign taxes deemed paid."

Includable income of Controlled Foreign Corporations

Prior to the Revenue Act of 1962, the U.S. stockholder's share in the profits of a foreign corporation was not subject to the U.S. income tax until the profits were repatriated to the U.S. stockholder in the form of a dividend.

The 1962 Act added "Subpart F--Controlled Foreign Corporations" to the Code (sections 951-964). Code section 951 provided that U.S. stockholders include in their gross income certain undistributed profits of foreign corporations controlled by

U.S. stockholders ("Controlled Foreign Corporations"). For this purpose, a corporation was considered controlled if more than 50 percent of its voting stock was owned directly or indirectly or constructively by U.S. "persons" (which included corporations), each of which owned at least 10 percent of such voting stock. However, for purposes of determining whether earnings from insurance of U.S. risks was taxable to the U.S. stockholders, a foreign corporation was also considered to be a Controlled Foreign Corporation if more than 25 percent of its voting stock was owned by U.S. stockholders and if gross premiums from insurance of U.S. risks exceeded 75 percent of gross premiums on all risks.

Includable income of Controlled Foreign Corporations consisted of:

(1) Subpart F income except if a certain "minimum distribution" of the profits of the Controlled Foreign Corporations was made;

(2) any previously excluded Subpart F income which had been invested in qualified assets in economically less developed countries (this income was not taxable until withdrawn or remitted to the U.S. stockholders);

(3) any increase in Controlled Foreign Corporation profits invested in U.S. property; and

(4) any previously excluded Subpart F income withdrawn from Export Trade Corporation (discussed below) assets.

Subpart F income, which was defined in Code section 952, included the sum of:

(1) income attributable to premiums from insurance of U.S. risks received by foreign insurance companies that were Controlled Foreign Corporations, and

(2) "foreign base company income" which included:

(a) "foreign personal holding company income" (in contrast to business operating income, this was "passive" investment income, including interest dividends, rents, and royalties, but with certain exceptions);

(b) "foreign base company sales income" (generally from sales of property produced in the United States or a foreign country by a manufacturer and sold thru a related distributor organized in another country, which had lower tax rates, for use outside that country); and

(c) "foreign base company services income" (in general, income from services performed or furnished for a related person, which included corporations, outside the country of incorporation of the Controlled Foreign Corporation, but with certain exceptions).

Income from qualified investments in economically less-developed countries or from certain sales of U.S. exports, and income derived from the use of aircraft or vessels in foreign commerce or related services was specifically excluded from "foreign base company income."

If the gross "foreign base company income" (before the above specified exclusions for income from economically less-developed countries and sales of U.S. exports) was less than 30 percent of the Controlled Foreign Corporation's gross income, it was not taken into account. If such income was over 70 percent of gross income, the Controlled Foreign Corporation's entire gross income (less specified exclusions and allowable deductions) was treated as "foreign base company income." If the percentage was between 30 and 70, only "foreign base company income" was taken into account.

In addition, "foreign base company income" did not include any item of income the Controlled Foreign Corporation received if it could be shown, with respect to such income, that the creation or organization of the Controlled Foreign Corporation did not have the effect of substantially reducing income or similar taxes.

Code section 963 provided that Subpart F income of a Controlled Foreign Corporation was not taxable to the U.S. corporate stockholder if the stockholder included the Controlled Foreign Corporation in a minimum distribution election and thus received a minimum dividend distribution of the profits of the Controlled Foreign Corporation or from a group or chain of foreign corporations in which the Controlled Foreign Corporation was included. The required minimum distribution included the foreign taxes deemed paid with respect to the dividend distribution (see "Foreign dividend income resulting from foreign taxes deemed paid").

The schedule of minimum distributions, provided in Code section 963, was designed to make the aggregate U.S. and foreign taxes on the pre-tax profits of the Controlled Foreign Corporations included in the election equal to about 90 percent of the U.S. tax rate for a given tax year of the U.S. corporation.

Flexibility was allowed the U.S. corporation in qualifying for exemption from Subpart F taxation under the minimum distribution election by allowing the corporation to: (1) treat most foreign branches, which had the attributes of separate businesses, as wholly-owned Controlled Foreign Corporations and to consider their profits to have been distributed to the

U.S. corporation; (2) include second- or lower-tier foreign corporations (in a group or chain of foreign corporations) which were not Controlled Foreign Corporations; (3) exclude all economically less-developed country corporations from a group of Controlled Foreign Corporations under the U.S. corporation's "control," provided the corporation did not own stock of an economically developed country corporation indirectly through the economically less-developed country corporation; and (4) exclude any Controlled Foreign Corporation whose profits could not have been distributed because of currency restrictions.

Another relief provision, provided by Subpart G of the Code (sections 970-972), enabled the taxpayer to reduce Subpart F income on the basis of certain sales of U.S. exports of Controlled Foreign Corporations qualifying as "Export Trade Corporations." However, as a result of the Revenue Act of 1971, which established the Domestic International Sales Corporation (DISC), no Controlled Foreign Corporation could qualify as an Export Trade Corporation for any taxable year beginning after October 31, 1971, unless it qualified for a taxable year beginning before this date. If a corporation failed to qualify as an Export Trade Corporation for a period of any 3 consecutive taxable years beginning after October 31, 1971, it could not qualify for any taxable year beginning after such period.

It should be noted that based on a review of returns in the sample used for Statistics of Income--1970, Corporation Income Tax Returns, it was estimated that there were only about 120 Export Trade Corporations for which a Form 3646, "Income from Controlled Foreign Corporations" was filed.

Code section 960 provided special rules regarding the credit for foreign taxes deemed paid on includable income of Controlled Foreign Corporations (see "Foreign taxes deemed paid"). As a result of the Revenue Act of 1962, constructively received income from economically developed country corporations was required to be "grossed-up" for U.S. tax purposes by the foreign taxes deemed paid with respect to it (see "Foreign dividend income resulting from foreign taxes deemed paid").

Income subject to U.S. tax

The 1954 Code provided several tax bases for different types of corporations. For purposes of this report, they included the

"taxable income" base, defined by Code section 63, used by the majority of corporations, and to which the regular normal tax and surtax rates applied; a variation of this base in combination with long-term capital gain when the lower capital gains rate was applicable; and the several tax bases applicable to insurance companies. All of these tax bases are included under this heading.

For most corporations, income subject to U.S. tax consisted of net income less certain additional deductions, described below as statutory special deductions, and was equal to the "taxable income" mentioned above. There were exceptions to this general rule because income subject to U.S. tax for some corporations, e.g., life insurance companies, was not derived from the amounts shown as net income.

Statutory special deductions included the deductions taken for: (1) "net operating losses" of prior years, (2) intercorporate dividends received, and (3) dividends paid on certain preferred stock of public utilities. Also included was (4) the special deduction allowed Western Hemisphere Trade Corporations under Code section 922. (These deductions were in addition to the ordinary and necessary business deductions allowed by the Code, and were, therefore, treated for the statistics as deductions from net income.)

The Western Hemisphere Trade Corporation deduction is the only statutory special deduction shown in this report. It was allowed to certain domestic companies that conducted their business outside the United States, but within the Western Hemisphere, and that qualified under section 921 of the Code.

Industrial classification

Industrial divisions and groups were used as a basis for classifying tax return data according to the principal business activity of the corporation. Returns were classified in the industry which accounted for the largest portion of total receipts even though the return may have been for a company engaged in many business activities or may have been a consolidated return filed for an affiliated group of corporations.

Year-to-year changes in the classification of specific corporations could have resulted from mergers and other changes in organization or from filing consolidated returns as well as from a change in the principal source of total receipts.

The industries used in the report generally conform with the Enterprise Standard Industrial Classification, authorized by the Office of Federal Statistical Policy and Standards, Department of Commerce. The structure of the classification follows closely along the lines of the Standard Industrial Classification, which was designed as a means of classifying separate establishments rather than the companies of which the establishments were a part. As in prior years, some departures from the classification system were made for Statistics of Income for the finance industries in order to reflect particular provisions of the Internal Revenue Code.

There were no changes in the definitions of the industry groups used for the period 1968-1972. A relatively few changes did occur in comparison to the definitions used for the international income and tax statistics for 1964-1966 as a result of the 1967 and 1968 revisions of the Standard Industrial Classification and Enterprise Standard Industrial Classification systems, respectively. However, the changes are not apparent at the "major industry" level which is used in this report. A detailed comparison of the industry groupings as a result of these revisions is presented in Statistics of Income--1968, Corporation Income Tax Returns.

Interest for which separate credit was computed

A separate foreign tax credit computation for certain interest income was required by the Revenue Act of 1962. Under Code section 904(f), as modified by the Foreign Investors Tax Act of 1966 (see the discussion in Section 1), the investment interest to which the separate limitation applied was defined, specifically, as all interest income except amounts:

- (1) derived from any transaction which was directly related to the active conduct of a foreign trade or business, such as interest on accounts receivable by a foreign business arising from its ordinary business transactions;
- (2) derived from the conduct of a banking, financing, or similar business;
- (3) received from a foreign corporation in which the U.S. corporation (or one or more members of an affiliated group, defined the same as for U.S. consolidated return filing purposes, in which the U.S. corporation was included) owned, directly or indirectly, at least 10 percent of the voting -

stock (for purposes of determining the 10 percent stock ownership, stock owned directly or indirectly by or for a foreign corporation was considered as owned proportionately by its stockholders); and

(4) received on obligations acquired where it was necessary to dispose of an active foreign trade or business or to dispose of securities in a foreign corporation in which the U.S. corporation owned at least 10 percent of the voting stock.

Investment credit

Investment credit was the reduction, after limitations, of income tax allowed U.S. corporations based on their investment in certain depreciable property (chiefly machinery and equipment) with a useful life of at least 3 years (4 years for 1968) and, for the most part, used within the United States. Such property could not be disposed of prior to the end of the useful life used as the basis for the credit. Otherwise, the credit already taken had to be repaid as an additional tax for the year in which the disposition occurred.

In general, the investment credit before limitations was equal to 7 percent of "qualified investment" (4 percent in the case of "public utility property"), an amount derived from the cost of the property and designed to give weight to investments in longer-lived assets. The credit claimed could equal the U.S. income tax available for investment credit, i.e., income tax (excluding tax from recomputing prior year investment credit and, after 1968, additional tax for tax preferences) less foreign tax credit. However, the investment credit was limited to \$25,000 plus 50 percent of the excess over \$25,000. Certain limitations were applicable to special classes or kinds of corporations and for used property. Amounts in excess of these limitations could be carried to other years to be claimed as a credit.

The Tax Reform Act of 1969 provided that the investment credit was not available for property acquired after April 18, 1969, or for property on which the construction, reconstruction, or erection began after that date. However, the Revenue Act of 1971 restored the investment credit for property acquired after August 15, 1971, or ordered after March 31, 1971.

Net income (or deficit)

This was the difference between gross taxable receipts and the ordinary and necessary business deductions allowed by the Code.

Gross taxable receipts included, not only actual receipts, but also certain "constructive" receipts (see "Includable income of Controlled Foreign Corporations" and "Foreign dividend income resulting from foreign taxes deemed paid").

The statistics for net income are generally larger than the amounts shown for income subject to U.S. tax. The principal reason for this is that certain statutory special (nonbusiness) deductions (mentioned under "Income subject to U.S. tax") from net income were allowed most corporations in computing their income subject to U.S. tax.

Related foreign corporations

See "Dividends paid by related foreign corporations."

Returns with foreign tax credit

Returns with foreign tax credit are the returns of U.S. corporations which showed a tax credit for taxes paid, accrued, or deemed paid to foreign countries or U.S. possessions (including Puerto Rico) and to their political subdivisions. Although summary statistics are furnished in this report for all corporation returns which showed the credit, detailed information on foreign income and taxes was available only for returns for which Forms 1118 were filed in support of the foreign tax credit claimed. Although Form 1118 data were not available for all returns with foreign tax credit, the effect on the statistics was negligible (see the discussion under "Coverage" in Section 1).

Taxable income (or loss) from foreign sources

Taxable income from foreign sources was, in general, defined the same way as income subject to U.S. tax. It was the taxable income computed under Subchapter B of the Code, which specified the gross income less the allocable deductions used to determine such taxable income with two important exceptions: (1) allocable deductions did not include income, war profits, and excess profits taxes imposed by foreign countries or U.S. possessions (including Puerto Rico) and their political subdivisions and (2) gross income included only that income derived from sources outside the United States as defined under Code sections 861-864. Western Hemisphere Trade Corporations were allowed a special deduction under Code section 922 in computing their taxable income.

U.S. corporations received most of their taxable foreign income from two foreign organizational structures: (1) a branch in a foreign country and (2) a foreign corporation in which the U.S. corporation owned stock. In the first instance the major component of taxable income was usually branch profits while in the latter the major component was dividends distributed by the foreign corporations.

Taxable income from foreign sources also included rentals, royalties, license fees, interest, gains from the sales of real property, and compensation for labor or services performed. Interest for which a separate foreign tax credit was computed was included in total taxable income from foreign sources and is discussed under that heading in this section. Also, dividends, deemed or actually, received by domestic corporations from DISC's were treated as foreign source income to the extent they were attributable to certain export receipts and were included in total taxable income from foreign sources beginning with 1972.

As a result of the Revenue Act of 1962, two additional components were added to taxable income from foreign sources. They were for income considered constructively received, i.e., certain undistributed profits of Controlled Foreign Corporations (see "Includable income of Controlled Foreign Corporations") and taxes deemed paid with respect to such income and to dividends received from related foreign corporations which were economically developed country corporations (the "foreign dividend gross-up"). The determination of foreign source income was also revised somewhat by the Foreign Investors Tax Act of 1966 (see discussion in Section 1).

Code section 862 provided for determining "taxable income from sources without the United States," by deducting from gross foreign source income the "expenses, losses, and other deductions properly apportioned or allocated thereto." (See "Geographic classification: area or country" for a discussion of the "source of income" rules in Code sections 861-864, which served as the basis for attributing foreign source income to specific countries.)

The relationship between taxable income from foreign sources and corporations' net income for U.S. tax purposes is discussed in Section 1 under "Differences in income concepts."

Taxes deemed paid

See "Foreign taxes deemed paid."

Taxes paid or accrued

See "Foreign taxes paid or accrued."

Total assets

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

Asset estimates for the few returns of corporations that failed to provide balance sheet information were obtained from other schedules on the return form; from reference books; and from the relationships between income statement and balance sheet items on similar returns which had both statements and which were classified in the same industrial group (see also, "Zero assets").

U.S. income tax before credits

U.S. income tax before credits was the gross amount of income tax liability before deducting the foreign tax, investment, and, beginning with tax year 1972, Work Incentive (WIN) credits.

The basic income tax for most corporations consisted of:

- (1) a normal tax of 22 percent on total taxable income plus a surtax of 26 percent on total taxable income in excess of \$25,000; or
- (2) an alternative tax, whereby the excess of net long-term capital gain over net short term capital loss was taxed at a special capital gains rate while the balance of income was taxed at the

normal tax and surtax rates. The alternative capital gains rate increased from 25 percent for 1968 and 1969, to 28 percent for 1970, and to 30 percent for 1971 and thereafter. Corporations with accounting periods overlapping either 1969 or 1971 were required to prorate their capital gains tax at the different rates.

Effective January 1968 through December 1969, the combined normal tax and surtax rate of 48 percent, was augmented by a 10 percent surcharge making the total combined tax rate including surcharge equal to 52.8 percent. From January 1970 through June 1970, the surcharge was reduced to 5 percent and finally discontinued after June 1970.

In addition to the preceding, the statistics for income tax also included:

- (1) an additional tax for tax preferences (or "minimum tax"), effective for taxable years ended after 1969,
- (2) the tax from recomputing a prior year investment credit, and
- (3) the 30 percent tax on undistributed net long-term capital gains of regulated investment companies and real estate investment trusts.

Statistics for income tax do not reflect the Personal Holding Company tax nor do they reflect any adjustments to the tax liability such as those resulting from:

- (1) recomputation of taxable income to reflect the carryback of net operating losses and certain capital losses for future years,
- (2) reduction of income tax by Work Incentive (WIN), investment, and foreign tax credits recomputed to take account of the carryback of unused investment credit and foreign taxes of certain future years,
- (3) audit examinations and other enforcement activities, and
- (4) uncollectible taxes.

The statistics, therefore, differ somewhat from the actual income tax collections and the final income tax liability of corporations for tax years 1968 through 1972.

Western Hemisphere Trade Corporation deduction

This special deduction was allowed certain domestic corporations which qualified under section 921 of the Code. These companies conducted their business outside the United States but within the Western Hemisphere. Because this deduction was in addition to the ordinary and necessary business deductions allowed under the Code, it is not reflected in net income and, instead, is treated for the statistics as a deduction from net income in arriving at the tax base, income subject to U.S. tax.

For 1972, the Western Hemisphere Trade Corporation deduction was 29.2 percent of net income after reduction by the other statutory special deductions allowed most corporations in computing their income subject to U.S. tax. (For 1968, the percentage was 26.5 percent.) These other special deductions were for "net operating losses" of prior years, intercorporate dividends received, and dividends paid on certain preferred stock of public utilities.

(For further discussion, see "Qualifications and benefits of Western Hemisphere Trade Corporations" in Section 2.)

Zero assets

Returns with zero assets comprised: (1) final returns of liquidating or dissolving corporations which had disposed of all assets; (2) final returns of merging corporations whose assets and liabilities were reported in the returns of the acquiring corporations; (3) part-year returns of corporations which changed accounting periods, and whose assets and liabilities were also reported on their first full-year returns; and (4) returns of foreign corporations with income "effectively connected" with the conduct of a trade or business in the United States (however, foreign insurance company returns with balance sheet information for U.S. branches were classified by the size of their U.S. branch assets).

Description of the Sample and Limitations of the Data

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SAMPLE CRITERIA AND SELECTION OF RETURNS

Data in this report are estimates derived from returns of corporations with foreign operations included in the samples used for Statistics of Income--Corporation Income Tax Returns. These samples were stratified based, for the most part, on combinations of size of total assets and of net income or deficit. For each of the four Income Years, 1968, 1969, 1970, and 1972, covered by this report, the total number of returns with foreign tax credit or with the Western Hemisphere Trade Corporation deduction was less than 1 percent of all corporation returns and less than 3 percent of the returns included in the Statistics of Income samples.

Returns sampled at the 100-percent rate accounted for the largest part of the estimated dollar amounts reported on corporation returns, although they were a relatively small proportion of the total number of returns filed. For returns used for this report, those sampled at the 100-percent rate accounted for an even larger part of the estimated dollar amounts and, in addition, in the case of returns with foreign tax credit, a large, although smaller, proportion of the estimated total number of returns.

The statistics are based on stratified probability samples of returns selected before audit. The total corporation population from which the samples were drawn contained the following types of returns:

- (1) Form 1120--U.S. Corporation Income Tax Return
- (2) Form 1120L--U.S. Life Insurance Company Income Tax Return
- (3) Form 1120M--U.S. Mutual Insurance Company Income Tax Return
- (4) Form 1120S--U.S. Small Business Corporation Income Tax Return (not applicable to the statistics in this report)
- (5) Form 1120F--U.S. Income Tax Return of Foreign Corporation
- (6) Form 1120-DISC--Domestic International Sales Corporation Return (first effective beginning with tax year 1972, but not applicable to the statistics in this report)

Returns not included in the corporate population were, for the most part, those in the Form 990 series filed by nonprofit, and therefore, tax-exempt corporations.

Delinquent returns for prior years processed for revenue purposes during the same period as timely filed returns for each of the four income years, were included in the sample for a given income year to compensate for current year returns filed late, after the cutoff date for sample receipts.

Sample rates ranged from 1 to 100 percent depending on the type of return, size of total assets, and size of net income (or deficit).

For the most part, the sample criteria and selection of returns for each of the years covered by this report were similar. For a detailed discussion of the sample and its selection see Statistics of Income--Corporation Income Tax Returns for each of the years involved.

For all four of the years covered by the statistics, the criteria for sampling returns at the 100-percent rate were virtually the same. In general, the 100-percent category comprised the following types of returns: (1) all Form 1120 returns with total assets of \$10 million or more or net income or deficit of

\$1 million or more and (2) all Forms 1120L, 1120M, and 1120F returns, regardless of the size of total assets or net income.

An income year was defined in terms of accounting periods. A given year included returns with accounting periods ended during the span of months, July of one calendar year through June of the following calendar year. Returns were sampled when they were received without regard to their accounting periods. Separation of the returns into the appropriate income year based on accounting periods was accomplished during statistical processing. Sampling rates were generally set for the calendar year in which returns were received without regard to the accounting period. Therefore, if the rate was changed from one calendar year to the next for a particular sample class, that class would have more than one sampling rate for a given income year.

In processing data on foreign income and taxes reported on returns with foreign tax credit computation schedules, a separate statistical record was prepared for each country for which a corporation reported income or taxes on its Form 1118, "Computation of Foreign Tax Credit--Corporations." Each record represented a "foreign country operation," i.e., the corporation's total operations in a particular foreign country or U.S. possession (including Puerto Rico), and took into account all of the foreign income and taxes for that country or possession. Tabulation of these records, using the weights given to the U.S. corporation return with which they were associated (see "Method of estimation" below), provided the estimated number of "foreign country operations" reported on the Form 1118, as shown in table 4A.

Table 4A shows that the number of Form 1118 foreign country operations in the sample were, in the overall, weighted by a smaller factor than the sample returns with which they were associated. This occurred because, although each foreign country operation was given

Sample and Limitations of the Data

Table 4A.--Corporation Returns With Foreign Tax Credit: Number in Sample and Estimated Number Filed, 1968 and 1972

Item	1968	1972
Returns in Sample		
Number of returns.....	n.a.	3,075
Number of returns with Forms 1118 filed in support of foreign tax credit claimed.....	2,967	2,938
Number of foreign country operations shown on Form 1118	12,749	16,037
Estimated Number of Returns Filed		
Estimated number of returns.....	7,110	6,412
As a percent of returns in sample.....	n.a.	209
Estimated number of returns with Forms 1118 filed in support of foreign tax credit claimed.....	6,196	5,497
As a percent of returns in sample.....	209	187
Estimated number of foreign country operations shown on Forms 1118.....	16,889	19,515
As a percent of returns in sample.....	132	122

n.a. - Not available.

the same weight as its related sample return, the sample returns with a weight of one generated more of these records than the sample returns with a weight greater than one. As already mentioned, returns with a weight of one represented the larger corporations, which accounted for most of the foreign operations of U.S. corporations.

The impact of these corporations on the statistics may be illustrated by the following facts from table 4A: for 1972, the weighted total number of foreign country operations (19,515) was only about 22 percent greater than the number of unweighted foreign country operations shown on returns in the sample (16,037), although the weighted number of returns with Form 1118 (5,497) was almost twice as great as the unweighted number of sample returns with Form 1118 (2,938).

METHOD OF ESTIMATION

For 1969 and later years, the totals for the number of returns filed are the result of computer tabulation of all the returns processed for the Internal Revenue Service Business Master File system in each of the Internal Revenue service centers. For 1968, totals for returns filed were based on manual counts made and submitted by each Internal Revenue district office and service center. For each of the years, a comparison was made between the expected and realized number of sample returns in each location to make sure the sample plan was working.

Sample data were weighted to the sample class totals by multiplying them by the quotient (or weighting factor):

$$\frac{\text{Number of returns filed per sample class}}{\text{Number of sample returns per sample class}}$$

SAMPLING VARIABILITY

Since the data in this report were derived from a probability sample of tax returns, they may differ from similar data obtained from a complete count or census because of the variability inherent in sampling. Because the tables on Western Hemisphere Trade Corporation returns were produced as part of the regular program for Statistics of Income--Corporation Income Tax Returns, numbers of returns (Frequencies) and money amounts considered to exceed acceptable sampling variability limits were treated in either one of two ways.

In the tables with data classified by industry, the affected industry was deleted but data for it were still included in the appropriate totals. In the tables with data classified by size of total assets, the affected asset size class was combined with one or more adjacent asset size classes so that the data for the combined asset size class was within acceptable sampling variability limits.

However, the importance of large corporation returns, sampled at the 100-percent rate, is shown by the statistics in tables 33 and 36, which present data for 1968 and 1972, respectively. For both

years, the Western Hemisphere Trade Corporation deduction reported on returns with total assets of \$10 million or more, all of which were sampled at the 100-percent rate, accounted for almost 95 percent of the total deduction.

The foreign tax credit tables were produced as a separate study especially for this report although, as already noted, they were based on returns included in the same sample used for the regular Statistics of Income program. The importance of the sample returns selected at a 100-percent rate in these tables is illustrated by the following:

(1) For 1968, about 77 percent of the sample returns with Form 1118 were in the sample classes for which returns were selected at the 100-percent rate; and about 92 percent of the total number of foreign country operations were based on sample returns selected at the 100-percent rate.

(2) For 1972, about 84 percent of the sample returns with Form 1118 were in sample classes for which returns were selected at the 100-percent rate; and about 96 percent of the total number of foreign country operations were based on sample returns selected at the 100-percent rate.

A further illustration of the extent of sampling at the 100-percent rate and the resulting impact on the data is shown in table 4B. Because of the impact of returns sampled at the 100-percent rate, sampling variability was not considered to be a major limitation of the data. Therefore, the statistics in the foreign tax credit tables were not reviewed for sampling variability.

In tables throughout this report, a dash in place of a frequency or amount indicates that: (1) if returns were sampled at a rate of 100 percent, no returns had the particular characteristic; or (2) if returns were sampled at a rate less than 100 percent, either no returns in the population had the characteristic or the characteristic was so rare that it did not appear on any sample returns.

SAMPLE MANAGEMENT AND PROCESSING CONTROLS

Sample and population counts of corporation returns were normally free from error. Sample counts were verified during statistical processing to minimize loss of data. Because of their impact on the statistics, inclusion of returns of the largest corporations was verified by controlling these companies on a name basis.

In transcribing and tabulating the information from the returns in the sample, additional checks were

imposed to improve the quality of the resulting estimates. Whenever possible, incorrect or missing entries were corrected during statistical editing to make them consistent with other entries on the return or accompanying schedules. When Forms 1118 had incomplete or missing information, it was possible, in some instances, to complete or estimate the data based on logical relationships among items on both the foreign tax credit computation schedule itself and on the corporation income tax return and other forms and schedules filed with it.

Quality of the data abstracted at the processing centers was controlled there by means of a continuous subsampling verification system. Prior to tabulation, numerous computer tests were applied to each statistical record to assure that proper balance and relationship between data items were maintained. Inconsistencies which could not be readily resolved, especially those that involved returns of the larger corporations, were referred to the Statistics Division in the National Office for resolution. In addition, with respect to Forms 1118 filed with returns for 1968 and 1972, when data were incomplete or there were data inconsistencies which could not be resolved, a

Table 4B.--Corporation Returns With Form 1118 Filed in Support of Foreign Tax Credit Claimed: Percentage of Selected Estimates Attributable to Returns not Subject to Sampling Variability,¹ 1968 and 1972

Selected characteristic	Percent attributable to returns not subject to sampling variability	
	1968	1972
Estimate for--		
Number of returns.....	36.7	45.0
Number of foreign country operations.....	69.5	78.5
Foreign tax credit claimed.....	99.2	99.6
Taxable income from foreign sources (net).....	98.9	99.4

¹Returns sampled at a 100-percent rate.

selective field followup of large returns was conducted to obtain additional information. This is discussed under "Limitations of the foreign tax credit statistics" in Section 1.

Finally, prior to publication all statistics and tables were reviewed for accuracy and reasonableness in light of provisions of tax laws, taxpayer reporting variations and limitations, economic conditions, comparability with

other statistical series and with prior years' data, and statistical techniques used in data processing.

However, the controls maintained over the selection of the sample returns, the processing of the source data, and the review of the statistics did not completely eliminate the possibility of error. Also, practical operating considerations necessitated allowance of reasonable tolerance in the statistical processing of the data.

Forms and Instructions

CONTENTS

Form 1120--U.S. Corporation Income
Tax Return:
1968, 166
1972, 172

Form 1118--Computation of Foreign
Tax Credit--Corporations:
1968 Revision, 178
1971 Revision, 180
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NOTE: Although a foreign tax
credit could also be claimed
on Forms 1120F, 1120L, and
1120M, only the Form 1120 is
shown here. Copies of the
other forms can be found in
the regular annual series of
Statistics of Income--Cor-
poration Income Tax Returns
reports.

U.S. Treasury Department Internal Revenue Service

For calendar year 1968 or other taxable year beginning 1968, ending 19 (PLEASE TYPE OR PRINT)

Check if a— A Sole proprietorship or partnership (C) electing under section 1361 to be taxed as a corporation. B Consolidated return Personal Holding Co. C Business Code No. (see page 7 of instructions.)

Name, Employer Identification No., Number and street, F County in which located, City or town, State, and ZIP code, G Enter total assets from line 14, column (D), Schedule L (See instruction 10)

IMPORTANT—All applicable lines and schedules must be filled in. If the lines on the schedules are not sufficient, see instruction N.

GROSS INCOME table with lines 1-11: Gross receipts or gross sales, Less: Returns and allowances, Less: Cost of goods sold, Gross profit, Dividends, Interest, Other interest, Gross rents, Gross royalties, Net gains, Other income, TOTAL income

DEDUCTIONS table with lines 12-30: Compensation of officers, Salaries and wages, Repairs, Bad debts, Rents, Taxes, Interest, Contributions, Casualty or theft losses, Amortization, Depreciation, Depletion, Advertising, Pension, profit-sharing, stock bonus, annuity plans, Other employee benefit plans, Other deductions, TOTAL deductions, Taxable income before net operating loss deduction, Less: (a) Net operating loss deduction, (b) Special deductions, Taxable income

TAX table with lines 31-35: TOTAL TAX, Credits: (a) Tax deposited—Form 7004 application for extension, (b) 1968 estimated tax payments, (c) Credit from regulated investment companies, (d) Credit for U.S. tax on nonhighway gas and lube oil, TAX DUE, OVERPAYMENT, Enter amount of line 34 you want: Credited to 1969 estimated tax, Refunded

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief it is true, correct, and complete. If prepared by a person other than the taxpayer, his declaration is based on all information of which he has any knowledge.

CORPORATE SEAL, Date, Signature of officer, Title, Date, Individual or firm signature of preparer, Address

Schedule A—COST OF GOODS SOLD (See instruction 2) and Schedule C—DIVIDENDS (See instruction 4) with lines 1-10

Schedule E—COMPENSATION OF OFFICERS (See instruction 12) with columns: 1. Name of officer, 2. Social security number, 3. Title, 4. Time devoted to business, 5. Percent of corporation stock owned, 6. Common, 7. Preferred, 7. Amount of compensation, 8. Expense account allowances

Schedule F—BAD DEBTS—RESERVE METHOD (See instruction 15) with columns: 1. Year, 2. Trade notes and accounts receivable outstanding at end of year, 3. Sales on account, 4. Current year's provision, 5. Recoveries, 6. Amount charged against reserve, 7. Reserve for bad debts at end of year

Schedule G—DEPRECIATION (See instructions for Schedule G) with columns: 1. Group and guideline class or description of property, 2. Date acquired, 3. Cost or other basis, 4. Depreciation allowed or allowable in prior years, 5. Method of computing depreciation, 6. Life or rate, 7. Depreciation for this year

Schedule H—SUMMARY OF DEPRECIATION with columns: Straight line, Declining balance, Sum of the years-digits, Units of production, Additional first-year (section 179), Other (specify), Total

Schedule I—SPECIAL DEDUCTIONS

1 (a) 85% of line 1, Schedule C. (b) 62.462% of line 2, Schedule C (for taxable years ending after June 30, 1969, see instructions). (c) 85% of line 3, Schedule C. (d) 100% of line 4, Schedule C. 2 Total—May not exceed 85% of (line 28, page 1, less the sum of lines 3 and 5 of this schedule). The 85% limitation does not apply to a year in which a net operating loss occurs. 3 100% of line 8, Schedule C. 4 Dividends paid on certain preferred stock of public utilities (see instructions). 5 Western Hemisphere trade corporations (see instructions). 6 Total special deductions—Add lines 2 through 5. Enter here and on line 29(b), page 1.

Schedule J—TAX COMPUTATION (For taxable years ending after June 30, 1969, see page 6 of instructions)

1 Taxable income (line 30, page 1). 2 Surtax exemption (line 1, \$25,000, or amount apportioned under section 1561, whichever is lesser). 3 Line 1 less line 2. 4 (a) 22% of line 1. (b) 26% of line 3. (c) If multiple surtax exemption is elected under section 1562, enter 6% of line 2. 5 (a) Income tax (line 4, or line 24 of separate Schedule D, whichever is lesser). (b) Tax Surcharge—10% of line 5(a). 6 Foreign tax credit (attach Form 1118). 7 Line 5 less line 6. 8 Investment credit (attach Form 3468). 9 Line 7 less line 8. 10 (a) Personal holding company tax (attach Schedule 1120 PH). (b) Tax Surcharge—10% of line 10(a). 11 Tax from recomputing a prior year investment credit (attach computation). 12 Total tax—Add lines 9, 10, and 11. Enter here and on line 31, page 1.

Schedule K—RECORD OF FORM 503 FEDERAL TAX DEPOSITS (List deposits in order of date paid)

Table with 8 columns: Serial number of Form 503, Date of deposit, Amount, Serial number of Form 503, Date of deposit, Amount, Serial number of Form 503, Date of deposit, Amount.

H Date incorporated. I (1) Did you at the end of the taxable year own directly or indirectly 50% or more of the voting stock of a domestic corporation? (2) Did any corporation, individual, partnership, trust, or association at the end of the taxable year own directly or indirectly 50% or more of your voting stock? J Did you have any contracts or subcontracts subject to the Renegotiation Act of 1951? K Did you claim a deduction for expenses connected with: (1) Entertainment facility (boat, resort, ranch, etc.). (2) Living accommodations (except employees on business). (3) Employees' families at conventions or meetings. (4) Employee or family vacations not reported on Form W-2. L Taxable income (or loss) from line 30, page 1, Form 1120 for: 1965, 1966, 1967. M Refer to page 7 of instructions and state the principal: Business activity, Product or service. N Were you a member of a controlled group subject to the provisions of: (1) Section 1561? (2) Section 1562? O Were you liable for filing Forms 1096 and 1099 or 1087 for the calendar year 1968? P Were you a U.S. shareholder of any controlled foreign corporation? Q Did you pay dividends (other than stock dividends and distributions in exchange for stock) during the taxable year which you considered to be partially or wholly nontaxable to shareholders? R Did you ever declare a stock dividend?

Table with columns: ASSETS, LIABILITIES AND STOCKHOLDERS' EQUITY. Rows include: 1 Cash, 2 Trade notes and accounts receivable, 3 Inventories, 4 Gov't obligations, 5 Other current assets, 6 Loans to stockholders, 7 Mortgage and real estate loans, 8 Other investments, 9 Buildings and other fixed depreciable assets, 10 Depletable assets, 11 Land, 12 Intangible assets, 13 Other assets, 14 Total assets, 15 Accounts payable, 16 Mtgs., notes, bonds payable in less than 1 yr., 17 Other current liabilities, 18 Loans from stockholders, 19 Mtgs., notes, bonds payable in 1 yr. or more, 20 Other liabilities, 21 Capital stock, 22 Paid-in or capital surplus, 23 Retained earnings—Appropriated, 24 Retained earnings—Unappropriated, 25 Less cost of treasury stock, 26 Total liabilities and stockholders' equity.

Schedule M-1—RECONCILIATION OF INCOME PER BOOKS WITH INCOME PER RETURN. 1 Net income per books. 2 Federal income tax. 3 Excess of capital losses over capital gains. 4 Taxable income not recorded on books this year. 5 Expenses recorded on books this year not deducted in this return. 6 Total of lines 1 through 5. 7 Income recorded on books this year not included in this return. 8 Deductions in this tax return not charged against book income. 9 Total of lines 7 and 8. 10 Income (line 28, page 1)—line 6 less 9.

Schedule M-2—ANALYSIS OF UNAPPROPRIATED RETAINED EARNINGS PER BOOKS (line 24 above). 1 Balance at beginning of year. 2 Net income per books. 3 Other increases. 4 Total of lines 1, 2, and 3. 5 Distributions: (a) Cash, (b) Stock, (c) Property. 6 Other decreases. 7 Total of lines 5 and 6. 8 Balance at end of year (line 4 less 7).

Forms and Instructions



1968 Instructions for Form 1120 U.S. Corporation Income Tax Return

(References are to the Internal Revenue Code.)

Some Notes About Your U.S. Corporation Income Tax Return

Use of the Preaddressed Form and Mailing Label

To provide efficient and economical service to the public, the Internal Revenue Service uses an automatic system to process data from millions of Federal tax returns filed yearly. This Automatic Data Processing System requires the use of specific information and uniformity in reporting. For instance, the name, address, and identifying number you use on your return must appear exactly as recorded on our Business Master File. Otherwise, there may be delays in processing your return.

That's why we urge you to use the preaddressed tax form we mailed you, and ask that you follow the instructions explicitly when preparing your return.

If your preaddressed form becomes unusable, remove the top part of your address label (the adhesive used permits this) and attach it to the form you file.

If for any reason you cannot use the preaddressed label, then print your name, address, and identifying number on the form you file, exactly as shown on the label. You should be extremely careful not to drop or add "letters" or words which are a part of your true name. (Ampersands (&) and hyphens (-) are considered to be "letters.") Such additions or deletions will cause a mismatch in the Master File. (For example: "ABC Corporation" cannot appear variously as "A-B-C Corporation" or "AB&C Corporation.")

If the preaddressed label is incorrect, please cross out the incorrect parts and enter the correct information.

Filing in the Form

If you have an item of income or a deduction for which a line is provided on page 1 of the form, please enter it on that line even though you also enter it on an attachment.

Please do not alter, substitute, or cross out the line titles printed on the form.

Where to File

Corporations in most states are now required to mail their returns directly to a specified Internal Revenue Service Center, instead of to a District Director's office. (See General Instruction C—Where to File.)

Depository Method of Payment

All corporation income and estimated income tax payments must be deposited in a Federal Reserve bank or an authorized commercial bank depository. A Form 503 (Federal Tax Deposit, Corporation Income Taxes) must accompany each deposit. (See General Instruction G—Deposit of Tax.)

GENERAL INSTRUCTIONS

A. Taxpayers required to file Form 1120.—

- Domestic corporations, whether or not having any taxable income, unless exempt under section 501.
- Real estate investment trusts defined in section 856.
- Regulated investment companies defined in section 851.
- Partnerships and proprietorships electing to be taxed as domestic corporations. (See section 1361.)
- Insurance companies described in section 831.

B. Returns required of certain organizations.—

- Foreign corporations other than life and mutual insurance companies filing Forms 1120-L and 1120-M—file Form 1120-F.
- Life insurance companies (section 802)—Form 1120-L.
- Mutual insurance companies (section 821)—Form 1120-M.
- Exempt farmers' cooperatives (section 1381)—Form 990-C.
- Exempt organizations with unrelated trade or business income—Form 990-T.
- Small business corporations (section 1372(a))—Form 1120-S.

C. Where to file.—

If the corporation's principal business, office, or agency is located in	Use this address
Delaware, District of Columbia, Maryland, New Jersey, Pennsylvania, Virginia	Internal Revenue Service Center 11601 Roosevelt Boulevard Philadelphia, Pa. 19155
Alabama, Florida, Georgia, Mississippi, North Carolina, South Carolina, Tennessee	Internal Revenue Service Center 4800 Buford Highway Chamblee, Georgia 30006
Indiana, Kentucky, Michigan, Ohio, West Virginia	Internal Revenue Service Center 1160 West 1230 South Street Ogden, Utah 84405
Arkansas, Colorado, Kansas, Louisiana, New Mexico, Oklahoma, Texas, Wyoming	Internal Revenue Service Center 3651 Interregional Highway Austin, Texas 78740
Alaska, Arizona, California, Hawaii, Idaho, Montana, Nevada, Oregon, Utah, Washington	Internal Revenue Service Center 1160 West 1230 South Street Ogden, Utah 84405
Illinois, Iowa, Nebraska, North Dakota, South Dakota, Missouri, Minnesota, Wisconsin	If filed in 1969, mail to your District Director. If filed in 1970, mail to: Internal Revenue Service Center 2206 E. Dammiter Road Kansas City, Missouri 64170
Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, Vermont	If filed in 1969, mail to your District Director. If filed in 1970, mail to: Internal Revenue Service Center 310 Lowell Street Andover, Mass. 01812

Note: Corporations which have a principal place of business outside the United States or which claim the benefits of section 931 (relating to income from sources within possessions of the United States) or section 941 (relating to special deduction for China Trade Act corporations) must file with the Director of International Operations, Internal Revenue Service, Washington, D.C. 20225.

D. When to file.—In general, Form 1120 must be filed on or before the 15th day of the 3d month following the close of the taxable year. Request for automatic extension of 3 months for filing Form 1120 must be made on Form 7004.

E. Other information returns and forms which may be required.—

- Forms W-2 and W-3.—Statement of wages, other compensation, and tax withheld; and reconciliation of tax withheld.
- Forms 966, 1099-L, and 1099-M.—Information returns regarding dissolution or liquidation, distributions in liquidation, and distributions by regulated investment companies.
- Forms 1096 and 1099.—Information returns concerning certain

dividends, earnings, interest, patronage dividends, rents, royalties, annuities, pensions, foreign items; and prizes, awards, and commissions to nonemployees.

4. Form 1118.—Computation of foreign tax credit.

5. Form 2950.—Statement in support of deduction for payments to an employees' pension, profit-sharing, stock bonus, trust or annuity plan and compensation under a deferred-payment plan.

6. Forms 2952 and 3646.—Returns relating to controlled foreign corporations.

7. Form 3468.—Computation of investment credit.

8. Forms 3921, 3922, and 4067.—Information returns concerning exercise of certain stock options and the transfer of stock acquired by certain options.

9. Form 4136.—Computation of credit for Federal tax on nonhighway gasoline and lubricating oil.

10. Schedule PH (Form 1120).—Computation of U.S. personal holding company tax.

F. Period to be covered by return.—Returns shall be filed for the calendar year 1968 or fiscal year beginning in 1968 and ending in 1969. If the return is for other than a calendar year, fill in the taxable year space at the top of the form.

FINAL RETURNS.—If the corporation ceases to exist, write "FINAL RETURN" at the top of the form. If the corporation liquidates within one calendar month pursuant to section 333, attach a computation (following the format in Revenue Procedure 65-10, C.B. 1965-1, 738) of accumulated earnings and profits including all items of income and expense accrued up to the date on which the transfer of all property is completed.

G. Deposit of tax.—The balance of tax due must be paid in full when the return is filed or in two installments, 50 percent by the 15th day of the 3d month and 50 percent by the 15th day of the 6th month following the close of the taxable year.

Corporations must deposit all income tax payments with an authorized commercial bank depository or Federal Reserve bank, and all deposits must be accompanied by a Federal Tax Deposit Form 503. Please enter the serial number of Form 503 on your remittance. Do not remit directly to Internal Revenue Service. All deposits made for the year should be listed in Schedule K.

Timeliness of deposits will be determined by the date the deposit was

received by the commercial bank depository or Federal Reserve bank. However, a deposit received after the due date will be considered timely if the corporation establishes that it was mailed on or before the second day before the prescribed due date.

A supply of Forms 503 will be mailed to corporations on a cyclical basis depending on the taxable year of the corporation. Corporations needing Forms 503 may obtain them only by applying to the Director of a service center (or District Director). The application should include the corporation's name, identification number, address, and the taxable year to which the deposits relate.

Corporations which surrender Treasury bills to Federal Reserve banks in payment of corporation income or estimated income taxes must submit with the securities a Form 503 on which the face amount of the bills has been entered in the space provided for the amount of the deposit. The Federal Reserve bank will acknowledge receipt of the bills and will effect the deposit on the date the taxes become due. Corporations should not submit with their tax returns the receipts for Treasury bills surrendered to Federal Reserve banks.

H. Accounting period.—To change your accounting period, see section 1.442-1 of the regulations and Form 1128, Application for Change in Accounting Period.

I. Accounting methods.—Taxable income must be computed using the method of accounting regularly used in maintaining the corporation's books and records. In all cases the method adopted must clearly reflect taxable income. (See section 446.)

Unless the law specifically permits, a taxpayer may not change the method of accounting used to report income in prior years (for income as a whole or for any material item) without first securing consent on Form 3115, Application for Change in Accounting Method.

Rounding off to whole-dollar amounts.—The money items on your return and accompanying schedules may be shown as whole-dollar amounts by eliminating any amount less than 50 cents and increasing any amount from 50 cents through 99 cents to the next higher dollar.

J. Estimated tax.—Corporations which can expect their "estimated tax" to be \$40 or more must make estimated tax payments. "Estimated tax" is the amount of the corporation's expected income tax (after credits) less an

exemption from estimated tax. (In general, after taking the exemption into account, a tax liability of \$5600 or more will result in estimated tax of \$40 or more.)

For taxable years beginning in 1969, the exemption is the sum of \$5500 and an amount which is 60% of the difference between the tax liability (not to exceed \$100,000) and \$5500. (For taxable years beginning in 1970 the 60% will drop to 40%.)

Members of a controlled group of corporations which must share one \$25,000 surtax exemption among all members must substitute 22% of their share of the surtax exemption for the above-mentioned \$5500.

Form 1120-W may be used as a worksheet to compute corporate estimated tax.

If you have an underpayment of estimated tax and believe an additional charge should not be asserted, attach Form 2220 to your return.

A corporation which has overpaid its estimated tax may apply for a "quick refund" of the overpayment if it is (1) at least 10% of the corporation's expected income tax liability AND (2) \$50 or more. Use Form 4466.

K. Consolidated returns.—The parent corporation must attach Form 851, Affiliations Schedule, to the consolidated return. For the first year a consolidated return is filed, each subsidiary must attach a Form 1122.

Supporting schedules in columnar form must be filed for each corporation included in the consolidated return showing, both before and after adjustments, the items of gross income and deductions, a computation of taxable income, balance sheets as of the beginning and end of the taxable year, and a reconciliation of retained earnings. In addition, attach consolidated balance sheets and a reconciliation of consolidated retained earnings.

L. Stock ownership in foreign corporations.—If you owned 5 percent or more in value of the outstanding stock of a foreign personal holding company, attach statement required by section 551(d).

If you control a foreign corporation or were a 10 percent or more shareholder of a controlled foreign corporation, you may be required to file Forms 2952 and 3646.

M. Financial statements.—The balance sheets must agree with your books and records or any differences must be reconciled. Copies of balance sheets required by Federal, State, etc., authorities may be used in place of Schedule L. Certificates of deposit should be in-

cluded as cash on line 1 of the balance sheet.

Banks, insurance companies, and other corporations required to submit substantially similar statements of income and expense to any Federal, State, etc., authority may submit copies of such statements in place of the information required on lines 1 through 30, page 1. Railroads may substitute Form 1090. In such cases taxable income must be reconciled in Schedule M-1 with the net profit shown on the statement and entered as line 30, page 1.

N. Attachments.—Attachments may be used if the lines on the form schedules are not sufficient. They must contain all the required information and follow the format of the schedules on

the return. If an attachment is used in place of a schedule having a summary line on page 1, the total need not be entered on the schedule but must be entered on page 1.

Your name and identifying number should be entered on all attachments exactly as shown on your preaddressed form.

O. Unincorporated business enterprises which elected under section 1361 to be taxed as a domestic corporation.—All elections were automatically terminated on January 1, 1969, and unincorporated business enterprises are not considered as domestic corporations for any period after December 31, 1968.

P. Tax on improperly accumulated earnings.—In order to prevent accu-

mulation of earnings and profits for the purpose of enabling shareholders to avoid the tax on individuals, section 531 provides an additional tax upon the accumulated taxable income of corporations formed or availed of for the purpose of such tax avoidance.

Q. Signature.—The return must be signed either by the president, vice president, treasurer, assistant treasurer, chief accounting officer, or by any other corporate officer (such as tax officer) who is authorized to sign. A receiver, trustee, or assignee must sign any return which he is required to file on behalf of a corporation.

R. Total assets.—If there are no assets at the end of the taxable year, show the total assets as of the beginning of the taxable year.

SPECIFIC INSTRUCTIONS (Numbered to correspond with the line numbers on page 1)

1. Gross receipts.—Enter gross receipts or sales from all business operations except those required to be reported in lines 4 through 10.

If you use the installment method of reporting, enter on line 1 the gross profit on collections from installment sales and carry the same amount to line 3. Attach a schedule showing for the current and 3 preceding years: (a) Gross sales, (b) cost of goods sold, (c) gross profits, (d) percentage of gross profits to gross sales, (e) amount collected, and (f) gross profit on amount collected.

2. Cost of goods sold.—Once an inventory method is adopted it may not be changed without permission. Application for permission to change must be made on Form 3115 within 90 days after the beginning of the taxable year in which it is desired to make the change.

A corporation electing to use the last-in, first-out method of valuing inventory provided in section 472, must file Form 970 with its return for the first year of the election. Thereafter, attach a schedule showing (1) a summary of all inventories and (2) with respect to any inventories computed under section 472, the computation of the quantities and cost by acquisition levels.

Cost of operations (where inventories are not an income-determining factor).—If the amount entered on line 2 includes an amount applicable to cost of operations, attach a schedule showing (1) salaries and wages and (2) other costs in detail.

4. Dividends.—(Numbered to correspond with line numbers in Schedule C.)

1. Enter dividends received from

domestic corporations subject to income tax, and which are subject to the 85-percent deduction under section 243(a)(1).

Small business investment companies enter dividends received from domestic corporations subject to income tax even though a deduction is allowed for the entire amount of such dividends in line 1 of Schedule I. For dividends received from a regulated investment company, see section 854 for the amount subject to the 85-percent deduction.

So called dividends or earnings received from mutual savings banks, etc., are in fact interest and should not be treated as dividends.

2. Enter dividends received on the preferred stock of a public utility which is subject to income tax and which is allowed the deduction provided in section 247 for dividends paid.

3. Enter dividends received from foreign corporations and which qualify for the 85-percent deduction provided in section 245(a).

4. Enter dividends received from wholly-owned foreign subsidiaries and which are eligible for the 100-percent deduction provided in section 245(b). In general, this deduction applies to dividends paid out of the earnings and profits of a foreign corporation for a taxable year during which (1) all of its outstanding stock is owned (directly or indirectly) by the domestic corporation receiving such dividends and (2) all of its gross income from all sources is effectively connected with the conduct of a trade or business within the United States.

The 100-percent deduction does not apply to any dividends if an election under section 1562 (election of multi-

ple surtax exemptions by a controlled group of corporations) is effective for either (1) the taxable year of the domestic corporation in which such dividends are received, or (2) the taxable year of the foreign corporation out of the earnings and profits of which such dividends are paid.

5. Enter foreign dividends (including minimum distributions under subpart F) which are not reportable on lines 3 and 4. Distributions of amounts constructively taxed in the current year or in prior years under subpart F should be excluded.

7. Include gross up attributable to income under subpart F.

8. Enter only those dividends subject to the elective provisions of section 243(b).

9. Include dividends (other than capital gain dividends) received from regulated investment companies and which are not subject to the 85-percent deduction; dividends from tax-exempt organizations; dividends (other than capital gain dividends) received from a real estate investment trust which, for the taxable year of the trust in which the dividends are paid, qualifies under sections 856-858; dividends not eligible for a dividends-received deduction because of the holding period of the stock or an obligation to make corresponding payments with respect to similar stock; and any other taxable dividend income not properly reported above.

6. Other interest.—Enter interest on loans, notes, mortgages, bonds, bank deposits, corporate bonds, tax refunds, etc.

The term "corporate bonds" includes bonds, debentures, notes, certificates of indebtedness or other evi-

dences of indebtedness issued by any corporation and bearing interest, with interest coupons or in registered form. Do not offset interest income against interest expense.

7. Gross rents.—Enter the gross amount received for the rent of property. Any expenses, including repairs, interest, taxes, and depreciation should be included in the proper lines for deductions.

9. Gains and losses from sales or exchanges of capital assets and other property.—Every sale or exchange of property, even though no gain or loss is indicated, must be reported in Schedule D.

If the net long-term capital gain exceeds the net short-term capital loss, or in case of only a net long-term capital gain, a computation of the alternative tax should be made on separate Schedule D.

10. Other income.—Include recoveries of bad debts deducted in prior years under the specific charge-off method. Refunds of taxes deducted in prior years should be reported here and not offset against current year's taxes.

If "other income" consists of only one item you may identify it by showing the account caption in parentheses on line 10.

12. Compensation of officers.—Column 8 of Schedule E must be completed for your 25 highest paid officers. To determine the highest paid officers, all allowances including expense account allowances must be added to each officer's compensation. Column 8 need not be completed for any officer for which the combined amount is less than \$10,000.

This information is to be submitted by each member of an affiliated group included in a consolidated return.

For this purpose an officer is a person who is elected or appointed to office or who is designated as such in the corporation's charter or bylaws such as regular officer, chairman of the board, etc.

14. Repairs.—Enter the cost of incidental repairs, including labor, supplies, and other items, which do not add to the value or appreciably prolong the life of the property.

15. Bad debts.—Bad debts may be treated in either of two ways—(1) as a deduction for debts which become worthless in whole or in part, or (2) as a deduction for a reasonable addition to a reserve for bad debts. (Section 166.)

Application for permission to change the method of computing bad debts must be made on Form 3115 within 90

days after the beginning of the taxable year for which it is desired to make the change.

17. Taxes.—Enter taxes paid or accrued during the taxable year and attach a schedule showing the type and amount of tax. Do not include Federal income, estate, inheritance, legacy, succession, or gift taxes; foreign or United States possession income taxes if a foreign tax credit is claimed; Federal taxes paid on bonds containing a tax-free covenant, or taxes not imposed upon the taxpayer. See section 164(d) regarding apportionment of taxes on real property between seller and purchaser.

18. Interest.—Enter business interest but do not include interest on indebtedness incurred or continued to purchase or carry obligations the interest on which is wholly exempt from income tax. (Section 265.)

Mutual savings banks, building and loan associations, and cooperative banks, enter amounts paid or credited to the accounts of depositors as dividends, interest, or earnings.

See section 267 for limitation on deductions for unpaid expenses and interest in the case of transactions between related taxpayers.

19. Contributions.—Enter contributions or gifts actually paid within the taxable year to or for the use of charitable and governmental organizations described in section 170(c).

Corporations on the accrual basis may elect to deduct contributions paid on or before the 15th day of the 3d month following the close of the taxable year if the contributions are authorized by the board of directors during the taxable year. A declaration, signed by an officer, must be attached to the return stating that the resolution authorizing the contributions was adopted by the board of directors.

The amount claimed may not exceed 5 percent of taxable income computed without regard to (1) this deduction, (2) the "special deductions" in line 29(b), and (3) any net operating loss carryback to the taxable year under section 172.

Do not deduct as a business expense charitable contributions that exceed the 5-percent limitation.

Charitable contributions paid during the taxable year in excess of the 5-percent limitation may be carried over to the five succeeding taxable years.

Attach a schedule showing the name of each organization and the amount paid. If a contribution is made in property other than money, state the kind of property contributed and the method

used in determining its fair market value. If a contribution carryover is included, show the amount and how the carryover was determined.

Special rule for contributions of certain property.—The amount of a contribution of property must be reduced by any gain that would have resulted from the application of section 617(d) (1), 1245(a), or 1250(a) if the property were sold at its fair market value.

20. Casualty or theft losses.—Enter losses sustained during the year arising from fire, storm, shipwreck, or other casualty. To determine the amount deductible, see section 165(b). Theft losses are deductible only in the year in which discovered.

21. Amortization.—If a deduction is claimed for amortization, attach a schedule showing: (1) A description of the expenditures being amortized; (2) date acquired, completed, or expended; (3) amount being amortized; (4) amortization deducted in prior years; (5) amortization period (number of months); (6) amortization for this year; and (7) the total amount of amortization less the amount claimed in Schedule A and elsewhere on the return.

22. Depreciation.—See instructions for Schedule G.

23. Depletion.—Attach Form T if a deduction is claimed for depletion of timber.

Expenditures to be deferred and deducted ratably under the election provided in sections 616(b), relating to certain expenditures in the development of mines, and 615(b), relating to deductions for mine exploration, are not to be taken into account in determining the adjusted basis for property for the purpose of computing a deduction for depletion under section 611.

25(b). Other employee benefit plans.—Enter deductions for contributions to employee benefit plans other than those claimed on line 25(a), such as insurance, health, or welfare plans. Attach a schedule for each plan showing: (1) nature of benefits, i.e., group-term life insurance, group permanent life insurance, non-insured death benefit, hospitalization, surgical, medical, sickness, accident, major medical expense, unemployment benefit, or other welfare benefits; (2) method of financing, i.e., insured, industry or areawide fund, self-insured fund, or direct benefit payments; (3) amount of deduction; (4) amount of employee contributions; (5) number of employees covered; and (6) if a self-insured plan, the amount of benefits paid during the taxable year.

Also show the number of employees employed by the corporation.

26. Other deductions.—No deduction is allowable for any amount allocable to a class of exempt income other than exempt interest income. Items directly attributable to wholly exempt income shall be allocated thereto, and items directly attributable to any class of taxable income shall be allocated to such taxable income.

If an item is indirectly attributable both to taxable income and exempt income, a reasonable proportion thereof, determined in the light of all the facts and circumstances in each case, shall be allocated to each.

Attach a statement showing (1) the amount of each class of exempt income and (2) the amount of expense items allocated to each such class (the amount allocated by apportionment being shown separately).

29(a). Net operating loss deduction.—The "net operating loss deduction" is the sum of the net operating loss carryovers and carrybacks to the taxable year. (Section 172(a).) Generally, a net operating loss may be carried back 3 years and carried over 5 years. The net operating loss must first be carried to the earliest of the 8 taxable

If a deduction is claimed for depreciation of property, leasehold improvements, patents, or copyrights, fill in Schedule G.

Salvage value must be taken into account in determining the depreciation deduction (except under the declining balance method) for real property; and for personal property to the extent it exceeds 10 percent of the cost or other basis of the property.

(a) Alternative depreciation guidelines and rules.—Revenue Procedure 62-21 (supplemented by Revenue Procedure 65-13) sets forth alternative standards and procedures for determining depreciation. Taxpayers who wish to use these provisions must use them for all assets in a particular guideline class.

(b) Depreciation methods.—Depreciation may be computed using the methods set forth in section 167(b). Property, whether new or used, may be depreciated under the straight line

years to which it may be carried, then to the next earliest year, etc. The portion of such loss which may be carried to each of the other 7 taxable years is the excess, if any, of such loss over the sum of the taxable income for each of the prior taxable years to which the loss may be carried. (Section 172(b).)

The term "net operating loss" means the excess of allowable deductions over gross income, computed with the following modifications under section 172(d):

(1) No net operating loss deduction is allowed.

(2) The special deduction provided in section 922 (Western Hemisphere trade corporations) is not allowed.

(3) The special deductions in line 1 of Schedule I are computed without regard to the 85-percent limitation provided in section 246(b). See section 1.172-2 of the regulations.

(4) The special deduction allowed by section 247 (dividends paid on certain preferred stock of public utilities) is computed without regard to the provisions of section 247(a)(1)(B).

As stated, the net operating loss deduction is the sum of the carryovers and carrybacks. However, the following modifications must be taken into ac-

SCHEDULE G—DEPRECIATION

method or the declining balance method at a rate not to exceed 1½ times the applicable straight line rate.

New tangible property with a useful life of 3 years or more may also be depreciated under (1) the double declining balance method, (2) the sum of the years-digits method, and (3) any other method which does not result in accumulated allowances at the end of any year (during the first two-thirds useful life of the property) greater than the total which could have been deducted if the double declining balance method had been used.

(c) Real property.—Suspension period property.—In general, in the case of certain real property whose construction, reconstruction, or erection was completed during the taxable year but which (1) began during the period beginning on October 10, 1966, and ending on March 9, 1967, or (2) began, pursuant to an order placed during such period, before May 24, 1967, the

SCHEDULE I—SPECIAL DEDUCTIONS

(Numbered to correspond with line numbers in Schedule I)

1. A small business investment company operating under the Small Business Investment Act of 1958 may deduct 100 percent of dividends received

from domestic corporations subject to income tax. (Section 243(a)(2).)

In general, no dividends-received deduction will be allowed on any share of

count in determining the taxable income which must be subtracted from a net operating loss to determine the portion of such loss which will still be available to carry to a subsequent year:

(a) The special deduction provided in section 922 (Western Hemisphere trade corporations) is not allowed.

(b) The net operating loss deduction is determined without regard to the net operating loss for the loss year or any taxable year thereafter, and under certain circumstances, without regard to any portion of a net operating loss attributable to a foreign expropriation loss.

If you have a net operating loss carryback and desire a "quick refund" of taxes, file Form 1139 within 12 months after the close of the taxable year in which the net operating loss is sustained. (Section 6411.)

If a net operating loss carryback creates an unused investment credit in a preceding year, the unused credit may be carried back to the 3 preceding years, and, under the provisions of section 6411, a quick refund of the taxes affected may be obtained by filing Form 1139.

29(b). Special deductions.—See instructions for Schedule I.

methods described in the preceding paragraph for new property apply only to that portion of the basis attributable to work done after May 23, 1967. For provisions relating to exceptions and \$50,000 exemption, see section 167(l).

(d) Section 179.—Additional first-year depreciation allowance.—For the first year a depreciation deduction is allowable, corporations may elect to write off 20 percent of the cost (before adjustment for salvage value) of tangible personal property (whether new or used) with a useful life of 6 years or more, up to an aggregate cost of \$10,000.

Total additional first-year depreciation must be shown on line 1 of the depreciation schedule.

If the additional first-year allowance is elected, the basis of the property must be reduced by the amount of the deduction and salvage value when computing ordinary depreciation.

stock (a) which is disposed of if the corporation has held such share for 15 days or less, or (b) to the extent the corporation is under an obligation to

make corresponding payments with respect to substantially identical stock or securities.

2. Limitation on dividends-received deduction.—In a year in which a net operating loss occurs, sections 172(d) and 245(b) provide that the 85-percent limitation on the amount of these special deductions does not apply even if the loss is created by the dividends-received deduction. In the case of a small business investment company, the dividends-received deduction of 100 percent included in line 2 is not subject to the overall 85-percent limitation.

4. Deduction for dividends paid on certain preferred stock of public utilities.—Section 247 allows public utilities a deduction of a certain percentage of the lesser of (1) dividends paid on its preferred stock during the taxable year,

or (2) taxable income computed without regard to this deduction. For taxable years beginning in 1968 and ending on or before June 30, 1969, this percentage is 26.515 percent. For taxable years ending after such date, see instruction 6. In a year in which a net operating loss occurs, section 172(d) provides that the deduction shall be computed without regard to section 247(a)(1)(B).

5. Deduction for Western Hemisphere trade corporations.—Section 922 allows Western Hemisphere trade corporations a deduction of a certain percentage of taxable income computed without regard to this deduction. For taxable years beginning in 1968 and ending on or before June 30, 1969, this percentage is 26.515 percent. For taxable years ending after such date, see instruction 6.

TAXABLE YEAR		APPLICABLE RATE
Beginning in 1968	Ending in 1969	
Aug. 1	July 31	.09150665
Sept. 1	Aug. 31	.08301370
Oct. 1	Sept. 30	.07479452
Nov. 1	Oct. 31	.06630137
Dec. 1	Nov. 30	.05808219

If the corporation prefers, the surcharge may be computed using the following formula:

$$\text{Amount on lines 5(a) and 10(a)} \times 10\% \times \frac{\text{No. days in taxable year before 7/1/69}}{\text{No. days in taxable year}}$$

Corporations which have a 52-53 week taxable year which ends after June 30, 1969, must use the formula to compute their surcharge.

2. Surtax exemption.—The surtax exemption is \$25,000 except for certain controlled corporations to which section 1561 applies.

Section 1561 provides that if a corporation is a component member of a controlled group of corporations (as defined in section 1563) on December 31

of its taxable year, the surtax exemption shall be—

(a) \$25,000 divided by the number of component members on such December 31, or

(b) If all members consent to an apportionment plan, their portion of \$25,000 determined in accordance with the plan. The sum of amounts so apportioned may not exceed \$25,000. See section 1561 and the regulations thereunder for time and manner of making the consent.

If the surtax exemption is determined under (a) or (b) above, the additional 6-percent tax under section 1562 does not apply.

3. Election of multiple surtax exemptions by a controlled group of corporations.—Subject to the provisions of section 1562, a controlled group of corporations may elect, with respect to a specified December 31, to have each of its component members claim a separate \$25,000 surtax exemption without having to divide equally or apportion one \$25,000 surtax exemption among all component members.

SCHEDULE J—TAX COMPUTATION

If the group elects to claim multiple surtax exemptions, each component member must pay an additional tax of 6 percent on its first \$25,000 taxable

income. If only one member of the group has any taxable income, the 6-percent tax does not apply. (Section 1562(b)(1)(A).)

4. Mutual savings banks conducting life insurance business.—The tax under section 594 consists of the sum of (1) a partial tax computed on Form 1120 on the taxable income of the bank determined without regard to income or deductions allocable to the life insurance department; and (2) a partial tax on the taxable income computed on Form 1120-L of the life insurance department. Enter the combined tax on line 5(a) of the Form 1120 tax computation schedule. Attach Form 1120-L as a schedule and identify as such.

5. Tax from recomputing a prior year investment credit.—If property is disposed of prior to the life used in computing the investment credit, the tax for the year of disposition must be increased by the difference between the credit taken (including carrybacks and carryovers) on such property and the credit which would have been allowed had the actual life been used. (Section 47.) The tax from recomputing a prior year investment credit may not be offset against the current year's investment credit.

6. Taxable years ending after June 30, 1969.—The deductions on line 1(b)—dividends received on certain preferred stock of public utilities, line 4—dividends paid on certain preferred stock of public utilities, and line 5—deduction for Western Hemisphere trade corporations, are computed using a formula which includes a fraction, the denominator of which is the sum of the normal tax and surtax rates. The denominator must be increased to reflect the 10-percent surcharge. For example, the denominator for calendar year 1968 corporations is 52.8 (48, the sum of normal tax and surtax rates, plus 10% of 48).

For taxable years ending after June 30, 1969 (the expiration date of the surcharge) the denominator must be increased to reflect the applicable surcharge rate shown in Schedule J instructions below.

Tax Guide for Small Business (Publication 334) contains answers to most questions which arise if you start, operate, or dispose of a business. Explanations and examples are provided to illustrate the application of Federal income, excise, social security, and withholding taxes to sole proprietorships, partnerships, and corporations. This booklet may be obtained from the Superintendent of Documents, U.S. Government Printing Office, Washington, D.C. 20402, or from your District Director, for 60 cents.

Codes for Principal Business Activity and Principal Product or Service

These industry titles and definitions are based on the Standard Enterprise Classification system developed by the Bureau of the Budget, Executive Office of the President, to classify enterprises by type of activity in which engaged. The system follows closely the Standard Industrial Classification used to classify establishments.

Using the list below, enter on page 1, under D, the code for the specific industry group from which the largest percentage of "total receipts" is derived. "Total receipts" means gross receipts (line 1, page 1) plus all other income (lines 4 through 10, page 1). On page 3, under M, state the principal business activity and principal product or service which account for the largest percentage of total receipts. For example, if the principal business activity is "Grain mill products," the principal product or service may be "Cereal preparations."

Code	Code	Code	Code
AGRICULTURE, FORESTRY, and FISHERIES	Code	Code	Code
0110 Farms.	2720 Commercial printing, including book printing, manifold business forms, and greeting cards.	7211 Motor vehicles; passenger car, truck, and bus bodies; and truck trailers.	5241 Automobile and truck dealers.
0120 Agricultural services and hunting and trapping.	2780 Bookbinding, related industries, and printing trade ser-ices.	7214 Motor vehicle parts and accessories.	5243 Gasoline service stations.
0130 Forestry and forestry services.	Chemicals and allied products:	7217 Aircraft, and complete guided missiles and space vehicles.	5248 Tire, battery, and accessory dealers, and miscellaneous aircraft, marine, and automotive dealers.
0140 Fisheries.	2811 Industrial inorganic and organic chemicals.	7222 Aircraft parts, and guided missile and space vehicle subassemblies.	Other retail stores:
MINING	2812 Plastics materials, synthetic resins, synthetic rubber, and man-made fibers, except glass.	7230 Ship and boat building and repair.	5250 Apparel and accessories.
Metal mining:	2830 Drugs.	7301 Railroad equipment, including street cars.	5260 Furniture, home furnishings, and equipment stores.
1010 Iron ores.	2841 Soaps, detergents, and cleaning preparations.	7308 Motorcycles, bicycles, and parts, and other transportation equipment.	5270 Eating and drinking places.
1020 Copper, lead and zinc, gold and silver ores.	2842 Perfumes, cosmetics, and other toilet preparations.	7311 Scientific instruments; photographic equipment; watches and clocks.	5281 Drug stores and proprietary stores.
1090 Other metal mining.	2850 Paints and allied products, including gum and wood chemicals.	7312 Scientific and mechanical measuring instruments.	5292 Liquor stores.
1100 Anthracite and bituminous coal and lignite mining.	2870 Other chemical products.	7320 Optical, medical, and ophthalmic goods.	5293 Jewelry stores.
Crude petroleum and natural gas:	2898 Other chemical products.	3800 Photographic equipment and supplies.	5298 Sporting goods and secondhand stores, farm and garden supply, fuel and ice dealers, and other retail stores.
1810 Crude petroleum, natural gas, and natural gas liquids.	Petroleum refining and related industries:	3870 Watches and clocks.	FINANCE, INSURANCE, and REAL ESTATE
1830 Oil and gas field services.	2911 Petroleum refining without extraction.	Miscellaneous manufacturing industries, including adhesives and accessories:	6011 Mutual savings banks.
1850 Nonmetallic minerals (except fuels) mining:	2912 Integrated petroleum refining and extraction.	3910 Jewelry, silverware, and plated ware.	6012 Banks and trust companies, except mutual savings banks.
1410 Stone, sand, and gravel.	2998 Paving and roofing materials, and other products of petroleum and coal.	3920 Toys and sporting goods.	Credit agencies other than banks:
1490 Other nonmetallic minerals, except fuels.	Rubber and miscellaneous plastics products:	3930 Ordnance, except guided missiles.	6021 Savings and loan, building and loan associations.
CONTRACT CONSTRUCTION	3010 Tires and inner tubes.	3991 Costume jewelry.	6022 Personal credit agencies.
General contract construction:	3020 Footwear, reamined rubber, and other fabricated rubber products.	3998 Musical instruments, office and artists' materials, and other manufacturing industries.	6028 Business credit agencies.
1610 Building construction.	3099 Miscellaneous plastics products.	TRANSPORTATION, COMMUNICATION, ELECTRIC, GAS, and SANITARY SERVICES	6029 Loan co-operatives and brokers, and other credit agencies.
1620 Highway and street construction, and other heavy construction.	Leather and leather products:	TRANSPORTATION:	Security and commodity brokers, dealers, exchange and services:
Special trade contractors:	3140 Footwear, except rubber.	4011 Railroad transportation, terminals, and related services.	6033 Security brokers, dealers, and flotation companies.
1631 Plumbing, heating, and air conditioning.	3146 Leather tanning and finishing, and other leather products.	4020 Local, suburban, and intercity passenger transportation, including taxicabs and school buses.	6038 Commodity brokers and dealers; security and commodity exchanges; and allied services.
1632 Electrical work.	3210 Glass and glass products.	4030 Motor freight transportation and warehousing.	Holding and investment companies:
1638 Other special trade contractors.	3240 Cement, hydraulic.	4040 Water transportation.	6042 Real estate investment companies.
MANUFACTURING	3270 Structural clay products.	4050 Air transportation.	6043 Real estate investment trusts, 1960 Act.
Food and kindred products:	3298 Cut stone and stone products, and abrasive, asbestos, and other nonmetallic mineral products.	4060 Pipe line transportation.	6044 Small business investment companies, 1958 Act.
2010 Meat products.	Primary metal industries:	4068 Other transportation services.	6048 Other holding and investment companies, 1958 Act.
2020 Dairy products.	3310 Blast furnaces, steel works, and iron and steel foundries and forgings.	Communication services:	6053 Life insurance.
2030 Canning and preserving fruits, vegetables, and sea foods.	3330 Nonferrous metals: smelting, refining, rolling, drawing, and alloying, including foundries and forgings.	4810 Telephone communications (wire or radio).	6054 Mutual insurance, except life or flood insurance companies.
2040 Grain mill products.	3398 Other primary metal industries.	4820 Telegraph communications (wire or radio).	6058 Other insurance companies.
2050 Bakery products.	Fabricated metal products, except machinery and transportation equipment:	4830 Radio and television broadcasting.	6059 Insurance agents, brokers, and service.
2060 Sugar.	3410 Metal cans.	4838 Other communication services.	6101 Real estate operators (except developers) and lessors of buildings.
2070 Confectionery and related products.	3420 Cutlery, hand tools, and general hardware.	4840 Electric, gas, and sanitary services:	6121 Lessors of mining, oil, and similar property.
2082 Meats, liquors and nuts.	3430 Heating apparatus (except electric) and plumbing fixtures.	4910 Electric companies and systems (95 percent or more).	6122 Lessors of railroad property.
2084 Wines, brandy, and brandy spirits.	3440 Fabricated structural metal products.	4920 Gas companies and systems (95 percent or more).	6128 Lessors of real property other than buildings, not elsewhere classified.
2085 Distilled, rectified, and blended liquors.	3450 Screw machine products, and bolts, nuts, screws, rivets, and washers.	4930 Gas companies and systems (95 percent or more).	6150 Subcontractors, developers, and operative builders.
2086 Soft drinks, flavoring extracts, and syrups.	3461 Metal stampings.	4940 Water supply and other sanitary services.	6201 Agents, brokers, and managers.
2091 Vegetable oil mills, and animal, marine, and edible fats and oils.	3465 Metal coating and engraving.	WHOLESALE TRADE	6202 Title abstract companies.
2098 Other food and kindred products.	3498 Fabricated wire products and other fabricated metal products.	4010 Motor vehicles and automotive equipment.	6203 Combinations of real estate, insurance, loans, and law offices.
2100 Tobacco manufactures.	Machinery, except clocks:	4020 Drugs, chemicals, and paints.	SERVICES
Textile mill products:	3510 Engines and turbines.	4030 Meats and meat products.	Hotels, rooming houses, camps, and other lodging places:
2111 Broad woven fabric mills, cotton.	3520 Farm machinery and equipment.	4040 Poultry and poultry products, fish and sea foods, and other groceries and related products.	7013 Tourist courts and motels.
2112 Broad woven fabric mills, man-made fiber and silk.	3530 Construction, mining, and materials handling machinery and equipment.	4050 Petroleum and petroleum products.	7015 Hotels and other lodging places, except tourist courts and motels.
2113 Lyeing and finishing, except wool and knit goods.	3540 Metalworking machinery and equipment.	4060 Beer, wine, and distilled alcoholic beverages.	Personal services:
2120 Broad woven fabric mills, wool: including dyeing and finishing.	3550 General industrial machinery and equipment.	4068 Paper and its products.	7210 Laundries, laundry services, cleaning and dry cleaning plants.
2200 Carpeting mills.	3570 Office, computing, and accounting machinery.	4070 Leather and construction materials.	7220 Photographic studios, including commercial photography.
2210 Knitting mills.	3598 Other electrical machinery and equipment.	4098 Other wholesale trade.	7298 Beauty, barber, shoe repair, and pressing shops, funeral, and other personal services.
2220 Carpets and rugs.	3611 Electrical transmission and distribution equipment.	RETAIL TRADE	Business services:
2230 Yarn and thread mills.	3612 Electrical transmission and distribution equipment.	Building materials, hardware, and farm equipment:	7310 Advertising.
2291 Narrow fabrics.	3613 Household appliances.	2211 Building materials.	7308 Credit reporting and employment agencies, news syndicates, duplicating, mailing, stenographic, building, and other business services.
2298 Other textile mill products.	3630 Radio and television receiving sets, except communication types.	2215 Hardware stores.	7310 Automobile parking, repair, and services.
Apparel and other fabricated textile products:	3662 Electronic components and accessories.	2218 Mail order houses.	7350 Repair services, except automobile.
2310 Men's and boys' clothing.	3691 Communication equipment.	2221 Department stores.	Motion pictures:
2330 Women's, children's, and infants' clothing.	3698 Other electrical machinery, equipment, and supplies.	2222 Variety stores.	7810 Motion picture production, distribution, and related services.
2390 Other fabricated textile products.	Code	2223 Mail order houses.	7820 Motion picture theaters.
Lumber and wood products, except turpentine:	3711 Motor vehicles; passenger car, truck, and bus bodies; and truck trailers.	2228 Other general merchandise stores.	7900 Amusement and recreational services, except motion pictures.
2410 Lumber, camps, and loggins; sawmills, planing mills.	3714 Motor vehicle parts and accessories.	Code	8210 Medical services.
2430 Millwork, veneers, plywood, and prefabricated structural wood products.	3717 Aircraft, and complete guided missiles and space vehicles.	2230 Medical services.	8228 Educational services.
2498 Wooden containers and other wood products.	3722 Aircraft parts, and guided missile and space vehicle subassemblies.	2238 Food stores.	8998 Services not elsewhere classified.
Furniture and fixtures:	3730 Ship and boat building and repair.	Code	
2510 Household furniture.	3701 Railroad equipment, including street cars.	2241 Medical services.	
2560 Furniture and fixtures, except household furniture.	3708 Motorcycles, bicycles, and parts, and other transportation equipment.	2242 Medical services.	
Paper and allied products:	3711 Scientific instruments; photographic equipment; watches and clocks.	2243 Medical services.	
2611 Pulp mills.	3712 Scientific and mechanical measuring instruments.	2248 Medical services.	
2614 Paper, paperboard, building paper, and building board mills.	3720 Optical, medical, and ophthalmic goods.	2249 Medical services.	
2640 Converted paper and paperboard products, except containers.	3730 Ship and boat building and repair.	2250 Medical services.	
2650 Paperboard boxes and containers.	3731 Railroad equipment, including street cars.	2251 Medical services.	
Printing, publishing, and allied industries:	3738 Motorcycles, bicycles, and parts, and other transportation equipment.	2252 Medical services.	
2711 Newspapers: publishing, publishing and printing.	3741 Motor vehicle parts and accessories.	2253 Medical services.	
2712 Periodicals: publishing, publishing and printing.	3744 Motor vehicle parts and accessories.	2254 Medical services.	
2718 Books: publishing, publishing and printing; and miscellaneous publishing.	3747 Aircraft, and complete guided missiles and space vehicles.	2255 Medical services.	

Forms and Instructions

Form 1120

U.S. Corporation Income Tax Return

For calendar year 1972 or other taxable year beginning

1972

Department of the Treasury Internal Revenue Service

1972, ending 19 (PLEASE TYPE OR PRINT)

Check if: A Consolidated return, B Personal Holding Co., C Business Code No. Name, Number and street, City or town, State, and ZIP code, D Employer Identification No., E County in which located, F Enter total assets from line 14, column (D), Schedule L.

IMPORTANT—Fill in all applicable lines and schedules. If the lines on the schedules are not sufficient, see instruction N.

GROSS INCOME table with lines 1-11 including Gross receipts or gross sales, Less: Returns and allowances, Cost of goods sold, Dividends, Interest, Other interest, Gross rents, Gross royalties, Net capital gains, Ordinary gain or loss, Other income, TOTAL income.

DEDUCTIONS table with lines 12-30 including Compensation of officers, Salaries and wages, Repairs, Bad debts, Rents, Taxes, Interest, Contributions, Amortization, Depreciation, Depletion, Advertising, Pension, Profit-sharing, Employee benefit programs, Other deductions, TOTAL deductions, Taxable income before net operating loss deduction, Less: Net operating loss deduction, Special deductions, Taxable income.

TAX table with lines 31-35 including TOTAL TAX, Credits: Overpayment from 1971, 1972 estimated tax payments, Less refund of 1972 estimated tax, Tax deposited with Form 7004, Tax deposited with Form 7005, Credit from regulated investment companies, U.S. tax on special fuels, TAX DUE, OVERPAYMENT, Enter amount of line 34 you want credited to 1973 estimated tax.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief it is true, correct, and complete. If prepared by a person other than the taxpayer, his declaration is based on all information of which he has any knowledge.

Signature and title fields for the taxpayer and preparer.

The Internal Revenue Service does not require a seal on this form, but if one is used, please place it here.

Form 1120 (1972)

Page 2

Schedule A—COST OF GOODS SOLD and Schedule C—DIVIDENDS tables with 7 and 12 rows respectively.

Schedule E—COMPENSATION OF OFFICERS table with 8 columns: Name of officer, Social security number, Title, Time devoted to business, Percent of corporation stock owned, Amount of compensation, Expense account allowances.

Schedule F—BAD DEBTS—RESERVE METHOD table with 7 columns: Year, Trade notes and accounts receivable outstanding, Sales on account, Current year's provision, Recoveries, Amount charged against reserve, Reserve for bad debts at end of year.

Schedule G—DEPRECIATION (See instructions for Schedule G) Note: If depreciation is computed by using the Class Life (ADR) System for assets placed in service after December 31, 1970, or the Guideline Class Life System for assets placed in service before January 1, 1971, you must file Form 4832 (Class Life (ADR) System) or Form 5005 (Guideline Class Life System) with your return.

Table for depreciation with 7 columns: Group and guideline class, Date acquired, Cost or other basis, Depreciation allowed or allowable in prior years, Method of computing depreciation, Life or rate, Depreciation for this year. Includes sections for first-year depreciation and summary of depreciation.

Schedule H—SUMMARY OF DEPRECIATION (Other than additional first-year depreciation) table with 5 columns: Straight line, Declining balance, Sum of the years-digits, Units of production, Other (specify), Total.

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Forms and Instructions

Schedule I—SPECIAL DEDUCTIONS

1 (a) 85% of line 1, Schedule C
(b) 60.208% of line 2, Schedule C
(c) 85% of line 3, Schedule C
(d) 100% of line 4, Schedule C
2 Total—See page 6 of instructions for limitation
3 100% of line 8, Schedule C
4 Enter dividends received deduction allowed for dividends reported on line 9, Schedule C. See section 1564(b) for computation.
5 Dividends paid on certain preferred stock of public utilities (see instructions)
6 Western Hemisphere trade corporations (see instructions)
7 Total special deductions—Add lines 2 through 6. Enter here and on line 29(b), page 1

Schedule J—TAX COMPUTATION

1 Taxable income (line 30, page 1). (If DISC inter-company pricing rules (section 994(a)) apply, check here [] attach a computation of taxable income under section 994(a), and enter the recomputed taxable income here)
2 Surtax exemption—Enter line 1 or \$25,000, whichever is lesser. (Component members of a controlled group—see page 6 of instructions and enter your surtax exemption or line 1, whichever is lesser.)
3 Line 1 less line 2
4 (a) 22% of line 1
(b) 26% of line 3
(c) If multiple surtax exemption is elected under section 1562, enter 6% of line 2
5 Income tax (line 4, or alternative tax from separate Schedule D, whichever is lesser)
6 (a) Foreign tax credit (attach Form 1118)
(b) Investment credit (attach Form 3468)
(c) Work incentive (WIN) credit (attach Form 4874)
7 Total of lines 6(a), (b), and (c)
8 Line 5 less line 7
9 Personal holding company tax (attach Schedule 1120 PH)
10 Tax from recomputing a prior year investment credit (attach Form 4255)
11 Minimum tax on tax preference items (see page 6 of instructions). Check here [] if Form 4626 is attached
12 Total tax—Add lines 8 through 11. Enter here and on line 31, page 1

Schedule K—RECORD OF FORM 503 FEDERAL TAX DEPOSITS (List deposits in order of date made—See instruction G)

Table with 9 columns: Serial number of Form 503, Date of deposit, Amount, Serial number of Form 503, Date of deposit, Amount, Serial number of Form 503, Date of deposit, Amount

G Date incorporated

H (1) Did you at the end of the taxable year own, directly or indirectly, 50% or more of the voting stock of a domestic corporation?
(2) Did any corporation, individual, partnership, trust, or association at the end of the taxable year own, directly or indirectly, 50% or more of your voting stock?

If the answer to (1) or (2) is "Yes," attach a schedule showing: (a) name, address, and identifying number; and (b) percentage owned.

If the answer to (1) above is "Yes," show the taxable income or (loss) from line 30, page 1, Form 1120 of such corporation for the taxable year ending with or within your taxable year.

If the answer to (2) above is "Yes," was the owner of such voting stock an alien individual or a foreign corporation, partnership, trust or association?

I Did you have any contracts or subcontracts subject to the Renegotiation Act of 1951?

J Did you ever declare a stock dividend?

K Did you claim a deduction for expenses connected with: (1) Entertainment facility (boat, resort, ranch, etc.)? (2) Living accommodations (except employees on business)? (3) Employees' families at conventions or meetings? (4) Employee or family vacations not reported on Form W-2?

L Taxable income or (loss) from line 30, page 1, Form 1120 for: 1969, 1970, 1971

M Refer to page 7 of instructions and state the principal: Business activity, Product or service

N Were you a member of a controlled group subject to the provisions of: (1) Section 1561? (2) Section 1562? If "Yes," check type of relationship: (a) parent-subsidiary (b) brother-sister (c) combination of (a) and (b)

O Did the corporation, at any time during the taxable year, have any interest in or signature or other authority over a bank, securities, or other financial account in a foreign country?

P Were you a U.S. shareholder of any controlled foreign corporation? If "Yes," file Schedule A, Form 1095, if this is a consolidated return, answer here for parent corporation and on Form 851, Affiliations Schedule, for each subsidiary.

Q During this taxable year, did you pay dividends (other than stock dividends and distributions in exchange for stock) in excess of your current and accumulated earnings and profits?

R Did you file all required Forms 1099, 1096 and 1087? Yes No

Table with columns: ASSETS, LIABILITIES AND STOCKHOLDERS' EQUITY, and sub-columns for Beginning of taxable year (A) Amount, (B) Total and End of taxable year (C) Amount, (D) Total. Rows include Cash, Trade notes and accounts receivable, Inventories, Gov't obligations, Other current assets, Loans to stockholders, Buildings and other fixed depreciable assets, Depletable assets, Land, Intangible assets, Other assets, Total assets, Accounts payable, Other current liabilities, Loans from stockholders, Other liabilities, Capital stock, Retained earnings, etc.

Schedule M-1—RECONCILIATION OF INCOME PER BOOKS WITH INCOME PER RETURN

Table with 2 columns for reconciliation. Row 1: Net income per books. Row 2: Federal income tax. Row 3: Excess of capital losses over capital gains. Row 4: Taxable income not recorded on books this year. Row 5: Expenses recorded on books this year not deducted in this return. Row 6: Total of lines 1 through 5. Row 7: Income recorded on books this year not included in this return. Row 8: Deductions in this tax return not charged against book income this year. Row 9: Total of lines 7 and 8. Row 10: Income (line 28, page 1)—line 6 less 9.

Schedule M-2—ANALYSIS OF UNAPPROPRIATED RETAINED EARNINGS PER BOOKS (line 24 above)

Table with 2 columns for analysis of unappropriated retained earnings. Row 1: Balance at beginning of year. Row 2: Net income per books. Row 3: Other increases. Row 4: Total of lines 1, 2, and 3. Row 5: Distributions: (a) Cash, (b) Stock, (c) Property. Row 6: Other decreases. Row 7: Total of lines 5 and 6. Row 8: Balance at end of year (line 4 less 7).

Forms and Instructions

1972 Department of the Treasury Internal Revenue Service

Instructions for Form 1120 U.S. Corporation Income Tax Return (References are to the Internal Revenue Code.)

General Instructions

A. Taxpayers required to file Form 1120.—

1. Domestic corporations, whether or not having any taxable income, unless exempt under section 501.

2. Real estate investment trusts defined in section 856.

3. Regulated investment companies defined in section 851.

4. Insurance companies described in section 831.

B. Returns required of certain organizations.—

1. Foreign corporations other than life and mutual insurance companies filing Forms 1120L and 1120M—file Form 1120F.

2. Life insurance companies (section 802)—file Form 1120L.

3. Mutual insurance companies (section 821)—file Form 1120M.

4. Exempt farmers' cooperatives (section 1381)—file Form 990-C.

5. Exempt organizations with unrelated trade or business income—file Form 990-T.

6. Small business corporations (section 1372(a))—file Form 1120S.

7. Domestic International Sales Corporations (section 992)—file Form 1120-DISC.

C. Where to file.—

If the corporation's principal business, office, or agency is located in

Use this address

New Jersey, New York City, Rockland, Suffolk, and Westchester	Internal Revenue Service Center 1040 Waverly Avenue Holtzville, N.Y. 11793
New York (all other counties), Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont	Internal Revenue Service Center 310 Lowell Street Andover, Mass. 01812
Alabama, Florida, Georgia, Mississippi, South Carolina	Internal Revenue Service Center 4800 Buford Highway Chamblee, Georgia 30006
Michigan, Ohio	Internal Revenue Service Center Cincinnati, Ohio 45298
Arkansas, Kansas, Louisiana, New Mexico, Oklahoma, Texas	Internal Revenue Service Center 3551 S. International Austin, Texas 78740
Alaska, Arizona, Colorado, Idaho, Minnesota, Montana, Nebraska, Nevada, North Dakota, Oregon, South Dakota, Utah, Washington, Wyoming	Internal Revenue Service Center 1180 West 1200 South Salt Lake City, Utah 84405
Illinois, Iowa, Missouri, Wisconsin	Internal Revenue Service Center 2306 E. Bannister Road Kansas City, Mo. 64170
California, Hawaii	Internal Revenue Service Center 5045 East Butler Avenue Fresno, California 93730

Indiana, Kentucky, North Carolina, Tennessee, Virginia, West Virginia	Internal Revenue Service Center 3131 Democrat Road Memphis, Tenn. 38110
Delaware, District of Columbia, Maryland, Pennsylvania	Internal Revenue Service Center 11601 Roosevelt Boulevard Philadelphia, Pa. 19155

Note: Corporations having a principal place of business outside the United States or claiming the benefits of section 931 (relating to income from sources within U.S. possessions) must file with the Internal Revenue Service Center, 11601 Roosevelt Boulevard, Philadelphia, Pennsylvania 19155.

D. When to file.—In general, Form 1120 must be filed on or before the 15th day of the 3d month after the end of the taxable year.

You may request an automatic 3-month extension of time to file Form 1120 by filing Form 7004.

Form 7005 may be used to request an additional extension but only by corporations that have previously obtained an automatic 3-month extension by filing Form 7004.

E. Information returns and forms that may be required.—

1. Forms W-2 and W-3.—Statement of wages, other compensation, and tax withheld; and reconciliation of tax withheld.

2. Forms W-2P and W-3P.—Information returns concerning annuities, pensions, profit-sharing, etc., distributions and tax withheld; and reconciliation of tax withheld.

3. Form 1087.—Nominee's information return for reporting dividends, earnings or interest received as a nominee on behalf of another person.

4. Form 1087-01D.—Nominee's information return for original issue discount.

5. Form 1096 and Schedule A (Form 1096).—Annual summary and transmittal of U.S. information returns; corporations paying nontaxable dividends.

6. Forms 966 and 1099-L.—Information returns regarding dissolution or liquidation, and distributions in liquidation.

7. Forms 1099.—Information returns for reporting certain dividends, earnings, interest, patronage dividends, rents, royalties; and commissions, fees, prizes, awards, etc., to non-employees.

8. Forms 1099-OID and 1099-MED.—Information returns regarding original issue discount, and payments for medical and health care.

9. Form 1118.—Computation of foreign tax credit.

10. Forms 2952 and 3646.—Returns relating to controlled foreign corporations.

11. Form 3468.—Computation of investment credit.

12. Forms 3921, 3922, and 4067.—Information returns concerning exercise of certain stock options and the transfer of stock acquired by certain options.

13. Form 4136.—Computation of credit for Federal tax on special fuels, nonhighway gasoline and lubricating oil.

14. Form 4255.—Tax from recomputing a prior year investment credit.

15. Form 4626.—Computation of minimum tax on tax preference items.

16. Schedule PH (Form 1120).—Computation of U.S. personal holding company tax.

17. Form 4683.—U.S. information return on foreign bank, securities, and other financial account(s).

18. Form 4797.—Sale or exchange of property (other than capital assets) including involuntary conversions.

19. Form 4832.—Computation of depreciation and repair expense as elected under the class life (ADR) system.

20. Form 4848.—Annual employer's return for employees' pension or profit-sharing plans, and the accompanying Schedule A (Form 4848).

21. Form 4849.—Financial statement of employees' pension or profit-sharing fund or fiduciary account.

22. Form 4874.—Computation of credit for wages paid or incurred in Work Incentive (WIN) Programs.

23. Form 5006.—Computation of depreciation and repair expense as elected under the guideline class life system.

F. Period to be covered by 1972 return.—The 1972 return is to be filed for calendar year 1972 and fiscal years beginning in 1972 and ending in 1973. If the return is for a fiscal year, fill in the taxable year space on the form.

FINAL RETURNS.—If the corporation ceases to exist, write "FINAL RETURN" at the top of the form.

G. Depository method of tax payment.—The balance of tax due (line 33) must be paid in full when the return is filed or in two installments, 50% by the 15th day of the 3d month and 50% by the 15th day of the 6th month after the end of the taxable year.

Corporations must deposit all income tax payments with an authorized commercial bank depository or Federal Reserve bank. All deposits must be accompanied by a Federal Tax Deposit Form 503. Please enter the serial number of Form 503 on your remittance. Do not remit directly to Internal Revenue.

In Schedule K, list all Form 503 deposits that relate to the taxable year for which this return is filed and which were made before or simultaneously with the filing of this return.

Timeliness of deposits will be determined by the date the deposit was received by the commercial bank depository or Federal Reserve bank.

Forms 503 will be mailed to corporations on a cyclical basis depending on the taxable year of the corporation. Corporations needing Forms 503 may obtain them from the Internal Revenue Service Center where they will file their returns. The application should include the corporation's name, identification number, address, and the taxable year to which the deposits relate.

Penalty for failure to pay tax.—Section 6651 imposes a penalty for failure to pay tax (other than estimated income tax) when due. The penalty is $\frac{1}{2}\%$ a month or fraction of a month, up to 25%, on the net amount due and is in addition to the 6% a year interest charge imposed on unpaid tax. The penalty does not apply if the failure is due to reasonable cause.

Taxpayers requesting an automatic extension may be liable for the penalty for failure to pay tax if they underestimate their tax on Form 7004. See Form 7004 for additional information.

H. Change in accounting period.—To change your accounting period, see section 1.442-1 of the regulations and Form 1128, Application for Change in Accounting Period.

I. Accounting methods.—Taxable income must be computed using the method of accounting regularly used in keeping the corporation's books and records. In all cases the method adopted must clearly reflect taxable income. (See section 446.)

Unless the law specifically permits, you may not change the method of accounting used to report income in prior years (for income as a whole or for any material item) without first obtaining consent on Form 3115, Application for Change in Accounting Method.

Rounding off to whole-dollar amounts.—The money items on your return and accompanying schedules may be shown as whole-dollar amounts by eliminating any amount less than 50 cents and increasing any amount

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from 50 cents through 99 cents to the next higher dollar.

J. Estimated tax.—A corporation must make estimated tax payments if its estimated tax (income tax less credits less an estimated tax exemption) can be expected to be \$40 or more.

For taxable years beginning in 1973, the estimated tax exemption is 80% of the lesser of (1) 22% of the corporation's surtax exemption or (2) total tax less credits. The 80% estimated tax exemption is reduced 20 percentage points each year and becomes zero in 1977.

A corporation must make estimated tax payments for taxable years beginning in 1973 if it can expect its total tax liability before the 80% estimated tax exemption to be \$200 or more.

Form 1120-W may be used as a worksheet to compute your estimated tax.

If you underpaid your estimated tax and believe a penalty charge should not be asserted, attach Form 2220 to your return.

If you overpaid your estimated tax you may apply on Form 4466 for a "quick refund" if the overpayment is (1) at least 10% of your expected income tax liability AND (2) at least \$500.

This application for a quick refund must be made within 2½ months after the end of the taxable year and before you file your tax return.

K. Consolidated returns.—The parent corporation must attach Form 851, Affiliations Schedule, to the consolidated return. For the first year a consolidated return is filed, each subsidiary must attach a Form 1122.

Supporting schedules must be filed for each corporation included in the consolidated return. The schedules must be in columnar form and show, both before and after adjustments, the items of gross income and deductions, a computation of taxable income, balance sheets as of the beginning and end of the taxable year, and a reconciliation of retained earnings. In addition, attach consolidated balance sheets and a reconciliation of consolidated retained earnings.

L. Stock ownership in foreign corporations.—If you owned 5% or more in value of the outstanding stock of a foreign personal holding company, attach the statement required by section 551(d).

If you control a foreign corporation or were a 10% or more shareholder of a controlled foreign corporation, you may be required to file Forms 2952 and 3646.

M. Financial statements.—The balance sheets must agree with your books and records. Any differences must be

reconciled. Copies of balance sheets required by Federal, State, etc., authorities may be used in place of Schedule L. Certificates of deposit should be included as cash on line 1 of the balance sheet.

Banks, insurance companies, and other corporations required to submit substantially similar statements of income and expense to any Federal, State, etc., authority may submit copies of such statements in place of the information required on lines 1 through 30, page 1. Railroads may substitute Form 1090. In such cases, taxable income must be reconciled in Schedule M-1 with the net profit shown on the statement and entered as line 30, page 1.

N. Attachments.—You may use attachments if the lines on the form schedules are not sufficient. They must contain all the required information and follow the format of the schedules on the return. If an attachment is used in place of a schedule having a summary line on page 1, the total need not be entered on the schedule but must be entered on page 1.

Enter your name and identifying number on all attachments exactly as shown on your preaddressed label.

O. Amended return.—An error in a previously filed income tax return may be corrected by filing a Form 1120X, Form 843, or an amended Form 1120. Although the use of Form 1120X is not mandatory, IRS prefers it be used since it is designed to expedite processing.

P. Transfers to corporation controlled by transferor.—If a person acquires stock or securities of a corporation in exchange for property, and no gain or loss is recognized under section 351, the transferor and transferee must file with their return for the taxable year in which the exchange is completed, the information required by section 1.351-3 of the regulations.

Q. Signature.—The return must be signed by the president, vice president, treasurer, assistant treasurer, chief accounting officer, or by any other corporate officer (such as tax officer) who is authorized to sign.

A receiver, trustee, or assignee must sign any return that he is required to file on behalf of a corporation.

R. Total assets.—If there are no assets at the end of the taxable year, show the total assets as of the beginning of the taxable year.

S. Corporations that liquidate within one calendar month pursuant to section 333.—Such corporations should attach a computation (following the format in Revenue Procedure 65-10, C.B. 1965-1, 738, as modified by Revenue Proce-

dure 67-12, C.B. 1967-1, 589) of accumulated earnings and profits including all items of income and expense accrued up to the date on which the transfer of all property is completed.

Specific Instructions

(Numbered to correspond with the line numbers on page 1 of the return.)

Gross Income

1. Gross receipts.—Enter gross receipts or sales from all business operations except those required to be reported in lines 4 through 10. For reporting advance payments and long-term contracts, see section 1.451-5 of the regulations.

If you use the installment method of reporting, enter on line 1 the gross profit on collections from installment sales and carry the same amount to line 3. Attach a schedule showing for the current and 3 preceding years: (a) gross sales, (b) cost of goods sold, (c) gross profits, (d) percentage of gross profits to gross sales, (e) amount collected, and (f) gross profit on amount collected.

2. Cost of goods sold.—The method of valuing inventories may not be changed without permission. Application for permission to change must be made on Form 3115.

Cost of operations (where inventories are not an income-determining factor).—If the amount entered on line 2 includes an amount applicable to cost of operations, attach a schedule showing (1) salaries and wages and (2) other costs in detail.

4. Dividends.—(Numbered to correspond with line numbers in Schedule C.)

[1.] Enter dividends received from domestic corporations subject to income tax and which are subject to the 85% deduction under section 243(a)(1). Include on this line dividends from a DISC or former DISC that are designated as being eligible for the 85% deduction. These are distributions which are made out of other earnings and profits.

Small business investment companies enter dividends received from domestic corporations subject to income tax even though a deduction is allowed for the entire amount of such dividends in line 1 of Schedule I. For dividends received from a regulated investment company, see section 854 for the amount subject to the 85% deduction.

So-called dividends or earnings received from mutual savings banks, etc., are really interest and should not be treated as dividends.

[2.] Enter dividends received on the preferred stock of a public utility that is subject to income tax and is allowed the deduction provided in section 247 for dividends paid.

[3.] Enter dividends received from foreign corporations and which qualify for the 85% deduction provided in section 245(a).

[4.] Enter dividends received from wholly-owned foreign subsidiaries and which are eligible for the 100% deduction provided in section 245(b).

In general, this deduction applies to dividends paid out of the earnings and profits of a foreign corporation for a taxable year during which (1) all of its outstanding stock is owned (directly or indirectly) by the domestic corporation receiving the dividends and (2) all of its gross income from all sources is effectively connected with the conduct of a trade or business within the United States.

This 100% deduction does not apply if an election under section 1562 (election of multiple surtax exemptions by a controlled group of corporations) is effective for either (1) the taxable year of the domestic corporation in which the dividends are received, or (2) the taxable year of the foreign corporation out of the earnings and profits of which the dividends are paid.

[5.] Enter foreign dividends (including minimum distributions under subpart F) that are not reportable on lines 3 and 4. Exclude distributions of amounts constructively taxed in the current year or in prior years under subpart F.

[6.] Include income constructively received from controlled foreign corporations under subpart F. This amount should equal the total of amounts reported in Schedule A, line 5 of Form(s) 3646.

[7.] Include gross-up for taxes deemed paid under sections 902 and 960.

[8.] Enter only those dividends that are subject to the elective provisions of section 243(b) and are entitled to the 100% dividends-received deduction under section 243(a)(3). Corporations making this election are subject to the provisions of section 1561.

[9.] Enter only those dividends that are subject to the elective provisions of section 243(b) and are entitled to the dividends-received deduction as computed under the provisions of section 1564(b). Corporations making this election are subject to the provisions of section 1562 as modified by section 1564.

[10.] Enter dividends from a DISC or former DISC that are designated as not being eligible for the 85% deduc-

tion. These are distributions out of accumulated DISC income, previously taxed income, and deemed distributions pursuant to section 995(b)(1).

[11.] Include dividends (other than capital gain dividends) received from regulated investment companies and which are not subject to the 85% deduction; dividends from tax-exempt organizations; dividends (other than capital gain dividends) received from a real estate investment trust which, for the taxable year of the trust in which the dividends are paid, qualifies under sections 856-858; dividends not eligible for a dividends-received deduction because of the holding period of the stock or an obligation to make corresponding payments with respect to similar stock; and any other taxable dividend income not properly reported above.

6. Other interest.—Enter interest on loans, notes, mortgages, bonds, bank deposits, corporate bonds, tax refunds, etc.

Do not offset interest income against interest expense.

7. Gross rents.—Enter the gross amount received for the rent of property. Deduct expenses such as repairs, interest, taxes, and depreciation in the proper lines for deductions.

9(a). Net capital gains.—Every sale or exchange of a capital asset must be reported in detail in Schedule D even though no gain or loss is indicated.

If the net long-term capital gain exceeds the net short-term capital loss, or in case of only a net long-term capital gain, compute the alternative tax on separate Schedule D to see if it produces a lesser tax.

9(b). Ordinary gain or loss.—Enter the total ordinary gain or loss from line 9, Part II, Form 4797.

10. Other income.—The attached schedule should include recoveries of bad debts deducted in prior years under the specific charge-off method. Refunds of taxes deducted in prior years should be reported here and not offset against current year's taxes.

If "other income" consists of only one item, you may identify it by showing the account caption in parentheses on line 10.

Deductions

Note: That portion of wage, salary, rent and price payments in excess of the amount permitted under Executive Order 11640, issued pursuant to the authority of the Economic Stabilization Act of 1970, as amended, is not deductible as a business expense under section 162(c)(2). (Revenue Ruling 72-236)

12. Compensation of officers.—Complete column 8 of Schedule E for

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your 25 highest paid officers. To determine the highest paid officers: add all allowances, including expense account allowances, to each officer's compensation. Expense account allowance means (1) amounts, other than compensation, received as advances or reimbursements and (2) amounts paid by or for the corporation for expenses incurred by or on behalf of an officer. Column 8 does not have to be completed for any officer for whom the combined amount is less than \$30,000.

This information is to be submitted by each member of an affiliated group included in a consolidated return.

For this purpose an officer is a person such as regular officer, chairman of the board, etc., who is elected or appointed to office or who is designated as such in the corporation's charter or bylaws.

14. Repairs.—Enter the cost of incidental repairs, including labor, supplies, and other items, that do not add to the value or appreciably prolong the life of the property. Include in this line the total amount of repairs from Forms 4832 and 5006.

15. Bad debts.—Bad debts may be treated in either of two ways—(1) as a deduction for debts that become worthless in whole or in part, or (2) as a deduction for a reasonable addition to a reserve for bad debts. (Section 166.) Application to change the method of computing bad debts must be made on Form 3115.

17. Taxes.—Enter taxes paid or accrued during the taxable year and attach a schedule showing the type and amount of tax.

Do not include Federal income taxes; estate, inheritance, legacy, succession, or gift taxes; foreign or United States possession income taxes if a foreign tax credit is claimed; Federal taxes paid on bonds containing a tax-free covenant, or taxes not imposed upon the taxpayer. See section 164(d) for apportionment of taxes on real property between seller and purchaser.

18. Interest.—Enter business interest but do not include interest on indebtedness incurred or continued to purchase or carry obligations on which the interest is wholly exempt from income tax. (Section 265.)

Mutual savings banks, building and loan associations, and cooperative banks, enter amounts paid or credited to the accounts of depositors as dividends, interest, or earnings.

See section 267 for limitation on deductions for unpaid expenses and interest in transactions between related taxpayers.

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19. Contributions.—Enter contributions or gifts actually paid within the taxable year to or for the use of charitable and governmental organizations described in section 170(c).

The amount claimed may not exceed 5% of taxable income computed without regard to (1) this deduction, (2) the "special deductions" in line 29(b), (3) any net operating loss carryback to the taxable year under section 172, and (4) any capital loss carryback to the taxable year under section 1212(a)(1).

Charitable contributions in excess of the 5% limitation may not be deducted for the taxable year but may be carried over to the next 5 taxable years.

Corporations on the accrual basis may elect to deduct contributions paid on or before the 15th day of the 3d month after the end of the taxable year if the contributions are authorized by the board of directors during the taxable year. A declaration, signed by an officer, must be attached to the return stating that the resolution authorizing the contributions was adopted by the board of directors.

Attach a schedule showing the name of each organization and the amount paid. If a contribution is made in property other than money, state the kind of property contributed and the method used in determining its fair market value. If a contribution carryover is included, show the amount and how it was determined.

Special rule for contributions of certain property.—If you make a charitable contribution of property, the contribution must be reduced by the sum of (1) the ordinary income and (2) in the case of certain contributions, 62½% of the long-term capital gain,

that would have resulted if the property were sold at its fair market value. The reduction for 62½% of the long-term capital gain applies to (1) contributions of tangible personal property for use by an exempt organization for a purpose or function unrelated to the basis for its exemption, and (2) contributions of any property to or for the use of certain private foundations. (Section 170(e).)

Bargain sale to a charitable organization.—If you take a charitable contribution deduction for property sold to a charitable organization, the adjusted basis for determining gain from the sale is an amount which is in the same ratio to the adjusted basis as the amount realized is to the fair market value of the property.

20. Amortization.—If you claim a deduction for amortization, attach a schedule showing: (1) a description of

the expenditures being amortized; (2) date acquired, completed, or expended; (3) amount being amortized; (4) amortization deducted in prior years; (5) amortization period (number of months); (6) amortization for this year; and (7) the total amount of amortization less the amount claimed in Schedule A and elsewhere on the return.

See section 169 and regulations thereunder for conditions under which the cost of certified pollution control facilities may be amortized over 60 months.

Also see section 188 for conditions under which certain expenditures for on-the-job training and child care facilities may be amortized over 60 months.

21. Depreciation.—See instructions for Schedule G.

22. Depletion.—The percentage depletion rate for oil and gas wells is 22%. See section 613(b) for rates applicable to other natural deposits.

Attach Form T if a deduction is claimed for depletion of timber.

24. Pension, profit-sharing, etc. plans.—You are required to file Form 4848 with a Schedule A (Form 4848) and Form 4849 if you have adopted a pension, profit-sharing, or other funded deferred compensation plan. These forms are, in general, to be filed on or before the 15th day of the 5th month following the close of your taxable year.

25. Employee benefit programs.—Enter the amount of your contributions to employee benefit programs that are not an incidental part of a pension, profit-sharing, etc., plan included on line 24. Contributions to employee benefit programs that are to be reported on this line include insurance, health and welfare programs.

26. Other deductions.—No deduction is allowable for any amount allocable to a class of exempt income other than exempt interest income. Items directly attributable to wholly exempt income must be allocated to such income, and items directly attributable to any class of taxable income must be allocated to such taxable income.

If an item is indirectly attributable both to taxable income and exempt income, a reasonable proportion of the item, determined in the light of all the facts and circumstances in each case, must be allocated to each.

Attach a statement showing (1) the amount of each class of exempt income and (2) the amount of expense items allocated to each such class. Show the amount allocated by apportionment separately.

29(a). Net operating loss deduction.—The "net operating loss deduction" is the sum of the net operating

loss carryovers and carrybacks to the taxable year. (Section 172(a).)

Generally, a net operating loss may be carried back 3 years and carried over 5 years. The net operating loss must first be carried to the earliest of the 8 taxable years to which it may be carried, then to the next earliest year, etc. The portion of the loss that may be carried to each of the other 7 taxable years is the excess, if any, of the loss over the sum of the taxable income for each of the prior taxable years to which the loss may be carried. (Section 172(b).)

The term "net operating loss" means the excess of allowable deductions over gross income, computed with the following modifications under section 172(d):

(1) No net operating loss deduction is allowed.

(2) The special deduction provided in section 922 (Western Hemisphere trade corporations) is not allowed.

(3) The special deductions in line 1 of Schedule I are computed without regard to the 85% limitation provided in section 246(b). See section 1.172-2 of the regulations.

(4) The special deduction allowed by section 247 (dividends paid on certain preferred stock of public utilities) is computed without regard to section 247(a)(1)(B).

As stated, the net operating loss deduction is the sum of the carryovers and carrybacks. However, the following modifications must be taken into account in determining the taxable income that must be subtracted from a net operating loss to determine the portion of such loss that will still be available to carry to a later year:

(a) The special deduction provided in section 922 (Western Hemisphere trade corporations) is not allowed.

(b) The net operating loss deduction is determined without regard to the net operating loss for the loss year or any taxable year thereafter, and under certain circumstances, without regard to any portion of a net operating loss attributable to a foreign expropriation loss.

If you have a net operating loss carryback and desire a "quick refund" of taxes, file Form 1139 within 12 months after the close of the taxable year in which the net operating loss occurred. (Section 6411.)

If a net operating loss carryback creates an unused investment credit in a preceding year, the unused credit may be carried back to the 3 preceding years, and, under the provisions of section 6411, a quick refund of the taxes

affected may be obtained by filing Form 1139.

29(b). Special deductions.—See instructions for Schedule I.

Schedule G—Depreciation

Complete Schedule G if you claim a deduction for depreciation of property, leasehold improvements, patents, or copyrights. Form 4562, Depreciation, may be used as a supplement to Schedule G.

Class Life (ADR) System and Guideline Class Life System.—If depreciation is figured by using the Class Life (ADR) System for assets placed in service after December 31, 1970, or the Guideline Class Life System for assets placed in service before January 1, 1971, you must file Form 4832 (Class Life (ADR) System) or Form 5006 (Guideline Class Life System) with your income tax return. Except as otherwise expressly provided in income tax regulations sections 1.167(a)-11(b)(5)(vi) and 1.167(a)-12, the provisions of Revenue Procedures 62-21 and 65-13 are not applicable for taxable years ending after December 31, 1970. For more information, see instructions for Form 4832 and Form 5006 and Publication 534.

Salvage value.—Salvage value must be taken into account in determining the depreciation deduction except under the declining balance method, Class Life (ADR) System, or Guideline Class Life System. For personal property (other than livestock) with a useful life for 3 years or more, salvage value may be reduced by an amount not in excess of 10% of the cost or other basis of the property. In no event may property be depreciated below a reasonable salvage value after making the salvage value reduction.

Tangible property other than real property.—Tangible personal property, whether new or used, may be depreciated under the straight line method or the 150% declining balance method.

New tangible personal property with a useful life of 3 years or more may also be depreciated under (1) the double declining balance method, (2) the sum of the years-digits method, and (3) any other method that does not result in accumulated allowances at the end of any year (during the first two-thirds useful life of the property) greater than the total that could have been deducted if the double declining balance method had been used.

New section 1250 property.—The double declining balance and sum of the years-digits methods may be used only for (1) new residential rental property (from which at least 80% of the gross rental income is derived from

rental of residential units), (2) other new real property acquired before July 25, 1969, and (3) new real property placed in service after July 24, 1969, if construction, acquisition, or permanent financing arrangements were entered into before July 25, 1969. Other new real property acquired after July 24, 1969, may be depreciated under the straight line or 150% declining balance methods.

Used section 1250 property.—Used residential rental property acquired after July 24, 1969, with a useful life of 20 years or more may be depreciated under the 125% declining balance method. In the case of used real property acquired before July 25, 1969, or used real property acquired after July 24, 1969, pursuant to a written contract entered into before July 25, 1969, for the acquisition of such property or for the permanent financing thereof, depreciation is limited to the 150% declining balance method. Other used real property acquired after July 24, 1969, may be depreciated under the straight line method.

Rehabilitation expenditures for low-income rental housing.—You may elect to depreciate property attributable to rehabilitation expenditures for low-income rental housing incurred after July 24, 1969. Such depreciation may be claimed under the straight line method using a useful life of 60 months. For details, see section 167(k).

Section 179—Additional first-year depreciation allowance.—For the first year a depreciation deduction is allowable, corporations may elect to write off 20% of the cost (before adjustment for salvage value) of tangible personal property (whether new or used) with a useful life of 6 years or more, up to an aggregate cost of \$10,000.

Controlled corporate groups must apportion this \$10,000 amount among members of the group. For this purpose, section 179(d)(7) provides a special definition of controlled groups.

Show total additional first-year depreciation on line 1 of the depreciation schedule.

If the additional first-year allowance is elected, the basis of the property must be reduced by the amount of the deduction when computing ordinary depreciation.

Schedule I—Special Deductions

(Numbered to correspond with line numbers in Schedule I.)

1. A small business investment company operating under the Small Business

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Investment Act of 1958 may deduct 100% of dividends received from domestic corporations subject to income tax. (Section 243(a)(2).)

No deduction shall be allowed under section 243 in respect of a dividend from a corporation which is a DISC or former DISC (as defined in section 992 (a)) to the extent such dividend is paid out of the corporation's accumulated DISC income or previously taxed income, or is a deemed distribution pursuant to section 995(b)(1).

In general, no dividends-received deduction will be allowed on any share of stock (a) that is disposed of before the corporation has held it at least 15 days, or (b) to the extent the corporation is under an obligation to make corresponding payments with respect to substantially identical stock or securities.

2. Limitation on dividends-received deduction.—Line 2 may not exceed 85% of (line 28, page 1, less the sum of lines 3, 4, and 6 of Schedule I). For this purpose, line 28, page 1, is to be computed without regard to any capital loss carryback to the taxable year under section 1212(a)(1).

In a year in which a net operating loss occurs, sections 172(d) and 246(b) provide that this 85% limitation does not apply even if the loss is created by the dividends-received deduction.

In the case of a small business investment company, the dividends-received deduction of 100% included in line 2 is not subject to the overall 85% limitation.

Financial institutions, see section 596 for special limitation on dividends-received deduction.

5. Deduction for dividends paid on certain preferred stock of public utilities.—Section 247 allows public utilities a deduction of 29.167% of the lesser of (1) dividends paid on their preferred stock during the taxable year, or (2) taxable income computed without regard to this deduction. In a year in which a net operating loss occurs, section 172(d) provides that the deduction is to be computed without regard to section 247(a)(1)(B).

6. Deduction for Western Hemisphere trade corporations.—Section 922 allows Western Hemisphere trade corporations a deduction of 29.167% of taxable income computed without regard to this deduction.

However, no deduction is allowed to a corporation for a taxable year for which it is a DISC or in which it owns at

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any time stock in a DISC or former DISC as defined in section 992(a).

Schedule J—Tax Computation

1. Surtax exemption.—In general, corporations are entitled to a \$25,000 surtax exemption. Certain controlled corporations, however, are limited to a smaller amount under the provisions of sections 1561, 1562 and 1564. (See section 1563 for definition of controlled group.)

Under the provisions of section 1561, a controlled group of corporations, with respect to a specified December 31, must divide one \$25,000 surtax exemption equally among all component members of the group unless the group specifically consents to split up the \$25,000 amount among all component members in accordance with an apportionment plan. See section 1561 and the regulations thereunder for the time and manner of making the consent.

For taxable years beginning in 1972, only one member of a group that has made an election under section 1562 may claim a full \$25,000 surtax exemption with the others being limited to \$12,500. (This \$12,500 is further reduced in years 1973 and 1974 and becomes zero in 1975.) Section 1564(a)(2) provides that the component members of the controlled group must elect which member is to receive the full \$25,000 and which members are to be limited to \$12,500. See regulations section 1.1564-1(b) for the manner of making the election.

If the group elects to have each component member claim a separate surtax exemption under section 1562, each component member must pay an additional tax of 6% of the amount of income equal to its surtax exemption. If only one member of the group has any taxable income, the 6% tax does not apply. (Section 1562(b)(1)(A)).

2. Mutual savings banks conducting life insurance business.—The tax under section 594 consists of the sum of (1) a partial tax computed on Form 1120 on the taxable income of the bank determined without regard to income or deductions allocable to the life insurance department; and (2) a partial tax on the taxable income computed on Form 1120L of the life insurance department. Enter the combined tax on line 5 of Schedule J, Form 1120. Attach Form 1120L as a schedule and identify as such.

3. Credit for wages paid or incurred in Work Incentive (WIN) Programs.—Effective for tax years beginning after

1971, employers may claim a credit of 20% of the salaries and wages paid or incurred to employees hired under a Work Incentive (WIN) Program. The credit is allowed for the salaries and wages paid or incurred for the first 12 months of employment. For special rules and limitations, see Form 4874 and sections 50A and 50B.

4. Tax from recomputing a prior year investment credit.—If property is disposed of prior to the life-years category used in computing the investment credit, the investment credit must be recomputed using as the useful life the period the property was actually held. In recomputing the credit, use the life-years categories of 0-3 years; 3-5; 5-7; and 7 or more. If the credit taken (including carrybacks and carryovers) exceeds the recomputed credit, the tax for the year of disposition must be increased by the excess. Form 4255 may be used to compute the tax.

The tax from recomputing a prior year investment credit may not be offset against the current year's investment credit.

5. Minimum tax on tax preference items.—Corporations having tax preference items must attach Form 4626, Computation of Minimum Tax, to their return whether or not the minimum tax applies.

Under the provisions of section 56, certain items of tax preference are subject to a minimum income tax. These tax preference items, after deducting a \$30,000 exemption, the amount of taxes imposed for the year, and tax carryovers to the taxable year, are taxed at a 10% rate.

Items of tax preference include: (1) Accelerated depreciation on real property, (2) Accelerated depreciation on personal property subject to a net lease,* (3) Amortization of pollution control facilities, (4) Amortization of railroad rolling stock, (5) Amortization of on-the-job training facilities, (6) Amortization of child care facilities, (7) Reserves for losses on bad debts of financial institutions, (8) Excess percentage depletion, and (9) Capital gains.

*Applies only to personal holding companies.

Tax Guide for Small Business (Publication 334) contains answers to most questions that arise if you start, operate, or dispose of a business. Explanations and examples are provided to illustrate the application of Federal income, excise, social security, and withholding taxes to sole proprietorships, partnerships, and corporations. This booklet may be obtained from the Public Documents Distribution Center, Pueblo Industrial Park, Pueblo, Colorado 81009 and Government Printing Office Bookstores (make check or money order payable to Superintendent of Documents) or your District Director for 75 cents.

Codes for Principal Business Activity and Principal Product or Service

These industry titles and definitions are based on the Standard Enterprise Classification system developed by the Office of Management and Budget, Executive Office of the President, to classify enterprises by type of activity in which they are engaged. The system follows closely the Standard Industrial Classification used to classify establishments.

Using the list below, enter on page 1, under C, the code number

for the specific industry group from which the largest percentage of "total receipts" is derived. "Total receipts" means gross receipts (line 1, page 1) plus all other income (lines 4 through 10, page 1). On page 3, under M, state the principal business activity and principal product or service that account for the largest percentage of total receipts. For example, if the principal business activity is "Grain mill products," the principal product or service may be "Cereal preparations."

Code	AGRICULTURE, FORESTRY, AND FISHERY	Code	Leather tanning and finishing, and other leather products.	Code	Hardware, and plumbing and heating equipment and supplies.
0110	Farms.	3198	Stone, clay, and glass products:	5070	Machinery, equipment, and supplies.
0120	Agricultural services and hunting and trapping.	3210	Glass and glass products.	5091	Metals and minerals, except petroleum products and scrap.
0130	Forestry and forestry services.	3240	Cement, hydraulic.	5092	Petroleum and petroleum products, gas, wine, and distilled alcoholic beverages.
0140	Fishery.	3250	Structural clay products.	5098	Paper and its products.
		3260	Pottery and related products.	5099	Lumber and construction materials.
		3270	Concrete, gypsum, and plaster products.	5098	Other wholesale trade.
		3298	Cut stone and stone products, and abrasives, asbestos, and other nonmetallic mineral products.		
			Primary metal industries:		
		3310	Blat furnaces, steel works, and iron and steel foundries and forgings.		
		3330	Nonferrous metals: smelting, refining, rolling, drawing, and alloying, including foundries and forgings.		
		3398	Other primary metal industries.		
			Fabricated metal products, except machinery and transportation equipment:		
		3410	Metal cans.		
		3420	Cutlery, hand tools, and general hardware.		
		3430	Heating apparatus (except electrical) and plumbing fixtures.		
		3440	Fabricated structural metal products.		
		3450	Screw machine products, and bolts, nuts, screws, rivets, and washers.		
		3461	Metal stampings.		
		3462	Metal coating and engraving.		
		3478	Fabricated wire products and other fabricated metal products.		
			Machinery, except electrical:		
		3520	Farm machinery and equipment.		
		3530	Construction, mining, and materials handling machinery and equipment.		
		3540	Metalworking machinery and equipment.		
		3550	Special industry machinery and equipment, except metalworking.		
		3560	General industrial machinery and equipment.		
		3570	Office, computing, and accounting machines.		
		3580	Service industry machines.		
		3598	Other machinery, except electrical.		
			Electric machinery, equipment, and supplies:		
		3611	Electrical transmission and distribution equipment.		
		3612	Electrical industrial apparatus.		
		3638	Household appliances.		
		3650	Radio and television receiving sets, except communication types.		
		3661	Communication equipment.		
		3662	Electronic components and accessories.		
		3691	Electric lighting and wiring equipment, except insulated wire.		
		3698	Other electrical machinery, equipment, and supplies.		
			Transportation equipment:		
		3711	Motor vehicles: passenger car, truck, and bus bodies, and truck trailers.		
		3714	Motor vehicle parts and accessories.		
		3721	Aircraft, and complete guided missiles and space vehicles.		
		3722	Aircraft parts, and guided missile and space vehicle subassemblies.		
		3730	Ship and boat building and repair.		
		3791	Railroad equipment, including street cars.		
		3798	Motorcycles, bicycles, and parts, and other transportation equipment.		
			Scientific instruments: photographic equipment, watches and clocks:		
		3810	Scientific and mechanical measuring instruments.		
		3830	Optical, medical, and ophthalmic goods.		
		3860	Photographic equipment and supplies.		
		3870	Watches and clocks.		
			Miscellaneous manufacturing industries, including ornaments and accessories:		
		3910	Jewelry, silverware, and plated ware.		
		3920	Toys and sporting goods.		
		3930	Ordnance, except guided missiles.		
		3938	Costume jewelry.		
		3998	Musical instruments, office and artists' materials, and other manufacturing industries.		
			TRANSPORTATION, COMMUNICATION, ELECTRIC, GAS, AND SANITARY SERVICES		
			Transportation:		
		4011	Railroad transportation, terminals, and related services.		
		4020	Local, suburban, and Inter-city passenger transportation, including taxicabs and school buses.		
		4030	Air transportation and warehousing.		
		4040	Water transportation.		
		4050	Pipe line transportation.		
		4098	Other transportation services.		
			Communication services:		
		4810	Telephone communications (wire or radio).		
		4830	Radio and television broadcasting.		
		4898	Other communication services.		
			Electric, gas, and sanitary services:		
		4910	Electric companies and systems (95 percent or more).		
		4920	Gas companies and systems (95 percent or more).		
		4930	Combination companies and systems—gas, electric, or other services.		
		4940	Water supply and other sanitary services.		
			WHOLESALE TRADE		
		5010	Motor vehicles and automotive equipment.		
		5020	Dry goods and apparel.		
		5030	Meat and meat products.		
		5048	Poultry and poultry products, fish and sea foods, and other groceries and related products.		
		5050	Farm products—raw materials.		
		5060	Electrical goods.		
			Food and kindred products:		
		2010	Meat products.		
		2020	Dairy products.		
		2030	Canning and preserving fruits, vegetables, and sea foods.		
		2040	Grain mill products.		
		2050	Bakery products.		
		2060	Sugar.		
		2070	Confectionery and related products.		
		2082	Malt liquors and malt.		
		2084	Wines, brandy, and brandy spirits.		
		2085	Distilled, rectified, and blended liquors.		
		2086	Soft drinks, flavoring extracts, and sirups.		
		2091	Vegetable oil mills, and animal, marine, and edible fats and oils.		
		2098	Other food and kindred products.		
		2100	Tobacco manufactures.		
			Textile mill products:		
		2210	Broad woven fabric mills, cotton.		
		2212	Broad woven fabric mills, man-made fiber and silk.		
		2213	Dyeing and finishing, except wool and knit goods.		
		2220	Broad woven fabric mills, wool, including dyeing and finishing.		
		2250	Knitting mills.		
		2270	Carpets and rugs.		
		2291	Yarn and thread mills.		
		2298	Narrow fabrics.		
		2298	Other textile mill products.		
			Apparel and other fabricated textile products:		
		2310	Men's and boys' clothing.		
		2330	Women's, children's, and infants' clothing.		
		2380	Hats, caps, millinery, fur goods, and other apparel and accessories.		
		2398	Other fabricated textile products.		
			Lumber and wood products, except furniture:		
		2410	Logging camps and logging contractors, saw-mills, and planing mills.		
		2430	Millwork, veneers, plywood, and prefabricated structural wood products.		
		2498	Wooden containers and other wood products, furniture, and fixtures.		
		2510	Household furniture.		
		2590	Furniture and fixtures, except household furniture.		
			Paper and allied products:		
		2611	Pulp mills.		
		2614	Paper, paperboard, building paper, and building board mills.		
		2640	Converted paper and paperboard products, except containers.		
		2650	Paperboard boxes and containers.		
			Printing, publishing, and allied industries:		
		2711	Newspapers, publishing, printing and printing.		
		2712	Periodicals: publishing, publishing and printing.		
		2715	Books: publishing and printing; greeting cards; miscellaneous publishing.		
		2720	Commercial printing, including manifold business forms.		
		2780	Bookbinding, related industries, and printing trade services.		
			Chemicals and allied products:		
		2811	Industrial inorganic and organic chemicals.		
		2812	Plastics materials, synthetic resins, synthetic rubber, and man-made fibers, except glass.		
		2830	Drugs.		
		2841	Soaps, detergents, and cleaning preparations.		
		2842	Perfumes, cosmetics, and other toilet preparations.		
		2850	Paints and allied products.		
		2870	Fertilizers and other agricultural chemicals.		
		2898	Other chemical products, including gum and wood products.		
			Petroleum refining and related industries:		
		2911	Petroleum refining without extraction.		
		2912	Integrated petroleum refining and extraction.		
		2998	Paving and roofing materials, and other products of petroleum and coal.		
			Rubber and miscellaneous plastics products:		
		3010	Tires and inner tubes.		
		3020	Rubber footwear, reclaimed rubber, and other fabricated rubber products.		
		3098	Miscellaneous plastic products.		
			Leather and leather products:		
		3140	Footwear, except rubber.		

Instructions for Form 1118

(References are to the Internal Revenue Code)



US Treasury Department Internal Revenue Service

General Instructions

A. Foreign Corporations.—See General Instruction K.

1. Corporations required to file Form 1118.—Any corporation claiming a credit for (1) income, war profits, or excess profits tax paid or accrued during the taxable year to any foreign country or U.S. possession and (2) the taxes deemed to have been paid under sections 902 and 903 must attach Form 1118 to its income tax return.

The term "income, war profits, and excess profits taxes" includes a tax imposed by statute or decree by a foreign country or U.S. possession if (1) such country or possession has in force a general income tax law, (2) the corporation claiming the credit would, in the absence of a specific provision applicable to the corporation, be subject to such general income tax, and (3) such general income tax is not imposed upon the corporation thus subject to such substituted tax. (Reg. sec. 1.903-1(a).)

B. Corporations to whom credit not allowed.—The credit is not allowed to (1) a China Trade Act corporation (section 942); (2) a domestic corporation entitled to the benefits of section 931 for income from U.S. possessions (section 931(g)); or (3) a regulated investment company which has exercised the election under section 853. (Reg. sec. 1.901-1.)

C. Taxes against which credit not allowed.—The foreign tax credit is allowed against income tax imposed by chapter 1 but not against any: (1) tax on accumulated earnings imposed by section 551; (2) personal holding company tax imposed by section 541; (3) additional tax imposed by section 1333 (relating to war loss recoveries) and under section 1351 (relating to recoveries of foreign expropriation losses); or (4) increase in tax under section 47 (relating to certain dispositions of section 38 property). See reg. sec. 1.901-1(f) and sections 47 and 1351. Foreign corporations may not take the credit against any tax imposed by section 881 on income not effectively connected with the conduct of a trade or business within the U.S.

D. Deduction denied if credit claimed.—If a corporation elects for any taxable year to claim a credit for taxes to any extent, the election shall apply to income, war profits, and excess profits taxes paid or accrued in such taxable year to all foreign countries and U.S. possessions, and no portion of any such taxes shall be allowed as a deduction in such taxable year or any succeeding taxable year. (Section 275(a)(4) and Reg. sec. 1.901-1(c).) Such election for any taxable year may be made or changed at any time prior to the expiration of the period prescribed for making a claim for credit or refund of the tax imposed by chapter 1 for such taxable year. (Section 901.) Members of an affiliated group electing under section 243 to deduct 100 percent of qualifying dividends received from members of the same affiliated group are treated as one taxpayer for purposes of making elections under section 901(a) and section 904(b)(1).

E. Method of reporting.—All amounts shall be expressed in U.S. dollars except as provided in Schedule A, column 6(a). Where it is necessary to convert from foreign currency attach a statement describing in reasonable detail why and how the particular rate was determined.

F. Taxes of foreign corporation.—(1) Domestic corporation owning stock of a foreign corporation.—If a domestic corporation owns 10 percent or more of the voting stock of a foreign corporation from which it receives dividends, a proportionate amount of the taxes paid or accrued by the foreign corporation are deemed to have been paid by the domestic corporation for purposes of the foreign tax credit. (Section 902(a).) For computation of taxes deemed paid by the domestic corporation, see Schedule B.

(2) Foreign corporation owning stock of another foreign corporation.—If any foreign corporation in (1) above owns 50 percent or more of the voting stock of another foreign corporation from which it receives dividends in any taxable year, it shall be deemed to have paid a proportionate amount of the foreign taxes of such foreign subsidiary. (Section 902(b).) For computation of taxes deemed paid by a related foreign corporation, see Schedule C.

(3) Source of income of foreign subsidiaries and country to which tax is deemed to have been paid.—For the purpose of section 904(a)(1), dividends of a foreign corporation (at least 10 percent of whose voting stock is owned by a domestic corporation) shall be deemed to have been derived from sources within the foreign country or U.S. possession in which the foreign corporation is incorporated, if under section 862(a)(2) such dividends are treated as income from sources without the U.S. In addition, all income, war profits, and excess profits taxes paid or deemed paid by the foreign corporation to any foreign country or U.S. possession shall be deemed to

have been paid to the country or possession under whose laws the foreign corporation is incorporated. (Reg. sec. 1.902-1(c).)

(4) Corporation treated as foreign.—The term "foreign corporation" as used above includes a domestic corporation entitled to the benefits of section 931 or 941. (Section 901(d).)

G. Limitation on credit.

(1) Per-country limitation.—If the overall limitation is not elected, the credit is limited to that percentage of total U.S. income tax which taxable income from sources within each country or U.S. possession (but not in excess of total taxable income) is of total taxable income. (Section 904(a)(1).)

(2) Overall limitation.—If the overall limitation is elected, the credit is limited to that percentage of total U.S. income tax which taxable income from sources without the U.S. (but not in excess of total taxable income) is of total taxable income. (Section 904(a)(2).)

(3) Election of overall limitation.—The per-country limitation is to apply unless an election is made to use the overall limitation. The initial election to use the overall limitation is made by checking the appropriate box at the top of Schedule A, and may be made without the Commissioner's consent at any time before the expiration of the period for making a claim for credit or refund of taxes for the year for which the election is made. The initial election may be revoked if such credit-refund period has not expired. If the revocation is timely and properly made, the initial election may be made for a later taxable year without the Commissioner's consent. Once the initial election has been made and the period prescribed for making such election has expired, it may not be revoked without the Commissioner's consent.

Members of an affiliated group electing the 100 percent dividends-received deduction under section 243(b) are treated as one taxpayer for purposes of electing the overall limitation.

H. When foreign tax credit may be taken.—The credit may be taken for the year in which the taxes were paid or accrued depending upon the method of accounting employed. However, a taxpayer reporting on the cash basis may elect to take the credit for accrued taxes. The election is made by checking the appropriate box in the heading in column 2 of Schedule A, and must be followed in all subsequent years. See section 905(a).

I. Credit for taxes accrued but not paid.—If credit is claimed for a tax accrued but not paid, Internal Revenue may, as a condition precedent to the allowance of the credit, require a bond, Form 1117, from the taxpayer. (Reg. sec. 1.905-4.)

J. Special limitation for certain interest income.—In computing the credit for foreign taxes paid or accrued on certain interest income, the limitation is to be applied separately from all other income and must be applied on a per-country basis. The overall limitation may not be used. This applies to interest income described in section 904(f)(2) which is received with respect to transactions consummated after April 2, 1962.

K. Foreign corporations claiming foreign tax credit.—For taxable years beginning after December 31, 1966, section 906 allows foreign corporations a foreign tax credit for income, war profits, and excess profits taxes paid or accrued (or deemed, under section 902, paid or accrued) to any foreign country or U.S. possession with respect to income effectively connected with the conduct of a trade or business within the U.S. The credit is not applicable, however, to the extent the tax is imposed by a foreign country or possession upon income from U.S. sources solely because the foreign corporation was created or organized under the law of such foreign country or possession or is domiciled there for tax purposes.

In applying the per-country and overall limitations taxable income includes only that taxable income which is effectively connected with the conduct of a trade or business within the U.S.

The credit may not be taken against any tax imposed by section 881 on income not effectively connected with a U.S. business.

For purposes of section 902(a) (relating to tax deemed to have been paid) and section 78 (relating to gross-up of dividends), a foreign corporation claiming a foreign tax credit shall, with respect to such dividends, be treated as a domestic corporation.

In applying the foreign tax credit carryback and carryover provisions of section 904, no amount may be carried to or from a taxable year beginning before January 1, 1967, and no such year shall be taken into account.

Instructions—Form 1118 (Rev. 2-68)

Specific Instructions for Schedules

Schedule A

Column 2.—If credit is claimed for taxes accrued show both the date of accrual and the date of payment (if paid). See General Instruction H.

Column 3.—Enter the type of tax (income, war profits, or excess profits).

Column 5.—Amounts entered in columns 5(a), (b) and (c) are to be stated in U.S. dollars. Include all income taxable (or losses allowable) by the U.S. whether or not taxable (or allowable) by the foreign country or U.S. possession. The computation of taxable income from sources without the U.S. must be made in accordance with sections 861 through 864, and is made without deduction of any income or profits taxes imposed by any foreign country or U.S. possession.

If the overall limitation is elected, all income from sources without the U.S. is taken into account. Thus income which is from sources without the U.S. but not from sources within any foreign country or U.S. possession (for example, high seas income) is not taken into account under the per-country limitation but is taken into account under the overall limitation. Where such income is taken into account it should be properly identified and shown on the schedule.

For dividends from a foreign corporation 50 percent or more of whose gross income was effectively connected with the conduct of a trade or business within the U.S., see section 861(a)(2)(B).

Gross-up of dividends.—Include in income as a "dividend gross-up" taxes deemed paid (Schedule B, column 11) on distributions by a foreign corporation out of accumulated profits of a year for which the foreign corporation was not a less developed country corporation.

Column 6.—Include tax withheld at the source on dividends and other tax paid or accrued. Do not include tax deemed to have been paid or accrued by a related foreign corporation as shown in column 7.

Column 6(a).—State the amount in the currency of the foreign country (e.g., pounds, francs, marks).

Column 6(b).—Give the rate of exchange used and attach a statement describing in reasonable detail why and how this particular rate was determined.

Column 7.—If the per-country limitation is elected, enter the tax deemed to have been paid to the individual foreign country or U.S. possession from Schedule B. If the overall limitation is elected, enter in the total line the total tax deemed to have been paid to all foreign countries and U.S. possessions from Schedule B.

Column 8.—Attach a schedule showing a computation of the carryback or carryover. If the per-country limitation is elected, a separate computation and entry will be necessary for each country. If the overall limitation is elected, enter the total carryback or carryover on the total line.

Taxes paid or accrued to any foreign country or U.S. possession in excess of the applicable limitation may be carried back 2 years and carried forward 5 years. The excess must first be applied to the earliest of the 7 years to which it may be carried, then to the next earliest year, etc. The excess may not be carried from a per-country year to an overall year or vice versa. However, where a taxpayer has elected to change the method of computing the limitation, years to which the excess cannot be carried because a different limitation is used are counted in determining whether a carryback or carryover is available.

Where the corporation has used a deduction instead of a credit in any taxable year to which the carryback or carryover is carried, the carryback or carryover is to be considered used in such year in the same manner as though the corporation had claimed the tax credit, instead of a deduction, but no credit is allowed for the amount so used.

Column 9.—If the per-country limitation is elected, columns 6(c), 7, and 8 must be totaled across line by line. If the overall limitation is elected, use only the total line.

Column 10.—If the per-country limitation is elected, enter on each line for each country for which the credit is claimed the total U.S. income tax before credits. If the overall limitation is elected, enter such amount on the total line only.

Column 11.—If the per-country limitation is elected, enter on each line for each country for which the credit is claimed the total taxable income (after net operating loss deduction and special deductions) from all sources. If the overall limitation is elected, enter such

amount on the total line only. For foreign corporations claiming the credit, taxable income includes only that taxable income which is effectively connected with the conduct of a trade or business within the U.S.

Column 12.—If the per-country limitation is elected, the ratio of foreign taxable income (column 5c) to taxable income from all sources (column 11) must be computed for each country. If the overall limitation is elected, the ratio is computed on the total line only. However, in computing such ratio the numerator may not exceed the denominator. See General Instruction G.

Column 13.—If the per-country limitation is elected, the limitation must be computed for each country. If the overall limitation is elected, the limitation is computed on the total line only.

If the overall limitation is elected, special limitations apply to consolidated returns which include a Western Hemisphere trade corporation. See section 1503(b).

Column 14.—If the per-country limitation is elected, enter for each country the amount in column 9 or column 13 whichever is less. The credit to be claimed on your income tax return will be the total of the individual credits in column 14. If the overall limitation is elected enter on the total line the amount in column 9 or column 13 whichever is less.

Schedule B

Column 2.—If dividends are paid from the gains, profits and income of more than 1 year, the tax deemed to have been paid must be computed and shown on a separate line for each year.

Column 4.—The gains, profits and income to be entered is determined by the gains, profits and income from all sources whatsoever, whether subjected to foreign tax, for the year from which the dividends (column 7) were paid. Include all dividends received from a foreign subsidiary of the related foreign corporation.

Internal Revenue may determine from which year's accumulated profits the dividends were paid. In making such determination, Internal Revenue shall, unless it is otherwise established to its satisfaction, treat any dividends which are paid in the first 60 days of any taxable year as having been paid from the accumulated profits of the preceding taxable year or years or shall, in other respects, treat any dividends as having been paid from the most recently accumulated profits.

The conversion to dollars must be made at the same exchange rate as that used for dividends in column 7.

Column 7.—Enter the amount of dividends paid by the related foreign corporations to the domestic corporation.

Column 8.—For dividends paid by a foreign corporation out of accumulated profits of a year for which such foreign corporation was a less developed country corporation—do not use the instruction in the column heading but enter the amount determined by dividing column 6 by column 4 and multiplying by column 5.

Column 11.—If the per-country limitation is elected, the amount entered in this column should be carried to Schedule A, column 7 and entered on the line with the country or U.S. possession for which a credit is claimed. If the overall limitation is elected, the total taxes deemed to have been paid should be entered on the total line of Schedule A, column 7.

Schedule C

If a related foreign corporation in Schedule B owns 50 percent or more of the voting stock of another foreign corporation from which it receives dividends, Schedule C must be filled in to determine the tax deemed to have been paid by the related foreign corporation.

Columns 1 through 6.—Same instructions as Schedule B.

Column 7.—Enter the amount of dividends paid by the subsidiary of the related foreign corporation to the related foreign corporation.

Column 10.—Enter the amount from column 8.

Column 11.—Carry the amount of tax deemed to have been paid to Schedule B, column 9 and enter on the line with the controlling foreign corporation. If dividends are paid from the gains, profits and income of more than 1 year, the tax deemed to have been paid by the related corporation must be computed separately for each year.

Instructions—Form 1118 (Rev. 2-68)

Forms and Instructions

Form 1118 (Rev. Mar. 1971) Department of the Treasury Internal Revenue Service

Computation of Foreign Tax Credit—Corporations For Calendar Year

or other taxable year beginning 19 and ending 19

Name Employer Identification Number

SCHEDULE A.—Computation is made under: per-country limitation (fill in columns 1 through 14, line by line) overall limitation (fill in columns 1 through 6, line by line including total line; use total line only for columns 7 through 14).

Table with columns: (1) Name of Foreign Country or U.S. Possession Imposing Tax, (2) Credit is Claimed for Taxes, (3) Type of Tax, (4) Statute Imposing Tax, (5) Taxable Income From Sources Without U.S., (6) Taxes Paid or Accrued.

INTEREST (See instruction J)

Table with columns: (7) Tax Deemed to Have Been Paid, (8) Carryback or Carryover, (9) Total Foreign Taxes, (10) Total U.S. Income Tax, (11) Total Taxable Income, (12) Column 5c--Column 11, (13) Limitation, (14) Credit.

TOTAL FOREIGN TAX CREDIT—Enter here and on your tax return

SCHEDULE B.—Taxes paid or accrued to a foreign country or U.S. possession by (1) a related foreign corporation (first foreign corporation) or (2) a related domestic corporation entitled to the benefits of section 931 or 941.

Table with columns: (1) Name of Related Foreign Corporation, (2) Year, (3) Incorporated Under the Laws of, (4) Gains, Profits, and Income of Foreign Corp., (5) Foreign Tax Paid or Accrued, (6) Accumulated Profits, (7) Dividends Paid by Related Foreign Corporation, (8) Foreign Tax Paid on Accumulated Profits, (9) Tax Deemed Paid by Related Foreign Corporation, (10) Column 8 Plus Column 9, (11) Tax Deemed to Have Been Paid.

SCHEDULE C.—The following lines are for the computation of taxes deemed to have been paid by the first foreign corporation in respect of dividends from the second foreign corporation. Column headings same as Schedule B.

Table with columns: (1) Name of Related Foreign Corporation, (2) Year, (3) Incorporated Under the Laws of, (4) Gains, Profits, and Income of Foreign Corp., (5) Foreign Tax Paid or Accrued, (6) Accumulated Profits, (7) Dividends Paid by Related Foreign Corporation, (8) Foreign Tax Paid on Accumulated Profits, (9) Tax Deemed Paid by Related Foreign Corporation, (10) Column 8 Plus Column 9, (11) Tax Deemed to Have Been Paid.

SCHEDULE D.—The following lines are for the computation of taxes deemed to have been paid by a second foreign corporation in respect of dividends from the third foreign corporation. Enter amount from col. 11, Schedule D in col. 9, Schedule C.

Table with columns: (1) Name of Related Foreign Corporation, (2) Year, (3) Incorporated Under the Laws of, (4) Gains, Profits, and Income of Foreign Corp., (5) Foreign Tax Paid or Accrued, (6) Accumulated Profits, (7) Dividends Paid by Related Foreign Corporation, (8) Foreign Tax Paid on Accumulated Profits, (9) Tax Deemed Paid by Related Foreign Corporation, (10) Column 8 Plus Column 9, (11) Tax Deemed to Have Been Paid.



Department of the Treasury
Internal Revenue Service
Instructions for Form 1118
(Revised March 1971)

(References are to the Internal Revenue Code)

General Instructions

Note.—Foreign Corporations—See General Instruction K.

A. Corporations required to file Form 1118.—Any corporation claiming a credit for (1) income, war profits, or excess profits tax paid or accrued during a taxable year to any foreign country or U.S. possession and (2) the taxes deemed to have been paid under sections 902 and 960 must attach Form 1118 to its income tax return.

The term "income, war profits, and excess profits taxes" includes a tax imposed by statute or decree by a foreign country or U.S. possession if (1) the country or possession has in force a general income tax law, (2) the corporation claiming the credit would, in the absence of a specific provision applicable to the corporation, be subject to such general income tax, and (3) the general income tax is not imposed upon the corporation thus subject to such substituted tax. (Reg. sec. 1.903-1(a).)

B. Corporations not allowed credit.—The credit is not allowed to (1) a China Trade Act corporation (section 942); (2) a domestic corporation entitled to the benefits of section 931 for income from U.S. possessions (section 931(g)); or (3) a regulated investment company which has exercised the election under section 853. (Reg. sec. 1.901-1.)

C. Taxes against which credit is not allowed.—The foreign tax credit is allowed against income tax imposed by chapter 1 but not against any: (1) minimum tax for tax preferences imposed by section 56; (2) tax on accumulated earnings imposed by section 531; (3) personal holding company tax imposed by section 541; (4) additional tax imposed by section 1333 (relating to war loss recoveries) and under section 1351 (relating to recoveries of foreign tax credits); (5) tax on excess profits tax imposed by section 474 (relating to certain dispositions of section 38 property). Foreign corporations may not take the credit against any tax imposed by section 861 on income not effectively connected with the conduct of a trade or business within the U.S.

D. No deduction if a credit is claimed.—If a corporation elects for any taxable year to claim a credit for taxes to any extent, the election shall apply to income, war profits, and excess profits taxes paid or accrued in the taxable year to all foreign countries and U.S. possessions, and no portion of the taxes shall be allowed as a deduction in the taxable year or any succeeding taxable year. (Section 275(a)(4) and Reg. sec. 1.901-1(c).) The election for any taxable year may be made or changed at any time prior to the expiration of the period prescribed for making a claim for credit or refund of the tax imposed by chapter 1 for the taxable year. (Section 501.) Members of an affiliated group electing under section 243 to deduct 100 percent of qualified dividends received from members of the same affiliated group are treated as one taxpayer for purposes of making elections under section 901(a) and section 904(b)(1).

E. Method of reporting.—All amounts are to be expressed in U.S. dollars except as provided in Schedule A, column 6(a). Where it is necessary to convert from foreign currency, attach a statement showing why and how the particular rate was determined.

F. Taxes of foreign corporation.—(1) Domestic corporation owning stock of a foreign corporation.—If a domestic corporation owns 10 percent or more of the voting stock of a related foreign corporation (first foreign corporation) from which it receives dividends, a proportionate amount of the taxes paid or accrued by the first foreign corporation are deemed to have been paid by the domestic corporation for purposes of the foreign tax credit. (Section 902(a).) For computation of taxes deemed paid by the domestic corporation, see Schedule B.

(2) First foreign corporation owning stock of a second foreign corporation.—If the first foreign corporation in (1) above owns 10 percent or more of the voting stock of a second foreign corporation from which it receives dividends in any taxable year, it shall be deemed to have paid a proportionate amount of the foreign taxes of the second foreign corporation. (Section 902(b)(1).) However, for purposes of the foreign tax credit, section 902(b)(1) shall not apply unless the percentage of voting stock owned by the domestic corporation in the first foreign corporation and the percentage of voting stock owned by the first foreign corporation in the second foreign corporation when multiplied together, equal at least 5 percent. This section shall apply with respect to all taxable years of domestic corporations ending after January 12, 1971 but only in respect of dividends paid by one corporation to another corporation after January 12, 1971. For computation of taxes deemed paid by the first foreign corporation regarding a second foreign corporation, see Schedule C.

(3) Second foreign corporation owning stock of a third foreign corporation.—If the first foreign corporation owns 10 percent or more of the voting stock of a second foreign corporation which, in turn, owns 10 percent or more of the voting stock of a third foreign corporation from which the second foreign corporation receives dividends in any taxable year, the second foreign corporation shall be deemed to have paid a proportionate amount of the foreign taxes of the third foreign corporation. (Section 902(b)(2).) Section 902(b)(2) shall not apply unless the percentage arrived at for purposes of applying sec. 902(b)(1) when multiplied by the percentage of voting stock owned by the second foreign corporation in the third foreign corporation is

equal to at least 5 percent. This section shall apply with respect to all taxable years of domestic corporations ending after January 12, 1971 but only in respect of dividends paid by one corporation to another corporation after January 12, 1971.

For computation of taxes deemed paid by a second foreign corporation regarding a third foreign corporation, see Schedule D.

(4) Source of income of foreign subsidiaries and country to which tax is deemed to have been paid.—For the purpose of section 904(a)(1), dividends of a foreign corporation (at least 10 percent of whose voting stock is owned by a domestic corporation) shall be deemed to have been derived from sources within the foreign country or U.S. possession in which the foreign corporation is incorporated, if under section 862(a)(2) the dividends are treated as income from sources without the U.S. In addition, all income, war profits, and excess profits taxes paid or deemed paid by the foreign corporation to any foreign country or U.S. possession shall be deemed to have been paid to the country or possession under whose laws the foreign corporation is incorporated. (Reg. sec. 1.902-1(c).)

(5) Corporation treated as foreign.—The term "foreign corporation" as used above includes a domestic corporation entitled to the benefits of section 931 or 941. (Section 901(d).)

(6) Controlled foreign corporations.—As provided in the heading instructions in Schedule B, attach a schedule showing the computation of the foreign tax credit under section 960. The attached schedule should be in a format similar to Schedule B. (Note: Present Code and regs. under sec. 960 do not provide for a deemed paid credit for a third-tier corporation.)

G. Limitation on credit.

(1) Per-country limitation.—If the overall limitation is not elected, the credit is limited to that percentage of total U.S. income tax which taxable income from sources within each country or U.S. possession (but not in excess of total taxable income) is of total taxable income. (Section 904(a)(1).)

(2) Overall limitation.—If the overall limitation is elected, the credit is limited to that percentage of total U.S. income tax which taxable income from sources without the U.S. (but not in excess of total taxable income) is of total taxable income. (Section 904(a)(2).)

(3) Election of overall limitation.—The per-country limitation is to apply unless an election is made to use the overall limitation. The initial election to use the overall limitation is made by checking the appropriate box at the top of Schedule A, and may be made without the Commissioner's consent at any time before the expiration of the period for making a claim for credit or refund of taxes for the year for which the election is made. The initial election may be revoked if such credit-refund period has not expired. If the revocation is timely and properly made, the initial election may be made for a later taxable year without the Commissioner's consent.

Once the initial election has been made and the period prescribed for making such election has expired, it may not be revoked without the Commissioner's consent. Such consent, however, is not required for the taxpayer's first taxable year beginning after December 31, 1969.

Members of an affiliated group electing the 100 percent dividends-received deduction under section 243(b) are treated as one taxpayer for purposes of electing the overall limitation.

H. When foreign tax credit may be taken.—The credit may be taken for the year in which the taxes were paid or accrued depending upon the method of accounting used. However, a taxpayer reporting on the cash basis may elect to take the credit for accrued taxes. The election is made by checking the appropriate box in the heading in column 2 of Schedule A, and must be followed in all subsequent years. See section 905(a).

I. Credit for taxes accrued but not paid.—If credit is claimed for a tax accrued but not paid, Internal Revenue may, as a condition precedent to the allowance of the credit, require a bond. Form 1117, from the taxpayer. (Reg. sec. 1.905-4.)

J. Special limitation for certain interest income.—In computing the credit for foreign taxes paid or accrued on certain interest income, the limitation is to be applied separately from all other income and must be applied on a per-country basis. The overall limitation must not be used. This applies to interest income described in section 904(f)(2) which is received with respect to transactions consummated after April 2, 1962.

K. Foreign corporations claiming foreign tax credit.—For taxable years beginning after December 31, 1966, section 906 allows foreign corporations a foreign tax credit for income, war profits, and excess profits taxes paid or accrued (or deemed, under section 902, paid or accrued) to any foreign country or U.S. possession with respect to income effectively connected with the conduct of a trade or business within the U.S. The credit is not applicable, however, to the extent the tax is imposed by a foreign country or possession upon income from U.S. sources solely because the foreign corporation was created or organized under the law of the foreign country or possession or is domiciled there for tax purposes.

In applying the per-country and overall limitations, taxable income includes only that taxable income which is effectively connected with the conduct of a trade or business within the U.S.

The credit may not be taken against any tax imposed by section 861 on income not effectively connected with a U.S. business.

For purposes of section 902(a) (relating to tax deemed to have been paid) and section 78 (relating to gross-up of dividends), a foreign corporation claiming a foreign tax credit shall, with respect to such dividends, be treated as a domestic corporation.

In applying the foreign tax credit carryback and carryover provisions of section 904, no amount may be carried to or from a taxable year beginning before January 1, 1967, and no such year shall be taken into account.

Specific Instructions for Schedules

L. Foreign taxes on mineral income.—For taxable years beginning after December 31, 1969, section 901(e) provides that, for purposes of section 901(b), the amount of foreign taxes paid or accrued to a foreign country or U.S. possession with respect to foreign mineral income from sources within such country or possession must be reduced by the lesser of (a) the amount of such taxes minus the amount of United States tax computed under Chapter 1 of the Code, with respect to such foreign mineral income, or (b) the amount of United States tax which would be computed under Chapter 1 of the Code, with respect to such income without the deduction allowed under section 613 minus the amount of United States tax computed under Chapter 1 of the Code with respect to such income.

If the above provisions apply, column (9), Schedule A, is to be filled in on a country by country basis. The total tax which would otherwise be shown on each line in column (9), Schedule A, must first be reduced by the lesser of (a) or (b) above. Attach a schedule showing the computation of the net amount to be entered on each line in column (9), Schedule A, after applying section 901(e). Also write in the heading of column (9), Schedule A, "see attachment."

Schedule A

Column 2.—If credit is claimed for taxes accrued, show both the date of accrual and the date of payment (if paid). See General instruction H.

Column 3.—Enter the type of tax (income, war profits, or excess profits).

Column 5.—Amounts entered in columns 5(a), (b) and (c) are to be stated in U.S. dollars. Include all income taxable (or losses allowable) by the U.S. whether or not taxable (or allowable) by the foreign country or U.S. possession. The computation of taxable income from sources without the U.S. must be made in accordance with sections 638 and 861 through 864, and is made without deduction of any income or profits taxes imposed by any foreign country or U.S. possession.

The schedule requested in columns 5(a) and (b) should categorize the type of gross income and expenses as follows: interest, royalties, branch incomes, dividends and other.

If the overall limitation is elected, all income from sources without the U.S. is taken into account. Thus, income from sources without the U.S. includes high seas income but such income is not taken into account under the per-country limitation. Where the income is taken into account it should be properly identified and shown on the schedule.

For dividends from a foreign corporation 50 percent or more of whose gross income was effectively connected with the conduct of a trade or business within the U.S., see section 861(a)(2)(B).

Gross-up of dividends.—Include in column 5 a "dividend gross-up," taxes deemed paid (Schedule B, column 11) on distributions by a foreign corporation out of accumulated profits of a year for which the foreign corporation was not a less developed country corporation.

Column 6.—Include tax withheld at the source on dividends and other tax paid or accrued. Do not include tax deemed to have been paid or accrued by a related foreign corporation as shown in column 7.

Taxpayers with foreign mineral income see general instruction L.

Column 6(a).—State the amount in the currency of the foreign country (e.g., pounds, francs, marks).

Column 6(b).—Give the rate of exchange used and attach a statement describing in reasonable detail why and how this particular rate was determined.

Column 7.—If the per-country limitation is elected, enter the tax deemed to have been paid to the individual foreign country or U.S. possession from Schedule B. If the overall limitation is elected, enter on the total line the total tax deemed to have been paid to all foreign countries and U.S. possessions from Schedule B. Taxpayers with foreign mineral income see general instruction L.

Column 8.—Attach a schedule showing a computation of the carryback or carryover. If the per-country limitation is elected, a separate computation and entry will be necessary for each country. If the overall limitation is elected, enter the total carryback or carryover on the total line.

Taxes paid or accrued to any foreign country or U.S. possession in excess of the applicable limitation may be carried back 2 years and carried forward 5 years. The excess must first be applied to the earliest of the 7 years to which it may be carried, then to the next earliest year, etc. The excess may not be carried from a per-country year to an overall year or vice versa. However, if a corporation has elected to change the method of computing the limitation, years to which the excess cannot be carried because a different limitation is used are counted in determining whether a carryback or carryover is available.

Where the corporation has used a deduction instead of a credit in any taxable year to which the carryback or carryover is carried, the carryback or carryover is to be considered used in such year in the same manner as though the corporation had claimed the tax credit, instead of a deduction, but no credit is allowed for the amount so used.

Column 9.—If the per-country limitation is elected, columns (c), 7, and 8 must be totaled across line by line. If the overall limitation is elected, use only the total line. Taxpayers with foreign mineral income see general instruction L.

Column 10.—If the per-country limitation is elected, enter on each line for each country for which the credit is claimed the total U.S. income tax before credits. If the overall limitation is elected, enter the amount on the total line only.

Column 11.—If the per-country limitation is elected, enter on each line for each country for which the credit is claimed the total taxable income (after net operating loss deduction and special deductions) from all sources. If the overall limitation is elected, enter such amount on the total line only. For foreign corporations claiming the credit, taxable income includes only that taxable income which is effectively connected with the conduct of a trade or business within the U.S.

Column 12.—If the per-country limitation is elected, the ratio of foreign taxable income (column 5(c)) to taxable income from all sources (column 11) must be computed for each country. If the overall limitation is elected, the ratio is computed on the total line only.

However, in computing such ratio the numerator may not exceed the denominator. See General Instruction G.

Column 13.—If the per-country limitation is elected, the limitation must be computed for each country. If the overall limitation is elected, the limitation is computed on the total line only.

If the overall limitation is elected, special limitations apply to consolidated returns which include a Western Hemisphere trade corporation. See section 1503(b).

Column 14.—If your per-country limitation is elected, enter for each country the amount in column 9 or column 13 whichever is less. The credit to be claimed on your income tax return will be the total of the individual credits in column 14. If the overall limitation is elected, enter on the total line the amount in column 9 or column 13, whichever is less.

Schedule B

Column 2.—If dividends are paid from the gains, profits and income of more than 1 year, the tax deemed to have been paid must be computed and shown on a separate line for each year.

Column 4.—The gains, profits and income to be entered is determined by the gains, profits and income from all sources whatsoever, whether or not subjected to foreign tax, for the year from which the dividends (column 7) were paid. Include all dividends received from a foreign subsidiary of the related foreign corporation.

Internal Revenue may determine from which year's accumulated profits the dividends were paid. In making such determination, Internal Revenue shall, unless it is otherwise established to its satisfaction, treat any dividends which are paid in the first 50 days of any taxable year as having been paid from the accumulated profits of the preceding taxable year or years or shall, in other respects, treat any dividends as having been paid from the most recently accumulated profits.

The conversion to dollars must be made at the same exchange rate used for dividends in column 7.

Column 7.—Enter the amount of dividends paid by the related foreign corporations to the domestic corporation.

Column 8.—For dividends paid by a foreign corporation out of accumulated profits of a year for which such foreign corporation was a less developed country corporation, do not use the instruction in the column heading but enter the amount determined by dividing column 5 by column 4 and multiplying by column 5.

Column 11.—If the per-country limitation is elected, the amount entered in this column should be carried to Schedule A, column 7 and entered on the line with the country or U.S. possession for which a credit is claimed. If the overall limitation is elected, the total taxes deemed to have been paid should be entered on the total line of Schedule A, column 7.

Schedule C

If a related foreign corporation (first foreign corporation) in Schedule B owns 10 percent or more of the voting stock of a second foreign corporation from which it receives dividends, Schedule C must be filled in to determine the tax deemed to have been paid by the first foreign corporation. See General Instruction F(2).

Column 1.—Enter name of second foreign corporation.

Column 2 through 6.—Same instructions as Schedule B.

Column 7.—Enter the amount of dividends paid by the second foreign corporation to the first foreign corporation.

Column 11.—Carry the amount of tax deemed to have been paid to Schedule B, column 9 and enter on the line with the related first foreign corporation. If dividends are paid from the gains, profits and income of more than 1 year, the tax deemed to have been paid by the first foreign corporation must be computed separately for each year.

Schedule D

If the second foreign corporation in Schedule C owns 10 percent or more of the voting stock of a third foreign corporation from which it receives dividends, Schedule D must be filled in to determine the tax deemed to have been paid by the second foreign corporation. See General Instruction F(3).

Column 1.—Enter name of third foreign corporation.

Column 2-6.—Same instructions as Schedule B.

Column 7.—Enter the amount of dividends paid by the third foreign corporation to the second foreign corporation.

Column 10.—Enter the amount from column 8.

Column 11.—Carry the amount of tax deemed to have been paid to Schedule C, column 9 and enter on the line with the related second foreign corporation. If dividends are paid from the gains, profits and income of more than 1 year, the tax deemed to have been paid by the second foreign corporation must be computed separately for each year.

Forms and Instructions

Form 1118 (Rev. Feb. 1973) Department of the Treasury Internal Revenue Service

Computation of Foreign Tax Credit—Corporations

For calendar year 19...

or fiscal year beginning 19... and ending 19...

Name Employer identification number

SCHEDULE A.—Computation is made under: per-country limitation (fill in columns 1 through 14, line by line) overall limitation (fill in columns 1 through 7, line by line including total line; use total line only for columns 8 through 14)

Table with 6 main columns: 1. Name of Foreign Country or U.S. Possession, 2. Credit is Claimed for Taxes, 3. Type of Tax, 4. Statute Imposing Tax, 5. Taxable Income From Sources Without U.S., 6. Taxes Paid or Accrued.

TOTALS IF COMPUTING THE OVERALL LIMITATION (Add lines A through H in columns 5(c), 6(c), and 7—enter only the totals in columns 8 through 14)

Summary rows for Interest and DISC Dividends.

Table with 8 main columns: 7. Tax Deemed to Have Been Paid, 8. Carryback or Carryover, 9. Total Foreign Taxes, 10. Total U.S. Income Tax, 11. Total Taxable Income, 12. Column 5(c) + Column 11, 13. Limitation, 14. Credit.

TOTAL FOREIGN TAX CREDIT—Enter here and on your tax return

SCHEDULE B.—Taxes paid or accrued to a foreign country or U.S. possession by (1) a related foreign corporation (first foreign corporation), (2) a related domestic corporation entitled to the benefits of section 931 or 941, or (3) a DISC or former DISC as defined in section 992(a) (to the extent of tax on dividends from a DISC or former DISC treated under sections 861 through 864 as income from sources without the U.S.).

Table with 11 columns: 1. Name of Corporation, 2. Year, 3. Incorporated Under the Laws of, 4. Gains, Profits, and Income of Such Corporation for Year, 5. Foreign Tax Paid or Accrued on Gains, Profits, and Income in Column 4, 6. Column 4 Less Column 5, 7. Dividends Paid by Such Corporation, 8. Foreign Tax Paid or Accrued on Accumulated Profits, 9. Tax Deemed Paid, 10. Column 8 Plus Column 9, 11. Tax Deemed to Have Been Paid by Corporation.

SCHEDULE C.—The following lines are for the computation of tax deemed to have been paid by the first foreign corporation with respect to dividends from the second foreign corporation. Column headings are the same as in Schedule B except as explained in the instructions.

Table with 11 columns, same as Schedule B, for the second foreign corporation.

SCHEDULE D.—The following lines are for the computation of tax deemed to have been paid by a second foreign corporation with respect to dividends from the third foreign corporation. Enter the amount from column 11, Schedule D in column 9, Schedule C.

Table with 11 columns, same as Schedule B, for the third foreign corporation.



Instructions for Form 1118

Computation of Foreign Tax Credit—Corporations

(Revised February 1973)

(References are to the Internal Revenue Code.)

A. Corporations required to file Form 1118.

Form 1118 must be attached to the income tax return of any corporation claiming a credit for (1) income, war profits, or excess profits tax paid or accrued during a taxable year to any foreign country or U.S. possession and (2) the taxes deemed to have been paid under sections 902 and 960.

The term "income, war profits, and excess profits tax" includes a tax imposed by statute or decree by a foreign country or U.S. possession if (1) the country or possession has in force a general income tax law, (2) the corporation claiming the credit would, in the absence of a specific provision applicable to the corporation, be subject to the general income tax, and (3) the general income tax is not imposed on the corporation subject to such substituted tax. (Section 1.903-1(a) of the regulations.)

B. Corporations not allowed credit.

The credit is not allowed to (1) a China Trade Act corporation (section 942); (2) a domestic corporation entitled to the benefits of section 931 for income from U.S. possessions (section 931(g)); (3) a regulated investment company which has exercised the election under section 853; or (4) a DISC as defined in section 992(a). (Section 1.901-1 of the regulations.)

C. Taxes against which credit is not allowed.

The foreign tax credit is allowed against income tax imposed by chapter 1 but not against any: (1) minimum tax for tax preferences imposed by section 56; (2) tax on accumulated earnings imposed by section 531; (3) personal

holding company tax imposed by section 541; (4) additional tax imposed by section 1333 (relating to war loss recoveries) and under section 1351 (relating to recoveries of foreign expropriation losses); (5) increase in tax under section 47 (relating to dispositions of investment credit property); or (6) increase in tax under section 50A(c) (relating to early termination of employment by an employer in a WIN program).

Foreign corporations may not take the credit against any tax imposed by section 881 on income not effectively connected with the conduct of a trade or business within the U.S.

D. No deduction if a credit is claimed.

If a corporation elects for any taxable year to claim a credit for taxes to any extent, the election will apply to income, war profits, and excess profits tax paid or accrued in the taxable year to all foreign countries and U.S. possessions and no portion of the tax will be allowed as a deduction in the taxable year or any succeeding taxable year. (Section 1.901-1(c) of the regulations and section 275(a)(4).)

The election for any taxable year may be made or changed at any time before the end of the period prescribed for making a claim for credit or refund of tax for the taxable year. (Section 901.)

Members of an affiliated group electing under section 243 to deduct 100% of qualifying dividends received from members of the same affiliated group are treated as one taxpayer for purposes of making elections under sections 901(a) and 904(b)(1).

E. Method of reporting.

Report all amounts in U.S. dollars except in column 6(a) of Schedule A. If it is necessary to convert from

foreign currency, attach a statement explaining why and how you determined the rate.

F. Taxes of foreign corporation.

(1) Domestic corporation owning stock of a foreign corporation.—If a domestic corporation owns 10% or more of the voting stock of a related foreign corporation (first foreign corporation) from which it receives dividends, a proportionate amount of the taxes paid or accrued by the first foreign corporation are deemed to have been paid by the domestic corporation for purposes of the foreign tax credit. (Section 902(a).)

For computation of taxes deemed paid by a domestic corporation with respect to a related foreign corporation, related domestic corporation, or DISC or former DISC, see Schedule B.

(2) First foreign corporation owning stock of a second foreign corporation.—If the first foreign corporation in (1) above owns 10% or more of the voting stock of a second foreign corporation from which it receives dividends, the first foreign corporation will be deemed to have paid a proportionate amount of the foreign taxes of the second foreign corporation. (Section 902(b)(1).)

However, for purposes of the foreign tax credit, section 902(b)(1) will not apply unless the percentage of voting stock owned by the domestic corporation in the first foreign corporation and the percentage of voting stock owned by the first foreign corporation in the second foreign corporation equal at least 5% when multiplied together.

Section 902(b)(1) applies to taxable years of domestic corporations ending after January 12, 1971, but only to dividends paid by one corporation to another corporation after January 12, 1971.

For computation of taxes deemed paid by the first foreign corporation with respect to a second foreign corporation, see Schedule C.

(3) Second foreign corporation owning stock of a third foreign corporation.—If the first foreign corporation owns 10% or more of the voting stock of a second foreign corporation which, in turn, owns 10% or more of the voting stock of a third foreign corporation from which the second foreign corporation receives dividends, the second foreign corporation will be deemed to have paid a proportionate amount

of the foreign taxes of the third foreign corporation. (Section 902(b)(2).)

However, section 902(b)(2) will not apply unless the percentage computed in applying section 902(b)(1) when multiplied by the percentage of voting stock owned by the second foreign corporation in the third foreign corporation equals at least 5%. Section 902(b)(2) applies to taxable years of domestic corporations ending after January 12, 1971, but only to dividends paid by one corporation to another corporation after January 12, 1971.

For computation of taxes deemed paid by a second foreign corporation with respect to a third foreign corporation, see Schedule D.

(4) Country to which tax is deemed paid.—For purposes of section 904 (limitation on foreign tax credit), all foreign income tax paid, or deemed paid, by a foreign corporation is deemed to be paid to the foreign country or U.S. possession under the laws of which the foreign corporation is created or organized. (Section 1.902-3(d)(2) of the regulations.)

(5) Corporation treated as foreign.—The term "foreign corporation" as used above includes a domestic corporation entitled to the benefits of section 931 or 941. (Section 901(d).)

Dividends from a DISC or former DISC (as defined in section 992(a)) are treated as dividends from a foreign corporation to the extent the dividends are treated under sections 861 through 864 as income from sources without the U.S.

(6) Controlled foreign corporations.—As provided in the heading instructions in Schedule B, attach a schedule showing the computation of the foreign tax credit under section 960. The schedule should be in a format similar to Schedule B. (Note: Present section 960 and the regulations thereunder do not provide for a deemed paid credit for a third-tier corporation.)

G. Limitation on credit.

The credit is limited to a percentage of total U.S. income tax. The computation must be made by using either the per-country limitation or the overall limitation.

(1) Per-country limitation.—If the overall limitation is not elected, the per-country limitation applies.

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Under the per-country limitation, the credit is computed separately for each foreign country or U.S. possession. The credit is limited to that percentage of total U.S. income tax which taxable income from sources within each country or U.S. possession (but not in excess of total taxable income) is of total taxable income. (Section 904(a)(1).)

(2) Overall limitation.—If the overall limitation is elected, the credit is computed on the total amount of tax paid to all foreign countries and U.S. possessions. The credit is limited to that percentage of total U.S. income tax which taxable income from all sources without the U.S. (but not in excess of total taxable income) is of total taxable income. (Section 904(a)(2).)

(3) Election of overall limitation.—The per-country limitation is to apply unless you elect to use the overall limitation. You can make the initial election to use the overall limitation by checking the appropriate box at the top of Schedule A. You can make the initial election without the Commissioner's consent at any time before the end of the period prescribed for claiming a credit or refund of taxes for the year for which the election is made.

You can revoke the initial election if the credit or refund period has not expired. If you make a proper and timely revocation, you can make the initial election of the overall limitation for a later taxable year without the Commissioner's consent.

Once you have made the initial election and the period prescribed for making such election has expired, you cannot revoke the initial election without the Commissioner's consent.

Members of an affiliated group electing the 100% dividends-received deduction under section 243(b) are treated as one taxpayer for purposes of electing the overall limitation.

H. When foreign tax credit can be taken.

You can take the credit for the year in which the taxes were paid or accrued depending on the method of accounting used. However, if you report on the cash basis, you can elect to claim the credit for accrued taxes. You can make the election by checking the appropriate box in the heading for column 2 of Schedule A. This election must be followed in all subsequent years. (Section 905(a).)

I. Credit for tax accrued but not paid.

If you claim a credit for tax accrued but not paid, Internal Revenue may require you to furnish a bond on Form 1117 as a condition precedent to the allowance of the credit. (Section 1.905-4 of the regulations.)

J. Special limitation for certain (1) interest income and (2) dividends from a DISC or former DISC.

In computing the credit for (1) foreign tax paid or accrued on certain interest income and (2) tax deemed paid with respect to dividends from a DISC or former DISC, the limitation is to be applied separately from all other income and must be applied on a per-country basis. The overall limitation cannot be used. This applies to interest income described in section 904(f)(2) and dividends from a DISC or former DISC (as defined in section 992(a)) to the extent the dividends are treated as income from sources without the U.S.

If you receive dividends from a DISC or former DISC, as described in section 904(f)(1)(B), for the taxable year from more than one corporation, the per-country limitation is applied to the aggregate of the dividends. (Section 904(f)(5).)

K. Foreign corporations claiming foreign tax credit.

Section 905 allows foreign corporations a foreign tax credit for income, war profits, and excess profits tax paid or accrued (or deemed paid or accrued under section 902) to any foreign country or U.S. possession with respect to income effectively connected with the conduct of a trade or business within the U.S. The credit is not applicable, however, to the extent the tax is imposed by a foreign country or possession on income from U.S. sources solely because the foreign corporation was created or organized under the law of the foreign country or possession or is domiciled there for tax purposes.

In applying the per-country and overall limitations, taxable income includes only that taxable income which is effectively connected with the conduct of a trade or business within the U.S.

The credit cannot be taken against any tax imposed by section 881 on income not effectively connected with a U.S. business.

For purposes of section 902(a) (relating to tax deemed to have been paid) and section 78 (relating to gross-up of dividends), a foreign corporation claiming a foreign tax credit will be treated as a domestic corporation.

In applying the foreign tax credit carryback and carryover provisions of section 904, no amount can be carried to or from a taxable year beginning before 1967, and no such year will be taken into account.

L. Foreign taxes on mineral income.

For taxable years beginning after 1969, section 901(e) provides that, for purposes of section 901(b), the amount of foreign tax paid or accrued to a foreign country or U.S. possession with respect to foreign mineral income from sources within such country or possession must be reduced by the lesser of (a) the amount of the tax minus the amount of U.S. tax computed under Chapter 1 of the Code with respect to the foreign mineral income, or (b) the amount of U.S. tax which would be computed under Chapter 1 of the Code with respect to the income without the deduction allowed under section 613 minus the amount of U.S. tax computed under Chapter 1 of the Code with respect to the income.

If the above provisions apply, complete column 9 of Schedule A on a country by country basis. The total tax that would otherwise be shown on each line in column 9, Schedule A, must first be reduced by the lesser of (a) or (b) above. Attach a schedule showing the computation of the net amount to be entered on each line in column 9, Schedule A, after applying section 901(e). Also, write in the heading of column 9, Schedule A, "see attachment."

Specific instructions for Schedules A through D Schedule A

Column 2.—If you claim a credit for taxes accrued, show both the date accrued and the date paid (if paid). See instruction H.

Column 3.—Enter the type of tax (income, war profits, or excess profits).

Column 5.—Enter amounts in columns 5(a), (b), and (c) in U.S. dollars. Complete columns 5(a), (b), and (c) for each country imposing the tax regardless of the method used in computing the limitation. In-

clude all income that is taxable (or losses that are allowable) by the U.S. whether or not taxable (or allowable) by the foreign country or U.S. possession. The computation of taxable income from sources without the U.S. must be made in accordance with sections 638 and 861 through 864, and must be made without deduction of any income or profits tax imposed by any foreign country or U.S. possession.

The schedule requested in columns 5(a) and (b) should categorize the type of gross income and expenses as follows: interest, royalties, branch income, dividends, and other.

Note: If an amount on any line in column 5(c) is a loss, you are required to complete that line through column 9.

If you elect the overall limitation, all income from sources without the U.S. is taken into account. Thus, income from sources without the U.S. includes high seas income but such income is not taken into account under the per-country limitation. Where high seas income is taken into account, it should be properly identified and shown on the schedule.

For dividends from a foreign corporation 50% or more of whose gross income was effectively connected with the conduct of a trade or business within the U.S., see section 861(a)(2)(B).

Gross-up of dividends.—Include in income as a "dividend gross-up," taxes deemed paid (Schedule B, column 11) on (1) actual or constructive distributions by a foreign corporation out of accumulated profits of a year for which the foreign corporation was not a less developed country corporation and (2) deemed or actual distributions from a DISC or former DISC.

Column 6.—Include tax withheld at the source on dividends and other tax paid or accrued. Do not include tax deemed to have been paid by a related corporation as shown in column 7.

If you have foreign mineral income, see instruction L.

Column 6(a).—State the amount in the currency of the foreign country (e.g., pounds, francs, marks).

Column 6(b).—Give the rate of exchange used and attach a statement describing in reasonable detail why and how you determined the rate used.

Column 6(c).—Regardless of

whether you elected the per-country limitation or the overall limitation, a separate computation and entry will be necessary for each country.

Column 7.—Regardless of whether you elected the per-country limitation or the overall limitation, enter the tax deemed to have been paid to the individual foreign country or U.S. possession from Schedule B except for tax deemed paid with respect to dividends from a DISC or former DISC.

Enter the total foreign tax deemed paid with respect to dividends from a DISC or former DISC (identified separately in column 11, Schedule B) on the "DISC Dividends" line.

If you have foreign mineral income, see instruction L.

Column 8.—Attach a schedule showing a computation of the carryback or carryover. If you elected the per-country limitation, a separate computation and entry will be necessary for each country. If you elected the overall limitation, enter the total carryback or carryover on the total line.

Taxes paid or accrued to any foreign country or U.S. possession in excess of the applicable limitation can be carried back 2 years and then carried forward 5 years. The excess must first be applied to the earliest of the 7 years to which it may be carried, then to the next earliest year, etc. The excess cannot be carried from a per-country year to an overall year or vice versa. However, the years to which you cannot carry the excess because you used a different limitation are counted in determining whether a carryback or carryover is available.

If you claim a deduction rather than a credit in any taxable year to which the carryback or carryover is carried, the carryback or carryover is to be considered used in such year in the same manner as though you had claimed the tax credit, instead of a deduction, but no credit is allowed for the amount so used.

Column 9.—If you elected the per-country limitation, columns 6(c), 7, and 8 must be totaled across line by line. If you elected the overall limitation, use only the total line.

If you have foreign mineral income, see instruction L.

Column 10.—If you elected the per-country limitation, enter on each line for each country for which the

credit is claimed the total U.S. income tax before credits. If you elected the overall limitation, enter the amount on the total line only.

Column 11.—If you elected the per-country limitation, enter on each line for each country for which the credit is claimed the total taxable income (after net operating loss deduction and special deductions) from all sources. If you elected the overall limitation, enter the amount on the total line only.

For foreign corporations claiming the credit, taxable income includes only that taxable income which is effectively connected with the conduct of a trade or business within the U.S.

Column 12.—If you elected the per-country limitation, the ratio of foreign taxable income (column 5(c)) to taxable income from all sources (column 11) must be computed for each country. (Divide the amount in column 5(c) by the amount in column 11 for each line.)

If you elected the overall limitation, the ratio is computed on the total line only. (Divide the total of column 5(c) by the amount entered in the total line for column 11.)

In computing the ratio, the numerator cannot exceed the denominator. See instruction G.

Column 13.—If you elected the per-country limitation, the limitation must be computed for each country. (Multiply the amount in column 10 by the amount in column 12 for each line.)

If you elected the overall limitation, the limitation is computed on the total line only. (Multiply the amount in the total line for column 10 by the amount in the total line for column 12.)

If you elected the overall limitation, special limitations apply to consolidated returns which include a Western Hemisphere trade corporation. See section 1503(b).

Column 14.—If you elected the per-country limitation, enter for each country the amount in column 9 or column 13, whichever is less. The credit to be claimed on your income tax return will be the total of the individual credits in column 14.

If you elected the overall limitation, enter on the total line the total amount in column 9 or column 13, whichever is less.

Schedule B

Column 2.—If dividends are from the gains, profits, and income of more than 1 year, the tax deemed to have been paid must be computed and shown on a separate line for each year.

Column 4.—The gains, profits, and income to be entered is determined by the gains, profits, and income from all sources, whether or not subject to foreign tax, for the year from which the dividends (column 7) were paid. Include all dividends received from a foreign subsidiary of the related foreign corporation.

Internal Revenue may determine from which year's accumulated profits the dividends were paid. In making the determination, Internal Revenue will, unless it is otherwise established to its satisfaction, treat any dividends which are paid in the first 60 days of any taxable year as having been paid from the accumulated profits of the preceding taxable year or years and will treat dividends which are paid after the first 60 days of any taxable year as having been paid from the most recently accumulated profits.

The conversion to dollars must be made at the same exchange rate used for dividends in column 7.

Column 7.—Enter the amount of dividends (1) paid or constructively distributed by the related foreign corporation to the domestic corporation, (2) paid by the related domestic corporation to the domestic corporation, and (3) paid or deemed distributed by the DISC or former DISC to the domestic corporation.

Column 8.—For dividends paid by a foreign corporation out of accumulated profits of a year for which the foreign corporation was a less developed country corporation, disregard the instruction in the column heading and enter the amount determined by dividing column 6 by column 4 and multiplying the result by column 5.

Column 11.—Regardless of whether you elected the per-country limitation or the overall limitation, the amount entered in this column, excluding any amount from a corporation that is a DISC or former DISC, should be carried to Schedule A, column 7 and entered on the line with the country or U.S. possession for which you are claiming a credit.

Since a separate limitation must be applied to foreign tax deemed

paid with respect to dividends from a DISC or former DISC, any amount included in the total of this column from a DISC or former DISC should be entered in total on the "DISC Dividends" line of Schedule A, column 7.

Schedule C

If a related foreign corporation (first foreign corporation) in Schedule B owns 10% or more of the voting stock of a second foreign corporation from which it receives dividends, Schedule C must be filled in to determine the tax deemed to have been paid by the first foreign corporation. See instruction F(2).

Column 1.—Enter the name of the second foreign corporation.

Columns 2 and 4.—Same instructions as Schedule B.

Column 7.—Enter the amount of dividends paid by the second foreign corporation to the first foreign corporation.

Column 11.—Carry the amount of tax deemed to have been paid to Schedule B, column 9 and enter on the line with the related first foreign corporation. If dividends are paid from the gains, profits, and income of more than 1 year, the tax deemed to have been paid by the first foreign corporation must be computed separately for each year.

Schedule D

If the second foreign corporation in Schedule C owns 10% or more of the voting stock of a third foreign corporation from which it receives dividends, Schedule D must be filled in to determine the tax deemed to have been paid by the second foreign corporation. See instruction F(3).

Column 1.—Enter the name of the third foreign corporation.

Columns 2 and 4.—Same instructions as Schedule B.

Column 7.—Enter the amount of dividends paid by the third foreign corporation to the second foreign corporation.

Column 10.—Enter the amount from column 8.

Column 11.—Carry the amount of tax deemed to have been paid to Schedule C, column 9 and enter on the line with the related second foreign corporation. If dividends are paid from the gains, profits, and income of more than 1 year, the tax deemed to have been paid by the second foreign corporation must be computed separately for each year.

