## **Section 3**

# Description of the Sample and Limitations of the Data

his section describes the 2006 Corporate sample design, sample selection, data capture, data cleaning, and data completion. The techniques used to produce estimates and an assessment of the data limitations, including sampling and non-sampling errors, are also discussed.

#### **Background**

From Tax Year 1916 through Tax Year 1950, data were extracted for the Statistics of Income (SOI) program from each corporate return filed. Stratified probability sampling was introduced for Tax Year Since that time, the sample size has 1951. generally decreased while the population has increased. For example, for Tax Year 1951 the sample comprised 41.5 percent of the entire population, or 285,000 of the 687,000 total returns filed. In comparison, for 2006, the sample proportion was about 1.7 percent of the total population of over 6.4 million. This population count differs from the estimated population count cited elsewhere in this publication because the sampling frame includes out-of-scope and duplicate returns.

For 1951, stratification was by size of total assets and industry. From 1952 through 1967, the stratification was by a measure of size only. The size was measured by volume of business (1953-1958) or total assets (1952 and 1959-1967). Since 1968, returns have been stratified by both total assets and, for Form 1120, 1120-A and 1120S returns, a measure of income [1].

#### **Target Population**

The target population consists of all returns of active corporations organized for profit that are required to file one of the 1120 forms that are part of the SOI study.

#### **Survey Population**

The survey population includes the returns that filed one of the 1120 forms selected for the SOI study and posted to the IRS Business Master File (BMF). Amended returns and returns for which the tax liabilities changed because of a tax audit are excluded. Figure E gives the number of corporate returns by form type that were subject to sampling during Tax Years 2003 through 2006.

Bertrand Überall, Richard Collins, and Lance Harris were responsible for the sample design and estimation of the SOI 2006 Corporation Program under the direction of Tamara Rib, Chief, Mathematical Statistics Section, Statistical Computing Branch.

Figure E.--Population Counts by Corporate Form Type, Tax Years 2003-2006

	Tax Year					
Form Type	2003	2004	2005	2006		
1120	2,080,166	2,026,712	2,010,496	2,036,881		
1120-A	215,306	209,824	194,757	187,180		
1120S	3,506,431	3,698,126	3,893,471	4,164,612		
1120-L	1,301	1,211	1,089	1,089		
1120-PC	4,524	5,473	5,863	6.458		
1120-RIC	11,053	10,993	11,066	11,571		
1120-REIT	1,073	1,140	1,264	1,437		
1120-F	25,755	27,159	28,329	31,016		
Total	5,845,609	5,980,638	6,146,335	6,440,244		

#### Sample Design

The current sample design is a stratified probability sample, with stratification by form type, and either size of total assets alone, or both size of total assets and a measure of income. Forms 1120 and 1120-A are stratified by size of total assets and size of "proceeds". Size of "proceeds", the measure of income, is the larger of the absolute value of net income (or deficit) or the absolute value of "cash flow", which is the sum of net income, several depreciation amounts, and depletion. Forms 1120-F, 1120-L, 1120-PC, 1120-RIC, and 1120-REIT are each stratified by size of total assets only. Form 1120S is stratified by size of total assets and size of ordinary income.

The design process began with projected population totals that were derived from IRS administrative workload estimates. adjusted according to the distribution by strata of the population from several previous survey years. Using projected population totals by sample strata, an optimal allocation, based on stratum standard errors, was carried out to assign sample sizes to each stratum such that the overall targeted sample size was approximately 108,000. sample was selected independently from each stratum with sampling rates ranging from 0.25 percent to 100 percent. Figure F on the following page shows the stratum boundaries, sampling rates, and frame population and sample counts from the BMF for each form type. This table also shows the population and sample counts after adjustments for missing returns, outliers, and weight trimming. The total realized sample for Tax Year 2006, including inactive corporations and non-eligible returns, is 111,731 returns. A supplementary sample of large

### 2006 Corporation Returns - Description of the Sample and Limitations of the Data

Figure F.--Corporation Returns: Number Filed, Number in Sample, and Sampling Rates, by Selection Class

Size of total assets   Size of proceeds	Sample	Description of san	nple selection classes		51.45		r of returns	.1
Ail Returns, Total	class			Sampling				
Form 1120 w/ Form 5736 statched, Total   100.00	number							_
1		All Returns, Total			6,440,244	111,731	6,440,295	111,355
1								
2 \$100,000,000 = \$250,000,000 = \$100,000 = \$			•			-		-
\$ \$250,000,000 or more.					-	-	-	
Form 1120 (no Form 5735 attached), 1120-A, Total ""  10					-	-	-	
4 Under \$50,000 Under \$25,000 0.0 4.0 1929,034 5,752 929,034 5,753 5 50 5 50 5 50 5 50 5 50 5 50 5 50 5	3	\$250,000,000 or more		100.00	15	15	15	15
4 Under \$50,000 Under \$25,000 0.0 4.0 1929,034 5,752 929,034 5,753 5 50 5 50 5 50 5 50 5 50 5 50 5 50 5		Form 1120 (no Form 5735 attac	shod) 1120 A Total ***		2 212 200	40 806	2 242 422	49 720
5 \$50,000 - \$100,000	1					,		,
6 \$100.000 - \$250.000 \$50,000 \$100.000 \$100.000 \$250,000 \$100.000 \$250,000 \$100.000 \$250,000 \$100.000 \$250,000 \$100.000 \$250,000 \$100.000 \$250,000 \$100.000 \$250,000 \$100.000 \$250,000 \$100.000 \$250,000 \$100.000 \$250,000 \$100.000 \$250,000 \$100.000 \$250,000 \$100.000 \$250,000 \$100.000 \$100.000 \$100.000 \$100.000 \$100.000 \$100.000 \$100.000 \$100.000 \$100.000 \$10.000 \$100.000 \$100.000 \$100.000 \$100.000 \$10.0000 \$10.000 \$10.000 \$10.000 \$10.000 \$10.000 \$10.000								
7 \$250,000 - \$500,000 . \$100,000 - \$250,000 . 1.09   243,452   2,741   243,452   2,736   8 \$800,000 - \$100,000 . \$250,000 . \$100,000 . \$500,000 . 1.00   3.48   138,847   4,805   38,847   4,749   13 \$250,000 . \$500,000 . \$100,000 .								
8 \$500,000 - \$1,000,000 - \$250,0000 - \$100,000 - \$1,000,000 - \$1,000,000 - \$1,000,000 - \$2,000,000 - \$1,000,0						,		
10   \$2,500,000 - \$5,000,000   . \$1,000,000 - \$1,500,000   . \$1,500,000   . \$1,500,000   . \$1,500,000   . \$1,500,000   . \$2,	8	\$500,000 - \$1,000,000	\$250,000 - \$500,000	1.81	175,033	3,120	175,033	3,113
11 \$5,000,000 - \$10,000,000 . \$1,500,000 - \$2,500,000 . \$1,500,000 . \$1,500,000 . \$2,500,000 . \$1,500,000 . \$2,500,000 . \$1,500 . \$1,50	9				138,847	4,805	138,847	4,794
12   \$10,000,000 - \$25,000,000   \$2,500,000   \$5,000,000   \$0,000   \$0,000   \$10,000   \$10,000   \$	10				56,435	3,374	56,435	3,367
\$25,000,000 - \$50,000,000								
14   \$50,000,000 - \$10,000,000\$10,000,000 - \$15,000,000   100,000   6,029   6,029   6,041   6,017   5,010   5,103   5,10						,		
15   \$100,000,000 - \$250,000,000   \$15,000,000   \$10,000   \$1,648   \$1,648   \$1,643   \$1,640   \$1,567   \$1,567   \$1,567   \$1,567   \$1,567   \$1,567   \$1,567   \$1,567   \$1,567   \$1,567   \$1,569   \$1,575,093   \$1,949   \$1,490   \$2,500   \$1,575,093   \$3,949   \$1,949   \$2,500   \$1,000   \$25,000   \$1,000   \$25,000   \$1,000   \$1,250   \$1,575,093   \$3,949   \$1,489   \$2,500   \$1,500								
16   \$250,000,000 - \$500,000,000   1,648   1,643   1,644   1,644   1,644   1,644   1,644   1,644   1,644   1,644   1,644   1,644   1,644   1,644   1								
100.00	_							
Form 1120S, Total ***	_						,	,
18	17	\$500,000,000 or more		100.00	1,587	1,587	1,623	1,623
18		Form 1120S Total ***			4 162 483	31 560	4 162 484	31 492
19	40					-	, ,	-
20								
21   \$250,000 - \$500,000   \$100,000 - \$250,000.00   0.31   633,920   1,696   533,920   1,694   22   \$500,000 - \$1,000,000   \$250,000 - \$500,000   0.05   6 302,138   1,647   302,163   1,643   32   31,000,000 - \$25,000,000   \$500,000   510,000,000   0.99   214,991   2,144   214,991   2,138   2	_				. ,			
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23   \$1,000,000 - \$2,500,000   \$500,000 - \$1,000,000   0.99   214,991   2,144   214,991   2,138   24   \$2,500,000 - \$5,000,000   \$1,000,000 - \$1,500,000   2.50   50,645   1,318   50,645   1,316   25   \$5,000,000 - \$50,000,000   \$1,000,000 - \$2,500,000   2.50   50,645   1,318   50,645   1,316   26   \$10,000,000 - \$25,5000,000   \$2,500,000   0.00   0						,		
24 \$2,500,000 - \$5,000,000 \$1,500,000 \$1,500,000 \$2,000,000 \$2,000		\$1,000,000 - \$1,000,000	\$500,000 - \$300,000	n 99				,
25   \$5,000,000		\$2 500 000 - \$5 000 000	\$1,000,000 \$1,000,000 \$1,000,000 - \$1,500,000	1.56				
26 \$10,000,000 - \$25,000,000 \$2,000,000 \$10,000,000								
27   \$25,000,000 - \$50,000,000   \$50,000,000 - \$10,000,000   \$10,000   \$10,0					,			
28 \$50,000,000 - \$100,000,000 - \$15,000,000 - 100,000   4,091   4,091   4,096   4,080   29 \$100,000,000 - \$250,000,000   \$15,000,000 rmore   100,000   572   573							- , -	
Section   Sect	28				4,091	4,091	4,095	4,080
Form 1120-L, Total	29				2,247	2,247	2,243	2,243
1	30	\$250,000,000 or more		100.00	572	572	573	573
1								
32         \$10,000,000 - \$50,000,000         100.00         52         52         51         51           33         \$50,000,000 - \$250,000,000         100.00         52         52         51         51           34         \$250,000,000 or more         100.00         51         51         64         64           Form 1120-F, Total         30,926         4,467         30,932         4,353           35         Under \$10,000,000         13.00         29,634         3,814         29,634         3,722           36         \$10,000,000 - \$50,000,000         13.00         726         87         726         85           37         \$50,000,000 - \$50,000,000         100.00         319         319         333         307           38         \$250,000,000 or more         100.00         247         247         239         239           Form 1120-PC, Total         6,124         1,612         6,127         1,589           39         Under \$2,500,000         10.00         3,967         390         3,966         380           40         \$2,500,000 - \$10,000,000         25.00         1,249         314         1,249         308           41 <td< td=""><td></td><td></td><td></td><td></td><td></td><td>-</td><td></td><td></td></td<>						-		
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Form 1120-F, Total								
35	34	\$250,000,000 or more		100.00	51	51	04	04
35		Form 1120-F Total			30 926	4 467	30 932	4 353
36         \$10,000,000 - \$50,000,000.         13,00         726         87         726         85           37         \$50,000,000 - \$250,000,000.         100.00         319         319         333         307           Form 1120-PC, Total.         6,124         1,612         6,127         1,589           39         Under \$2,500,000.         10.00         3,967         390         3,966         380           40         \$2,500,000 - \$10,000,000         25,00         1,249         314         1,249         308           41         \$10,000,000 - \$50,000,000         100.00         705         705         707         696           42         \$50,000,000 - \$250,000,000         100.00         192         192         191         191           43         \$250,000,000 - \$250,000,000         100.00         11         11         14         14           Form 1120-REIT, Total         1,214         1,003         1,214         979           44         Under \$10,000,000         25.00         302         91         301         89           45         \$10,000,000 - \$50,000,000         25.00         302         91         301         89 <t< td=""><td>35</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></t<>	35							
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38         \$250,000,000 or more.         100.00         247         247         239         239           Form 1120-PC, Total.         6,124         1,612         6,127         1,589           39         Under \$2,500,000         10.00         3,967         390         3,966         380           40         \$2,500,000         10.000         705         705         707         696           41         \$10,000,000 - \$50,000,000         100.00         705         705         705         707         696           42         \$50,000,000 - \$250,000,000         100.00         192         192         191         191         191           43         \$250,000,000 or more.         100.00         11         11         14         14         14           Form 1120-REIT, Total.         25.00         302         91         301         89           44         Under \$10,000,000         250,000,000         254         254         260         244           46         \$50,000,000 - \$50,000,000         100.00         321         321         321         314           47         \$250,000,000 - \$250,000,000         100.00         337         337         332								
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41       \$10,000,000 - \$50,000,000       100.00       705       705       707       696         42       \$50,000,000 - \$250,000,000       100.00       192       192       191       191         43       \$250,000,000 or more       100.00       11       11       14       14         Form 1120-REIT, Total       1,214       1,003       1,214       979         44       Under \$10,000,000       25.00       302       91       301       89         45       \$10,000,000 - \$50,000,000       100.00       254       254       260       244         46       \$50,000,000 - \$250,000,000       100.00       321       321       321       314         47       \$250,000,000 or more       100.00       337       337       332       332         Form 1120-RIC, Total       11,059       8,652       11,060       8,636         48       Under \$10,000,000       1500       1,508       251       1,506       248         49       \$10,000,000 - \$50,000,000       30.00       1,671       521       1,670       519         50       \$50,000,000 - \$100,000,000       100.00       2,073       2,073       2,088       <								
42       \$50,000,000 - \$250,000,000       100.00       192       192       191       191         43       \$250,000,000 or more       100.00       11       11       14       14         Form 1120-REIT, Total       1,214       1,003       1,214       979         44       Under \$10,000,000       25.00       302       91       301       89         45       \$10,000,000 - \$50,000,000       100.00       254       254       260       244         46       \$50,000,000 - \$250,000,000       100.00       321       321       321       314         47       \$250,000,000 or more       100.00       337       337       332       332         Form 1120-RIC, Total       11,059       8,652       11,060       8,636         48       Under \$10,000,000       15.00       1,508       251       1,506       248         49       \$10,000,000 - \$50,000,000       30.00       1,671       521       1,670       519         50       \$50,000,000 - \$100,000,000       100.00       2,073       2,073       2,068       2,064         52       \$250,000,000 - \$500,000,000       100.00       1,587       1,587       1,583 <t< td=""><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></t<>								
\$250,000,000 or more								
Form 1120-REIT, Total         1,214         1,003         1,214         979           44         Under \$10,000,000         25.00         302         91         301         89           45         \$10,000,000 - \$50,000,000         100.00         254         254         260         244           46         \$50,000,000 - \$250,000,000         100.00         321         321         321         314           47         \$250,000,000 or more         100.00         337         337         332         332           Form 1120-RIC, Total         11,059         8,652         11,060         8,636           48         Under \$10,000,000         15.00         1,508         251         1,506         248           49         \$10,000,000 - \$50,000,000         30.00         1,671         521         1,670         519           50         \$50,000,000 - \$100,000,000         100.00         1,342         1,342         1,348         1,337           51         \$100,000,000 - \$250,000,000         100.00         2,073         2,073         2,068         2,064           52         \$250,000,000 - \$500,000,000         100.00         1,587         1,587         1,583         1,583								
44         Under \$10,000,000         25.00         302         91         301         89           45         \$10,000,000 - \$50,000,000         100.00         254         254         260         244           46         \$50,000,000 - \$250,000,000         100.00         321         321         321         314           47         \$250,000,000 or more         100.00         337         337         332         332           Form 1120-RIC, Total         11,059         8,652         11,060         8,636           48         Under \$10,000,000         15.00         1,508         251         1,506         248           49         \$10,000,000 - \$50,000,000         30.00         1,671         521         1,670         519           50         \$50,000,000 - \$50,000,000         100.00         1,342         1,342         1,348         1,337           51         \$100,000,000 - \$250,000,000         100.00         2,073         2,073         2,068         2,064           52         \$250,000,000 - \$500,000,000         100.00         1,587         1,587         1,583         1,583           53         \$500,000,000 or more         100.00         2,878         2,878         2,885	43	\$250,000,000 or more		100.00	11	11	14	14
44         Under \$10,000,000         25.00         302         91         301         89           45         \$10,000,000 - \$50,000,000         100.00         254         254         260         244           46         \$50,000,000 - \$250,000,000         100.00         321         321         321         314           47         \$250,000,000 or more         100.00         337         337         332         332           Form 1120-RIC, Total         11,059         8,652         11,060         8,636           48         Under \$10,000,000         15.00         1,508         251         1,506         248           49         \$10,000,000 - \$50,000,000         30.00         1,671         521         1,670         519           50         \$50,000,000 - \$50,000,000         100.00         1,342         1,342         1,348         1,337           51         \$100,000,000 - \$250,000,000         100.00         2,073         2,073         2,068         2,064           52         \$250,000,000 - \$500,000,000         100.00         1,587         1,587         1,583         1,583           53         \$500,000,000 or more         100.00         2,878         2,878         2,885		Form 4420 DEIT Total			4 244	4 002	4 244	070
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46       \$50,000,000 - \$250,000,000       100.00       321       321       321       332         47       \$250,000,000 or more       100.00       337       337       332       332         Form 1120-RIC, Total       11,059       8,652       11,060       8,636         48       Under \$10,000,000       15.00       1,508       251       1,506       248         49       \$10,000,000 - \$50,000,000       30.00       1,671       521       1,670       519         50       \$50,000,000 - \$100,000,000       100.00       1,342       1,342       1,348       1,337         51       \$100,000,000 - \$250,000,000       100.00       2,073       2,073       2,068       2,064         52       \$250,000,000 - \$500,000,000       100.00       1,587       1,587       1,583       1,583         53       \$500,000,000 or more       100.00       2,878       2,878       2,885       2,885         54       Special Studies (All Form Types)       100.00       13,947       13,947       13,932       13,900 <sup>†</sup>								
47       \$250,000,000 or more       100.00       337       337       332       332         Form 1120-RIC, Total       11,059       8,652       11,060       8,636         48       Under \$10,000,000       15.00       1,508       251       1,506       248         49       \$10,000,000 - \$50,000,000       30.00       1,671       521       1,670       519         50       \$50,000,000 - \$100,000,000       100.00       1,342       1,342       1,348       1,337         51       \$100,000,000 - \$250,000,000       100.00       2,073       2,073       2,068       2,064         52       \$250,000,000 - \$500,000,000       100.00       1,587       1,587       1,583       1,583         53       \$500,000,000 or more       100.00       2,878       2,878       2,885       2,885         54       Special Studies (All Form Types)       100.00       13,947       13,947       13,932       13,900†								
Form 1120-RIC, Total 11,059 8,652 11,060 8,636  48		, ,						
48         Under \$10,000,000         15.00         1,508         251         1,506         248           49         \$10,000,000 - \$50,000,000         30.00         1,671         521         1,670         519           50         \$50,000,000 - \$100,000,000         100.00         1,342         1,342         1,348         1,337           51         \$100,000,000 - \$250,000,000         100.00         2,073         2,073         2,068         2,064           52         \$250,000,000 - \$500,000,000         100.00         1,587         1,587         1,583         1,583           53         \$500,000,000 or more         100.00         2,878         2,878         2,885         2,885           54         Special Studies (All Form Types)         100.00         13,947         13,947         13,932         13,900 <sup>†</sup>	l ''	+			]	557	002	302
48         Under \$10,000,000         15.00         1,508         251         1,506         248           49         \$10,000,000 - \$50,000,000         30.00         1,671         521         1,670         519           50         \$50,000,000 - \$100,000,000         100.00         1,342         1,342         1,348         1,337           51         \$100,000,000 - \$250,000,000         100.00         2,073         2,073         2,068         2,064           52         \$250,000,000 - \$500,000,000         100.00         1,587         1,587         1,583         1,583           53         \$500,000,000 or more         100.00         2,878         2,878         2,885         2,885           54         Special Studies (All Form Types)         100.00         13,947         13,947         13,932         13,900 <sup>†</sup>		Form 1120-RIC. Total			11.059	8.652	11.060	8.636
49     \$10,000,000 - \$50,000,000     30.00     1,671     521     1,670     519       50     \$50,000,000 - \$100,000,000     100.00     1,342     1,342     1,348     1,337       51     \$100,000,000 - \$250,000,000     100.00     2,073     2,073     2,068     2,064       52     \$250,000,000 - \$500,000,000     100.00     1,587     1,587     1,583     1,583       53     \$500,000,000 or more     100.00     2,878     2,878     2,885     2,885       54     Special Studies (All Form Types)     100.00     13,947     13,947     13,932     13,900†	48							
50     \$50,000,000 - \$100,000,000     100.00     1,342     1,342     1,348     1,337       51     \$100,000,000 - \$250,000,000     100.00     2,073     2,073     2,068     2,064       52     \$250,000,000 - \$500,000,000     100.00     1,587     1,587     1,583     1,583       53     \$500,000,000 or more     100.00     2,878     2,878     2,885     2,885       54     Special Studies (All Form Types)     100.00     13,947     13,947     13,932     13,900†							,	
51       \$100,000,000 - \$250,000,000       100.00       2,073       2,073       2,068       2,064         52       \$250,000,000 - \$500,000,000       100.00       1,587       1,587       1,583       1,583         53       \$500,000,000 or more       100.00       2,878       2,878       2,885       2,885         54       Special Studies (All Form Types)       100.00       13,947       13,947       13,932       13,900†								1,337
52       \$250,000,000 - \$500,000,000       100.00       1,587       1,587       1,583       1,583         53       \$500,000,000 or more       100.00       2,878       2,878       2,885       2,885         54       Special Studies (All Form Types)       100.00       13,947       13,947       13,932       13,900 <sup>†</sup>								
54 Special Studies (All Form Types)		\$250,000,000 - \$500,000,000		100.00	1,587		1,583	
	53	\$500,000,000 or more		100.00	2,878	2,878	2,885	2,885
			,	,				

<sup>\*</sup> Proceeds is defined as the larger of absolute value of net income (deficit) or absolute value of cash flow (net income + depreciation + depletion).

<sup>\*\*</sup> Includes adjustments for missing returns, undercoverage, outliers, and weight trimming.

<sup>\*\*\*</sup> Returns were classified according to either size of total assets or size of proceeds, whichever corresponded to the higher sample class. Example: A Form 1120 return with total assets of \$750,000 and proceeds of \$75,000 is in sample class 8 (based on total assets), rather than in sample class 6 (based on proceeds).

<sup>†</sup> The adjusted sample count is lower than the adjusted population count due to returns unavailable for processing.

1120S returns (assets \$10 million or more), selected since Tax Year 1998, has been discontinued.

#### Sample Selection

Corporation income tax returns are filed at the Cincinnati, Ogden, and Philadelphia IRS Submission Processing Centers. All corporate returns are processed initially to determine tax liability. Then, the tax data are transmitted and updated on a weekly basis to the IRS Business Master File (BMF) system located in Martinsburg, West Virginia. These returns are said to "post" to the BMF. This BMF database serves as the SOI sampling frame. The SOI sample is also selected on a weekly basis.

Sample selection for Tax Year 2006 occurred over the period of July 2006 through June 2008. A 24-month sampling period is needed for two reasons. First, approximately 12.6 percent of all corporations had noncalendar vear accounting In order to take these filings into consideration, the 2006 statistics represent all corporations filing returns with accounting periods ending during the period from July 2006 to June 2007. Also, many corporations, including some of the largest, request six-month filing extensions. The combination of noncalendar year filing and filing extensions means that the last Tax Year 2006 returns that the IRS received (those with accounting periods ending in June 2007, which must therefore be filed by October 2007) could be timely filed as late as March 2008, taking into account the sixmonth extension of the October 2007 due date. Normal administrative processing time lags required that the sample selection process remain open for the 2006 study until June 30, 2008. However, a few very large returns for Tax Year 2006 were added to the sample as late as November 2008.

Each tax return posted to the BMF and in the survey population (as defined above) is assigned to a stratum and subjected to sampling. Each filing corporation has a unique Employer Identification Number (EIN). An integer function of the EIN, called the Transformed Taxpayer Identification Number (TTIN), is computed. The number formed by the last four digits of the TTIN is a pseudo-random number. A return for which this pseudo-random number is less than the sampling rate multiplied by 10,000 is selected in the sample.

The algorithm for generating the TTIN does not change from year to year, so any corporation selected into the sample in a given year will be selected again the next year, providing that the corporation files a return using the same EIN in the two years and that it falls into a stratum with the same or higher sampling rate. If the corporation falls into a stratum with a lower rate, the probability of selection will be the ratio of the second year

sampling rate to the first year sampling rate. If the corporation files with a new EIN, the probability of selection will be independent from the prior year selection [2].

#### **Data Capture**

Data processing for SOI begins with information already extracted for IRS administrative purposes; over 100 items available from the BMF system are checked and corrected as necessary. Some 1,630 additional data items are extracted from the tax returns during SOI processing. The SOI data capture process can take as little time as fifteen minutes for a small, single entity corporation filing on Form 1120-A, or up to several weeks for a large consolidated corporation filing several hundred attachments and schedules with the return. The process is further complicated by several factors:

- Over 1,630 separate data items may be extracted from any given tax return, and often require totals to be constructed from various other items on other parts of the return.
- Each 1120 form type has a different layout with different types of schedules and attachments, making data extraction less than uniform for the various form types.
- There is no legal requirement that a corporation meet its tax return filing requirements by filling in, line by line, the entire U.S. tax return form. Therefore, many corporate taxpayers report many of their financial details in schedules of their own design, or using commercial taxpreparation software packages.
- There is no single accepted method of corporate accounting used throughout the country, but rather several accepted accounting "guidelines," many of which are unique to geographic locations. SOI staff attempt to standardize these differences during data abstraction and editing.
- Different companies may report the same data item, such as other current liabilities, on different lines of the tax form. Again, SOI staff attempt to standardize these differences.

To help SOI editors overcome these complexities and differences due to taxpayer reporting, SOI staff prepares detailed instructions for the SOI editing unit at the IRS Submission Processing Centers each tax year. For Tax Year 2006, these instructions consisted of almost 1,000 pages covering standard and straightforward procedures and instructions for exceptions that might be encountered.

#### **Data Cleaning**

Statistical processing of the corporate returns is performed in an online computer environment, where the data from returns selected for the corporate sample are entered directly into the SOI corporation database. In this context, the term "editing" refers to the combined interactive processes of data extraction, consistency testing, and error resolution. There are over 860 of these tests, which look for such inconsistencies as:

- Impossible conditions, such as incorrect tax data for a particular form type;
- Internal inconsistencies, such as items not adding to totals;
- Questionable values, such as a bank with an unusually large amount reported for cost of goods sold and/or operations; and
- Improper sample class codes, such as when a return has \$100 million in total assets, but was selected as though it had \$1 million because the last two digits of the total assets were mistakenly keyed in as cents.

#### **Data Completion**

In addition to the tests mentioned above, missing data problems must be addressed and returns that are to be excluded from the tabulations must be identified. The data completion process focuses on these issues.

If the missing data items are from the balance sheet, then imputation procedures are used. If data for a whole return are missing because the return is unavailable to SOI during the data capture process, imputation procedures are also used in certain cases.

A ratio-based imputation procedure is used to estimate missing balance sheet items for all 1120 forms except those with less than 12-month accounting periods. The ratios are determined using the most recent data available, either the corporation's Tax Year 2005 return if the corporation filed a return for 2005 and the balance sheet was not already imputed for 2005, or the Tax Year 2004 aggregate data for the corporation's minor industrial group, which are the most recent aggregate data available at the time that editing for Tax Year 2006 begins (which is mid-June of Calendar Year 2007). If the reported balance sheet items do not balance (i.e., the sum of asset items does not equal the sum of liability and shareholders' equity items), then missing items are imputed. If the total assets amount is among the missing items, this item is imputed first based on the ratio of total assets to business receipts (or total receipts) from either the corporation's Tax Year 2005 return, or the Tax Year 2004 aggregate data for the corporation's minor industry.

The other missing asset and liability items are then imputed based on the ratios so that the total of all asset items and the total of all liability items are both equal to the total assets amount, whether this amount was reported or imputed. A detailed description of the balance sheet imputation process is given in reference [3]. The following chart shows the number of sampled returns that had balance sheet items imputed, as well as the percentages they represent of the total sample sizes, for Tax Years 2003 through 2006.

Returns with	Tax Year					
imputations	2003	2004	2005	2006		
Number of imputed returns	77	75	62	56		
Percent imputed	0.05	0.05	0.05	0.05		

For Tax Year 2006, there were 56 returns with imputed balance sheets. The amount of imputed total assets represents a negligible fraction of the assets for all active returns in the sample.

Data for unavailable critical corporations are imputed in various ways, depending on what information is available at the time the SOI database produced. Critical corporations include corporations with total assets greater than or equal to 5 percent of the total assets for their minor industrial group, and corporations for which total assets are over a specified limit, which is dependent on form type or minor industry. For critical corporations selected for the sample but unavailable for statistical processing through the regular procedures, electronically filed data were used. For Tax Year 2006, there were 48 returns that met these criteria. For the critical corporations not selected for the sample, if the current tax return is not found in any of the IRS Submission Processing Centers and no other current tax data are available, data from the previous year's return are used with adjustments for tax law changes. There are 17 returns derived from prior year returns in the Tax Year 2006 data.

Another part of the data cleaning process is identifying sampled returns that are not eligible for the sample. The BMF system used for sample selection can include duplicate tax returns and other out-of-scope returns, such as returns of nonprofit corporations, returns having neither current income nor deductions, prior-year tax returns, amended or tentative returns, returns of nonresident foreign corporations having no effectively connected income with a trade or business located within the United States, fraudulent returns, and returns of corporations that are exempt from taxation.

Figure G below displays the number of inactive sampled returns that were excluded from tabulations, as well as the percentages they represent of the total sample sizes, for Tax Years 2003 through 2006.

Figure G.--Number of Inactive Sampled Returns for Tax Years 2003-2006

	Tax Year						
Type of inactive return	2003	2004	2005	2006			
No Income or Deductions	1,897	1,652	1,433	1,580			
Duplicate*	1,111	1,023	1,046	1,194			
Other**	4,005	4,004	3,668	4,640			
Total	7,013	6,679	6,147	7,414			
Percent of sample	4.90	4.60	5.29	6.66			

<sup>\*</sup> Duplicate returns are those that appear more than once in the sample.

Estimates of the number of active corporations by form type for Tax Years 2003 through 2006 are provided in Figure H below.

Figure H.--Estimated Number of Active Returns for Tax Years 2003-2006

	Tax Year					
Form Type	2003	2004	2005	2006		
1120	1,857,667	1,834,390	1,799,530	1,791,344		
1120-A	173,759	175,583	157,640	145,220		
1120S	3,341,606	3,518,334	3,684,086	3,872,766		
1120-L	1,314	1,241	1,145	1,128		
1120-PC	4,527	5,641	5,916	6,314		
1120-RIC	10,979	10,896	10,959	11,477		
1120-REIT	1,059	1,123	1,251	1,409		
1120-F*	10, 328	10,758	10,730	11,140		
Total	5,401,237	5,557,965	5,671,257	5,840,799		

<sup>\*</sup> Foreign Insurance Companies file on Forms 1120-L and 1120-PC, but are counted in Form 1120-F Tables 10 and 11.

#### **Estimation**

Estimates of the total number of corporations and associated variables produced in this report are based on weighted sample data. Either a one-step process or a two-step process was used to determine the weights, depending on the return's form type.

Under the one-step process, the weights are assigned as the reciprocal of the realized sampling rate, adjusted for unavailable returns, outliers, and weight trimming. These weights, referred to as the "national weights", are used to produce the estimates published in this report for Forms 1120-F, 1120-L, 1120-PC, 1120-RIC, 1120-REIT and Form

1120 with Form 5735 attached, as well as for Form 1120 and 1120S returns that were sampled with certainty.

The two-step process was used to improve the estimates by industry for Form 1120-A, and Form 1120 and 1120S returns that are not self-representing. The first stage is the one-step process described above, which provides an initial weight for the return. The second stage involves post-stratification by industry and sample selection class. A bounded raking ratio estimation approach is applied in order to determine the final weight, because certain post-stratification cells may have small sample sizes [4]. These final weights are used to produce the aggregated frequency and money amount estimates that are published in this report for these forms.

# Data Limitations and Measures of Variability

Several extensive quality review processes are used to improve data quality, beginning at the sample selection stage with weekly monitoring to ensure that the proper number of returns is being selected. They continue through the data collection, data cleaning, and data completion procedures with consistency testing. Part of the review process includes extensive comparisons between the 2006 data and the 2005 data. A great amount of effort is made at every stage of processing to ensure data integrity.

#### Sampling Error

Since the corporation estimates are based on a sample, they may differ from the population aggregates that would have been obtained if a complete census of all income tax returns had been taken. The particular sample used to produce the results in this report is one of a large number of possible samples that could have been selected under the same sample design. Estimates derived from one of the possible samples could differ from those derived from other samples and from the population aggregates. The deviation of a sample estimate from the average of all possible similarly selected samples is called the sampling error.

The standard error (SE), a measure of the average magnitude of the sampling errors over all possible samples, can be estimated from the realized sample. The estimated standard error is usually expressed as a percentage of the value being estimated. This is called the estimated coefficient of variation (CV) of the estimate, and it can be used to assess the reliability of an estimate. The smaller the CV, the more reliable the estimate is judged to be.

<sup>\*\*</sup> Includes prior-year returns.

Note: Detail may not add to total due to rounding.

#### 2006 Corporation Returns – Description of the Sample and Limitations of the Data

The estimated coefficient of variation of an estimate is calculated by dividing the estimated standard error by the estimate itself. Estimated coefficients of variation by industrial groupings for the estimated number of returns, as well as for selected money amount estimates, are shown in Table 1 of this report. For the estimated number of returns by asset size and sector, estimated coefficients of variation are given in Figure I on page 15. The corresponding estimates are in Table 4.

The estimated coefficient of variation, CV(X), can be used to construct confidence intervals for the estimate X. The estimated standard error, which is required for the confidence interval, must first be calculated. For example, the estimated number of companies in the manufacturing sector with net income and the corresponding estimated coefficient of variation can be found in Table 1 and used to calculate the estimated standard error:

A 95-percent confidence interval for the estimated number of returns in manufacturing is constructed as follows:

$$X \pm 2 \bullet SE(X) = 166,836 \pm (2 \times 5,355)$$
  
= 166,836 \pm 10,710

The interval estimate is 156,126 returns to 177,546 returns. This means that if all possible samples were selected under the same general conditions and sample design, and if an estimate and its estimated standard error were calculated from each sample, then approximately 95 percent of the intervals from two standard errors below the estimate to two standard errors above the estimate would include the average estimate derived from all possible samples. Thus, for a particular sample, it can be said with 95-percent confidence that the average of all possible samples is included in the constructed interval. This average of the estimates derived from all possible samples would be equal to or near the value obtained from a census.

#### Nonsampling Error

In addition to sampling error, nonsampling error can also affect the estimates. Nonsampling errors can be classified into two groups: random errors, whose effects may cancel out, and systematic errors, whose effects tend to remain somewhat fixed and result in bias.

Nonsampling errors include coverage errors, nonresponse errors, processing errors, or response errors. These errors can be the result of the inability to obtain information about all returns in the sample,

differing interpretations of tax concepts or instructions by the taxpayer, inability to provide accurate information at the time of filing (data are collected before auditing), inability to obtain all tax schedules and attachments, errors in recording or coding the data, errors in collecting or cleaning the data, errors made in estimating for missing data, and failure to represent all population units.

Coverage Errors: Coverage errors in the SOI Corporation data can result from the difference between the time frame for sampling and the actual time needed for filing and processing the returns. Since many of the largest corporations receive extensions to their filing periods, they may file their returns after sample selection has ended for that tax year. However, any of the largest returns found are added into the file until the final file is produced.

Coverage problems within industrial groupings in the SOI Corporation study result from the way consolidated returns may be filed. The Internal Revenue Code permits a parent corporation to file a single return, which includes the combined financial data of the parent and all its subsidiaries. These data are not separated into the different industries but are entered only into the industry with the largest receipts. Thus, there is undercoverage of financial data within certain industries and overcoverage in others. Coverage problems within industrial groupings present a limitation on any analysis done with the sample results.

Nonresponse Errors: Unit nonresponse occurs when a sampled return is unavailable for SOI processing. For example, other areas of the IRS may have the return at the time it is needed for statistical processing. These returns are termed "unavailable returns." In 2006, there were 385 such unavailable returns in the corporation study, which constituted about 0.34 percent of the total sample. The number of unavailable returns and their percentages of the total sample size for Tax Years 2003 through 2006 are shown in the following chart.

	Tax Year					
Unavailable returns	2003	2004	2005	2006		
Number of unavailable returns	181	329	282	385		
Percent unavailable	0.13	0.22	0.24	0.34		

Item nonresponse occurs when certain items are unavailable for a return selected for the sample, even if the return itself is available for SOI processing. An example of item nonresponse would be when items are missing on the balance sheet, even though other balance sheet items are reported.

Figure I.--Coefficients of Variation (CVs) for Number of Returns, by Asset Size and Sector, for Tax Year 2006

Figure 1Coefficients of Variation (CVS	Tor Humber	Size of total assets				
Sector	All		\$1	\$500.000	\$1,000,000	
	asset	Zero	under	under	under	
	sizes	Assets	\$ 500,000	\$1,000,000	\$5,000,000	
			. ,	. , ,	. , ,	
1	(1)	(2)	(3)	(4)	(5)	
All industries <sup>1</sup>	0.21	1.62	0.47	1.06	0.62	
Agriculture, forestry, fishing, and hunting	2.99	12.66	4.59	4.84	3.75	
Mining	7.22	22.66	10.99	16.44	9.90	
Jtilities	17.08	61.31	24.24	39.51	23.67	
Construction	0.94	4.84	1.55	3.25	1.89	
Manufacturing	2.34	9.99	3.95	5.53	2.70	
Vholesale and retail trade	1.04	4.43	1.62	2.47	1.44	
ransportation and warehousing	2.64	7.50	4.21	8.67	5.98	
nformation	4.26	11.36	5.71	13.36	7.24	
inance and insurance	2.27	8.24	3.56	7.90	5.17	
Real estate and rental and leasing	1.18	4.62	2.02	3.06	2.04	
	1.10	4.02	2.02	3.00	2.04	
Professional, scientific, and technical	4 47	4.24	4 66	6.16	4 4 5	
services	1.17	4.24	1.66	0.10	4.15	
Management of companies	F 00	45.70	10.40	15.00	0.07	
(holding companies)	5.98	15.73	10.16	15.98	9.87	
Administrative and support and waste				40 = 4	- 40	
management and remediation services	2.70	7.39	3.48	10.51	7.18	
Educational services	7.27	15.62	9.33	30.30	22.30	
lealth care and social assistance	1.35	7.46	1.77	8.53	7.52	
Arts, entertainment, and recreation	3.85	10.84	5.24	14.49	10.30	
Accommodation and food services	1.66	8.73	2.33	5.87	3.86	
Other services	2.05	6.83	2.68	6.79	7.23	
		S	Size of total assets –	continued		
Sector	\$5,000,000	\$10,000,000	\$25,000,000	\$50,000,000	\$100,000,000	
	under	under	under	under	under	
	\$10,000,000	\$25,000,000	\$50,000,000	\$100,000,000	\$250,000,000	
	(6)	(7)	(8)	(9)	(10)	
All Industries <sup>1</sup>	0.95	0.47	0.56	0.14	0.03	
Agriculture, forestry, fishing, and hunting	9.97	4.68	7.96	0.58	0.64	
Aining	10.99	5.07	5.00	0.39	0.35	
Jtilities	20.57	13.73	11.91	0.95	0.53	
Construction	2.83	1.46	2.27	0.21	0.20	
Manufacturing	3.41	1.39	1.52	0.13	0.12	
Wholesale and retail trade	1.97	0.99	1.37	0.13	0.12	
ransportation and warehousing	8.75	3.70	5.84	0.14	0.14	
nformation	8.75	4.14	3.83	0.30	0.31	
Finance and insurance	5.36	1.90	1.78	0.42	0.07	
Real estate and rental and leasing	3.65	1.79	2.41	0.24	0.25	
Professional, scientific, and technical			A	2.22		
services	5.83	2.93	3.45	0.26	0.27	
Management of companies		_				
(holding companies)	11.42	4.27	3.06	0.68	0.07	
Administrative and support and waste						
management and remediation services	13.13	6.13	6.67	0.48	0.44	
Educational services	37.25	14.41	15.59	1.10	0.89	
Health care and social assistance	12.26	5.99	5.96	0.51	0.52	
Arts, entertainment, and recreation	16.73	6.56	8.21	0.70	0.68	
			_			
Accommodation and food services	10.96	4.13	5.95	0.51	0.51	
Accommodation and food services	10.96 14.17	4.13 7.91	5.95 12.23	0.51 0.83	0.51 1.15	

<sup>1</sup>Includes returns not allocable by sector.

Note: Returns with assets of \$250,000,000 or more are self-representing and thus are not subject to sampling error.

Processing Errors: Errors in recording, coding, or processing the data can cause a return to be sampled in the wrong sampling class. This type of error is called a mis-stratification error. One example of how a return might be mis-stratified is the following: a corporation files a return with total assets of \$100,000,023 and net income of \$5,000. A processing error causes the last two digits of the

total assets to be keyed in as cents, so that the return is classified according to total assets of \$1,000,000.23 and net income of \$5,000.00. The return would be mis-stratified according to the incorrect value of the total assets stratifier. To adjust for mis-stratification errors, only returns selected in a non-certainty stratum which really belonged in a certainty stratum were moved to this stratum.

#### 2006 Corporation Returns – Description of the Sample and Limitations of the Data

Response errors: Response errors are due to data being captured before audit. Some purely arithmetical errors made by the taxpayer are corrected during the data capture and cleaning processes. Because of time constraints, adjustments to a return during audit are not incorporated into the SOI file.

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