

Foreign Recipients of U.S. Income, 2008

by Scott Luttrell

Whenever a U.S. entity (the payer) distributes U.S.-source income to foreign persons, it is required to withhold taxes on the income or to appoint a third-party withholding agent to do so. Foreign financial institutions that enter into an agreement with the Internal Revenue Service (IRS), known as qualified intermediaries (QIs), may also serve as withholding agents. The payer or withholding agent is fully liable for all taxes owed and is required to report the income paid to each foreign recipient on a Form 1042-S, Foreign Persons' U.S.-Source Income Subject to Withholding. Absent this withholding requirement, there would be no effective way to enforce taxpayer compliance because foreign recipients are generally not required to file U.S. tax returns to report this income.

The principal types of income reported on Form 1042-S include interest, dividends, notional principal contract income, rents, royalties, Social Security and railroad retirement payments, and personal services income, shown separately in Table 2. Other types of income include capital gains, scholarships, pensions and annuities, gambling winnings, and certain real estate distributions. Bank deposit interest and certain other interest payments on specific types of financial obligations are generally not reported on Form 1042-S.¹

As most foreign recipients are not required to file U.S. tax returns, it is generally not possible to tax them at ordinary graduated rates on their consolidated U.S.-source income.² Therefore, the statutory withholding rate for income paid to foreign persons is 30 percent. The flat, statutory rate is frequently reduced or eliminated by an income tax treaty or statutory exemption (see Table 1 for the amount of income exempt from taxation). Income that is exempt from taxation because of a tax treaty or certain other exemptions must still be reported.

Data Highlights

During Calendar Year 2008, more than \$659.7 billion in U.S.-source income payments were made to for-

ign recipients. This amount represents an increase of 2.0 percent over the \$646.5 billion that was paid in 2007. The increase was fueled primarily by growth in notional principal contract income, which rose by 59.7 percent in 2008. A notional principal contract is a contract involving two parties who agree contractually to pay each other amounts at specified times, based on the underlying notional amount. The underlying amount is notional because neither party to the notional principal contract is required to actually hold the property comprising the underlying amount. Notional principal contracts are used by financial institutions to reduce the risk of changes in interest rates, commodity prices, and currency exchange rates. Interest rate swaps, currency swaps, and equity swaps are examples of notional principal contracts.³ As shown in Figure A, notional principal contract income accounted for 16.7 percent of total income, up from 10.7 percent in 2007.

The increase in notional principal contract income between 2007 and 2008 is in contrast to the declines observed in other major types of income paid to foreign persons. The two categories that account for the largest amounts of income paid to foreign persons, dividend and interest payments, declined in 2008, due to the affects of the recession.⁴ Interest payments (\$355.1 billion) decreased by 5.7 percent in 2008, while dividends (\$122.9 billion) fell by 8.3 percent. Although interest payments continued to account for the majority of all U.S.-source income payments to foreigners in 2008, their share of the total fell to 53.8 percent from 58.3 percent in 2007. Dividend payments to foreign persons also accounted for a smaller share of the total in 2008, dropping from 20.7 percent to 18.6 percent. Personal services income and Social Security and railroad retirement benefits combined to account for less than 1 percent of total income, remaining constant from 2007.

Residents of certain foreign countries may be entitled to reduced rates of withholding, or exemption from taxation, under a reciprocal tax treaty between the United States and the recipient's country of residence. During Tax Year 2008, the U.S. had treaties in force with the 64 foreign jurisdictions listed in Table 1. Payments to residents of treaty partner

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¹ U.S. Department of the Treasury, Internal Revenue Service, Instructions for Form 1042-S. Bank deposit interest is generally excluded from Form 1042-S reporting, although an exception exists for Canadian residents who are not U.S. citizens. Bank deposit interest paid to Canadian residents is subject to Form 1042-S reporting but is exempt from withholding tax. In addition to bank deposit interest, other payments to foreign persons that are not subject to reporting on Form 1042-S include: interest and original issue discount (OID) from short-term obligations, registered obligations targeted to foreign markets, bearer obligations targeted to foreign markets, notional principal contract payments that are not effectively connected income, and accrued interest and OID. These types of income are not available from other sources.

² An exception to this general rule exists in some cases for personal services income.

³ Blaisi, Ronald W. U.S. Master Bank Tax Guide. CCH, Inc. 2008.

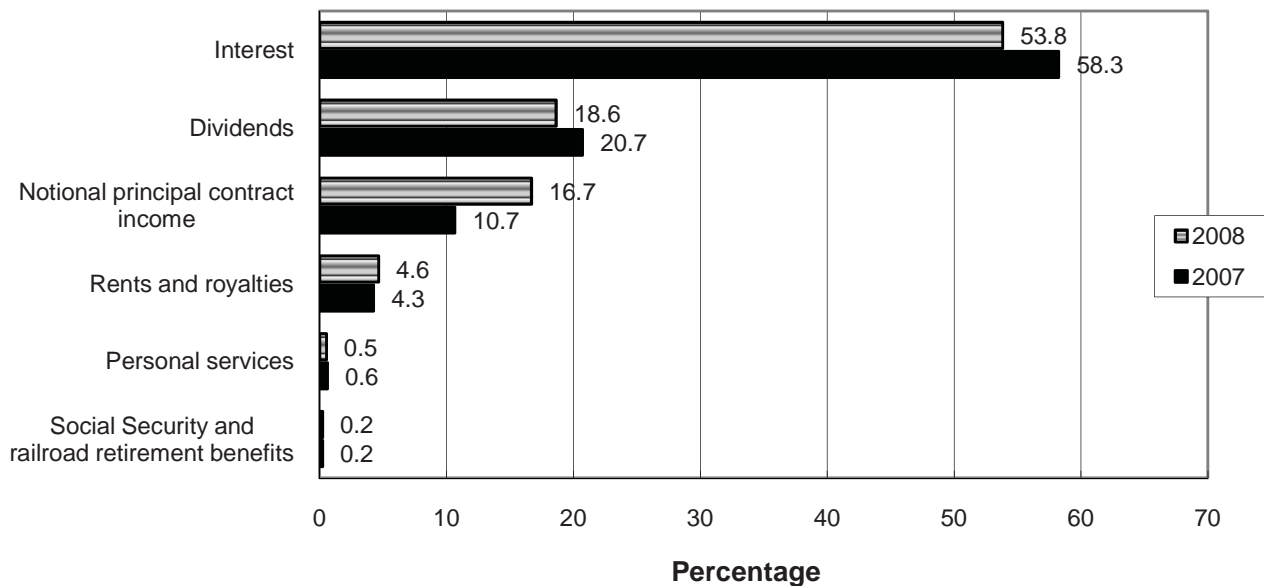
⁴ Economic Report of the President February 2009. Washington: Government Printing Office, 2009. http://www.gpoaccess.gov/eop/2009/2009_erp.pdf.

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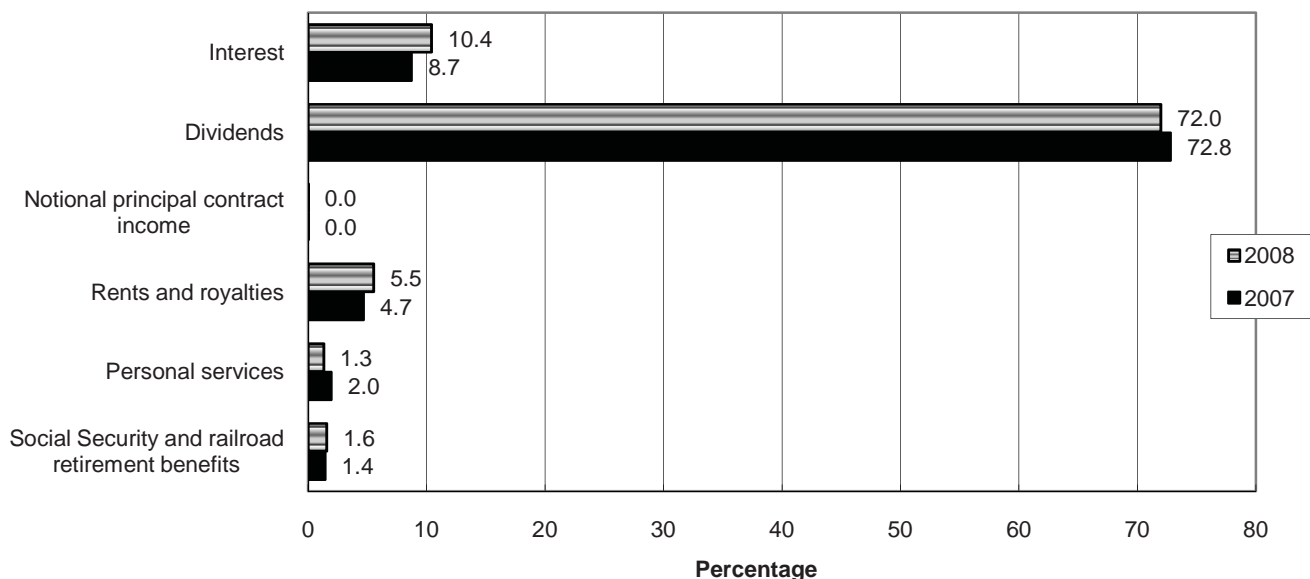
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Figure A

Percentage of Total Income Paid, by Income Type, 2007 and 2008



Percentage of Total Taxes Withheld, by Income Type, 2007 and 2008



countries made up 76.8 percent of income paid and 61.9 percent of total tax withheld. U.S.-source income earned by residents of treaty partner countries was subject to substantially lower tax rates than those from other countries in 2008. While the effective withholding rate on U.S.-source income payments to all countries was 10.5 percent during 2008, the effective rate for treaty country residents was 7.8 percent. By comparison, recipients from non treaty countries

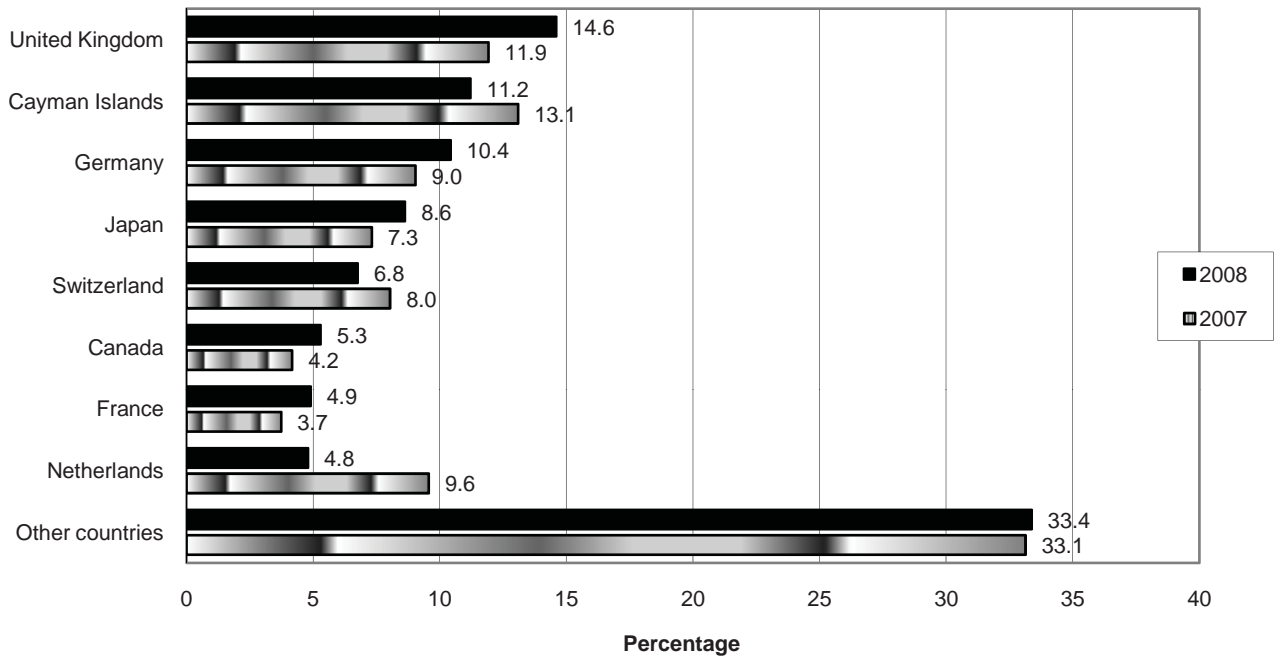
faced an effective U.S. tax rate of 23.9 percent on their income subject to withholding. While their effective withholding rate was higher, recipients from non-treaty countries actually received a larger proportion of income that was exempt from withholding (90.4 percent) compared to those from treaty countries (85.6 percent). Income paid to foreign persons and reported on Form 1042-S may be exempt from withholding tax for a variety of reasons, including:

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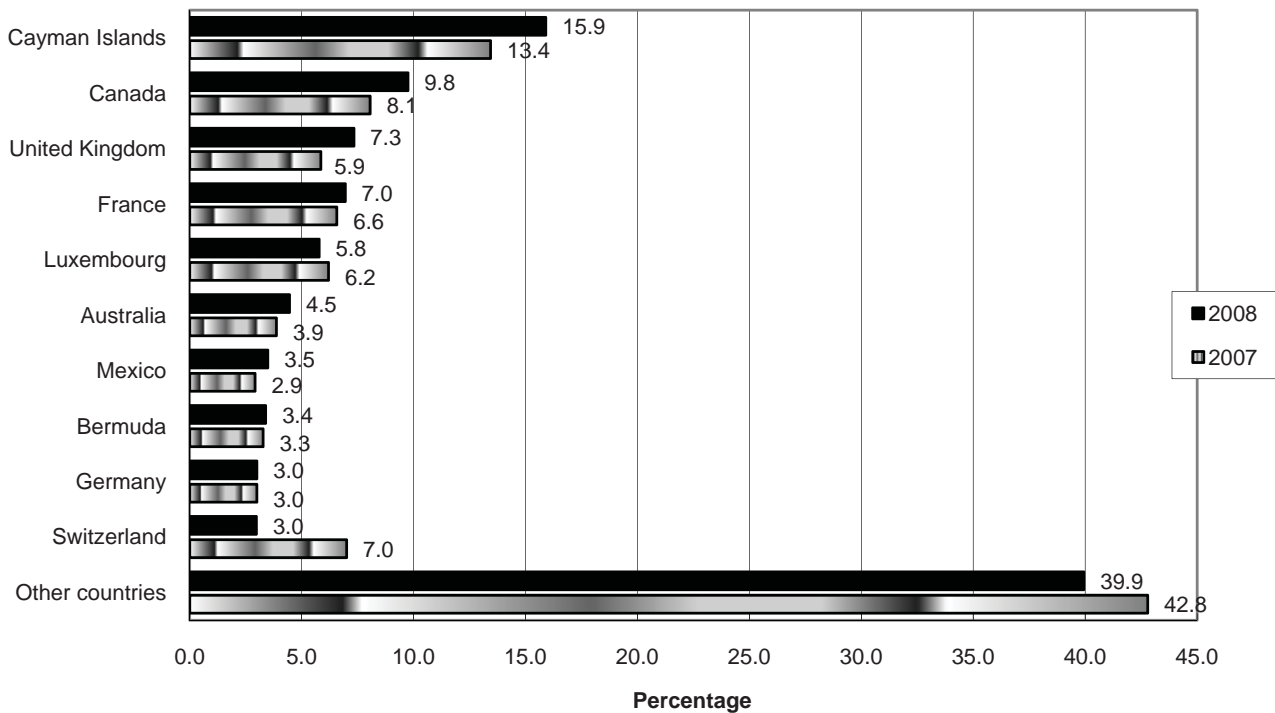
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Figure B

**Form 1042-S
Percentage of Total Income Paid, by Country of Foreign Recipient,
2007 and 2008**



**Percentage of Total Taxes Withheld, by Country of Foreign Recipient,
2007 and 2008**



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it is effectively connected with a U.S. trade or business; it is bank deposit interest; it is exempt under tax treaty; it is portfolio interest exempt under an Internal Revenue Code; or it is being paid to a withholding foreign partnership or withholding foreign trust, among other reasons.

Historically, the majority of U.S.-source income payments to foreign persons have been concentrated among residents of a relatively small number of countries, and Tax Year 2008 was no exception. The eight countries listed in Part I of Figure B combined to account for 66.6 percent of all income paid to foreign recipients. U.S. income payments to U.K. residents rose from \$77.1 billion to \$96.3 billion in 2008, increasing their share of the total U.S. income received to 14.6 percent, most among all countries in 2008. Residents of the Cayman Islands received \$73.9 billion in 2008, down from \$84.7 billion in 2007. This decline caused the share of U.S. income received by Cayman Island recipients to fall from 13.1 percent to 11.2 percent in 2008. Among other countries shown in Figure B, Part I, residents of Germany, Japan, Canada, and France all increased in their share of U.S.-source income by at least 1.0 percent. Residents of the Netherlands experienced the largest decline of any country, as their share of U.S. income fell by half, from 9.6 percent to 4.8 percent in 2008.

With six countries accounting for 50.3 percent of the total, tax withheld on U.S.-source income payments to foreign persons is heavily concentrated among a small number of countries, as illustrated in Figure B. Interestingly, however, the correlation between income received and taxes paid varies among countries. For example, Canadian recipients accounted for 9.8 percent of all tax withheld in 2008 but received only 5.3 percent of U.S.-source income. Taxes were high for Canadian recipients in relation to their income received, principally because they received large amounts of Social Security and railroad retirement payments and personal services income, which tend to have higher effective withholding rates. In fact, 24.5 percent of all Social Security and railroad retirement payments and 17.6 percent of all personal services income payments to non-U.S. residents were made to Canadians in 2008.

There are vast differences in the taxation of certain types of income reported on Form 1042-S. While tax treaties reduce withholding on dividend payments to residents of certain countries, dividends are taxed at rates closer to the statutory rate more fre-

quently than the other most commonly reported types of income. Figure A shows that dividend payments accounted for 18.6 percent of all U.S. income paid to foreign persons but made up 72.0 percent of all withholding taxes. Interest income paid to foreign persons is commonly exempt from withholding, and, when it is subject to taxation, it is frequently taxed at a rate of less than 10 percent. Therefore, it is not surprising to see that tax withheld on interest made up only 10.4 percent of the total, while interest income accounted for 53.8 percent of all income paid to foreign persons. Notional principal contract income is not subject to taxation, although it must be reported on Form 1042-S if it is effectively connected with the conduct of a trade of business in the United States. This explains why there is no tax for notional principal income in Figure A, despite accounting for 16.7 percent of income.

Additional Foreign Income and Withholding Data

While income reported on Form 1042-S represents the majority of U.S.-source income payments to foreign persons, data reported on two other tax forms help provide a more complete picture of withholding on foreign persons' U.S. income. U.S. partnership income that is allocable to foreign partners is reported on Form 8805, *Foreign Partner's Information Statement of Section 1446 Withholding Tax*. Domestic partnerships are required to withhold income tax on effectively connected taxable income deemed allocable to foreign partners. A U.S. partnership files a Form 8805 to show the amount of taxable income and the total tax allocable to the foreign partner for the partnership's tax year.⁵ The statutory withholding rate for partnership income allocable to foreign partners is 35 percent. Reduced withholding rates may apply if the foreign partner is an individual and the specific type of income is among those subject to preferential rates. These types of income include capital gains, depreciation recapture, and collectibles gains.

The other tax form that provides information about withholding on foreign persons' U.S. income is the Form 8288-A. The Foreign Investment in Real Property Tax Act of 1980 (FIRPTA) was introduced to ensure that the U.S. collected a portion of the capital gains realized by foreigners from the sales of U.S. real property interests. The sales price of the U.S. real property sold by the foreign person and the

⁵ A withholding credit for the tax withheld by the partnership can be claimed by the partner when the partner attaches the Form 8805 to his or her U.S. income tax return.

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Figure C

U.S.-Source Payments to Foreign Persons: Number of Forms, Income, and Tax Withheld, by IRS Form Type and Selected Country, Tax Year 2008

[Money amounts are in thousands of dollars]

Form and selected country	All payments		Payments subject to tax			
	Total number of forms	Income (less loss)	Number of forms [1]	Income [2]	U.S. tax withheld	Effective tax rate [3]
	(1)	(2)	(3)	(4)	(5)	(6)
All Forms	3,690,472	664,801,703	1,984,493	106,820,314	14,860,084	13.9
Form 1042-S: All countries	3,439,301	659,700,157	1,833,080	87,799,958	9,197,703	10.5
United Kingdom	322,438	96,333,306	180,027	5,795,951	675,035	11.7
Cayman Islands	93,465	73,948,539	30,578	6,442,855	1,463,216	22.7
Germany	435,864	68,847,722	200,007	2,223,697	279,128	12.6
Japan	134,398	56,902,077	47,650	1,747,301	170,032	9.7
Switzerland	47,548	44,610,219	26,802	8,187,899	273,909	3.4
Canada	537,447	34,922,595	251,025	13,575,393	897,079	6.6
France	58,763	32,326,845	34,342	10,875,577	639,589	5.9
Netherlands	48,748	31,627,464	25,006	1,131,561	169,619	15.0
Luxembourg	7,904	26,820,728	3,308	4,446,698	532,082	12.0
Australia	177,194	13,123,803	125,957	3,214,257	410,124	12.8
Bermuda	23,358	12,315,961	10,075	1,057,119	312,314	29.5
Mexico	154,182	6,390,637	114,660	2,236,640	320,895	14.3
Form 8805: All countries [4]	242,242	1,854,696	142,484	15,773,506	5,328,326	33.8
United Kingdom	5,374	1,084,373	3,663	1,178,260	407,074	34.6
Germany	183,976	863,843	99,223	1,108,677	334,351	30.2
France	1,135	515,247	866	527,338	183,457	34.8
Canada	8,054	195,962	4,694	378,372	114,953	30.4
Netherlands	2,028	156,563	1,610	201,225	40,195	20.0
Form 8288-A: All countries [5]	8,929	3,246,850	8,929	3,246,850	334,055	10.3

[1] Number of forms in this column include returns with income subject to taxation for Form 1042-S; positive income (excluding losses) for Form 8805; sales price for Form 8288-A.

[2] Amounts in this column represent income subject to taxation for Form 1042-S; positive income (excluding losses) for Form 8805; sales price for Form 8288-A.

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

[4] Income for all payments (column 2) is less than income on payments subject to tax (column 4) because column 2 includes forms with negative income. Also, the sum of the components in column 2 for Form 8805 is greater than the total because certain countries not shown in this figure had negative income in 2008.

[5] The country of residence of the foreign seller is not always readily available. Therefore, amounts by country are not displayed for this form type.

tax withheld on that sales price is reported on Form 8288-A, *Statement of Withholding on Dispositions by Foreign Persons of U.S. Real Property Interests*.⁶ Typically, the sales price is subject to 10 percent withholding, although corporations may be taxed up to 35 percent in certain circumstances. When a foreign person sells real property interests in the United States, the buyer of the property is responsible for collecting and remitting to the IRS the appropriate amount of withholding and filing the necessary tax forms.

As one might expect, the sales of U.S. real property interests account for a relatively small amount of U.S.-source income paid to foreign persons. Income from the sale of U.S. real property interests, as reported on Form 8288-A, accounted for 3 percent of

U.S.-source income paid to foreign persons in 2008.

Income reported on Form 8288-A is not eligible for reduced withholding rates under tax treaties and is typically subject to 10-percent withholding. Therefore, the effective withholding rate of 10.3 percent, shown in Figure C, is well within expectations. Taxes on income from the sales of U.S. real property made up 2.2 percent of withholding taxes on U.S.-source income paid to foreign persons, while the total number of reportable transactions of U.S. real property sales made up less than 1.0 percent of all U.S. payments to foreign persons for 2008.

The effective withholding rates vary widely among the types of income reported on tax forms 1042-S, 8805, and 8288A. As shown in Figure C,

⁶ For purposes of this article and the accompanying data tables, the terms "sales price" and "income" are used interchangeably to refer to the sales price of disposed U.S. real property interests reported on Form 8288-A. See Figure C, columns 2 and 4.

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U.S. partnership income allocable to foreign partners was subject to significantly higher rates of withholding than other types of U.S. income payments to foreign persons during Tax Year 2008. In fact, the effective withholding rate on income reported on Form 8805 was 33.8 percent, compared with 10.3 percent for income reported on Form 8288-A and 10.5 percent for income reported on Form 1042-S. Nearly 35.9 percent of all withholding taxes on U.S. income paid to foreign persons were reported on Form 8805, while only 14.8 percent of the income paid was reported on this form. Higher effective tax rates exist for Form 8805 income because income paid to foreign partnerships is not typically reduced by tax treaties and is far more likely to be taxed near the statutory 35 percent tax rate.

Data Sources and Limitations

Payers (or their authorized withholding agents) of most U.S.-source income to foreign persons must withhold tax in accordance with Internal Revenue Code Section 1441. Form 1042-S, *Foreign Persons' U.S.-Source Income Subject to Withholding*, is filed by the payer to report this income and the U.S. tax withheld. Often a financial institution acts as the payer's withholding agent. The statistics in this data release were tabulated by calendar year, using all Forms 1042-S filed with the Internal Revenue Service for 2008. The data reflect the income that was paid and U.S. tax that was withheld for 2008.

Domestic partnerships (or their authorized withholding agents) must withhold tax in accordance with Internal Revenue Code Section 1446 on distributions made to foreign partners. Form 8805, *Foreign Partner's Information Statement of Section 1446 Withholding Tax*, is filed by the payer to report income paid by U.S. partnerships to their foreign partners and the U.S. tax withheld. The statistics in this data release were tabulated by calendar year, using all Forms 8805 filed with the Internal Revenue Service for 2008. The data reflect the income that was paid and U.S. tax that was withheld for 2008.

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

with the Internal Revenue Service with a data of transfer occurring during 2008.

Because the population of Forms 1042S, Forms 8805, and Form 8288-A were used for the statistics, the data are not subject to sampling error. However, the data are subject to nonsampling error, including data entry and taxpayer reporting errors. Although the data were subjected to tests for certain basic mathematical relationships, including the calculation of the correct tax withheld, the possibility of error can not be completely eliminated.

Explanation of Selected Terms

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

Notional principal contract income—Notional principal contracts involve two parties who agree contractually to pay each other amounts at specified times, based on the underlying contract. The notional amount is an amount specified in the contract and, based on that amount, certain calculations are made. Generally, when amounts under the contract are due at the same time, they are netted, and only one payment is made. Notional principal contract income is not subject to withholding but must be reported on Form 1042-S, if it the income effectively connected with the conduct of a trade or business in the United States.

Qualified intermediary pool—Payments made by a qualified intermediary directly to beneficial owners may generally be reported on the basis of reporting pools. A reporting pool consists of income that falls within a particular withholding rate and within a particular income type, exemption type, or recipient type.

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

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Table 1. Foreign Recipients of U.S. Income Forms 1042S: Number, Total U.S.-Source Income, and U.S. Tax Withheld, Tax Treaty Countries and Total Non-Tax Treaty Countries, 2005

[Money amounts in thousands of dollars]

Treaty status, country or geographic area	Number of Forms 1042S	U.S.-source income			U.S. tax withheld
		Total	Exempt from withholding	Subject to withholding	
	(1)	(2)	(3)	(4)	(5)
Total	3,439,301	659,700,157	571,900,199	87,799,958	9,197,703
Tax treaty countries, total	2,608,884	506,767,018	433,637,697	73,129,321	5,697,994
Armenia	580	28,616	27,574	1,042	216
Australia [1]	177,428	13,125,509	9,910,800	3,214,709	410,247
Austria	26,500	1,357,289	1,134,438	222,851	41,805
Azerbaijan	436	6,085	5,767	318	67
Bangladesh	1,412	7,113	5,561	1,552	216
Barbados	2,626	508,740	452,215	56,525	8,880
Belarus	577	3,039	1,659	1,380	347
Belgium	25,221	23,758,833	12,799,540	10,959,293	181,161
Canada	537,447	34,922,595	21,347,202	13,575,393	897,079
China	100,909	8,001,108	7,820,604	180,504	28,178
Cyprus	2,047	102,805	86,444	16,361	3,350
Czech Republic	6,300	181,670	169,772	11,898	2,631
Denmark	10,984	2,026,110	1,619,301	406,809	57,077
Egypt	5,787	92,196	68,538	23,658	4,063
Estonia	1,611	50,419	48,253	2,166	348
Finland	5,372	1,495,626	1,423,611	72,015	9,336
France [2]	58,936	32,327,834	21,451,846	10,875,989	639,698
Georgia	620	4,640	3,963	677	132
Germany	435,864	68,847,722	66,624,024	2,223,697	279,128
Greece	16,825	136,308	52,130	84,178	23,073
Hungary	4,877	5,023,535	4,818,372	205,164	13,355
Iceland	1,739	1,062,540	1,045,473	17,067	2,030
India	35,435	1,256,927	1,096,616	160,311	26,052
Indonesia	9,720	27,291	19,148	8,143	1,513
Ireland	43,745	20,753,727	19,691,831	1,061,895	259,134
Israel	38,929	1,321,219	908,869	412,351	67,890
Italy	58,759	3,301,625	2,606,408	695,217	73,300
Jamaica	5,351	128,662	113,444	15,218	3,177
Japan	134,398	56,902,077	55,154,776	1,747,301	170,032
Kazakhstan	698	319,685	299,608	20,077	2,186
Korea, Republic of (South)	32,895	3,740,848	3,108,108	632,740	92,517
Kyrgyzstan	341	1,507	1,409	99	18
Latvia	1,293	26,601	22,810	3,792	759
Lithuania	1,141	10,754	9,070	1,684	277
Luxembourg	7,904	26,820,728	22,374,030	4,446,698	532,082
Mexico	154,182	6,390,637	4,153,997	2,236,640	320,895
Moldova	327	1,398	1,028	370	65
Morocco	1,275	19,102	14,779	4,323	665

Footnotes at end of table.

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Table 1. Foreign Recipients of U.S. Income Forms 1042S: Number, Total U.S.-Source Income, and U.S. Tax Withheld, Tax Treaty Countries and Total Non-Tax Treaty Countries, 2005—Continued

[Money amounts in thousands of dollars]

Treaty status, country or geographic area	Number of Forms 1042S	U.S.-source income			U.S. tax withheld
		Total	Exempt from withholding	Subject to withholding	
	(1)	(2)	(3)	(4)	(5)
Netherlands	48,748	31,627,464	30,495,902	1,131,561	169,619
New Zealand	22,878	926,308	734,390	191,918	25,315
Norway	7,905	5,634,777	5,485,908	148,869	22,798
Pakistan	3,951	15,845	10,171	5,674	1,214
Philippines	24,459	756,405	663,301	93,104	22,908
Poland	10,521	201,409	135,514	65,895	9,958
Portugal	9,844	271,240	184,289	86,951	13,564
Romania	2,941	15,046	10,712	4,335	902
Russia	11,933	527,345	496,014	31,331	5,667
Slovak Republic	2,026	25,464	12,207	13,257	2,062
Slovenia	4,626	36,712	19,458	17,254	3,699
South Africa	8,389	332,733	270,116	62,616	9,682
Spain	34,778	2,661,562	1,797,084	864,478	95,012
Sri Lanka	735	2,405	723	1,683	267
Sweden	21,807	5,815,333	5,140,732	674,601	83,815
Switzerland	47,548	44,610,219	36,422,320	8,187,899	273,909
Tajikistan	230	1,023	927	96	14
Thailand	9,271	101,170	62,381	38,789	5,578
Trinidad and Tobago	4,709	180,818	166,410	14,408	4,042
Tunisia	455	47,833	45,794	2,039	404
Turkey	6,231	75,654	59,610	16,044	2,764
Turkmenistan	597	2,651	1,985	666	187
Ukraine	2,185	12,641	7,684	4,957	1,044
United Kingdom	322,438	96,333,306	90,537,355	5,795,951	675,035
Uzbekistan	386	2,217	1,714	503	107
Venezuela	48,802	2,456,320	381,983	2,074,337	115,451
Nontreaty countries, total [3]	830,417	152,933,139	138,262,502	14,670,637	3,499,710

[1] Includes Ashmore and Cartier Islands, Christmas Island, Cocos (Keeling) Islands, Coral Sea Islands Territory, and Norfolk Island.

[2] Includes Guadeloupe, French Guiana, Martinique, and Reunion.

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

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

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Table 2. Foreign Recipients of U.S. Income Forms 1042S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Type of Income, Selected Recipient Type, and Selected Country of Recipient, 2008

[Money amounts are in thousands of dollars]

Selected country or geographic area and selected recipient type	Number of Forms 1042S	U.S. tax withheld [1]	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and railroad retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Total	3,439,301	9,197,703	659,700,157	355,082,408	122,894,568	30,622,145	1,496,163	3,486,471	110,051,050
RECIPIENT TYPES									
Individuals, total	2,850,944	979,342	18,428,137	7,444,414	2,676,851	827,074	1,496,163	1,172,187	1
Corporations, total	379,290	5,716,320	470,477,128	235,969,903	77,077,036	27,614,651	0	2,212,033	108,975,164
Partnerships/trusts, total	128,097	573,294	16,633,383	10,005,781	5,202,496	313,139	0	75,000	2,945
U.S. branch treated as U.S. person, total	592	1,786	4,130,975	3,113,380	90,706	7	0	68	877,122
Governments and international organizations, total	7,143	145,291	46,407,398	31,586,759	10,534,294	37,579	0	1,804	187,794
Tax-exempt organizations, total [1]	9,090	33,837	6,786,680	3,668,059	2,461,772	58,302	0	310	0
Private foundations, total	1,192	5,570	188,635	63,307	87,780	24,580	0	233	0
Artists and athletes, total	13,616	136,299	2,097,223	0	0	0	0	0	0
Qualified intermediary pools, total	22,022	1,238,883	82,484,950	57,470,644	20,951,292	100,002	0	14	90
Other/unknown, total	27,315	367,081	12,065,648	5,760,161	3,812,341	1,646,811	0	24,822	7,934
COUNTRIES OR GEOGRAPHIC AREAS, RECIPIENT TYPES									
Argentina	67,044	23,532	466,007	365,536	55,090	4,945	8,845	4,092	0
Individuals	64,702	12,833	256,735	200,682	31,065	669	8,845	3,388	0
Corporations	1,675	4,953	162,884	147,203	6,189	3,493	0	699	0
Qualified intermediary pools	17	0	2,342	2,293	49	0	0	0	0
Australia	177,194	410,124	13,123,803	3,381,465	3,890,798	502,440	21,148	19,886	3,789,769
Individuals	121,964	18,548	195,295	23,714	43,107	18,465	21,148	13,238	0
Corporations	24,384	252,067	10,292,211	2,071,084	2,869,388	474,003	0	4,729	3,775,900
Qualified intermediary pools	32	8	25,293	6,530	18,479	1	0	0	0
Austria	26,500	41,805	1,357,289	884,265	216,899	33,960	7,904	18,821	20,962
Individuals	22,486	4,894	55,995	10,837	8,535	14,243	7,904	2,566	0
Corporations	1,093	8,805	538,162	365,950	75,294	17,196	0	16,245	20,962
Qualified intermediary pools	1,426	26,108	546,543	339,081	116,323	83	0	0	0
Bahamas	16,721	89,453	5,198,900	4,764,290	321,019	15,161	683	605	0
Individuals	3,994	3,937	51,135	31,056	14,084	49	683	560	0
Corporations	11,772	60,353	4,660,398	4,388,030	181,632	13,081	0	41	0
Qualified intermediary pools	198	5,015	222,148	153,199	62,963	5	0	0	0
Bahrain	1,621	3,202	339,479	315,231	11,244	46	11	4	276
Individuals	1,220	407	4,738	3,132	767	27	11	2	0
Corporations	308	2,767	272,702	255,597	5,125	19	0	0	151
Qualified intermediary pools	6	0	1,877	74	1,793	0	0	0	0
Barbados	2,626	8,880	508,740	430,760	50,784	3,020	1,430	423	3,620
Individuals	1,288	859	6,653	2,397	818	377	1,430	423	0
Corporations	1,115	6,788	446,710	379,476	46,903	2,639	0	0	3,620
Qualified intermediary pools	14	471	19,807	18,424	1,333	3	0	0	0
Belgium	25,221	181,161	23,758,833	17,954,184	1,720,080	332,046	5,950	35,002	663,334
Individuals	22,367	8,799	110,441	27,374	36,095	5,658	5,950	18,297	0
Corporations	1,520	60,335	3,508,110	2,074,702	275,460	326,088	0	15,461	655,026
Qualified intermediary pools	337	97,795	19,874,860	15,615,775	1,394,943	91	0	0	0
Bermuda	23,358	312,314	12,315,961	10,878,285	1,079,606	24,120	921	8,022	29,891
Individuals	6,116	4,606	105,850	77,547	17,605	376	921	170	0
Corporations	13,993	279,375	11,489,970	10,246,285	911,149	23,676	0	6,844	29,891
Qualified intermediary pools	36	67	132,003	123,310	8,642	46	0	0	0

Footnotes at end of table.

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Table 2. Foreign Recipients of U.S. Income Forms 1042S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Type of Income, Selected Recipient Type, and Selected Country of Recipient, 2008—Continued

[Money amounts are in thousands of dollars]

Selected country or geographic area and selected recipient type	Number of Forms 1042S	U.S. tax withheld [1]	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and railroad retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Brazil	34,411	42,175	893,530	631,049	56,461	5,990	5,580	22,592	53,496
Individuals	32,042	17,881	143,361	63,195	22,105	3,406	5,580	17,119	0
Corporations	1,291	22,229	422,269	300,637	31,841	2,087	0	4,983	53,496
Qualified intermediary pools	9	0	85	83	2	0	0	0	0
British Virgin Islands	59,975	274,235	6,319,036	5,167,226	979,770	15,096	319	747	0
Individuals	2,889	2,976	54,005	40,676	10,325	1,182	319	1	0
Corporations	55,649	255,266	6,061,247	4,976,044	920,752	13,688	0	742	0
Qualified intermediary pools	10	3	2,248	2,172	33	0	0	0	0
Canada	537,447	897,079	34,922,595	14,055,721	13,730,936	1,060,535	366,393	614,780	2,448,858
Individuals	487,290	120,917	3,697,952	2,169,657	252,362	93,107	366,393	115,154	0
Corporations	23,984	340,210	21,165,201	7,151,029	8,939,694	908,309	0	475,298	2,354,608
Qualified intermediary pools	762	278,809	4,037,594	1,724,760	2,218,964	246	0	6	0
Cayman Islands	93,465	1,463,216	73,948,539	68,039,050	4,771,410	30,634	494	1,411	48,968
Individuals	10,865	63,919	1,592,082	1,372,689	212,283	194	494	138	0
Corporations	74,531	1,282,854	68,445,736	63,301,349	4,161,809	12,233	0	923	48,968
Qualified intermediary pools	111	1,823	74,372	63,773	9,648	0	0	0	0
Chile	21,426	81,502	888,904	565,915	258,905	1,402	4,208	2,978	778
Individuals	16,902	7,274	69,493	36,345	16,272	154	4,208	1,522	0
Corporations	4,231	73,573	430,837	144,855	240,647	1,136	0	255	778
Qualified intermediary pools	12	89	5,007	4,204	789	3	0	0	0
China	100,909	28,178	8,001,108	3,836,772	2,956,677	346,488	372	307,490	1,928
Individuals	98,506	9,567	486,432	37,179	19,523	925	372	297,597	0
Corporations	1,160	16,278	2,776,982	1,501,363	510,805	345,212	0	9,663	1,928
Qualified intermediary pools	8	3	65	23	42	0	0	0	0
Colombia	26,123	17,380	655,410	558,137	52,961	3,225	8,033	4,563	0
Individuals	23,866	7,117	59,240	21,497	7,190	969	8,033	3,867	0
Corporations	1,897	9,544	329,968	290,265	27,733	2,235	0	631	0
Qualified intermediary pools	3	1	3	1	2	0	0	0	0
Costa Rica	8,866	4,080	116,722	75,614	8,065	166	5,540	474	72
Individuals	7,482	2,653	20,171	7,918	2,311	63	5,540	378	0
Corporations	1,243	1,157	79,445	56,973	3,363	103	0	23	72
Qualified intermediary pools	0	0	0	0	0	0	0	0	0
Cyprus	2,047	3,350	102,805	60,384	11,507	6,693	792	938	0
Individuals	1,599	535	12,221	4,188	1,979	100	792	583	0
Corporations	369	2,776	89,636	55,565	9,371	6,591	0	252	0
Qualified intermediary pools	18	0	492	410	81	0	0	0	0
Czech Republic	6,300	2,631	181,670	116,927	10,848	880	467	7,137	0
Individuals	5,615	1,496	15,985	1,623	2,090	225	467	6,829	0
Corporations	189	182	16,054	9,352	2,481	636	0	286	0
Qualified intermediary pools	29	322	3,055	253	2,766	0	0	0	0
Denmark	10,984	57,077	2,026,110	1,088,880	644,590	116,440	4,385	26,061	31,694
Individuals	6,974	3,523	77,344	743	2,764	3,309	4,385	4,416	0
Corporations	2,650	37,343	1,050,957	541,188	305,346	109,651	0	21,642	31,603
Qualified intermediary pools	164	14,890	781,762	466,485	313,687	1	0	0	90
Finland	5,372	9,336	1,495,626	357,902	294,588	83,215	2,601	1,137	704,277
Individuals	4,023	1,383	11,058	2,803	934	450	2,601	828	0
Corporations	769	2,237	1,132,074	170,880	142,938	81,175	0	309	704,277
Qualified intermediary pools	67	5,133	85,178	32,252	52,899	0	0	0	0
France	58,763	639,589	32,326,845	12,855,696	7,050,619	4,903,387	30,971	72,856	6,448,366
Individuals	48,875	45,338	548,764	148,012	73,756	42,332	30,971	54,367	0
Corporations	5,746	540,317	28,732,234	10,582,865	6,330,615	4,659,457	0	17,969	6,418,827
Qualified intermediary pools	815	11,530	1,427,725	877,200	540,914	580	0	0	0

Footnotes at end of table.

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Table 2. Foreign Recipients of U.S. Income Forms 1042S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Type of Income, Selected Recipient Type, and Selected Country of Recipient, 2008—Continued

[Money amounts are in thousands of dollars]

Selected country or geographic area and selected recipient type	Number of Forms 1042S	U.S. tax withheld [1]	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and railroad retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Germany	435,864	279,128	68,847,722	16,351,581	4,943,123	3,278,302	111,586	246,560	41,942,395
Individuals	416,389	93,228	1,304,029	228,898	564,705	171,648	111,586	54,077	0
Corporations	9,975	109,041	62,915,443	12,867,498	3,744,594	3,095,834	0	192,102	41,314,149
Qualified intermediary pools	3,452	67,310	3,515,725	2,981,446	524,485	5,597	0	0	0
Greece	16,825	23,073	136,308	26,718	53,495	3,411	36,073	4,196	0
Individuals	16,089	12,392	68,724	7,156	12,329	310	36,073	4,053	0
Corporations	502	8,771	47,142	13,494	29,435	2,998	0	139	0
Qualified intermediary pools	31	1,400	12,168	5,900	4,987	0	0	0	0
Guatemala	7,025	2,569	146,011	132,734	4,193	132	2,061	923	0
Individuals	6,311	2,116	22,081	11,387	2,043	73	2,061	807	0
Corporations	635	399	10,131	7,733	2,008	45	0	116	0
Qualified intermediary pools	0	0	0	0	0	0	0	0	0
Guernsey	3,738	29,550	1,015,384	856,361	133,253	3,004	0	248	0
Individuals	283	480	5,209	2,807	1,833	2	0	155	0
Corporations	2,543	22,531	807,569	717,651	78,908	890	0	0	0
Qualified intermediary pools	122	1,793	100,182	62,049	29,335	35	0	0	0
Hong Kong	42,917	81,545	2,052,063	1,638,600	315,142	6,251	1,576	24,871	8,543
Individuals	38,108	18,309	135,428	48,025	64,360	915	1,576	4,366	0
Corporations	3,278	26,840	905,882	790,163	64,290	5,113	0	19,230	8,543
Qualified intermediary pools	196	25,716	421,723	314,073	100,279	2	0	0	0
Hungary	4,877	13,355	5,023,535	3,299,467	173,251	206,710	1,234	33,789	0
Individuals	4,140	1,216	45,336	902	1,356	1,337	1,234	3,553	0
Corporations	530	11,916	4,880,196	3,289,212	170,570	204,308	0	1,308	0
Qualified intermediary pools	5	0	11	4	7	0	0	0	0
Iceland	1,739	2,030	1,062,540	1,039,796	14,943	369	532	855	0
Individuals	1,258	365	2,741	90	298	149	532	787	0
Corporations	309	1,161	1,042,118	1,026,172	11,675	172	0	68	0
Qualified intermediary pools	22	240	5,188	3,453	1,565	1	0	0	0
India	35,435	26,052	1,256,927	143,677	31,094	20,195	2,573	582,917	78
Individuals	31,990	10,703	134,825	19,820	6,178	1,778	2,573	36,322	0
Corporations	650	13,935	943,255	49,974	23,921	17,251	0	544,008	78
Qualified intermediary pools	d	d	d	d	d	d	d	d	d
Ireland	43,745	259,134	20,753,727	15,905,656	3,734,658	562,692	21,706	60,101	48,119
Individuals	33,535	8,684	1,155,621	968,014	91,664	56,424	21,706	2,591	0
Corporations	6,907	221,850	16,244,185	14,436,534	822,846	504,731	0	57,359	48,119
Qualified intermediary pools	104	1,383	2,932,005	342,529	2,588,738	8	0	0	0
Israel	38,929	67,890	1,321,219	650,889	164,589	226,839	9,506	34,492	87,959
Individuals	35,576	13,557	200,319	61,892	37,867	34,553	9,506	19,865	0
Corporations	1,839	36,763	654,933	262,436	28,526	186,318	0	14,403	86,264
Qualified intermediary pools	163	13,930	212,094	120,125	82,748	29	0	0	0
Italy	58,759	73,300	3,301,625	1,900,499	818,551	127,442	100,697	52,524	92,490
Individuals	54,247	12,799	282,423	65,413	25,042	17,129	100,697	31,270	0
Corporations	1,766	38,442	961,217	361,190	355,768	106,220	0	12,057	92,490
Qualified intermediary pools	856	15,062	1,369,081	972,277	382,693	122	0	0	0

Footnotes at end of table.

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Table 2. Foreign Recipients of U.S. Income Forms 1042S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Type of Income, Selected Recipient Type, and Selected Country of Recipient, 2008—Continued

[Money amounts are in thousands of dollars]

Selected country or geographic area and selected recipient type	Number of Forms 1042S	U.S. tax withheld [1]	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and railroad retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Jamaica	5,351	3,177	128,662	99,254	3,018	1,635	5,581	8,668	0
Individuals	4,764	2,658	38,044	12,289	1,382	1,169	5,581	8,345	0
Corporations	381	408	85,083	82,893	1,416	431	0	282	0
Qualified intermediary pools	d	d	d	d	d	d	d	d	d
Japan	134,398	170,032	56,902,077	29,551,631	9,185,551	6,796,850	137,474	58,813	8,327,896
Individuals	122,740	25,502	640,034	137,863	78,336	35,582	137,474	42,063	0
Corporations	7,530	105,278	34,210,927	14,397,199	4,282,059	5,318,550	0	16,094	8,056,242
Qualified intermediary pools	644	34,796	11,452,503	7,721,344	3,637,302	5	0	0	0
Jersey	5,170	101,306	1,499,854	1,129,332	267,557	235	0	855	0
Individuals	354	880	9,992	6,777	2,795	28	0	0	0
Corporations	3,106	67,974	1,195,483	971,821	130,999	81	0	847	0
Qualified intermediary pools	367	21,838	226,555	127,354	93,712	10	0	0	0
Kazakhstan	698	2,186	319,685	279,650	37,403	2	0	35	0
Individuals	598	46	1,702	81	47	2	0	22	0
Corporations	55	2,053	45,613	42,344	2,401	0	0	13	0
Qualified intermediary pools	d	d	d	d	d	d	d	d	d
Korea, North	562	467	100,646	54,374	119	472	0	1,038	0
Individuals	528	423	1,700	48	84	11	0	54	0
Corporations	19	0	3,372	1,893	34	460	0	984	0
Qualified intermediary pools	0	0	0	0	0	0	0	0	0
Korea, Republic of (South)	32,895	92,517	3,740,848	2,718,276	265,710	394,037	4,588	40,235	3,246
Individuals	30,130	7,758	129,584	34,108	7,083	1,312	4,588	34,631	0
Corporations	965	83,212	991,589	491,622	60,542	390,102	0	5,407	3,246
Qualified intermediary pools	16	42	1,023	713	310	0	0	0	0
Kuwait	3,616	5,212	1,975,892	880,103	954,245	242	0	228	0
Individuals	2,600	1,127	6,482	1,810	2,975	242	0	228	0
Corporations	604	3,176	38,089	27,711	8,792	0	0	0	0
Qualified intermediary pools	d	d	d	d	d	d	d	d	d
Liechtenstein	1,074	21,860	200,070	93,239	95,504	2,326	50	40	0
Individuals	222	469	3,181	1,536	1,461	45	50	40	0
Corporations	522	3,084	40,168	26,206	6,673	1,452	0	0	0
Qualified intermediary pools	90	6,413	112,107	61,296	49,655	13	0	0	0
Luxembourg	7,904	532,082	26,820,728	20,735,389	4,547,545	38,276	440	5,408	0
Individuals	1,835	1,141	18,893	12,320	4,529	32	440	1,013	0
Corporations	4,871	386,498	15,261,312	10,984,550	2,934,300	37,497	0	3,984	0
Qualified intermediary pools	627	139,994	11,437,002	9,674,743	1,589,458	640	0	0	0
Malaysia	31,550	7,362	158,288	136,808	10,736	305	136	1,029	0
Individuals	30,376	2,405	13,979	3,054	5,911	188	136	792	0
Corporations	367	4,272	59,130	50,680	3,427	107	0	233	0
Qualified intermediary pools	6	1	6	0	6	0	0	0	0
Mauritius	690	36,093	142,634	24,634	116,435	1	26	181	0
Individuals	298	77	627	67	99	0	26	59	0
Corporations	329	35,933	141,158	23,957	116,204	0	0	29	0
Qualified intermediary pools	0	0	0	0	0	0	0	0	0

Footnotes at end of table.

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Table 2. Foreign Recipients of U.S. Income Forms 1042S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Type of Income, Selected Recipient Type, and Selected Country of Recipient, 2008—Continued

[Money amounts are in thousands of dollars]

Selected country or geographic area and selected recipient type	Number of Forms 1042S	U.S. tax withheld [1]	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and railroad retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Mexico	154,182	320,895	6,390,637	4,129,285	593,890	271,363	175,397	48,461	378
Individuals	147,694	109,150	935,803	271,567	144,812	16,641	175,397	35,465	0
Corporations	3,750	71,134	1,301,966	575,892	371,994	249,165	0	8,939	378
Qualified intermediary pools	3	0	7	1	6	0	0	0	
Netherlands	48,748	169,619	31,627,464	14,071,475	11,847,953	1,174,787	15,402	160,481	2,138,509
Individuals	32,402	14,098	162,077	54,547	44,542	8,981	15,402	14,993	0
Corporations	9,040	126,742	22,665,119	9,532,747	9,189,838	1,147,299	0	140,397	2,133,073
Qualified intermediary pools	439	15,510	615,827	367,390	236,663	140	0	0	0
Netherlands Antilles	4,917	31,979	1,459,616	470,049	284,194	9,083	276	223	0
Individuals	2,167	651	689,755	5,072	1,752	73	276	36	0
Corporations	2,420	30,381	723,182	434,403	267,127	9,010	0	187	0
Qualified intermediary pools	31	638	12,738	8,346	4,250	0	0	0	0
New Zealand	22,878	25,315	926,308	173,217	135,448	93,331	1,151	1,703	478,297
Individuals	16,724	2,183	21,566	1,604	8,347	2,045	1,151	725	0
Corporations	1,850	18,666	685,798	57,517	48,161	88,759	0	907	478,297
Qualified intermediary pools	d	d	d	d	d	d	d	d	d
Nigeria	3,558	874	128,390	121,642	972	424	169	202	0
Individuals	3,047	738	5,533	108	619	385	169	175	0
Corporations	94	83	4,268	4,002	217	31	0	3	0
Qualified intermediary pools	d	d	d	d	d	d	d	d	d
Norway	7,905	22,798	5,634,777	3,843,323	1,260,368	110,012	0	22,929	17,798
Individuals	6,277	3,173	36,145	6,701	4,303	3,927	0	10,242	0
Corporations	786	13,566	683,745	365,982	77,164	86,710	0	12,588	17,798
Qualified intermediary pools	15	4,249	77,698	50,325	27,373	0	0	0	0
Oman	618	1,702	369,442	334,805	33,634	50	0	1	0
Individuals	452	180	1,397	423	460	30	0	1	0
Corporations	47	1,130	6,585	2,793	3,771	21	0	0	0
Qualified intermediary pools	d	d	d	d	d	d	d	d	d
Panama	21,010	36,857	1,415,940	1,202,829	176,521	2,445	1,740	2,149	0
Individuals	5,019	8,285	53,836	23,646	23,423	84	1,740	1,532	0
Corporations	15,704	27,185	1,323,871	1,144,021	150,517	2,360	0	544	0
Qualified intermediary pools	4	2	77	11	65	0	0	0	0
Peru	9,023	10,576	473,040	399,626	62,093	529	1,883	2,190	0
Individuals	8,536	2,467	21,535	9,497	2,571	327	1,883	2,128	0
Corporations	348	7,964	424,074	364,268	58,256	197	0	22	0
Qualified intermediary pools	d	d	d	d	d	d	d	d	d
Philippines	24,459	22,908	756,405	612,804	22,190	13,765	34,866	20,221	5
Individuals	23,446	16,217	91,551	12,834	7,896	210	34,866	8,954	0
Corporations	386	3,097	43,932	16,136	3,373	11,734	0	11,053	5
Qualified intermediary pools	3	3	20	0	12	0	0	8	0
Poland	10,521	9,958	201,409	120,298	20,055	23,702	16,798	9,180	0
Individuals	10,032	7,247	50,725	1,431	1,463	15,213	16,798	8,239	0
Corporations	219	2,369	146,302	118,415	17,486	8,073	0	848	0
Qualified intermediary pools	6	6	356	317	39	0	0	0	0

Footnotes at end of table.

Foreign Recipients of U.S. Income, 2008

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Table 2. Foreign Recipients of U.S. Income Forms 1042S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Type of Income, Selected Recipient Type, and Selected Country of Recipient, 2008—Continued

[Money amounts are in thousands of dollars]

Selected country or geographic area and selected recipient type	Number of Forms 1042S	U.S. tax withheld [1]	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and railroad retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Portugal	9,844	13,564	271,240	174,014	32,086	1,173	23,432	3,005	1,625
Individuals	8,935	6,687	39,661	5,977	3,075	276	23,432	2,954	0
Corporations	419	5,185	142,757	103,696	7,209	879	0	47	1,625
Qualified intermediary pools	66	832	29,938	17,100	11,842	7	0	0	0
Puerto Rico	8,069	4,275	2,374,326	2,265,164	90,912	154	0	435	2,340
Individuals	1,710	387	20,404	18,414	465	32	0	103	0
Corporations	4,860	3,357	1,672,565	1,634,854	27,689	114	0	9	2,340
Qualified intermediary pools	0	0	0	0	0	0	0	0	0
Russia	11,933	5,667	527,345	412,751	6,972	21,319	60	9,868	0
Individuals	10,953	3,574	56,940	3,105	5,291	2,554	60	8,801	0
Corporations	381	757	71,193	25,075	863	18,253	0	1,044	0
Qualified intermediary pools	d	d	d	d	d	d	d	d	d
Saudi Arabia	6,663	14,788	3,634,500	2,522,474	419,554	379	41	295	0
Individuals	5,933	3,939	23,943	9,149	11,176	327	41	271	0
Corporations	429	10,196	125,008	86,608	25,413	34	0	22	0
Qualified intermediary pools	4	0	1	0	1	0	0	0	0
Singapore	56,336	77,771	7,326,450	3,483,554	3,317,358	24,540	171	2,423	54,894
Individuals	50,337	10,586	98,508	23,998	55,776	892	171	1,097	0
Corporations	3,177	47,752	917,491	735,451	67,122	23,503	0	1,271	54,894
Qualified intermediary pools	144	12,028	212,152	148,021	56,549	117	0	0	0
South Africa	8,389	9,682	332,733	230,212	51,775	21,140	1,184	7,391	0
Individuals	7,379	2,772	25,709	1,351	4,980	1,588	1,184	6,568	0
Corporations	396	5,022	283,984	220,071	38,620	19,463	0	604	0
Qualified intermediary pools	9	359	2,561	61	2,499	0	0	0	0
Spain	34,778	95,012	2,661,562	1,287,294	705,268	66,891	26,983	21,577	447,568
Individuals	31,042	13,160	125,438	27,961	25,162	4,621	26,983	15,722	0
Corporations	2,000	73,085	1,913,443	772,877	601,648	58,025	0	5,795	447,568
Qualified intermediary pools	176	3,533	275,293	229,484	45,358	2	0	0	0
Sweden	21,807	83,815	5,815,333	2,094,104	2,254,311	708,626	12,344	39,190	263,368
Individuals	18,840	6,887	62,054	2,435	17,733	4,079	12,344	6,867	0
Corporations	1,239	41,008	4,251,158	1,682,643	1,401,772	702,208	0	32,002	263,368
Qualified intermediary pools	144	33,878	376,142	41,377	332,093	317	0	0	0
Switzerland	47,548	273,909	44,610,219	20,701,014	9,337,735	5,600,386	16,462	77,551	6,645,345
Individuals	35,038	13,212	234,228	64,127	90,145	5,485	16,462	11,371	0
Corporations	5,790	187,455	38,685,020	17,745,252	7,328,933	5,497,311	0	65,889	6,644,322
Qualified intermediary pools	2,515	54,278	3,865,087	2,053,023	1,696,210	1,019	0	0	0
Taiwan	89,601	165,913	4,406,830	3,429,088	545,154	33,986	341	28,120	1,823
Individuals	83,539	22,508	253,990	143,326	64,358	1,122	341	2,906	0
Corporations	2,550	112,614	1,928,183	1,506,030	334,272	32,852	0	24,939	1,823
Qualified intermediary pools	d	d	d	d	d	d	d	d	d
Thailand	9,271	5,578	101,170	59,765	22,245	1,063	2,538	4,664	0
Individuals	8,813	2,639	29,202	5,247	8,104	630	2,538	4,284	0
Corporations	217	2,742	50,706	38,213	10,100	411	0	379	0
Qualified intermediary pools	6	1	6	1	6	0	0	0	0
Trinidad and Tobago	4,709	4,042	180,818	160,680	11,624	243	1,890	1,548	0
Individuals	3,897	1,472	10,443	1,411	1,778	202	1,890	1,239	0
Corporations	664	2,518	44,548	34,499	8,978	14	0	310	0
Qualified intermediary pools	0	0	0	0	0	0	0	0	0
United Arab Emirates	8,436	21,584	2,597,175	850,455	1,474,931	22,095	12	1,025	0
Individuals	7,218	2,083	16,469	6,514	5,539	342	12	495	0
Corporations	466	13,720	1,141,077	47,623	881,303	21,748	0	433	0
Qualified intermediary pools	31	0	6,827	391	2,461	3	0	0	0
United Kingdom	322,438	675,035	96,333,306	38,090,593	19,328,583	3,041,718	109,566	458,861	31,368,180
Individuals	272,995	74,323	1,640,497	548,029	352,167	224,243	109,566	120,335	0
Corporations	21,851	248,586	78,749,595	26,771,769	14,868,207	2,615,979	0	325,421	31,346,527
Qualified intermediary pools	1,074	73,044	8,444,911	7,115,450	1,070,640	89,393	0	0	0

Footnotes at end of table.

Foreign Recipients of U.S. Income, 2008

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Table 2. Foreign Recipients of U.S. Income Forms 1042S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Type of Income, Selected Recipient Type, and Selected Country of Recipient, 2008—Continued

[Money amounts are in thousands of dollars]

Selected country or geographic area and selected recipient type	Number of Forms 1042S	U.S. tax withheld [1]	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and railroad retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Uruguay	14,563	5,610	293,285	265,244	17,754	212	927	505	0
Individuals	10,130	1,920	55,250	44,691	6,343	148	927	293	0
Corporations	4,326	3,575	123,490	106,566	10,953	63	0	208	0
Qualified intermediary pools	16	9	12,577	12,351	226	0	0	0	0
U.S. Virgin Islands	542	210	171,279	156,473	6,040	50	0	0	0
Individuals	251	56	426	83	45	26	0	0	0
Corporations	152	131	131,372	129,112	473	24	0	0	0
Qualified intermediary pools	0	0	0	0	0	0	0	0	0
Venezuela	48,802	115,451	2,456,320	366,587	2,037,859	3,049	1,065	6,115	714
Individuals	46,039	11,870	184,077	121,286	17,857	2,717	1,065	5,663	0
Corporations	2,264	103,304	2,259,281	236,169	2,019,451	232	0	404	714
Qualified intermediary pools	7	1	124	118	6	0	0	0	0

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

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

NOTES: Detail may not add to totals because of rounding. Form 1042S is entitled "Foreign Person's U.S. Source Income Subject to Withholding." All countries with total U.S.-source income over \$100 million for tax year 2008 were selected for this table.