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

Information on the availability of supplemental data on the topics included in this issue, special tabulations undertaken on a reimbursable basis, or other SOI subjects, may be obtained by telephoning the SOI's Statistical Information Services (202-874-0410), or by writing to the Director, Statistics of Income Division RAS:S, Internal Revenue Service, P.O. Box 2608, Washington, D.C. 20013-2608.

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by Scott Luttrell

The foreign tax credit is the largest tax credit claimed by corporations; however, very few corporations claim this credit each year. While less than half of 1 percent (6,922) of all U.S. corporations reported a foreign tax credit for Tax Year 2010, the amount claimed (\$118.1 billion) reduced the tax liability for these corporations 43.6 percent. When other credits were added, the overall tax liability was reduced an additional 5 percent to 48.6 percent, or from \$270.6 billion to \$139.1 billion. Corporations claiming a foreign tax credit in 2010 reported \$470.4 billion in foreign-source taxable income. The Netherlands (7.6 percent), United Kingdom (7.1 percent), and Canada (6.7 percent) accounted for the largest shares of foreign source taxable income for the year.

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In the Next Issue

Articles on the following topics are tentatively planned for inclusion in the quarter 2014 issue of the *Statistics of Income Bulletin*, scheduled to be published in March 2015:

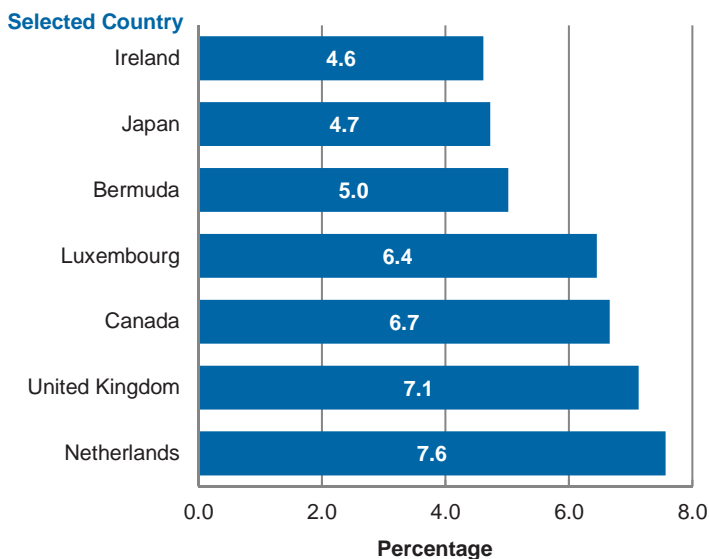
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Corporate Foreign Tax Credit, 2010

by Scott Luttrell

The foreign tax credit is the largest tax credit claimed by corporations; however, very few corporations claim this credit each year. While less than half of 1 percent (6,922) of all U.S. corporations reported a foreign tax credit for Tax Year 2010, the amount claimed (\$118.1 billion) reduced the tax liability for these corporations 43.6 percent. When other credits were added, the overall tax liability was reduced an additional 5 percent to 48.6 percent, or from \$270.6 billion to \$139.1 billion. Corporations claiming a foreign tax credit in 2010 reported \$470.4 billion in foreign-source taxable income. The Netherlands (7.6 percent), United Kingdom (7.1 percent), and Canada (6.7 percent) accounted for the largest shares of foreign-source taxable income for the year (Figure A). These statistics are based on data compiled from Form 1120, *U.S. Corporation Income Tax Returns*, and Form 1118, *Computation of Foreign Tax Credit—Corporations*.¹

Figure A
U.S. Corporation Returns with a Foreign Tax Credit:
Percentage of Foreign-Source Taxable Income, by
Selected Country, Tax Year 2010



NOTE: Data for this figure are based on information reported on Form 1118, *Computation of Foreign Tax Credit—Corporations*, and related corporate tax forms.

Source: IRS, Statistics of Income Division, Corporate Foreign Tax Credit, November 2013.

Highlights

- The total foreign tax credit (\$118.1 billion) increased by more than 26 percent from 2009 to 2010.
- The foreign tax credit enabled corporations to reduce their U.S. income tax liability 43.6 percent.
- Less than half of one percent of corporations (excluding subchapter-S corporations) claimed a foreign tax credit, yet these corporations accounted for 75.5 percent of all U.S. income tax before credits.
- European countries accounted for 44 percent of foreign-source taxable income and almost 50 percent of current-year foreign taxes.
- Manufacturing companies claimed about two-thirds (67.5 percent) of all foreign tax credits.

2010 Summary Highlights

Corporations claiming a foreign tax credit for Tax Year 2010, reported income subject to U.S. tax of \$770.7 billion, an increase of 20.0 percent from 2009. About 61 percent (\$470.4 billion) of the income subject to U.S. tax came from foreign sources, up 33.5 percent from the previous year. Notably, the foreign-source taxable income of corporations claiming a foreign tax credit (6,922 corporations) accounted for 46 percent of worldwide taxable income reported by all corporations (1,686,171 corporations). Current-year foreign taxes paid by corporations claiming a foreign tax credit rose 22.6 percent in 2010 to \$128.0 billion.²

Corporations claimed \$118.1 billion in foreign tax credits for 2010, which is an increase of 26.2 percent from 2009. Foreign tax credits plus other credits enabled these corporations to reduce their U.S. income tax 48.6 percent, from \$270.6 billion to \$139.1 billion (Figure B).

Closer Look at Corporation Returns with a Foreign Tax Credit

The foreign tax credit is the largest credit claimed by corporations; however, relatively few corporations claim it each year. Less than half of 1 percent of corporations (excluding subchapter-S corporations) filing a tax return for 2010 claimed a foreign tax credit. While few in number, these corporations accounted

¹ These statistics exclude corporations filing Form 1120-S, *U.S. Income Tax Return for an S Corporation*.

² Taxable income (less loss) before adjustments: Table 1, Column 36.



for nearly 43 percent of total assets for the year. In addition, these corporations tallied 75.5 percent of all U.S. income tax before credits and 62.5 percent of U.S. income tax after credits.

Corporations claiming a foreign tax credit accounted for significant amounts of total interest, rents, royalties, and license fees, as well as various types of dividends. These corporations reported nearly 47 percent of all corporate interest earned in 2010; just 9.3 percent (\$57.1 billion) of that interest was foreign-earned interest. These corporations also reported more than 68 percent of all rents, royalties, and license fee income for the year; more than 71 percent (\$132.8 billion) of that rents, royalties, and license fee income was earned abroad. Corporations claiming a foreign tax credit accounted for more than 90 percent of foreign dividends earned.

Figure B
Selected Items From U.S. Corporation Returns and From Those Returns With a Foreign Tax Credit, Tax Year 2010

[Money amounts are in thousands of dollars]

Selected items	All corporations	Corporations claiming a foreign tax credit		Corporations not claiming a foreign tax credit
		Number	Percentage	
	(1)	(2)	(3)	(4)
Number of corporations [1]	1,686,171	6,922	0.4	1,679,249
Total assets [2]	76,579,863,711	32,883,187,462	42.9	43,696,676,249
U.S. income tax before credits	358,154,010	270,562,315	75.5	87,591,695
U.S. income tax after credits	222,708,271	139,082,695	62.5	83,625,576
Interest	1,306,237,091	612,528,761	46.9	693,708,330
Rents, royalties, & license fees	272,645,482	186,187,515	68.3	86,457,967
Foreign dividends	140,473,574	127,282,234	90.6	13,191,340
Includable income of controlled foreign corporations	75,647,921	70,225,595	92.8	5,422,326
Dividend Gross-up	86,001,538	82,732,742	96.2	3,268,796

[1] Excludes Form 1120-S, *U.S. Income Tax Returns for an S Corporation*.

[2] All data presented in this figure are tabulated from Form 1120, *U.S. Corporation Income Tax Return*.

Source: IRS, Statistics of Income Division, Corporate Foreign Tax Credit, November 2013.

Geographic Spotlight

Among geographic regions, European countries tallied the largest shares of foreign-source taxable income (44.0 percent) and current-year foreign taxes paid, accrued, and deemed paid (49.7 percent) in 2010. When looking at the share of total foreign-source taxable income, the Netherlands (7.6 percent), United Kingdom (7.1 percent), Canada (6.7 percent), Luxembourg (6.4 percent), Bermuda (5.0 percent), Japan (4.7 percent), and Ireland (4.6 percent) reported the largest shares, accounting for more than 42 percent. Foreign-source taxable income for each of these countries exceeded \$21 billion with the Netherlands reporting the highest amount (\$35.6 billion).

The Corporate Foreign Tax Credit

U.S. corporations are taxed on their worldwide incomes, regardless of the source. These corporations may be taxed on their foreign-source incomes by both the foreign jurisdiction in which the income is earned and the United States, resulting in double taxation of the foreign-source income. The U.S. adopted the foreign tax credit to alleviate this problem.

Under foreign tax credit provisions, the United States taxes worldwide income, but allows a credit against the U.S. tax liability on foreign-source income for the income taxes paid to foreign countries. Taxpayers report their foreign-source income and taxes and calculate their foreign tax credit on Form 1118, *Computation of Foreign Tax Credit—Corporations*. Corporations file a separate Form 1118 and a separate foreign tax credit is calculated by category of foreign-source income. The two primary categories are passive income and general limitation income. The foreign tax credit amount is limited to the U.S. tax rate multiplied by the foreign-source income. Any foreign taxes paid in excess of this “limitation” amount may be carried back 1 year or carried forward up to 10 years. Taxpayers also have the option of deducting foreign taxes from their foreign-source taxable incomes; however, most corporations elect to take the foreign tax credit because it offsets U.S. taxes dollar-for-dollar.

Industrial Sector Data

As in past years, manufacturing corporations accounted for the majority of the foreign-source taxable income (over 60 percent) reported for 2010, paid the most (62.1 percent) in current-year foreign taxes, and claimed the largest percentage (67.5 percent) of the foreign tax credit (Figure C). Service corporations accounted for the next largest percentage of the total foreign tax credit during 2010 (8.8 percent), followed by the mining sector (6.7 percent). In comparison, companies in the finance, insurance, real estate, and rental and leasing sector reported the second largest amount of foreign-source taxable income (11.6 percent).

Data Sources and Limitations

Internal Revenue Code section 901 specifies the provisions for the foreign tax credit. Corporations report the foreign income and taxes related to the credit on Form 1118, *Computation of Foreign Tax Credit—Corporations*, and file it with their corporate tax return. The statistics in this data release are based on information reported on Forms 1118 and related corporate tax forms for those corporation income tax returns with a foreign tax credit that were included in the 2010 Statistics of Income (SOI) sample of corporate returns with accounting periods ending between July 2010 and June 2011. SOI selected these returns after administrative processing, but prior to any amendments

Figure C

Selected Items From U.S. Corporation Returns with a Foreign Tax Credit by Selected Industrial Sectors, Tax Year 2010

[Money amounts are in thousands of dollars]

Selected industrial sectors	Number of returns	Foreign-source taxable income [1]	Current-year foreign taxes	Foreign tax credit claimed
	(1)	(2)	(3)	(4)
All industries	6,922	470,406,676	128,013,899	118,077,676
Agriculture, forestry, fishing, and hunting	271	27,796	1,538	7,359
Mining	189	26,253,172	9,276,985	7,875,064
Utilities	* 6	* 903,400	* 279,674	* 290,494
Construction	157	477,468	129,173	125,122
Manufacturing	1,191	282,479,194	79,480,458	79,744,330
Food manufacturing	63	6,239,825	2,634,351	2,523,751
Petroleum and coal products manufacturing	26	118,224,797	42,717,766	40,511,360
Chemical manufacturing	185	55,879,968	12,259,408	14,026,205
Pharmaceutical and medicine manufacturing	41	36,316,116	6,231,112	7,779,027
Computer and electronic product manufacturing	159	50,377,405	8,089,874	9,146,333
Transportation equipment manufacturing	67	6,918,689	2,232,049	1,979,270
Wholesale and retail trade	869	23,889,752	5,829,335	5,730,021
Transportation and warehousing	92	2,378,385	330,460	295,109
Information	776	31,624,085	6,985,747	7,059,289
Finance, insurance, real estate, rental and leasing	1,070	54,446,207	10,413,112	6,576,695
Securities, commodity contracts, etc.	179	14,972,801	5,412,762	2,782,216
Insurance and related activities	371	35,068,690	3,993,376	2,907,030
Services	2,302	47,927,217	15,287,418	10,374,193
Professional, scientific, and technical services	815	6,400,321	1,478,939	1,412,968
Management of holding companies	940	32,080,216	10,448,947	6,066,137

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

[1] Foreign-source taxable income is also referred to as "Taxable income (less loss) before adjustments."

NOTE: Data for this figure are based on information reported on Form 1118, *Computation of Foreign Tax Credit—Corporations*, and related corporate tax forms.

Source: IRS, Statistics of Income Division, Corporate Foreign Tax Credit, November 2013.

or audit examination. The 2010 corporation income tax return sample included Forms 1120, 1120-F, 1120-L, 1120-PC, and 1120-REIT.³ The statistics in this data release do not include any foreign tax credit data filed specifically for the computation of the alternative minimum tax (AMT), even if the corporation reported both the regular and AMT foreign tax credits.

Small discrepancies exist between the more complete foreign tax credit data presented here and those published in *Statistics of Income—2010, Corporation Income Tax Returns*. Returns selected for the SOI sample that were received too late to be included in the corporation income tax statistics account for some of these differences. Also, for the foreign tax credit statistics, SOI requested additional data from some corporations that submitted preliminary data on their original returns because at the time of filing they lacked complete information.

Foreign income and taxes available for credit are understated to the extent that they were not reported on Form 1118 filed with Form 1120. This study includes credits carried forward from prior years and used in Tax Year 2010. However, because amended

returns are not included in the sample, these statistics do not contain foreign taxes carried back to 2010 from subsequent tax years, or credits for foreign taxes from 2010 carried back to earlier years. In addition, SOI excluded corporations from the sample that reported foreign income and taxes, but could not claim a foreign tax credit because they did not have a U.S. tax liability. Finally, some corporations may have deducted their foreign taxes from their gross income rather than claim a foreign tax credit. SOI also excluded these deductions from the study.

Because SOI based these estimates on a sample, they are subject to sampling error. Coefficients of Variation (CVs) were used to measure the magnitude of this sampling error. The CV concept is defined in the section on sampling variability in the "SOI Sampling Methodology and Data Limitations," located at <http://www.irs.gov/pub/irs-soi/sampling.pdf>. The smaller the CV, the more reliable the estimate is judged to be. The CVs for corporations with foreign tax credits are shown by selected North American Industry Classification System (NAICS) divisions, and industrial sectors or groups (Figure D).

³ Other forms selected for the corporation income tax return sample included Form 1120-F, *U.S. Income Tax Return of a Foreign Corporation*, Form 1120-L, *U.S. Life Insurance Company Income Tax Return*, Form 1120-PC, *U.S. Property and Casualty Insurance Company Income Tax Return*, and Form 1120-REIT, *U.S. Income Tax Return for Real Estate Investment Trusts*.

Figure D

Coefficients of Variation for U.S. Corporation Returns with a Foreign Tax Credit, by Selected Sector or Group, Tax Year 2010

Selected sector or group	Number of returns	Foreign tax credit claimed (thousands of dollars)	Coefficients of variation (percentages)
	(1)	(2)	(3)
All industries	6,922	118,077,676	0.02
Agriculture, forestry, fishing, and hunting	271	7,359	1.07
Mining	189	7,875,064	0.02
Utilities	* 6	290,494	[1]
Construction	157	125,122	0.16
Manufacturing	1,191	79,744,330	0.01
Food manufacturing	63	2,523,751	0.05
Beverage and tobacco products	13	1,544,984	[1]
Petroleum and coal products manufacturing	26	40,511,360	[1]
Chemical manufacturing	185	14,026,205	0.02
Pharmaceutical and medicine manufacturing	41	7,779,027	0.01
Machinery manufacturing	190	2,776,679	0.06
Computer and electronic product manufacturing	159	9,146,333	0.02
Electrical equipment, appliance & component manufacturing	56	3,390,994	0.04
Transportation equipment manufacturing	67	1,979,270	0.19
Wholesale and retail trade	869	5,730,021	0.14
Transportation and warehousing	92	295,109	0.25
Information	776	7,059,289	0.07
Publishing (except internet), motion picture & sound recording	420	5,419,430	0.04
Finance, insurance, real estate, rental and leasing	1,070	6,576,695	0.06
Finance and Insurance	653	6,398,517	0.05
Securities, commodity contracts, etc.	179	2,782,216	0.11
Insurance and related activities	371	2,907,030	[1]
Services	2,302	10,374,193	0.21
Management of holding companies	940	6,066,137	0.32

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

[1] Less than 0.005 percent.

NOTE: Data for this figure are based on information reported on Form 1118, *Computation of Foreign Tax Credit—Corporations*, and related corporate tax forms.

Source: IRS, Statistics of Income Division, Corporate Foreign Tax Credit, November 2013.

Description of Tables 1 and 2

Table 1, columns 2 through 14, presents statistics on assets, receipts, income, and taxes reported on the basic corporation income tax returns for those corporations that claimed a foreign tax credit. Columns 15 through 53 present statistics from Form 1118, *Computation of Foreign Tax Credit—Corporations*. Although the amounts of oil and gas income and deductions (columns 22 and 35) are included in columns 15 through 21 and in columns 24 through 33, taxpayers report these amounts separately on Form 1118 (*Schedule I, Reduction of Oil and Gas Extraction Taxes*). The reason for this is that oil and gas extraction income is subject to special rules under Internal Revenue Code section 907, which effectively requires a separate limitation calculation for taxes related to this type of income. Foreign branch income (column 23) is also contained in the summary columns but reported separately on Form 1118 (*Schedule F, Gross Income and Definitely Allocable Deductions for Foreign Branches*). Table 2 includes foreign income, deductions, and taxes paid, accrued, or deemed paid from Form 1118, by selected geographic region and country.

Explanation of Selected Terms

Adjustments to taxable income—Foreign-source taxable income is adjusted, when applicable, by the allocation of current-year foreign losses, recharacterization of income due to prior-year loss allocations, and adjustments related to overall foreign losses, including recapture of prior overall foreign losses, and allocations of current-year U.S. losses. See Table 1, column 37.

Carryover of foreign taxes—Corporations can carry taxes paid in excess of the limitation back 1 year or forward up to 10 years.

Controlled foreign corporations (CFCs)—As defined in the Internal Revenue Code section 957(a), any foreign corporation in which U.S. shareholders own directly, indirectly, or constructively more than 50 percent of either the total combined voting power or total value of all stock on any day of the taxable year of the corporation.

Deemed dividends—Certain types of income earned by controlled foreign corporations (CFCs) are recognized under Subpart F of the Internal Revenue Service Code as a U.S.

corporation's current-year income, even if no income is actually received from the CFC in the current tax year. In such cases, the U.S. corporation is deemed to have received a pro-rata share of this income and is required to report it as a "deemed dividend" on Form 1118.

Dividend gross-up—U.S. corporations that satisfy ownership and other requirements are permitted to take an indirect foreign tax credit for taxes paid on profits from which dividends were distributed. Under Internal Revenue Code section 78, these taxes are "deemed paid" by U.S. corporations under Internal Revenue Code sections 902 and 960(a). Consequently, the dividend income is "grossed up" by the amount of taxes deemed paid on the income from which the dividend was paid.

Foreign-source taxable income—Gross income (less loss) less deductions from sources outside the United States, including U.S. possessions.

General limitation income—This separate limitation category contains all foreign income not included in any other separate limitation category.

Income re-sourced by bilateral tax treaty—This separate limitation category includes certain U.S.-source income that has been subject to tax in another country pursuant to a bilateral income tax treaty. To relieve double taxation, as appropriate, these items of income are reclassified by a treaty provision as arising from foreign sources. A separate foreign tax credit limitation has to be computed for each amount re-sourced by a tax treaty.

Passive income—This separate limitation category is comprised of dividends, interest, rents, royalties, annuities, and net

capital gains, as well as commodity transactions not connected with the active conduct of a trade or business. Passive income subject to a foreign tax rate that exceeds the highest applicable U.S. tax rate is excluded from this separate limitation category and included in general limitation income.

Section 901(j) income—This separate limitation category includes income and taxes paid to countries sanctioned by the United States. Internal Revenue Code section 901(j) denies credit for taxes paid or accrued to these countries. For 2010, countries subject to these restrictions included Cuba, Iran, North Korea, Sudan, and Syria. A separate limitation credit is computed for each Section 901(j) country for informational purposes.

Additional Tabular Data on Tax Stats

For additional Form 1118 tabular data, see the Corporate Foreign Tax Credit Statistics section of the Tax Stats Webpages at <http://www.irs.gov/uac/SOI-Tax-Stats-Corporate-Foreign-Tax-Credit-Statistics>. Income, deduction, and tax data items for corporations claiming a foreign tax credit are available annually beginning with Tax Year 2004. Data are available by major and selected minor industry, as well as by geographic region and country.

Scott Luttrell is an economist with the Special Studies Returns Analysis Section. This data release was prepared under the direction of Chris Carson, Chief.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry

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

Major and selected minor industry of U.S. corporation filing return	Number of returns	Total assets	Total receipts	Dividends received from foreign corporations	Dividends received from IC-DISC's or former DISC's [1]	Includable income of controlled foreign corporations	Foreign dividend income from foreign taxes deemed paid (gross-up)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All industries	6,922	32,883,187,462	9,058,391,546	127,282,234	5,230	70,225,595	82,732,742
Agriculture, forestry, fishing, and hunting	271	3,253,033	3,709,011	1,846	0	4,222	1,270
Mining	189	289,564,452	171,325,473	8,198,759	0	535,061	4,189,195
Oil and gas extraction, coal mining	50	119,725,071	82,406,707	4,709,346	0	179,165	2,856,333
Metal ore mining	* 8	* 70,988,955	* 36,828,799	* 2,483,868	* 0	* 90,362	* 884,151
Nonmetallic minerals	15	4,265,245	2,659,007	11,480	0	7,086	17,777
Support activities for mining	116	94,585,180	49,430,960	994,067	0	258,448	430,934
Utilities	* 6	* 56,840,834	* 25,484,591	* 636,180	* 0	* 3,170	* 278,637
Construction	157	42,199,988	42,808,517	59,252	44	138,343	56,654
Construction of buildings	16	9,491,157	14,941,945	5,943	44	5,926	5,910
Heavy and civil engineering construction	34	26,402,715	23,652,812	42,647	0	132,415	49,009
Special trade contractors	107	6,306,115	4,213,761	10,662	0	3	1,735
Manufacturing	1,191	7,172,697,672	3,888,607,399	72,652,854	5,147	43,286,199	50,779,480
Food manufacturing	63	315,332,557	252,772,163	2,203,891	1,440	2,771,145	2,134,427
Beverage and tobacco products	13	148,865,863	87,704,684	2,299,448	0	804,987	1,145,071
Tobacco manufacturing	* 4	* 57,534,389	* 45,801,009	* 312,587	* 0	* 13,571	* 157,686
Textile mills and textile product mills	10	4,828,241	3,966,937	10,453	0	7,222	6,117
Apparel manufacturing	11	12,345,647	15,548,555	184,201	0	44,228	153,638
Leather and allied product manufacturing	* 5	* 4,121,980	* 2,300,536	* 23,149	* 933	* 14,722	* 10,970
Wood product manufacturing	35	10,009,463	8,586,799	844	0	12	317
Paper manufacturing	26	79,729,307	41,812,263	1,034,544	388	579,074	787,626
Printing and related support activities	20	2,588,633	2,526,133	26,687	0	40,818	34,269
Petroleum and coal products manufacturing	26	2,187,418,998	1,422,918,001	40,649,847	0	12,371,380	21,476,849
Chemical manufacturing	185	1,557,894,197	586,388,359	11,849,559	1,778	10,027,851	10,046,602
Pharmaceutical and medicine manufacturing	41	952,806,195	319,179,747	4,908,364	0	7,319,740	4,919,523
Other chemical manufacturing	144	605,088,002	267,208,612	6,941,195	1,778	2,708,111	5,127,079
Plastics and rubber products manufacturing	51	26,498,431	22,109,347	221,710	0	37,684	97,191
Nonmetallic mineral product manufacturing	23	12,576,503	11,506,405	155,910	0	198,272	136,849
Primary metal manufacturing	36	140,282,114	62,163,682	397,005	0	451,340	174,584
Fabricated metal products	98	274,248,369	62,441,379	254,076	0	810,068	349,168
Machinery manufacturing	190	338,333,890	187,491,411	2,636,156	598	2,190,220	2,390,787
Computer and electronic product manufacturing	159	681,175,120	433,074,976	4,323,120	0	4,842,585	6,476,173
Electrical equipment, appliance and component manufacturing	56	842,535,516	218,470,111	2,465,017	0	6,355,865	2,239,469
Transportation equipment manufacturing	67	367,141,175	342,037,784	2,426,864	0	492,952	2,043,182
Motor vehicles and related manufacturing	36	77,147,024	71,022,752	641,211	0	61,218	287,036
Other transportation equipment manufacturing	31	289,994,151	271,015,032	1,785,653	0	431,734	1,756,147
Furniture and related products	* 8	* 8,123,468	* 8,368,090	* 157,210	* 0	* 9,302	* 71,557
Miscellaneous manufacturing and manufacturing not allocable	109	158,648,202	116,419,783	1,333,163	9	1,236,473	1,004,631
Wholesale and retail trade	869	1,763,363,611	1,839,192,329	5,792,723	40	5,542,043	4,288,856
Wholesale trade	620	1,152,723,303	869,736,621	3,372,778	40	4,381,675	2,464,247
Durable goods	407	141,080,018	188,739,361	916,768	0	1,627,566	599,938
Machinery, equipment, and supplies	87	9,210,263	10,709,229	89,702	0	12,129	25,957
Other miscellaneous durable goods	319	131,869,755	178,030,131	827,066	0	1,615,437	573,981
Nondurable goods	214	1,011,643,285	680,997,260	2,456,010	40	2,754,109	1,864,309
Drugs, chemicals, and allied products	69	143,268,323	264,863,030	355,227	0	469,511	261,128
Groceries and related products	26	643,229,802	183,770,628	1,079,221	0	315,804	324,353
Petroleum and petroleum products	29	62,543,605	87,329,891	129,904	40	11,414	19,050
Other miscellaneous nondurable goods	90	162,601,556	145,033,711	891,658	0	1,957,380	1,259,779

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Number of returns	Total assets	Total receipts	Dividends received from foreign corporations	Dividends received from IC-DISC's or former DISC's [1]	Includable income of controlled foreign corporations	Foreign dividend income from foreign taxes deemed paid (gross-up)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Wholesale and retail trade—continued							
Retail trade	248	610,640,307	969,455,709	2,419,945	0	1,160,368	1,824,609
Motor vehicle, parts dealers, and gas stations	21	12,900,150	31,252,546	289	0	70	18
Furniture and home furnishings stores	* 5	* 9,557,265	* 15,112,629	* 0	* 0	* 3,875	* 341
Building materials, garden equipment, and supplies	10	68,763,087	64,083,363	1,669	0	4,816	1,292
Food and beverages stores	11	22,905,951	55,597,792	6,291	0	2,039	1,632
Apparel and accessory stores	54	44,255,220	82,225,101	541,623	0	112,530	229,244
General merchandise stores	60	302,740,451	531,181,473	881,903	0	322,296	968,380
Miscellaneous retail trade	88	149,518,183	190,002,805	988,170	0	714,742	623,701
Transportation and warehousing	92	173,829,327	151,347,909	500,361	0	43,369	201,723
Information	776	1,205,615,862	502,679,583	5,422,432	0	2,751,624	3,779,400
Publishing (except internet), motion picture, and sound recording	420	475,763,521	215,587,223	3,945,231	0	2,156,774	2,825,221
Broadcasting, internet publishing	38	172,840,463	67,994,716	599,200	0	98,114	461,805
Telecommunications	49	488,652,498	185,766,517	702,961	0	25,072	374,817
Internet service providers, web search portals, and data processing services	259	14,937,675	5,144,705	26,245	0	3,266	32,384
Other information services	12	53,421,705	28,186,422	148,795	0	468,397	85,173
Finance, insurance, real estate, and rental and leasing	1,070	10,478,439,921	1,484,661,420	21,194,398	0	7,334,228	7,956,540
Finance and insurance	653	10,434,614,214	1,468,547,424	21,155,343	0	7,316,601	7,945,647
Commercial banking and other depository credit agencies	17	14,852,307	1,610,543	170	0	25	3
Commercial banking	* 6	* 4,228,740	* 1,099,959	* 0	* 0	* 25	* 0
Depository credit agencies other than banks	11	10,623,566	510,584	170	0	0	3
Nondepository credit intermediation	20	655,917,393	81,670,483	624,245	0	445,653	438,735
Securities, commodity contracts, and other	179	3,732,249,657	146,845,286	3,057,840	0	4,304,866	4,975,113
Insurance and related activities	371	6,030,080,760	1,238,210,911	17,470,446	0	2,565,512	2,531,778
Insurance agencies and brokerages	13	24,316,863	6,017,611	242,696	0	157,495	98,823
Funds, trusts, and other financial vehicles	66	1,514,098	210,200	2,642	0	545	18
Real estate and rental and leasing	416	43,825,706	16,113,996	39,054	0	17,627	10,894
Real estate	318	17,675,166	4,828,160	32,254	0	15,094	6,826
Rentals and leasing	98	26,150,540	11,285,836	6,800	0	2,534	4,067
Services	2,302	11,697,382,765	948,575,315	12,823,429	0	10,587,335	11,200,987
Professional, scientific, and technical services	815	301,545,909	195,342,947	1,061,565	0	856,712	842,572
Management of holding companies	940	11,158,210,760	580,826,334	8,214,398	0	9,097,193	7,645,696
Administrative and support and waste management and remediation	342	59,398,888	55,921,569	745,272	0	286,728	513,638
Education services, health care, and social assistance	29	37,800,736	31,091,604	106,995	0	4,435	18,302
Arts, entertainment, and recreation	68	2,491,364	1,699,142	8,269	0	0	582
Accommodation and food services	88	131,592,825	77,934,665	2,652,533	0	314,150	2,150,755
Accommodation	42	34,257,517	14,105,011	1,577,829	0	90,664	1,542,644
Food services and drinking places	47	97,335,308	63,829,654	1,074,704	0	223,487	608,111
Other services	19	6,342,283	5,759,054	34,398	0	28,117	29,442
Repair and maintenance services	10	2,026,241	1,616,698	682	0	1,255	861
Personal services	* 5	* 4,252,055	* 4,037,596	* 33,698	* 0	* 26,862	* 28,581
Religious, grantmaking, civic, professional, and similar organizations	* 5	* 63,987	* 104,760	* 17	* 0	* 0	* 0

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Net income (less deficit)	Income subject to U.S. tax	U.S. income tax before credits		Foreign tax credit claimed	General business credit	U.S. income tax after credits [4]
			Total [3]	Regular and alternative minimum tax			
	(8)	(9)	(10)	(11)	(12)	(13)	(14)
All industries	822,158,106	770,673,281	270,562,315	270,456,093	118,077,676	12,256,880	139,082,695
Agriculture, forestry, fishing, and hunting	396,113	390,680	133,255	133,255	7,359	2,031	123,861
Mining	34,350,028	30,442,688	10,814,877	10,814,436	7,875,064	87,796	2,832,211
Oil and gas extraction, coal mining	11,552,970	11,182,242	3,912,883	3,912,862	3,123,434	4,176	765,720
Metal ore mining	* 14,494,339	* 12,303,515	* 4,343,655	* 4,343,234	* 3,821,453	* 10,431	* 511,771
Nonmetallic minerals	284,861	238,562	84,541	84,541	17,917	1,235	65,200
Support activities for mining	8,017,859	6,718,369	2,473,799	2,473,799	912,261	71,953	1,489,520
Utilities	* 1,399,403	* 1,336,513	* 467,670	* 467,670	* 290,494	* 59,167	* 118,010
Construction	2,261,376	2,232,912	787,341	779,415	125,122	9,837	651,854
Construction of buildings	554,042	542,593	192,699	189,615	5,184	1,634	185,851
Heavy and civil engineering construction	1,361,789	1,358,864	478,830	475,141	105,506	7,765	365,061
Special trade contractors	345,544	331,455	115,813	114,659	14,432	439	100,942
Manufacturing	401,179,426	389,657,302	136,462,922	136,420,408	79,744,330	5,376,036	50,874,900
Food manufacturing	19,272,517	18,982,333	6,644,721	6,641,036	2,523,751	107,900	4,008,657
Beverage and tobacco products	14,436,823	14,389,737	5,036,310	5,036,310	1,544,984	12,283	3,479,042
Tobacco manufacturing	* 7,926,849	* 7,920,762	* 2,772,267	* 2,772,267	* 148,244	* 2,633	* 2,621,390
Textile mills and textile product mills	255,449	239,953	83,806	83,806	11,798	2,782	67,634
Apparel manufacturing	1,109,508	1,087,220	380,388	380,388	147,881	3,564	228,796
Leather and allied product manufacturing	* 196,307	* 194,958	* 67,957	* 67,957	* 14,477	* 1,036	* 52,456
Wood product manufacturing	54,400	55,932	19,028	19,028	2,279	4,113	12,636
Paper manufacturing	6,190,296	6,132,768	2,146,031	2,146,026	968,865	165,503	999,825
Printing and related support activities	195,169	188,622	65,657	65,657	34,603	532	30,522
Petroleum and coal products manufacturing	132,687,492	132,032,031	46,254,876	46,244,610	40,511,360	843,357	4,572,015
Chemical manufacturing	80,492,616	77,804,731	27,246,503	27,246,108	14,026,205	1,528,783	11,625,401
Pharmaceutical and medicine manufacturing	44,961,745	43,386,034	15,184,820	15,184,487	7,779,027	1,217,317	6,129,801
Other chemical manufacturing	35,530,870	34,418,697	12,061,683	12,061,621	6,247,177	311,466	5,495,600
Plastics and rubber products manufacturing	1,263,934	1,186,428	420,986	420,986	128,051	22,266	270,250
Nonmetallic mineral product manufacturing	1,088,667	1,076,614	376,269	376,217	147,512	7,173	221,566
Primary metal manufacturing	2,788,323	2,735,758	958,037	958,035	338,832	11,053	602,258
Fabricated metal products	5,338,268	5,183,950	1,812,776	1,811,686	664,000	71,315	1,041,000
Machinery manufacturing	17,495,173	16,977,072	5,944,804	5,944,378	2,776,679	264,135	2,903,084
Computer and electronic product manufacturing	71,402,002	65,639,616	22,978,229	22,971,129	9,146,333	1,463,043	12,361,935
Electrical equipment, appliance and component manufacturing	13,109,871	12,660,382	4,429,304	4,429,142	3,390,994	130,711	906,029
Transportation equipment manufacturing	21,100,975	20,791,030	7,294,168	7,275,133	1,979,270	578,581	4,735,288
Motor vehicles and related manufacturing	3,673,232	3,472,732	1,214,279	1,214,279	335,101	78,195	800,133
Other transportation equipment manufacturing	17,427,743	17,318,298	6,079,888	6,060,854	1,644,169	500,385	3,935,154
Furniture and related products	* 396,391	* 396,124	* 138,454	* 138,454	* 96,137	* 2,077	* 40,241
Miscellaneous manufacturing and manufacturing not allocable	12,305,245	11,902,042	4,164,617	4,164,321	1,290,321	155,829	2,716,266
Wholesale and retail trade	96,844,903	92,955,891	32,537,812	32,536,022	5,730,021	1,171,223	25,445,701
Wholesale trade	48,200,429	45,192,811	15,822,891	15,821,508	3,690,633	853,825	11,119,445
Durable goods	11,983,316	11,637,821	4,065,821	4,065,820	890,588	198,837	2,972,471
Machinery, equipment, and supplies	988,887	971,614	338,128	338,127	70,189	1,152	266,742
Other miscellaneous durable goods	10,994,429	10,666,207	3,727,693	3,727,693	820,399	197,685	2,705,729
Nondurable goods	36,217,114	33,554,991	11,757,070	11,755,688	2,800,045	654,988	8,146,973
Drugs, chemicals, and allied products	11,617,058	11,099,335	3,898,956	3,898,956	388,051	359,557	3,120,600
Groceries and related products	11,703,649	10,069,269	3,523,782	3,523,782	470,285	250,139	2,803,247
Petroleum and petroleum products	1,622,566	1,545,298	540,675	540,675	148,861	1	387,355
Other miscellaneous nondurable goods	11,273,840	10,841,089	3,793,656	3,792,275	1,792,849	45,290	1,835,771

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Net income (less deficit)	Income subject to U.S. tax	U.S. income tax before credits		Foreign tax credit claimed	General business credit	U.S. income tax after credits [4]
			Total [3]	Regular and alternative minimum tax			
	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Wholesale and retail trade—continued							
Retail trade	48,644,473	47,763,079	16,714,921	16,714,514	2,039,388	317,398	14,326,256
Motor vehicle, parts dealers, and gas stations	1,589,028	1,587,370	555,157	555,157	3,129	13,166	538,740
Furniture and home furnishings stores	* 1,535,305	* 1,443,257	* 505,065	* 505,065	* 3,964	* 7,714	* 493,387
Building materials, garden equipment, and supplies	4,143,865	4,143,737	1,450,190	1,450,190	67,943	16,644	1,365,603
Food and beverages stores	2,413,814	2,412,147	844,172	844,172	13,500	10,633	820,038
Apparel and accessory stores	7,956,185	7,766,538	2,717,861	2,717,847	389,812	29,306	2,268,578
General merchandise stores	21,560,755	21,276,790	7,446,667	7,446,663	795,166	203,093	6,447,407
Miscellaneous retail trade	9,445,522	9,133,240	3,195,808	3,195,419	765,872	36,841	2,392,502
Transportation and warehousing	8,700,970	8,573,471	2,999,963	2,999,707	295,109	79,398	2,623,390
Information	74,422,405	63,785,595	22,332,290	22,318,037	7,059,289	838,278	14,416,909
Publishing (except internet), motion picture, and sound recording	37,513,818	35,128,978	12,290,618	12,289,663	5,419,430	536,551	6,327,132
Broadcasting, internet publishing	7,566,824	7,307,990	2,570,693	2,557,394	774,692	9,070	1,786,288
Telecommunications	22,127,693	14,242,303	4,984,185	4,984,185	587,966	130,557	4,259,102
Internet service providers, web search portals, and data processing services	688,676	684,136	239,075	239,075	61,577	5,613	171,874
Other information services	6,525,394	6,422,189	2,247,720	2,247,720	215,623	156,487	1,872,513
Finance, insurance, real estate, and rental and leasing	107,853,616	91,029,810	32,434,370	32,405,097	6,576,695	1,043,615	24,499,662
Finance and insurance	105,571,589	88,801,084	31,642,146	31,626,039	6,398,517	1,036,991	23,913,585
Commercial banking and other depository credit agencies	257,736	253,552	92,418	88,324	7,157	1,833	85,219
Commercial banking	* 168,323	* 167,907	* 62,780	* 58,686	* 6,950	* 1,568	* 56,052
Depository credit agencies other than banks	89,413	85,645	29,638	29,638	207	264	29,167
Nondepository credit intermediation	7,856,771	8,196,460	2,869,219	2,869,201	700,159	62,637	2,099,805
Securities, commodity contracts, and other	30,671,238	24,543,381	8,606,831	8,606,700	2,782,216	98,174	5,708,200
Insurance and related activities	66,638,453	55,664,403	20,023,813	20,011,948	2,907,030	874,330	15,972,468
Insurance agencies and brokerages	604,805	596,484	208,609	208,560	115,272	36,072	57,265
Funds, trusts, and other financial vehicles	147,392	143,288	49,865	49,865	1,955	17	47,894
Real estate and rental and leasing	2,282,026	2,228,726	792,224	779,059	178,178	6,624	586,077
Real estate	798,446	785,033	278,377	275,272	69,281	441	208,541
Rentals and leasing	1,483,580	1,443,693	513,847	503,787	108,897	6,183	377,535
Services	94,749,865	90,268,419	31,591,813	31,582,047	10,374,193	3,589,499	17,496,199
Professional, scientific, and technical services	18,276,939	17,273,939	6,040,562	6,037,415	1,412,968	280,466	4,327,613
Management of holding companies	56,111,638	52,808,232	18,489,280	18,483,775	6,066,137	3,015,528	9,298,505
Administrative and support and waste management and remediation	4,256,452	4,163,123	1,454,743	1,454,447	565,735	54,169	834,305
Education services, health care, and social assistance	4,039,142	3,986,365	1,394,402	1,394,402	37,713	4,081	1,350,165
Arts, entertainment, and recreation	239,057	221,454	77,041	77,041	9,662	116	67,263
Accommodation and food services	11,421,531	11,416,806	3,995,871	3,995,053	2,242,857	228,955	1,523,740
Accommodation	3,292,431	3,289,962	1,151,476	1,151,169	1,042,211	8,800	100,146
Food services and drinking places	8,129,099	8,126,844	2,844,395	2,843,885	1,200,646	220,154	1,423,595
Other services	405,105	398,499	139,914	139,914	39,121	6,184	94,608
Repair and maintenance services	52,652	51,444	18,837	18,837	10,788	141	7,908
Personal services	* 330,128	* 324,763	* 113,477	* 113,477	* 28,327	* 6,044	* 79,106
Religious, grantmaking, civic, professional, and similar organizations	* 22,325	* 22,292	* 7,600	* 7,600	* 6	* 0	* 7,594

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118						
	Gross income (less loss)						
	Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees	Service income	Other income
	(15)	(16)	(17)	(18)	(19)	(20)	(21)
All industries	813,733,671	194,115,903	82,503,215	57,080,367	132,828,232	43,171,166	304,034,788
Agriculture, forestry, fishing, and hunting	50,322	5,859	1,270	764	901	10,924	30,603
Mining	35,726,711	8,709,547	4,188,808	672,694	1,533,780	3,336,125	17,285,757
Oil and gas extraction, coal mining	10,306,840	4,888,702	2,855,997	26,082	47,552	81,547	2,406,959
Metal ore mining	* 16,071,674	* 2,553,575	* 884,151	* 287,377	* 197,977	* 166,504	* 11,982,089
Nonmetallic minerals	100,288	15,764	17,777	9,126	12,470	29,868	15,283
Support activities for mining	9,247,910	1,251,506	430,883	350,108	1,275,781	3,058,206	2,881,427
Utilities	* 971,396	* 639,350	* 278,637	* 52,587	* 0	* 0	* 822
Construction	1,331,919	192,570	56,654	6,314	127,954	873,284	75,143
Construction of buildings	376,634	11,926	5,910	175	15,357	318,136	25,131
Heavy and civil engineering construction	727,285	176,025	49,009	3,685	112,598	338,549	47,419
Special trade contractors	228,000	4,618	1,735	2,455	0	216,599	2,593
Manufacturing	410,258,727	113,674,830	50,717,156	6,044,071	76,685,400	5,212,195	157,925,074
Food manufacturing	12,700,943	4,940,282	2,120,993	133,106	1,178,933	2,651	4,324,979
Beverage and tobacco products	10,600,281	3,073,625	1,143,394	143,636	1,749,278	0	4,490,348
Tobacco manufacturing	* 694,307	* 325,422	* 157,686	* 30,809	* 19,143	* 0	* 161,248
Textile mills and textile product mills	120,298	17,621	6,270	1,756	516	7,653	86,481
Apparel manufacturing	886,421	228,428	153,638	4,641	374,493	0	125,220
Leather and allied product manufacturing	* 213,451	* 38,803	* 10,970	* 0	* 135,231	* 0	* 28,446
Wood product manufacturing	210,322	303	317	6,850	4,054	8,164	190,634
Paper manufacturing	5,929,091	1,612,777	787,543	218,886	1,113,079	13,063	2,183,743
Printing and related support activities	280,427	67,496	34,269	6,370	13,118	46,827	112,347
Petroleum and coal products manufacturing	142,284,004	52,497,504	21,472,950	833,647	431,240	133,251	66,915,412
Chemical manufacturing	84,651,098	21,407,108	10,029,623	1,106,239	26,797,088	454,042	24,856,998
Pharmaceutical and medicine manufacturing	55,933,828	11,848,160	4,911,034	835,237	20,394,018	5,043	17,940,336
Other chemical manufacturing	28,717,270	9,558,948	5,118,589	271,002	6,403,070	448,999	6,916,662
Plastics and rubber products manufacturing	780,520	258,928	97,192	26,530	137,651	23,707	236,512
Nonmetallic mineral product manufacturing	710,236	353,275	136,849	2,664	11,970	78,829	126,649
Primary metal manufacturing	2,768,859	840,432	174,575	734,483	80,724	49,016	889,629
Fabricated metal products	4,052,317	1,048,818	348,239	139,375	1,201,696	119,016	1,195,173
Machinery manufacturing	16,224,532	4,785,020	2,386,960	442,515	2,083,669	209,927	6,316,441
Computer and electronic product manufacturing	79,901,590	8,325,073	6,459,839	573,703	33,593,012	2,862,462	28,087,501
Electrical equipment, appliance and component manufacturing	25,131,665	8,544,213	2,236,432	1,422,228	3,694,916	53,599	9,180,278
Transportation equipment manufacturing	9,925,652	2,919,790	2,042,481	120,078	1,299,137	565,407	2,978,758
Motor vehicles and related manufacturing	1,675,477	702,246	287,035	33,077	146,044	90,086	416,989
Other transportation equipment manufacturing	8,250,175	2,217,544	1,755,446	87,001	1,153,093	475,321	2,561,769
Furniture and related products	* 446,032	* 166,510	* 71,557	* 1,830	* 10,335	* 0	* 195,800
Miscellaneous manufacturing and manufacturing not allocable	12,440,989	2,548,825	1,003,063	125,533	2,775,260	584,581	5,403,726
Wholesale and retail trade	44,533,356	11,275,935	4,282,898	873,966	7,268,328	2,143,524	18,688,705
Wholesale trade	30,536,654	7,718,757	2,463,948	481,452	4,298,463	2,085,344	13,488,690
Durable goods	6,987,542	2,543,860	599,938	138,298	646,082	555,575	2,503,789
Machinery, equipment, and supplies	472,957	101,624	25,957	611	168,644	56,349	119,773
Other miscellaneous durable goods	6,514,584	2,442,235	573,982	137,687	477,438	499,226	2,384,016
Nondurable goods	23,549,112	5,174,897	1,864,010	343,154	3,652,381	1,529,769	10,984,901
Drugs, chemicals, and allied products	7,346,314	811,458	261,030	45,545	2,270,450	1,467,280	2,490,550
Groceries and related products	6,544,915	1,387,512	324,240	103,600	167,479	43,580	4,518,504
Petroleum and petroleum products	309,246	139,624	19,050	4,599	3,647	0	142,327
Other miscellaneous nondurable goods	9,348,638	2,836,304	1,259,689	189,410	1,210,806	18,909	3,833,520

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118						
	Gross income (less loss)						
	Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees	Service income	Other income
	(15)	(16)	(17)	(18)	(19)	(20)	(21)
Wholesale and retail trade—continued							
Retail trade	13,996,703	3,557,178	1,818,950	392,514	2,969,865	58,180	5,200,016
Motor vehicle, parts dealers, and gas stations	229,378	436	18	8,673	14,085	30,718	175,448
Furniture and home furnishings stores	* 102,775	* 3,875	* 341	* 366	* 4,893	* 0	* 93,301
Building materials, garden equipment, and supplies	294,936	6,485	1,292	36,229	236,544	0	14,386
Food and beverages stores	132,931	8,330	1,632	170	121,477	218	1,103
Apparel and accessory stores	3,383,642	653,802	229,858	53,539	375,691	3,895	2,066,858
General merchandise stores	4,407,359	1,201,912	968,380	137,579	1,253,136	0	846,352
Miscellaneous retail trade	5,445,683	1,682,339	617,428	155,957	964,040	23,349	2,002,569
Transportation and warehousing	16,735,877	536,812	202,459	163,912	378,315	10,561,000	4,893,378
Information	65,586,660	8,088,134	3,775,965	518,575	33,557,252	6,060,741	13,585,993
Publishing (except internet), motion picture, and sound recording	45,671,384	6,005,388	2,821,250	205,248	24,812,417	2,301,394	9,525,688
Broadcasting, internet publishing	9,770,878	711,401	461,805	144,319	7,491,241	814,774	147,338
Telecommunications	7,898,524	728,208	376,262	163,190	226,192	2,753,278	3,651,394
Internet service providers, web search portals, and data processing services	398,882	29,511	32,384	553	112,445	188,121	35,867
Other information services	1,846,991	613,625	84,264	5,266	914,956	3,174	225,706
Finance, insurance, real estate, and rental and leasing	113,911,128	28,248,977	7,799,476	22,514,027	5,599,160	2,569,144	47,180,344
Finance and insurance	111,382,882	28,191,287	7,788,583	22,464,998	3,876,176	2,452,583	46,609,256
Commercial banking and other depository credit agencies	223,524	1,166	0	222,358	0	0	0
Commercial banking	* 222,400	* 45	* 0	* 222,355	* 0	* 0	* 0
Depository credit agencies other than banks	1,124	1,122	0	3	0	0	0
Nondepository credit intermediation	12,439,102	1,058,121	437,782	882,289	2,173,392	333,871	7,553,647
Securities, commodity contracts, and other	24,613,267	6,951,055	4,825,520	6,125,166	228,849	1,295,128	5,187,549
Insurance and related activities	74,072,608	20,180,659	2,525,246	15,231,020	1,463,360	819,750	33,852,573
Insurance agencies and brokerages	582,641	391,405	98,807	2,398	17,559	11,485	60,988
Funds, trusts, and other financial vehicles	34,381	286	34	4,164	10,575	3,834	15,487
Real estate and rental and leasing	2,528,246	57,690	10,894	49,029	1,722,984	116,561	571,088
Real estate	655,519	48,366	6,826	47,204	157,015	27,718	368,390
Rentals and leasing	1,872,727	9,324	4,067	1,825	1,565,969	88,844	202,698
Services	124,627,575	22,743,889	11,199,890	26,233,457	7,677,141	12,404,230	44,368,969
Professional, scientific, and technical services	18,619,470	1,922,300	843,726	98,754	2,674,097	9,119,863	3,960,730
Management of holding companies	88,855,347	16,665,286	7,645,373	25,898,369	1,750,618	987,191	35,908,511
Administrative and support and waste management and remediation	4,498,115	1,013,805	511,712	43,090	508,588	1,845,885	575,035
Education services, health care, and social assistance	414,423	111,426	18,302	1,575	64,651	121,787	96,683
Arts, entertainment, and recreation	204,547	8,311	582	0	129,027	41,119	25,508
Accommodation and food services	11,651,395	2,960,246	2,150,754	183,411	2,460,811	127,266	3,768,908
Accommodation	4,504,392	1,668,508	1,542,651	50,066	264,228	43,586	935,353
Food services and drinking places	7,147,003	1,291,738	608,102	133,345	2,196,583	83,680	2,833,555
Other services	384,279	62,515	29,442	8,259	89,349	161,119	33,594
Repair and maintenance services	49,229	1,938	861	34	0	41,877	4,520
Personal services	* 335,000	* 60,560	* 28,581	* 8,225	* 89,349	* 119,210	* 29,074
Religious, grantmaking, civic, professional, and similar organizations	* 49	* 17	* 0	* 0	* 0	* 32	* 0

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118—continued					
	Gross income (less loss)—continued		Total	Deductions		
	Oil and gas extraction income [5]	Foreign branch income [5]		Definitely allocable deductions		
				Total	Depreciation, depletion, and amortization	Other expenses
(22)	(23)	(24)	(25)	(26)	(27)	
All industries	137,056,188	150,472,559	343,326,994	182,197,742	3,507,329	5,512,241
Agriculture, forestry, fishing, and hunting	0	891	22,526	18,643	0	0
Mining	10,068,532	9,511,017	9,473,540	7,073,369	118,202	558,078
Oil and gas extraction, coal mining	10,068,532	1,868,131	1,194,059	718,005	0	539
Metal ore mining	* 0	* 3,927,168	* 3,920,953	* 2,979,863	* 19,655	* 0
Nonmetallic minerals	0	22,692	40,452	24,502	0	0
Support activities for mining	0	3,693,026	4,318,076	3,350,998	98,547	557,538
Utilities	* 0	* 27,606	* 67,997	* 11,778	* 0	* 0
Construction	0	334,457	854,451	547,163	15,701	28,218
Construction of buildings	0	116,306	340,446	310,028	14	26,800
Heavy and civil engineering construction	0	61,408	349,084	79,228	14,621	1,067
Special trade contractors	0	156,743	164,921	157,907	1,066	351
Manufacturing	126,475,585	47,816,381	127,779,532	61,853,155	284,554	677,671
Food manufacturing	0	3,700,426	6,461,118	3,195,880	8,170	2,693
Beverage and tobacco products	0	2,360,344	4,931,663	2,832,102	0	0
Tobacco manufacturing	* 0	* 67,288	* 151,682	* 12,698	* 0	* 0
Textile mills and textile product mills	0	13,130	74,006	59,630	79	744
Apparel manufacturing	0	1,453	269,304	119,276	6,087	4,248
Leather and allied product manufacturing	* 0	* 0	* 47,193	* 1,958	* 0	* 0
Wood product manufacturing	0	14,581	125,388	16,723	0	0
Paper manufacturing	0	442,932	2,223,046	1,066,062	41	689
Printing and related support activities	0	127,235	153,832	123,839	434	630
Petroleum and coal products manufacturing	126,475,585	19,099,038	24,059,207	19,542,110	21,068	0
Chemical manufacturing	0	10,600,887	28,771,130	9,538,510	20,619	251,997
Pharmaceutical and medicine manufacturing	0	7,986,730	19,617,711	7,324,250	9,775	177,998
Other chemical manufacturing	0	2,614,157	9,153,418	2,214,260	10,844	74,000
Plastics and rubber products manufacturing	0	47,744	350,252	111,826	0	2,162
Nonmetallic mineral product manufacturing	0	34,534	149,246	103,542	18	0
Primary metal manufacturing	0	448,588	1,518,610	211,609	0	0
Fabricated metal products	0	633,380	1,922,780	663,075	47,021	1,869
Machinery manufacturing	0	1,859,246	6,419,269	1,801,176	25,678	3,505
Computer and electronic product manufacturing	0	5,520,499	29,524,185	9,910,241	1,685	129,253
Electrical equipment, appliance and component manufacturing	0	464,007	11,075,898	7,078,230	296	4,228
Transportation equipment manufacturing	0	777,218	3,006,963	1,432,687	111,420	5,653
Motor vehicles and related manufacturing	0	42,882	518,215	150,454	7,280	127
Other transportation equipment manufacturing	0	734,336	2,488,748	1,282,232	104,140	5,525
Furniture and related products	* 0	* 75,043	* 161,275	* 125,000	* 0	* 2,778
Miscellaneous manufacturing and manufacturing not allocable	0	1,596,096	6,535,166	3,919,678	41,938	267,220
Wholesale and retail trade	64,754	8,373,984	20,643,604	14,377,405	34,892	455,205
Wholesale trade	64,754	5,182,668	14,616,528	9,836,600	30,601	386,557
Durable goods	0	524,102	2,827,101	1,763,150	5,492	74,727
Machinery, equipment, and supplies	0	56,659	211,613	185,018	4,444	65,812
Other miscellaneous durable goods	0	467,443	2,615,488	1,578,132	1,048	8,915
Nondurable goods	64,754	4,658,566	11,789,426	8,073,450	25,108	311,830
Drugs, chemicals, and allied products	0	1,192,398	4,125,138	2,416,465	23,078	230,947
Groceries and related products	0	1,466,763	4,063,854	3,702,770	643	2,007
Petroleum and petroleum products	64,754	52,530	293,091	99,706	206	8,766
Other miscellaneous nondurable goods	0	1,946,875	3,307,344	1,854,509	1,181	70,110

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118—continued					
	Gross income (less loss)—continued		Deductions			
	Oil and gas extraction income [5]	Foreign branch income [5]	Total	Definitely allocable deductions		
				Total	Depreciation, depletion, and amortization	Other expenses
(22)	(23)	(24)	(25)	(26)	(27)	
Wholesale and retail trade—continued						
Retail trade	0	3,191,315	6,027,077	4,540,805	4,291	68,648
Motor vehicle, parts dealers, and gas stations	0	52,341	190,152	174,683	43	0
Furniture and home furnishings stores	* 0	* 94,076	* 85,387	* 79,850	* 1,586	* 9,475
Building materials, garden equipment, and supplies	0	14,180	97,346	12,975	0	0
Food and beverages stores	0	0	22,310	12,637	0	10,995
Apparel and accessory stores	0	590,221	1,802,544	1,581,898	215	44,573
General merchandise stores	0	820,101	1,363,470	1,007,822	2,447	2,591
Miscellaneous retail trade	0	1,620,397	2,465,867	1,670,939	0	1,014
Transportation and warehousing	4,237	4,257,369	14,357,492	14,025,866	7,827	57,654
Information	0	4,894,002	33,962,575	19,646,440	2,218,267	2,926,005
Publishing (except internet), motion picture, and sound recording	0	4,182,049	22,358,769	10,349,495	976,971	714,070
Broadcasting, internet publishing	0	106,805	5,791,471	5,287,962	1,198,039	2,070,973
Telecommunications	0	302,156	5,118,293	3,479,689	9	104,252
Internet service providers, web search portals, and data processing services	0	75,452	201,530	168,746	1,540	18,002
Other information services	0	227,540	492,511	360,547	41,708	18,709
Finance, insurance, real estate, and rental and leasing	0	26,615,565	59,464,921	28,380,536	108,276	161,458
Finance and insurance	0	26,502,013	58,113,961	27,747,610	45,394	63,613
Commercial banking and other depository credit agencies	0	0	161,448	7,552	0	0
Commercial banking	* 0	* 0	* 161,448	* 7,552	* 0	* 0
Depository credit agencies other than banks	0	0	0	0	0	0
Nondepository credit intermediation	0	5,583,182	9,285,780	3,794,861	0	17,422
Securities, commodity contracts, and other	0	2,792,327	9,640,466	6,325,568	16,804	20,963
Insurance and related activities	0	18,126,504	39,003,918	17,597,933	28,590	17,064
Insurance agencies and brokerages	0	22,201	246,083	72,267	0	0
Funds, trusts, and other financial vehicles	0	0	22,349	21,696	0	8,165
Real estate and rental and leasing	0	113,552	1,350,959	632,926	62,882	97,845
Real estate	0	39,699	376,124	164,559	2,321	19,433
Rentals and leasing	0	73,853	974,835	468,367	60,561	78,413
Services	443,079	48,641,288	76,700,357	36,263,388	719,609	647,953
Professional, scientific, and technical services	31,468	4,177,178	12,219,150	9,731,099	14,003	231,547
Management of holding companies	411,611	39,516,306	56,775,131	20,576,673	687,973	343,182
Administrative and support and waste management and remediation	0	1,178,135	2,626,804	2,027,266	1,111	21,697
Education services, health care, and social assistance	0	102,302	207,966	152,311	27	10,412
Arts, entertainment, and recreation	0	165,370	144,928	117,095	13,354	0
Accommodation and food services	0	3,385,280	4,520,778	3,523,479	3,141	37,217
Accommodation	0	148,388	988,309	732,071	0	0
Food services and drinking places	0	3,236,892	3,532,469	2,791,408	3,141	37,217
Other services	0	116,717	205,601	135,464	0	3,897
Repair and maintenance services	0	0	21,598	5,016	0	0
Personal services	* 0	* 116,717	* 184,003	* 130,448	* 0	* 3,897
Religious, grantmaking, civic, professional, and similar organizations	* 0	* 0	* 0	* 0	* 0	* 0

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118—continued					
	Deductions—continued					
	Definitely allocable deductions—continued		Deductions not allocable to specific types of income			
	Service expenses	Other definitely allocable deductions	Total [6]	Research and development	Interest	Other
(28)	(29)	(30)	(31)	(32)	(33)	
All industries	25,615,779	147,562,394	158,313,399	20,812,587	54,549,220	82,267,191
Agriculture, forestry, fishing, and hunting	9,438	9,205	3,883	0	3,204	678
Mining	1,777,001	4,620,088	2,397,213	94,449	1,353,194	944,739
Oil and gas extraction, coal mining	0	717,466	476,054	5,683	267,008	198,531
Metal ore mining	* 119,954	* 2,840,254	* 941,090	* 41,434	* 627,411	* 272,244
Nonmetallic minerals	19,459	5,044	15,950	341	8,687	6,921
Support activities for mining	1,637,588	1,057,325	964,120	46,991	450,087	467,042
Utilities	* 0	* 11,778	* 56,219	* 0	* 53,197	* 3,022
Construction	461,938	41,306	306,803	4,330	38,272	264,200
Construction of buildings	280,003	3,211	30,418	1,382	9,276	19,760
Heavy and civil engineering construction	26,863	36,677	269,855	2,948	28,815	238,093
Special trade contractors	155,073	1,417	6,530	0	182	6,347
Manufacturing	3,142,767	57,748,163	65,737,829	17,079,417	23,164,132	25,269,352
Food manufacturing	2,070	3,182,947	3,262,314	66,385	2,810,922	379,032
Beverage and tobacco products	0	2,832,102	2,099,561	2,026	1,240,632	856,903
Tobacco manufacturing	* 0	* 12,698	* 138,984	* 869	* 132,955	* 5,160
Textile mills and textile product mills	5,360	53,446	14,377	86	4,884	9,407
Apparel manufacturing	0	108,941	150,029	2,374	95,598	52,056
Leather and allied product manufacturing	* 0	* 1,958	* 45,236	* 10,261	* 6,064	* 28,780
Wood product manufacturing	0	16,723	108,664	2,302	102,306	4,057
Paper manufacturing	2,880	1,062,451	1,156,985	373,269	480,024	296,822
Printing and related support activities	35,928	86,848	29,993	4,168	19,978	4,339
Petroleum and coal products manufacturing	76,379	19,444,663	4,517,097	304,885	3,346,521	862,800
Chemical manufacturing	127,082	9,138,812	19,232,472	6,757,876	6,066,150	6,403,727
Pharmaceutical and medicine manufacturing	1,236	7,135,242	12,293,461	5,279,982	3,420,062	3,593,131
Other chemical manufacturing	125,846	2,003,570	6,939,011	1,477,895	2,646,088	2,810,596
Plastics and rubber products manufacturing	7,612	102,052	238,426	32,454	162,618	43,354
Nonmetallic mineral product manufacturing	43,266	60,258	45,704	13,196	7,623	24,885
Primary metal manufacturing	709	210,900	1,307,001	30,011	1,002,240	200,863
Fabricated metal products	61,178	553,007	1,256,577	76,934	899,757	269,487
Machinery manufacturing	78,069	1,693,924	4,611,676	878,287	1,504,274	2,228,452
Computer and electronic product manufacturing	2,193,402	7,585,901	19,472,724	7,017,954	1,966,985	10,392,426
Electrical equipment, appliance and component manufacturing	18,451	7,055,256	3,966,045	438,883	1,785,003	1,735,900
Transportation equipment manufacturing	34,807	1,280,807	1,573,145	372,387	778,681	421,619
Motor vehicles and related manufacturing	18,263	124,784	366,630	62,371	146,822	157,367
Other transportation equipment manufacturing	16,544	1,156,023	1,206,515	310,016	631,859	264,252
Furniture and related products	* 0	* 122,222	* 36,274	* 6,987	* 19,182	* 9,633
Miscellaneous manufacturing and manufacturing not allocable	455,576	3,154,944	2,613,528	688,693	864,691	1,044,811
Wholesale and retail trade	316,282	13,571,027	6,246,334	709,467	2,402,512	3,008,934
Wholesale trade	296,503	9,122,940	4,776,518	695,215	1,441,904	2,517,686
Durable goods	244,032	1,438,899	1,060,822	122,231	134,343	796,088
Machinery, equipment, and supplies	35,839	78,923	25,922	389	6,198	18,805
Other miscellaneous durable goods	208,193	1,359,975	1,034,900	121,842	128,145	777,283
Nondurable goods	52,471	7,684,041	3,715,696	572,984	1,307,561	1,721,598
Drugs, chemicals, and allied products	37,464	2,124,976	1,708,673	472,661	305,137	927,095
Groceries and related products	10,756	3,689,364	361,084	2,213	355,781	2,592
Petroleum and petroleum products	0	90,734	193,385	0	115,052	61,032
Other miscellaneous nondurable goods	4,251	1,778,967	1,452,554	98,109	531,591	730,879

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118—continued					
	Deductions—continued					
	Definitely allocable deductions—continued		Deductions not allocable to specific types of income			
	Service expenses	Other definitely allocable deductions	Total [6]	Research and development	Interest	Other
	(28)	(29)	(30)	(31)	(32)	(33)
Wholesale and retail trade—continued						
Retail trade	19,779	4,448,087	1,469,817	14,252	960,609	491,248
Motor vehicle, parts dealers, and gas stations	13,664	160,977	15,469	0	1,598	13,871
Furniture and home furnishings stores	* 0	* 68,789	* 826	* 0	* 362	* 464
Building materials, garden equipment, and supplies	0	12,975	84,371	0	78,628	5,743
Food and beverages stores	0	1,642	9,673	0	9,355	319
Apparel and accessory stores	0	1,537,110	220,646	2,785	65,224	150,263
General merchandise stores	0	1,002,784	355,648	1,890	329,952	23,805
Miscellaneous retail trade	6,116	1,663,810	783,184	9,577	475,490	296,783
Transportation and warehousing	9,358,546	4,601,838	331,626	9,682	59,005	254,837
Information	1,679,024	12,823,143	13,779,152	1,999,565	2,736,238	8,989,014
Publishing (except internet), motion picture, and sound recording	127,213	8,531,242	11,955,896	1,912,475	1,744,737	8,247,645
Broadcasting, internet publishing	3,297	2,015,652	503,509	4,324	299,116	196,772
Telecommunications	1,404,133	1,971,296	1,155,251	20,221	666,057	468,973
Internet service providers, web search portals, and data processing services	144,381	4,823	32,784	3,633	13,346	15,806
Other information services	0	300,130	131,712	58,912	12,982	59,818
Finance, insurance, real estate, and rental and leasing	564,495	27,546,306	29,428,088	153,090	8,363,860	20,727,164
Finance and insurance	495,655	27,142,948	28,710,054	63,945	8,252,199	20,257,072
Commercial banking and other depository credit agencies	0	7,552	153,896	0	19,000	42,928
Commercial banking	* 0	* 7,552	* 153,896	* 0	* 19,000	* 42,928
Depository credit agencies other than banks	0	0	0	0	0	0
Nondepository credit intermediation	17,715	3,759,725	5,490,918	23,516	1,335,826	4,131,577
Securities, commodity contracts, and other	210,240	6,077,560	3,314,898	39,185	2,699,999	545,362
Insurance and related activities	265,771	17,286,508	19,749,688	1,244	4,196,748	15,537,178
Insurance agencies and brokerages	0	72,267	173,816	0	173,747	70
Funds, trusts, and other financial vehicles	1,928	11,603	653	0	626	27
Real estate and rental and leasing	68,840	403,358	718,034	89,145	111,661	470,092
Real estate	0	142,806	211,565	0	56,591	154,969
Rentals and leasing	68,840	260,552	506,469	89,145	55,071	315,123
Services	8,306,287	26,589,539	40,026,252	762,587	16,375,605	22,805,253
Professional, scientific, and technical services	5,690,195	3,795,353	2,474,904	351,890	791,450	1,267,647
Management of holding companies	968,704	18,576,815	35,800,887	389,391	14,629,003	20,774,285
Administrative and support and waste management and remediation	1,469,719	534,738	599,538	12,874	234,733	350,908
Education services, health care, and social assistance	64,896	76,976	55,655	49	24,439	30,063
Arts, entertainment, and recreation	2,428	101,314	27,832	0	423	24,843
Accommodation and food services	84	3,483,037	997,299	8,382	649,367	338,245
Accommodation	84	731,987	256,238	4,137	206,578	45,523
Food services and drinking places	0	2,751,050	741,061	4,245	442,789	292,722
Other services	110,261	21,306	70,136	0	46,190	19,261
Repair and maintenance services	2,958	2,058	16,582	0	1,029	10,867
Personal services	* 107,303	* 19,248	* 53,554	* 0	* 45,161	* 8,394
Religious, grantmaking, civic, professional, and similar organizations	* 0	* 0	* 0	* 0	* 0	* 0

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118—continued						
	Deductions—continued		Taxable income (less loss) before adjustments	Adjustments to taxable income	Taxable income (less loss) after adjustments	Foreign taxes available for credit	
	Net operating loss deductions	Deductions from oil and gas extraction income [7]				Total	Other adjustments [8]
	(34)	(35)	(36)	(37)	(38)	(39)	(40)
All industries	2,815,853	21,738,076	470,406,676	56,571,979	413,834,697	196,962,854	12,644,971
Agriculture, forestry, fishing, and hunting	0	0	27,796	[2]	27,796	7,658	0
Mining	2,958	996,947	26,253,172	1,161,998	25,091,174	11,928,502	1,186,349
Oil and gas extraction, coal mining	0	996,947	9,112,781	49,328	9,063,453	3,449,847	994,946
Metal ore mining	* 0	* 0	* 12,150,720	* 983,529	* 11,167,191	* 7,350,326	* 191,404
Nonmetallic minerals	0	0	59,836	-1,506	61,342	25,858	0
Support activities for mining	2,958	0	4,929,835	130,647	4,799,188	1,102,472	0
Utilities	* 0	* 0	* 903,400	* 5	* 903,395	* 349,988	* 0
Construction	484	0	477,468	-3,077	480,545	173,531	370
Construction of buildings	0	0	36,188	222	35,966	14,052	0
Heavy and civil engineering construction	0	0	378,202	14,823	393,025	138,018	370
Special trade contractors	484	0	63,079	11,526	51,553	21,462	0
Manufacturing	188,549	20,513,849	282,479,194	15,185,832	267,293,362	115,567,221	11,388,427
Food manufacturing	2,923	0	6,239,825	-1,392,894	7,632,719	2,868,500	0
Beverage and tobacco products	0	0	5,668,618	267,379	5,401,239	1,607,506	0
Tobacco manufacturing	* 0	* 0	* 542,625	* [2]	* 542,625	* 165,505	* 0
Textile mills and textile product mills	0	0	46,292	7,330	38,962	12,251	0
Apparel manufacturing	0	0	617,116	56,520	560,596	370,934	0
Leather and allied product manufacturing	* 0	* 0	* 166,257	* 7,396	* 158,861	* 27,419	* 0
Wood product manufacturing	0	0	84,934	67,303	17,631	2,282	0
Paper manufacturing	0	0	3,706,045	37,142	3,668,903	1,456,183	0
Printing and related support activities	0	0	126,595	24,570	102,025	69,942	0
Petroleum and coal products manufacturing	0	20,513,849	118,224,797	670,227	117,554,570	66,746,422	11,388,153
Chemical manufacturing	147	0	55,879,968	6,373,942	49,506,026	16,587,903	170
Pharmaceutical and medicine manufacturing	0	0	36,316,116	6,486,905	29,829,211	8,970,244	0
Other chemical manufacturing	147	0	19,563,852	-112,963	19,676,815	7,617,659	170
Plastics and rubber products manufacturing	0	0	430,267	4,118	426,149	211,468	0
Nonmetallic mineral product manufacturing	0	0	560,990	66,472	494,518	199,159	57
Primary metal manufacturing	0	0	1,250,249	35,919	1,214,330	686,097	0
Fabricated metal products	3,128	0	2,129,537	74,871	2,054,666	1,255,593	0
Machinery manufacturing	6,417	0	9,805,262	516,048	9,289,214	4,239,182	[2]
Computer and electronic product manufacturing	141,220	0	50,377,405	3,911,661	46,465,744	10,936,394	0
Electrical equipment, appliance and component manufacturing	31,622	0	14,055,767	4,004,234	10,051,533	3,694,996	30
Transportation equipment manufacturing	1,131	0	6,918,689	29,107	6,889,582	2,793,582	0
Motor vehicles and related manufacturing	1,131	0	1,157,262	27,168	1,130,094	421,346	0
Other transportation equipment manufacturing	0	0	5,761,427	1,939	5,759,488	2,372,237	0
Furniture and related products	* 0	* 0	* 284,757	* 4,461	* 280,296	* 105,063	* 0
Miscellaneous manufacturing and manufacturing not allocable	1,960	0	5,905,823	420,025	5,485,798	1,696,345	16
Wholesale and retail trade	19,865	164,869	23,889,752	878,673	23,011,079	9,414,015	25,866
Wholesale trade	3,410	164,869	15,920,126	-217,911	16,138,037	4,983,145	25,866
Durable goods	3,129	0	4,160,441	63,630	4,096,811	1,271,235	0
Machinery, equipment, and supplies	673	0	261,344	1,449	259,895	90,774	0
Other miscellaneous durable goods	2,456	0	3,899,096	62,180	3,836,916	1,180,460	0
Nondurable goods	281	164,869	11,759,686	-281,540	12,041,226	3,711,911	25,866
Drugs, chemicals, and allied products	0	0	3,221,176	177,710	3,043,466	440,563	0
Groceries and related products	0	0	2,481,061	1,479	2,479,582	473,201	0
Petroleum and petroleum products	0	164,869	16,155	-414,566	430,721	173,738	6,042
Other miscellaneous nondurable goods	281	0	6,041,294	-46,163	6,087,457	2,624,409	19,824

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118—continued						
	Deductions—continued		Taxable income (less loss) before adjustments	Adjustments to taxable income	Taxable income (less loss) after adjustments	Foreign taxes available for credit	
	Net operating loss deductions	Deductions from oil and gas extraction income [7]				Total	Other adjustments [8]
	(34)	(35)	(36)	(37)	(38)	(39)	(40)
Wholesale and retail trade—continued							
Retail trade	16,455	0	7,969,626	1,096,585	6,873,041	4,430,870	0
Motor vehicle, parts dealers, and gas stations	0	0	39,225	4,380	34,845	4,131	0
Furniture and home furnishings stores	* 4,711	* 0	* 17,389	* -174	* 17,563	* 12,218	* 0
Building materials, garden equipment, and supplies	0	0	197,590	[2]	197,590	97,894	0
Food and beverages stores	0	0	110,620	855	109,765	19,357	0
Apparel and accessory stores	0	0	1,581,098	-90,078	1,671,176	523,285	0
General merchandise stores	0	0	3,043,889	664,339	2,379,550	2,429,418	0
Miscellaneous retail trade	11,744	0	2,979,815	517,262	2,462,553	1,344,567	0
Transportation and warehousing	0	193	2,378,385	394,032	1,984,353	390,596	1,647
Information	536,983	0	31,624,085	2,987,464	28,636,621	8,487,226	-3,561
Publishing (except internet), motion picture, and sound recording	53,378	0	23,312,615	2,125,509	21,187,106	6,431,466	1,371
Broadcasting, internet publishing	0	0	3,979,407	248,691	3,730,716	860,679	0
Telecommunications	483,352	0	2,780,231	669,124	2,111,107	843,353	-4,932
Internet service providers, web search portals, and data processing services	0	0	197,352	17,016	180,336	109,684	0
Other information services	252	0	1,354,480	-72,875	1,427,355	242,044	0
Finance, insurance, real estate, and rental and leasing	1,656,297	0	54,446,207	23,779,334	30,666,873	17,121,348	2,494
Finance and insurance	1,656,297	0	53,268,921	23,681,311	29,587,610	16,855,698	2,494
Commercial banking and other depository credit agencies	0	0	62,076	[2]	62,076	8,818	0
Commercial banking	* 0	* 0	* 60,952	* [2]	* 60,952	* 8,611	* 0
Depository credit agencies other than banks	0	0	1,124	[2]	1,124	207	0
Nondepository credit intermediation	0	0	3,153,322	-593,056	3,746,378	1,072,450	0
Securities, commodity contracts, and other	0	0	14,972,801	4,686,710	10,286,091	7,756,679	2,447
Insurance and related activities	1,656,297	0	35,068,690	19,587,618	15,481,072	8,011,830	47
Insurance agencies and brokerages	0	0	336,558	[2]	336,558	210,705	0
Funds, trusts, and other financial vehicles	0	0	12,032	39	11,993	5,922	0
Real estate and rental and leasing	0	0	1,177,287	98,025	1,079,262	265,650	0
Real estate	0	0	279,395	25,745	253,650	143,356	0
Rentals and leasing	0	0	897,892	72,280	825,612	122,294	0
Services	410,718	62,218	47,927,217	12,187,717	35,739,500	33,522,768	43,379
Professional, scientific, and technical services	13,147	15,121	6,400,321	648,627	5,751,694	2,317,915	3,679
Management of holding companies	397,571	47,097	32,080,216	10,875,698	21,204,518	26,626,668	39,694
Administrative and support and waste management and remediation	0	0	1,871,310	117,752	1,753,558	681,353	0
Education services, health care, and social assistance	0	0	206,457	10,326	196,131	49,039	0
Arts, entertainment, and recreation	0	0	59,619	15,680	43,939	13,991	6
Accommodation and food services	0	0	7,130,617	506,890	6,623,727	3,774,797	0
Accommodation	0	0	3,516,083	443,849	3,072,234	2,394,546	0
Food services and drinking places	0	0	3,614,534	63,041	3,551,493	1,380,252	0
Other services	0	0	178,678	12,745	165,933	59,005	0
Repair and maintenance services	0	0	27,631	-3,876	31,507	19,084	0
Personal services	* 0	* 0	* 150,997	* 16,621	* 134,376	* 39,915	* 0
Religious, grantmaking, civic, professional, and similar organizations	* 0	* 0	* 49	* [2]	* 49	* 6	* 0

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118—continued						
	Foreign taxes available for credit—continued						
	Carryover	Limitation	Difference between limitation and foreign tax credit [9]	Total paid, accrued, and deemed paid	Foreign taxes paid or accrued		
					Total	Dividends	Interest
(41)	(42)	(43)	(44)	(45)	(46)	(47)	
All industries	81,593,924	144,812,383	26,734,501	128,013,899	33,896,937	2,579,188	593,197
Agriculture, forestry, fishing, and hunting	6,120	9,598	2,239	1,538	268	182	0
Mining	3,837,866	8,781,179	906,115	9,276,985	5,086,773	311,724	24,678
Oil and gas extraction, coal mining	984,696	3,172,138	48,704	3,460,096	604,106	767	2,182
Metal ore mining	* 2,618,418	* 3,908,517	* 87,064	* 4,923,311	* 4,039,160	* 309,958	* 17,535
Nonmetallic minerals	4,518	21,379	3,462	21,340	3,563	44	905
Support activities for mining	230,234	1,679,145	766,885	872,239	439,944	955	4,055
Utilities	* 70,314	* 316,178	* 25,684	* 279,674	* 1,037	* 252	* 0
Construction	44,728	167,791	42,669	129,173	72,519	868	77
Construction of buildings	5,657	12,490	7,306	8,395	2,485	10	0
Heavy and civil engineering construction	32,203	137,507	32,001	106,184	57,175	760	17
Special trade contractors	6,868	17,794	3,362	14,594	12,859	99	60
Manufacturing	47,475,190	93,542,626	13,798,206	79,480,458	17,435,320	1,028,627	315,255
Food manufacturing	234,149	2,670,144	146,393	2,634,351	498,027	73,117	51,077
Beverage and tobacco products	119,967	1,890,434	345,449	1,487,540	342,468	77,413	404
Tobacco manufacturing	* 0	* 189,919	* 41,675	* 165,505	* 7,820	* 0	* 21
Textile mills and textile product mills	3,450	13,613	1,815	8,801	2,531	277	451
Apparel manufacturing	180,362	196,170	48,289	190,572	36,983	1,504	122
Leather and allied product manufacturing	* 9,772	* 55,485	* 41,008	* 17,647	* 6,678	* 0	* 0
Wood product manufacturing	0	6,167	3,889	2,282	1,964	58	4
Paper manufacturing	438,129	1,283,834	314,968	1,018,054	230,278	41,973	272
Printing and related support activities	31,252	35,553	950	38,690	4,421	1,843	17
Petroleum and coal products manufacturing	35,416,809	41,143,948	632,589	42,717,766	9,983,826	225,519	33,708
Chemical manufacturing	4,328,665	17,326,132	3,299,928	12,259,408	2,208,343	308,774	22,308
Pharmaceutical and medicine manufacturing	2,739,132	10,439,999	2,660,972	6,231,112	1,310,823	157,984	4,427
Other chemical manufacturing	1,589,533	6,886,133	638,956	6,028,296	897,519	150,789	17,880
Plastics and rubber products manufacturing	91,262	148,749	20,698	120,206	23,015	6,445	1,793
Nonmetallic mineral product manufacturing	43,783	172,866	25,266	155,433	18,583	9,027	233
Primary metal manufacturing	438,024	424,660	85,828	248,073	73,495	3,577	3,070
Fabricated metal products	647,445	718,116	54,116	608,148	258,989	4,305	35,652
Machinery manufacturing	1,430,680	3,249,803	473,124	2,808,501	418,175	39,429	17,404
Computer and electronic product manufacturing	2,846,521	16,261,241	7,114,908	8,089,874	1,608,414	72,711	23,162
Electrical equipment, appliance and component manufacturing	309,344	3,517,385	126,391	3,385,683	1,149,088	114,322	109,571
Transportation equipment manufacturing	561,534	2,410,699	431,429	2,232,049	188,810	20,908	2,549
Motor vehicles and related manufacturing	113,051	395,017	59,916	308,295	21,260	1,076	2,250
Other transportation equipment manufacturing	448,483	2,015,682	371,513	1,923,754	167,551	19,832	299
Furniture and related products	* 27,143	* 98,085	* 1,948	* 77,920	* 6,363	* 2,498	* 452
Miscellaneous manufacturing and manufacturing not allocable	316,901	1,919,541	629,220	1,379,460	374,868	24,927	13,007
Wholesale and retail trade	3,610,546	8,049,774	2,319,683	5,829,335	1,530,445	237,021	107,728
Wholesale trade	1,492,474	5,645,192	1,954,489	3,516,537	1,043,021	161,473	24,722
Durable goods	389,653	1,431,912	541,324	881,582	272,727	113,751	5,339
Machinery, equipment, and supplies	14,624	90,270	20,082	76,151	41,277	244	26
Other miscellaneous durable goods	375,030	1,341,642	521,243	805,431	231,449	113,507	5,313
Nondurable goods	1,102,821	4,213,280	1,413,165	2,634,955	770,295	47,722	19,383
Drugs, chemicals, and allied products	41,711	1,064,882	676,830	398,851	137,723	14,468	635
Groceries and related products	3,859	867,757	397,472	469,342	145,101	19,192	6,415
Petroleum and petroleum products	141,671	150,710	1,850	38,108	19,059	54	126
Other miscellaneous nondurable goods	915,579	2,129,931	337,012	1,728,653	468,411	14,008	12,207

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118—continued						
	Foreign taxes available for credit—continued						
	Carryover	Limitation	Difference between limitation and foreign tax credit [9]	Total paid, accrued, and deemed paid	Total	Foreign taxes paid or accrued	
						Dividends	Interest
(41)	(42)	(43)	(44)	(45)	(46)	(47)	
Wholesale and retail trade—continued							
Retail trade	2,118,072	2,404,582	365,194	2,312,798	487,423	75,548	83,006
Motor vehicle, parts dealers, and gas stations	9	12,111	8,981	4,123	4,104	52	0
Furniture and home furnishings stores	* 6,120	* 6,043	* 2,078	* 6,098	* 5,757	* 0	* 0
Building materials, garden equipment, and supplies	51,684	69,145	1,202	46,210	44,918	517	26,055
Food and beverages stores	5,575	38,398	24,898	13,783	12,151	328	1,465
Apparel and accessory stores	227,799	584,696	194,884	295,486	65,628	30,014	919
General merchandise stores	1,289,089	832,737	37,571	1,140,328	171,948	28,441	42,924
Miscellaneous retail trade	537,795	861,452	95,579	806,771	182,918	16,197	11,643
Transportation and warehousing	61,783	694,135	399,026	330,460	128,002	9,137	3,516
Information	1,497,917	10,020,101	2,960,812	6,985,747	3,204,932	102,431	11,922
Publishing (except internet), motion picture, and sound recording	1,090,545	7,413,497	1,994,067	5,342,292	2,517,065	81,468	9,846
Broadcasting, internet publishing	87,902	1,305,585	530,893	772,777	310,994	8,461	34
Telecommunications	175,893	738,456	150,490	662,528	286,280	6,489	2,043
Internet service providers, web search portals, and data processing services	56,474	63,018	1,441	53,211	20,827	490	0
Other information services	87,104	499,545	283,922	154,940	69,767	5,523	0
Finance, insurance, real estate, and rental and leasing	6,710,729	10,731,180	4,154,484	10,413,112	2,352,749	198,297	61,388
Finance and insurance	6,598,087	10,355,534	3,957,017	10,260,105	2,210,635	197,251	57,730
Commercial banking and other depository credit agencies	6,830	21,697	14,540	1,988	1,988	215	1,773
Commercial banking	* 6,830	* 21,305	* 14,355	* 1,780	* 1,780	* 8	* 1,773
Depository credit agencies other than banks	0	392	185	207	207	207	0
Nondepository credit intermediation	223,986	1,311,532	611,372	848,464	298,893	12,311	8,494
Securities, commodity contracts, and other	2,346,364	3,600,249	818,033	5,412,762	438,976	14,131	15,428
Insurance and related activities	4,018,501	5,417,929	2,510,900	3,993,376	1,467,281	170,542	31,896
Insurance agencies and brokerages	106,688	117,794	2,522	104,017	5,195	2,327	0
Funds, trusts, and other financial vehicles	2,406	4,127	2,172	3,516	3,498	52	140
Real estate and rental and leasing	112,642	375,646	197,468	153,007	142,113	1,046	3,658
Real estate	104,614	88,008	18,728	38,742	31,915	511	3,589
Rentals and leasing	8,028	287,637	178,740	114,265	110,198	536	68
Services	18,278,730	12,499,822	2,125,584	15,287,418	4,084,894	690,648	68,632
Professional, scientific, and technical services	842,655	2,009,422	596,408	1,478,939	634,861	26,596	3,773
Management of holding companies	16,217,415	7,418,659	1,352,522	10,448,947	2,803,221	626,005	38,643
Administrative and support and waste management and remediation	81,418	612,563	46,828	599,935	86,294	12,518	3,917
Education services, health care, and social assistance	12,863	68,264	30,551	36,176	17,874	1,372	4,183
Arts, entertainment, and recreation	1,299	15,163	5,501	12,699	12,116	28	0
Accommodation and food services	1,112,417	2,317,928	75,072	2,662,380	511,626	22,915	18,115
Accommodation	799,369	1,075,078	32,867	1,595,177	52,525	96	59
Food services and drinking places	313,049	1,242,851	42,205	1,067,203	459,101	22,819	18,056
Other services	10,662	57,823	18,701	48,343	18,900	1,214	0
Repair and maintenance services	4,580	10,904	116	14,504	13,643	507	0
Personal services	* 6,082	* 46,902	* 18,574	* 33,833	* 5,252	* 705	* 0
Religious, grantmaking, civic, professional, and similar organizations	* 0	* 17	* 11	* 6	* 6	* 1	* 0

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118—continued					
	Foreign taxes available for credit—continued					
	Foreign taxes paid or accrued—continued					Taxes deemed paid
	Taxes withheld at source on—continued	Other taxes paid or accrued on--				
	Rents, royalties, and license fees	Branch income	Specifically allocable income (section 863(b))	Service income	Other income	
(48)	(49)	(50)	(51)	(52)	(53)	
All industries	4,639,434	11,337,322	39,480	1,008,838	13,699,478	94,116,962
Agriculture, forestry, fishing, and hunting	14	70	0	51	20	1,270
Mining	130,353	1,417,701	[2]	53,194	3,149,122	4,190,212
Oil and gas extraction, coal mining	1,904	154,773	0	638	443,843	2,855,989
Metal ore mining	* 2,292	* 1,161,151	* 0	* 0	* 2,548,223	* 884,151
Nonmetallic minerals	894	1,512	0	0	207	17,777
Support activities for mining	125,264	100,264	[2]	52,557	156,848	432,295
Utilities	* 0	* 0	* 0	* 0	* 785	* 278,637
Construction	11,418	18,479	0	41,292	384	56,654
Construction of buildings	1,168	0	0	1,262	45	5,910
Heavy and civil engineering construction	10,250	15,859	0	29,975	314	49,009
Special trade contractors	0	2,620	0	10,055	24	1,735
Manufacturing	2,248,520	5,441,025	21,127	135,051	8,245,714	62,045,137
Food manufacturing	82,733	273,074	11	1,395	16,619	2,136,324
Beverage and tobacco products	42,612	205,998	1,778	1,081	13,183	1,145,071
Tobacco manufacturing	* 90	* 5,928	* 0	* 0	* 1,780	* 157,686
Textile mills and textile product mills	104	1,285	0	258	157	6,270
Apparel manufacturing	29,664	65	0	109	5,519	153,589
Leather and allied product manufacturing	* 6,066	* 612	* 0	* 0	* 0	* 10,969
Wood product manufacturing	758	224	920	0	0	317
Paper manufacturing	91,556	11,565	180	13,702	71,031	787,775
Printing and related support activities	654	1,857	25	22	3	34,269
Petroleum and coal products manufacturing	9,568	2,783,554	0	7,379	6,924,100	32,733,940
Chemical manufacturing	739,294	481,083	6,223	33,807	616,854	10,051,066
Pharmaceutical and medicine manufacturing	416,357	214,023	6,035	2,227	509,770	4,920,289
Other chemical manufacturing	322,937	267,060	188	31,581	107,084	5,130,777
Plastics and rubber products manufacturing	8,389	2,891	0	853	2,644	97,191
Nonmetallic mineral product manufacturing	1,196	4,019	0	2,473	1,636	136,849
Primary metal manufacturing	3,009	45,104	0	20	18,714	174,578
Fabricated metal products	23,330	146,432	375	12,259	36,637	349,159
Machinery manufacturing	55,017	206,217	1,853	9,400	88,856	2,390,327
Computer and electronic product manufacturing	904,474	301,534	7,409	23,248	275,875	6,481,460
Electrical equipment, appliance and component manufacturing	70,760	738,462	299	1,553	114,121	2,236,595
Transportation equipment manufacturing	42,584	79,207	1,587	26,823	15,153	2,043,238
Motor vehicles and related manufacturing	8,579	7,648	348	763	596	287,035
Other transportation equipment manufacturing	34,005	71,559	1,239	26,059	14,557	1,756,203
Furniture and related products	* 635	* 2,531	* 0	* 0	* 247	* 71,557
Miscellaneous manufacturing and manufacturing not allocable	136,119	155,313	467	668	44,366	1,004,593
Wholesale and retail trade	295,023	497,619	198	15,429	377,427	4,298,890
Wholesale trade	140,650	384,613	196	12,533	318,835	2,473,515
Durable goods	51,830	50,140	196	5,471	45,999	608,855
Machinery, equipment, and supplies	34,403	4,426	0	479	1,699	34,873
Other miscellaneous durable goods	17,427	45,714	196	4,992	44,300	573,982
Nondurable goods	88,820	334,472	0	7,062	272,836	1,864,660
Drugs, chemicals, and allied products	31,976	72,281	0	474	17,890	261,128
Groceries and related products	6,568	66,614	0	501	45,810	324,240
Petroleum and petroleum products	552	1,094	0	28	17,204	19,050
Other miscellaneous nondurable goods	49,724	194,483	0	6,059	191,931	1,260,242

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118—continued					
	Foreign taxes available for credit—continued					
	Foreign taxes paid or accrued—continued					Taxes deemed paid
	Taxes withheld at source on—continued	Other taxes paid or accrued on--				
	Rents, royalties, and license fees	Branch income	Specifically allocable income (section 863(b))	Service income	Other income	
(48)	(49)	(50)	(51)	(52)	(53)	
Wholesale and retail trade—continued						
Retail trade	154,373	113,006	2	2,896	58,593	1,825,375
Motor vehicle, parts dealers, and gas stations	1,021	0	0	2,352	679	18
Furniture and home furnishings stores	* 190	* 1,968	* 0	* 32	* 3,567	* 341
Building materials, garden equipment, and supplies	17,906	415	0	0	25	1,292
Food and beverages stores	10,353	0	0	0	6	1,632
Apparel and accessory stores	10,657	15,187	0	0	8,851	229,858
General merchandise stores	51,371	47,235	0	39	1,938	968,380
Miscellaneous retail trade	62,876	48,201	2	473	43,527	623,853
Transportation and warehousing	18,582	78,097	1	4,874	13,794	202,459
Information	1,485,123	569,592	17,367	236,732	781,765	3,780,814
Publishing (except internet), motion picture, and sound recording	1,203,991	547,232	17,367	1,404	655,757	2,825,227
Broadcasting, internet publishing	239,471	1,624	0	58,438	2,966	461,783
Telecommunications	24,610	13,226	0	118,221	121,690	376,248
Internet service providers, web search portals, and data processing services	15,503	2,853	0	1,981	0	32,384
Other information services	1,547	4,658	0	56,688	1,351	85,173
Finance, insurance, real estate, and rental and leasing	193,283	1,252,836	0	51,773	595,173	8,060,363
Finance and insurance	80,724	1,244,909	0	45,406	584,616	8,049,469
Commercial banking and other depository credit agencies	0	0	0	0	0	0
Commercial banking	* 0	* 0	* 0	* 0	* 0	* 0
Depository credit agencies other than banks	0	0	0	0	0	0
Nondepository credit intermediation	73,789	186,314	0	1,414	16,570	549,571
Securities, commodity contracts, and other	3,466	90,987	0	20,765	294,199	4,973,786
Insurance and related activities	2,257	967,607	0	23,051	271,928	2,526,094
Insurance agencies and brokerages	432	2,342	0	0	93	98,823
Funds, trusts, and other financial vehicles	1,212	0	0	176	1,919	18
Real estate and rental and leasing	112,558	7,927	0	6,367	10,557	10,894
Real estate	12,357	7,244	0	2,990	5,225	6,826
Rentals and leasing	100,201	683	0	3,377	5,333	4,067
Services	257,117	2,061,974	787	470,441	535,295	11,202,524
Professional, scientific, and technical services	63,504	101,634	787	380,662	57,905	844,077
Management of holding companies	38,057	1,624,226	0	56,805	419,485	7,645,726
Administrative and support and waste management and remediation	17,820	24,893	0	17,282	9,864	513,641
Education services, health care, and social assistance	2,531	8,250	0	1,381	158	18,302
Arts, entertainment, and recreation	596	11,392	0	44	56	582
Accommodation and food services	132,817	289,653	0	1,021	47,105	2,150,754
Accommodation	1,500	4,313	0	0	46,557	1,542,651
Food services and drinking places	131,317	285,340	0	1,021	548	608,102
Other services	1,792	1,925	0	13,247	723	29,442
Repair and maintenance services	0	0	0	13,136	0	861
Personal services	* 1,792	* 1,925	* 0	* 107	* 723	* 28,581
Religious, grantmaking, civic, professional, and similar organizations	* 0	* 0	* 0	* 4	* 0	* 0

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry—Continued

Footnotes—

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

[1] Interest-Charge Domestic International Sales Corporation (IC-DISC) and Domestic International Sales Corporation (DISC).

[2] Less than \$500.

[3] Includes adjustments and recapture of certain tax credits not included in column 11.

[4] In addition to the credits shown in columns 12 and 13, this is after reduction by other credits, such as the jobs credit and the investment credit, which are not shown separately in this table.

[5] Included in gross income (less loss), columns 15-21. See notes below.

[6] Column 30 exceeds the sum of columns 31 through 33 because some corporations do not file a Schedule H to support the not allocable deductions reported on Schedule A.

[7] Included in deductions, columns 24-33. See notes below.

[8] Includes reduction of taxes eligible for credit and high tax kickout.

[9] This calculation does not include the reduction for participation in an international boycott and certain other adjustments. Therefore, the amounts presented in this column may differ slightly than subtracting the foreign tax credit (column 12) from the limitation (column 42). The difference between the foreign tax credit limitation and the foreign tax credit is a measure of the U.S. tax owed on foreign source corporate income. The foreign tax credit limitation is the ratio of foreign source income (after deductions) to total taxable income from all sources multiplied by the total U.S. income tax against which the credit is allowed. A limitation of this measure of the U.S. tax owed on foreign source corporate income is that it relies on the definition of foreign source income contained in the tax code. Thus, it assumes that the allocation of expenses to foreign source income accurately reflects the cost of earning that income. Current law also allows expenses allocable to foreign source income to be deducted even when all of the income associated with those expenses is deferred. In that case, the computed residual U.S. tax would be zero, rather than negative. In addition, the definition of foreign source income includes income that may be considered domestic source income, such as certain income from sales of U.S. inventory property.

NOTES: Detail may not add to totals because of rounding. Columns 2 through 14 present statistics on assets, receipts, income, and taxes reported on Form 1120, *U.S. Corporation Income Tax Return*, series for corporations claiming a foreign tax credit. Columns 15 through 53 present statistics from Form 1118, *Foreign Tax Credit—Corporations*. Schedule references indicate the schedule of Form 1118 from which the data were obtained. Columns 15 through 34 present statistics on foreign income (i.e., income from sources outside the United States) and deductions reported primarily on Schedule A, Form 1118.

Although the amounts of oil and gas income and deductions (columns 22 and 35, respectively) are contained in the summary columns (i.e., columns 15 through 21 and 24 through 33), these amounts are also reported separately (on Schedule I) because oil and gas income is subject to special rules under Internal Revenue Code section 907, which may result in a reduction of foreign taxes available for credit. Foreign branch income and Code section 863(b) income (income partly within and partly without the United States) also are included in the summary amounts reported in columns 15 through 21.

Foreign branch income also is reported separately on Schedule F, shown in column 23. Total deductions not allocable to specific types of income (column 30) are equal to the sum of columns 31 through 33 (any differences are due to taxpayer reporting practices). Total foreign-source gross income (column 15) less total foreign deductions (column 24) is equal to foreign-source taxable income (less loss) before adjustments (column 36).

Adjustments to foreign-source taxable income (reported in column 37) include allocations of current-year U.S.-source losses and recapture of foreign losses, as well as other adjustments. These adjustments (reported on Schedule J) affect the numerator of the limitation fraction used to compute the foreign tax credit. The foreign-source taxable income (less loss) after adjustments (the numerator of the limitation fraction) is reported in column 38. The limitation fraction, which represents the ratio of foreign-source taxable income after adjustments to total (U.S. and foreign) taxable income after adjustments, is applied to the total U.S. tax against which the credit is allowed to determine any limitation on the foreign tax credit.

Statistics on foreign taxes are reported in columns 39 through 53. Data on foreign taxes paid, accrued, and deemed paid (through related foreign corporations or their subsidiaries) from Schedule B, Form 1118, are reported in columns 44 through 53. Total foreign taxes paid or accrued (column 45) are the sum of columns 46 through 52.

Total foreign taxes paid, accrued, and deemed paid (column 44) are equal to the sum of total taxes paid or accrued (column 45) and taxes deemed paid (column 53). Total foreign taxes paid, accrued, and deemed paid are then adjusted for certain items (e.g., reductions of foreign taxes under Code section 907 related to oil and gas income), which are reported in column 40, as well as carryovers of foreign taxes not credited in prior years, which are reported in column 41. Thus, total foreign taxes available for credit (column 39) are equal to total foreign taxes paid, accrued, and deemed paid (column 44) less certain foreign taxes (column 40), plus any carryover of prior-year foreign taxes (column 41).

Source: IRS, Statistics of Income Division, November 2013.

Table 2. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country

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

Selected country	Number of returns [1]	Foreign income, deductions, and taxes reported on Form 1118						
		Gross income (less loss)						
		Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees	Service income	Other income
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
All geographic areas	6,922	813,733,671	194,115,903	82,503,215	57,080,367	132,828,232	43,171,166	304,034,788
Canada	2,055	51,663,666	14,610,774	5,984,911	5,637,963	7,027,755	3,584,161	14,818,102
Latin America, total	1,479	73,364,165	19,549,714	9,288,016	4,265,548	9,837,659	3,894,530	26,528,698
Mexico	1,000	15,159,840	4,280,309	2,091,975	647,793	2,406,910	951,995	4,780,857
Central America, total	304	2,117,860	616,157	172,622	113,278	521,710	123,832	570,261
Costa Rica	165	676,350	181,413	54,181	7,377	330,734	29,035	73,610
El Salvador	127	288,087	72,926	22,323	17,577	30,728	10,478	134,056
Guatemala	150	346,280	68,211	14,936	9,452	48,660	42,012	163,009
Honduras	104	167,853	55,226	14,873	8,962	26,890	4,244	57,658
Nicaragua	84	112,175	42,731	17,873	235	12,925	10,828	27,583
Panama (including Canal Zone)	205	506,315	188,639	47,260	65,845	67,023	26,292	111,256
Other Central American countries	38	20,799	7,012	1,177	3,830	4,750	944	3,088
Caribbean countries, total	410	19,148,729	7,727,466	4,095,333	1,737,844	2,268,362	129,804	3,189,919
Barbados	99	131,256	32,583	7,450	16,376	14,206	948	59,693
Cayman Islands (British)	231	15,434,945	7,512,788	4,004,424	1,620,393	1,582,080	-65,955	781,215
Dominican Republic	193	798,636	36,918	6,791	31,669	535,692	34,562	153,004
Haiti	44	52,790	4,819	547	5,712	3,087	13,120	25,505
Jamaica	101	104,464	222	0	28,159	24,514	16,901	34,667
Trinidad	149	2,608,137	135,024	76,121	35,490	105,743	121,711	2,134,049
Other Caribbean countries	45	18,500	5,112	0	44	3,040	8,517	1,786
South America, total	921	36,679,992	6,925,783	2,928,086	1,766,454	4,640,640	2,688,559	17,730,471
Argentina	446	5,672,501	776,851	454,222	410,244	245,006	578,051	3,208,127
Bolivia	103	71,911	41,401	13,166	614	12,977	1,879	1,874
Brazil	596	15,033,376	2,779,163	1,065,061	665,529	2,859,086	1,489,468	6,175,067
Chile	369	4,968,681	1,107,035	178,792	186,140	310,067	43,102	3,143,545
Colombia	350	3,409,576	504,512	160,977	226,955	401,030	247,430	1,868,672
Ecuador	203	510,375	57,456	20,159	21,375	181,643	38,187	191,556
Paraguay	91	115,094	21,115	6,368	18,125	18,317	3,444	47,726
Peru	319	3,889,765	584,698	215,093	53,588	146,250	187,929	2,702,208
Uruguay	155	284,665	86,976	45,416	43,509	30,662	2,058	76,044
Venezuela	232	2,656,021	961,561	768,299	123,536	419,075	95,315	288,236
Other South American countries	49	68,026	5,015	533	16,839	16,527	1,695	27,417
Latin America not allocable	*7	*257,745	*0	*0	*179	*37	*339	*257,190
Other Western Hemisphere, total	332	33,812,014	24,315,114	3,105,161	1,458,164	2,654,747	89,938	2,188,890
Bahamas	117	5,116,768	3,485,025	237,731	652,026	16,891	6,433	718,661
Bermuda	216	26,522,583	19,863,646	2,690,746	625,003	2,541,584	21,828	779,776
British Virgin Islands	100	1,613,288	759,571	48,742	150,399	30,359	3,356	620,861
Netherlands Antilles	106	424,528	193,562	121,979	10,566	39,845	9,023	49,552
All other Western Hemisphere	126	134,848	13,310	5,963	20,170	26,067	49,299	20,039
Europe, total	1,879	324,058,425	102,234,162	50,104,209	24,998,439	48,291,935	9,715,209	88,714,471
European Union, total	1,745	267,327,229	88,509,540	42,361,079	23,216,265	40,041,603	8,633,829	64,564,913
Austria	253	1,499,119	274,850	85,504	107,668	490,905	39,122	501,069
Belgium	347	7,211,759	741,029	419,010	241,047	902,316	141,971	4,766,387
Czech Republic	174	397,416	117,765	32,722	7,473	135,984	4,742	98,731
Denmark	261	4,554,219	1,885,416	1,403,955	81,046	239,830	40,370	903,601
Finland	220	1,427,711	59,886	15,296	60,564	1,105,480	13,772	172,713

Footnotes at end of table.

Table 2. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country—Continued

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

Selected country	Number of returns [1]	Foreign income, deductions, and taxes reported on Form 1118						
		Gross income (less loss)						
		Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees	Service income	Other income
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
Europe, total—continued								
France	590	10,450,721	2,158,419	1,138,492	684,360	2,311,000	988,585	3,169,866
Germany	680	16,925,172	4,149,203	2,357,648	671,272	2,995,406	1,421,329	5,330,314
Greece	198	214,277	68,107	26,054	10,357	70,783	73,662	-34,687
Hungary	171	453,728	258,546	17,166	40,274	209,057	22,494	-93,810
Ireland	325	30,407,068	7,773,806	1,855,451	713,881	15,614,830	130,630	4,318,469
Italy	497	8,823,839	1,263,067	1,175,513	239,408	1,243,461	1,099,761	3,802,628
Luxembourg	238	32,409,737	22,961,345	7,138,294	788,750	1,028,748	11,455	481,145
Netherlands	690	42,826,669	20,531,610	12,163,800	2,090,134	5,294,552	500,604	2,245,968
Poland	242	1,395,694	333,123	209,782	117,456	229,885	48,798	456,651
Portugal	210	4,313,243	2,095,880	1,354,835	33,948	107,596	13,637	707,347
Romania	122	208,341	53,979	6,204	27,673	60,442	11,853	48,190
Spain	463	13,845,814	7,834,283	2,680,311	259,777	1,136,870	842,373	1,092,201
Sweden	337	2,601,561	865,214	540,118	161,320	750,339	86,014	198,556
United Kingdom	1,066	86,598,871	14,663,504	9,641,251	16,853,880	6,011,218	3,121,522	36,307,495
Other European Union countries	202	762,269	420,507	99,672	25,978	102,898	21,136	92,079
Other European countries, total	699	56,731,197	13,724,621	7,743,130	1,782,175	8,250,332	1,081,380	24,149,558
Jersey	32	2,026,551	484,984	857,951	579,236	7,664	0	96,716
Kazakhstan	136	10,047,720	32,777	16,455	150,868	28,876	124,876	9,693,868
Norway	250	14,476,563	2,244,785	3,817,261	273,658	256,679	155,532	7,728,647
Russia	254	3,507,462	614,154	125,940	136,149	519,675	118,719	1,992,824
Switzerland	441	21,787,828	8,506,113	2,371,647	511,701	6,950,204	290,832	3,157,330
Turkey	210	1,067,705	306,417	78,217	81,989	195,824	40,826	364,432
Ukraine	93	382,263	131,058	51,077	27,511	55,274	33,399	83,944
Other European countries	201	3,435,106	1,404,333	424,582	21,062	236,135	317,196	1,031,798
Africa, total	499	20,586,145	3,781,804	1,733,626	861,973	1,188,952	1,749,414	11,270,376
Algeria	67	270,519	208	125	34,302	3,187	41,385	191,311
Angola	92	2,426,454	686,331	1,273	3,817	214,095	821,078	699,860
Chad	20	1,109,781	250,625	167,091	41	4,660	2,800	684,564
Egypt	171	2,755,040	76,503	23,172	215,035	192,186	73,503	2,174,642
Equatorial Guinea	51	1,887,118	72	25	2,537	1,227	109,867	1,773,390
Gabon	40	308,700	165,891	4,834	2,784	715	13,190	121,286
Mauritius	88	906,476	323,494	49,516	93,989	96,931	52,567	289,979
Nigeria	119	6,035,898	1,252,969	923,147	40,053	15,390	12,308	3,792,031
South Africa	316	2,024,373	558,707	232,212	378,517	371,814	166,489	316,634
Other African countries	244	2,861,787	467,004	332,231	90,897	288,749	456,229	1,226,677
Asia, total	1,750	151,792,798	21,462,318	9,549,333	6,694,207	28,325,652	9,307,629	76,453,658
Middle East, total	530	26,967,786	600,936	84,325	754,943	1,075,978	4,082,823	20,368,782
Bahrain	88	363,887	16,621	780	166,616	39,526	22,876	117,468
Iraq	56	2,274,582	299	106	7	2,176	2,023,051	248,943
Israel	290	1,220,370	157,522	41,347	124,937	246,330	133,894	516,340
Kuwait	104	964,191	9,916	173	8,329	49,441	786,229	110,103
Lebanon	87	97,850	3,604	322	5,178	19,848	9,249	59,650
Qatar	146	14,056,878	49,682	6,850	130,713	93,659	219,929	13,556,045
Saudi Arabia	210	5,056,429	115,368	14,144	49,431	425,617	358,633	4,093,236
United Arab Emirates	268	2,372,550	196,617	2,292	256,065	170,657	483,501	1,263,418
Yemen	35	411,872	45,248	17,984	2	2,129	2,510	343,999

Footnotes at end of table.

Table 2. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country—Continued

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

Selected country	Number of returns [1]	Foreign income, deductions, and taxes reported on Form 1118						
		Gross income (less loss)						
		Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees	Service income	Other income
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
Asia, total—continued								
Other Middle East countries	113	149,177	6,061	327	13,666	26,595	42,951	59,577
Southern and Southeast Asia, total	1,058	41,706,059	6,374,201	2,545,302	4,037,832	8,885,867	3,396,324	16,466,532
Bangladesh	50	110,483	1,081	994	35,492	5,479	4,833	62,605
India	554	6,541,022	1,056,486	411,431	1,522,096	619,419	601,106	2,330,483
Indonesia	275	10,589,464	2,408,800	1,214,772	644,514	206,323	143,352	5,971,703
Malaysia	421	2,901,740	272,135	92,745	82,257	445,080	95,486	1,914,038
Pakistan	125	680,699	52,124	46,995	123,063	13,558	32,427	412,532
Philippines	259	2,082,106	336,964	166,540	361,654	233,061	265,615	718,271
Singapore	580	13,675,295	1,641,502	362,309	833,074	6,861,548	513,087	3,463,775
Sri Lanka	91	75,532	1,860	378	17,049	18,125	7,534	30,588
Thailand	347	2,830,398	587,387	246,971	362,173	291,583	83,736	1,258,549
Vietnam	154	328,501	12,302	1,588	51,253	31,828	124,566	106,965
Other Southern and Southeast Asian countries	128	1,890,818	3,563	579	5,207	159,864	1,524,581	197,023
Eastern Asia, total	1,283	81,428,445	14,486,307	6,919,652	1,901,432	18,363,798	1,828,190	37,929,066
China	726	13,060,850	2,128,695	795,013	222,216	4,168,557	310,028	5,436,342
Hong Kong	498	10,512,137	2,905,963	364,697	848,565	709,300	410,173	5,273,439
Japan	813	44,638,520	7,727,301	5,262,633	361,482	7,846,262	451,434	22,989,409
South Korea, Republic of	469	7,933,073	1,061,612	318,556	408,103	3,675,852	306,683	2,162,268
Taiwan	412	5,252,207	662,736	178,754	61,064	1,948,857	344,237	2,056,559
Other Eastern Asian countries	39	31,657	0	0	2	14,970	5,635	11,049
Asia not allocable	*4	*1,690,507	*873	*53	*0	*10	*293	*1,689,278
Oceania, total	696	26,531,628	6,120,176	2,103,976	3,435,167	2,268,872	935,943	11,667,495
Australia	663	24,066,498	5,178,655	2,036,805	2,984,986	1,981,619	883,041	11,001,392
New Zealand	288	2,036,684	867,094	52,333	439,645	274,529	42,002	361,081
Other countries of Oceania	92	428,446	74,427	14,837	10,536	12,723	10,900	305,022
Puerto Rico and U.S. Possessions, total	505	14,910,810	313,057	131,345	1,158,895	9,126,166	689,495	3,491,853
Puerto Rico	444	14,260,263	266,214	124,308	1,024,737	9,104,427	568,231	3,172,346
U.S. Possessions, total	194	650,546	46,843	7,037	134,158	21,739	121,264	319,507
American Samoa	26	18,829	0	0	3,572	815	14,327	115
Guam	134	405,425	12,527	1,186	111,189	13,200	88,805	178,518
Virgin Islands, U.S.	114	201,171	34,316	5,851	7,681	6,642	12,775	133,906
Other U.S. Possessions	35	25,122	0	0	11,716	1,082	5,357	6,967
Country not stated	3,776	75,690,104	1,319,044	499,221	8,529,779	24,083,530	10,494,740	30,763,789
Section 863 income [4]	383	40,911,895	3,639	0	40,132	22,966	2,709,039	38,136,120
Regulated Investment Companies [5]	65	412,023	406,102	3,417	100	0	1,068	1,336

Footnotes at end of table.

Table 2. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country—Continued

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

Selected country	Foreign income, deductions, and taxes reported on Form 1118—continued							
	Gross income (less loss)—continued		Total deductions	Deductions from oil and gas extraction income [3]	Taxable income (less loss) before adjustments	Foreign taxes paid, accrued, and deemed paid		
	Oil and gas extraction income [2]	Foreign branch income [2]				Total	Foreign taxes paid or accrued	
			Total	Taxes withheld at source on—	Dividends			
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
All geographic areas	137,056,188	150,472,559	343,326,994	21,738,076	470,406,676	128,013,899	33,896,937	2,579,188
Canada	5,397,746	10,138,790	20,325,883	1,463,274	31,337,782	9,286,940	3,298,564	390,589
Latin America, total	10,528,395	10,577,899	26,484,027	3,007,984	46,880,137	15,721,518	6,407,292	626,555
Mexico	18,818	2,567,983	5,915,711	5,245	9,244,129	2,919,430	827,348	87,680
Central America, total	180,066	398,538	833,624	53,254	1,284,236	302,934	129,561	5,340
Costa Rica	2,661	97,574	276,225	25	400,125	65,632	11,452	830
El Salvador	24,203	42,088	139,409	1,225	148,678	50,450	28,100	4
Guatemala	91,746	47,163	160,943	49,434	185,337	43,892	28,378	764
Honduras	10,323	40,549	67,121	330	100,733	26,844	11,971	612
Nicaragua	6,579	17,414	27,562	595	84,612	26,024	8,152	1,353
Panama (including Canal Zone)	42,546	148,648	156,702	1,191	349,613	87,818	40,415	727
Other Central American countries	2,007	5,102	5,663	452	15,137	2,273	1,094	1,050
Caribbean countries, total	6,058,566	737,817	4,193,450	1,096,971	14,955,279	4,841,973	745,478	10,808
Barbados	4,626	16,202	42,452	89	88,804	9,937	2,483	400
Cayman Islands (British)	3,847,835	389,460	2,500,174	160,762	12,934,771	4,005,637	54	33
Dominican Republic	4,885	125,742	271,918	346	526,718	44,456	37,665	1,977
Haiti	790	25,602	33,342	6	19,448	2,001	1,454	92
Jamaica	689	52,122	109,471	-38	-5,008	8,811	8,811	297
Trinidad	2,199,741	125,380	1,228,434	935,806	1,379,703	771,132	695,011	8,010
Other Caribbean countries	0	3,308	7,658	0	10,842	0	0	0
South America, total	4,270,946	6,873,561	15,381,031	1,852,514	21,298,961	7,646,004	4,693,729	522,726
Argentina	2,426,521	1,225,774	3,412,619	1,323,422	2,259,882	990,988	536,686	26,052
Bolivia	3,911	-2,197	15,867	61	56,045	23,732	10,566	6,762
Brazil	51,709	2,145,872	6,691,769	24,420	8,341,607	2,369,810	1,289,320	218,003
Chile	4,480	260,655	686,783	-25	4,281,898	1,603,939	1,425,147	241,973
Colombia	1,010,469	596,356	1,620,236	287,691	1,789,341	551,062	390,086	24
Ecuador	-8,702	178,226	312,712	57,397	197,662	100,581	79,117	56
Paraguay	22,899	20,036	57,366	10,415	57,729	12,674	6,294	389
Peru	60,437	2,236,994	1,394,358	30,592	2,495,407	1,063,365	848,260	27,025
Uruguay	1,038	81,702	144,056	9,906	140,610	43,979	-1,444	2,295
Venezuela	697,415	101,506	977,527	108,625	1,678,495	883,212	107,569	146
Other South American countries	770	28,636	67,739	9	287	2,661	2,128	0
Latin America not allocable	*0	*0	*160,212	*0	*97,533	*11,177	*11,177	*0
Other Western Hemisphere, total	3,591,714	1,573,596	4,347,697	89,933	29,464,317	3,104,994	7,750	14
Bahamas	716,680	1,162,979	795,298	71,394	4,321,469	237,769	31	0
Bermuda	2,809,221	356,690	2,904,889	9,520	23,617,694	2,682,263	14	2
British Virgin Islands	47,296	8,275	471,706	551	1,141,583	51,561	2,819	0
Netherlands Antilles	17,908	28,960	76,988	8,392	347,540	123,074	525	12
All other Western Hemisphere	610	16,692	98,816	76	36,032	10,327	4,360	0
Europe, total	71,697,011	58,481,075	117,191,974	6,409,454	206,866,451	63,600,208	7,500,901	658,814
European Union, total	47,387,324	48,074,655	103,513,280	3,742,400	163,813,948	47,601,506	4,311,070	257,950
Austria	754	445,399	949,255	841	549,864	146,154	60,653	8,673
Belgium	97,471	3,481,909	5,268,631	52,202	1,943,128	488,217	65,306	1,462
Czech Republic	1,535	69,944	167,905	1,535	229,511	51,658	17,102	1,138
Denmark	2,257,909	81,283	408,068	43,776	4,146,151	1,828,716	423,157	3,307
Finland	13	91,582	571,807	12	855,904	24,904	9,562	1,062

Footnotes at end of table.

Table 2. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country—Continued

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

Selected country	Foreign income, deductions, and taxes reported on Form 1118—continued							
	Gross income (less loss)—continued		Total deductions	Deductions from oil and gas extraction income [3]	Taxable income (less loss) before adjustments	Foreign taxes paid, accrued, and deemed paid		
	Oil and gas extraction income [2]	Foreign branch income [2]				Total	Foreign taxes paid or accrued	
			Total	Taxes withheld at source on—	Dividends			
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
Europe, total—continued								
France	59,319	1,712,273	5,916,496	30,861	4,534,225	1,415,526	271,801	11,646
Germany	269,360	5,003,593	6,948,322	41,948	9,976,850	3,009,875	648,310	29,608
Greece	28	-1,372	215,770	7,478	-1,493	50,496	24,427	6,337
Hungary	43,710	132,745	470,741	43,786	-17,012	52,871	35,705	23,442
Ireland	1,455,976	1,730,028	8,686,093	834,632	21,720,975	2,299,108	437,803	30
Italy	15,000	3,737,836	6,153,129	13,879	2,670,710	1,400,143	224,257	16,716
Luxembourg	14,986,921	129,028	2,070,328	9,924	30,339,409	7,208,236	64,652	70
Netherlands	8,638,015	1,266,381	7,238,862	92,217	35,587,807	12,365,352	173,170	55,005
Poland	2,729	259,985	550,010	350	845,684	235,065	25,279	3,727
Portugal	3,293,348	706,153	830,451	83	3,482,792	1,371,882	17,049	3,089
Romania	70	46,021	105,342	45	102,999	17,499	11,125	25
Spain	8,257,428	848,757	2,736,845	127	11,108,969	2,957,122	274,934	47,295
Sweden	166	143,570	969,841	150	1,631,720	582,787	42,004	1,368
United Kingdom	7,996,697	28,123,675	53,063,767	2,568,546	33,535,104	11,981,791	1,470,909	42,074
Other European Union countries	10,875	65,865	191,619	9	570,651	114,102	13,864	1,876
Other European countries, total	24,309,687	10,406,420	13,678,694	2,667,054	43,052,503	15,998,701	3,189,832	400,864
Jersey	0	255,763	509,363	0	1,517,187	1,000,148	6,587	53
Kazakhstan	9,922,765	4,174,616	2,532,832	2,078,550	7,514,888	2,454,529	2,438,042	78,685
Norway	13,264,285	348,517	1,008,749	434,556	13,467,814	8,902,817	162,686	5,734
Russia	722,020	1,656,193	2,145,531	144,033	1,361,931	206,817	77,797	8,983
Switzerland	37,760	3,482,011	6,229,281	5,147	15,558,547	2,751,804	375,033	288,694
Turkey	1,333	390,870	657,701	1,165	410,004	122,807	45,567	13,442
Ukraine	29	21,231	190,754	0	191,508	62,137	11,060	3,841
Other European countries	361,495	77,219	404,482	3,604	3,030,624	497,642	73,060	1,434
Africa, total	12,934,427	3,645,201	6,561,141	1,976,373	14,025,004	6,897,335	897,856	43,364
Algeria	1,540	197,110	155,548	4,572	114,971	55,443	55,318	0
Angola	1,313,839	619,331	1,551,310	777,363	875,144	57,516	56,243	0
Chad	1,076,404	11,250	25,133	2,901	1,084,647	549,223	4,233	0
Egypt	1,949,253	563,401	1,255,648	780,649	1,499,392	367,017	343,833	0
Equatorial Guinea	1,722,800	347,474	416,973	267,485	1,470,145	394,852	89,893	0
Gabon	278,213	118,971	132,446	38,582	176,254	34,250	29,417	8
Mauritius	421	114,308	305,151	1,929	601,325	60,655	11,139	4,166
Nigeria	5,635,028	133,185	288,520	-44,532	5,747,378	4,452,564	64,147	37,964
South Africa	101,536	535,490	1,095,564	12,163	928,809	421,705	78,726	128
Other African countries	855,392	1,004,679	1,334,849	135,262	1,526,938	504,111	164,907	1,097
Asia, total	25,464,549	54,869,989	68,350,152	4,086,643	83,442,646	21,645,293	10,766,716	658,942
Middle East, total	17,525,931	16,822,506	9,874,562	2,745,523	17,093,224	5,191,647	4,357,696	76,994
Bahrain	-1,079	259,581	407,565	232	-43,678	4,485	3,705	135
Iraq	656	252,685	1,906,756	2,432	367,826	369	263	0
Israel	4	349,738	708,395	4	511,975	140,191	98,471	21,522
Kuwait	554	92,572	847,482	1,446	116,709	6,525	6,352	0
Lebanon	0	80,669	82,469	0	15,381	2,608	2,286	184
Qatar	13,408,045	13,514,590	2,132,575	1,893,902	11,924,303	2,763,810	2,202,932	0
Saudi Arabia	3,534,741	435,645	1,609,907	686,459	3,446,523	2,059,946	1,898,371	55,153
United Arab Emirates	234,650	1,473,210	1,917,772	40,517	454,777	139,441	89,354	0
Yemen	347,805	282,343	175,357	120,042	236,515	68,325	50,341	0

Footnotes at end of table.

Table 2. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country—Continued

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

Selected country	Foreign income, deductions, and taxes reported on Form 1118—continued							
	Gross income (less loss)—continued		Total deductions	Deductions from oil and gas extraction income [3]	Taxable income (less loss) before adjustments	Foreign taxes paid, accrued, and deemed paid		
	Oil and gas extraction income [2]	Foreign branch income [2]				Total	Foreign taxes paid or accrued	
			Total	Taxes withheld at source on—	Dividends			
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
Asia, total—continued								
Other Middle East countries	554	81,473	86,284	489	62,893	5,948	5,621	0
Southern and Southeast Asia, total	5,996,300	9,616,280	17,940,822	1,058,862	23,765,237	6,466,533	3,349,368	303,696
Bangladesh	0	96,206	102,697	0	7,787	31,362	30,368	106
India	28,258	2,946,453	3,696,499	15,912	2,844,523	920,667	509,230	29,263
Indonesia	2,906,421	1,161,986	3,225,097	415,194	7,364,367	3,128,094	1,900,287	197,665
Malaysia	1,503,524	361,592	855,787	69,004	2,045,953	710,751	73,049	501
Pakistan	414,641	195,388	371,713	183,950	308,986	170,401	123,406	853
Philippines	36,741	1,060,167	1,278,423	9,496	803,682	293,234	126,060	27,090
Singapore	444,426	2,212,281	5,216,743	160,538	8,458,552	585,554	223,430	3,797
Sri Lanka	441	38,161	55,426	33	20,107	10,580	10,202	636
Thailand	658,442	1,077,121	1,345,627	98,116	1,484,771	578,055	317,669	38,101
Vietnam	3,363	217,965	217,819	1,889	110,683	22,022	20,434	0
Other Southern and Southeast Asian countries	43	248,960	1,574,990	104,731	315,827	15,813	15,234	5,684
Eastern Asia, total	1,942,318	28,431,204	40,534,521	282,258	40,893,924	9,987,060	3,059,652	278,253
China	1,049,960	3,025,468	6,057,399	156,071	7,003,451	1,820,413	1,019,850	137,132
Hong Kong	39,164	4,699,862	5,547,919	2,308	4,964,218	536,559	171,679	1,520
Japan	691,864	17,698,084	22,398,791	93,837	22,239,729	6,371,096	1,108,788	30,821
South Korea, Republic of	132,943	1,653,137	3,457,441	4,664	4,475,633	819,254	500,407	42,920
Taiwan	25,249	1,349,737	3,056,749	22,615	2,195,459	439,359	258,547	65,860
Other Eastern Asian countries	3,138	4,915	16,222	2,763	15,434	380	380	0
Asia not allocable	*0	*0	*247	*0	*1,690,260	*53	*0	*0
Oceania, total	6,934,962	7,334,612	11,121,143	2,346,050	15,410,485	3,356,624	1,247,507	16,413
Australia	6,616,710	6,724,077	10,140,018	2,243,583	13,926,480	3,151,267	1,113,469	15,252
New Zealand	32,364	324,737	815,919	6,899	1,220,765	100,446	48,074	783
Other countries of Oceania	285,888	285,799	165,206	95,569	263,239	104,910	85,963	378
Puerto Rico and U.S. Possessions, total	65,774	2,375,644	6,768,551	10,465	8,142,258	987,993	856,613	32,219
Puerto Rico	52,260	2,022,018	6,317,564	10,387	7,942,700	943,307	818,999	32,219
U.S. Possessions, total	13,514	353,627	450,988	77	199,559	44,686	37,614	0
American Samoa	0	3,314	13,193	0	5,636	2,138	2,138	0
Guam	13,236	260,744	289,271	-187	116,154	28,121	26,900	0
Virgin Islands, U.S.	278	81,822	134,111	264	67,059	13,165	7,314	0
Other U.S. Possessions	0	7,747	14,412	0	10,709	1,262	1,262	0
Country not stated	441,610	1,475,753	59,583,734	2,347,900	16,106,369	3,337,530	2,838,508	116,817
Section 863 income [4]	0	0	22,340,110	0	18,571,786	39,480	39,480	0
Regulated Investment Companies [5]	0	0	252,583	0	159,440	35,984	35,750	35,460

Footnotes at end of table.

Table 2. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country—Continued

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

Selected country	Foreign income, deductions, and taxes reported on Form 1118—continued						
	Foreign taxes paid, accrued, and deemed paid—continued						
	Foreign taxes paid or accrued—continued						Taxes deemed paid
	Taxes withheld at source on—continued	Other taxes paid or accrued on—			Service income	Other income	
Interest	Rents, royalties, and license fees	Branch income	Specifically allocable income (section 863(b))				
(17)	(18)	(19)	(20)	(21)	(22)	(23)	
All geographic areas	593,197	4,639,434	11,337,322	39,480	1,008,838	13,699,478	94,116,962
Canada	151,027	271,164	1,340,876	0	56,080	1,088,828	5,988,376
Latin America, total	133,227	1,003,602	1,713,353	0	203,152	2,727,404	9,314,226
Mexico	64,430	219,160	309,971	0	27,105	119,002	2,092,083
Central America, total	1,442	36,165	47,963	0	6,631	32,019	173,373
Costa Rica	48	6,297	1,807	0	1,019	1,451	54,181
El Salvador	118	5,967	20,618	0	358	1,034	22,350
Guatemala	57	13,122	3,631	0	1,858	8,946	15,514
Honduras	806	3,778	4,663	0	1,134	978	14,873
Nicaragua	13	1,626	4,159	0	612	388	17,873
Panama (including Canal Zone)	399	5,376	13,084	0	1,650	19,178	47,403
Other Central American countries	0	0	0	0	0	44	1,179
Caribbean countries, total	1,501	20,888	16,659	0	14,810	680,812	4,096,495
Barbados	0	311	1,105	0	268	399	7,453
Cayman Islands (British)	0	0	0	0	0	21	4,005,583
Dominican Republic	804	12,849	12,524	0	7,505	2,006	6,791
Haiti	0	675	24	0	640	24	547
Jamaica	14	945	1,770	0	3,023	2,761	0
Trinidad	683	6,108	1,236	0	3,374	675,601	76,121
Other Caribbean countries	0	0	0	0	0	0	0
South America, total	65,853	727,388	1,338,761	0	154,607	1,884,394	2,952,275
Argentina	8,650	108,471	171,183	0	17,490	204,840	454,303
Bolivia	0	1,253	1,759	0	575	216	13,166
Brazil	44,755	363,020	247,681	0	93,641	322,219	1,080,491
Chile	1,293	58,875	12,429	0	10,178	1,100,399	178,792
Colombia	1,601	83,366	94,802	0	12,284	198,008	160,977
Ecuador	3,412	46,406	13,954	0	7,822	7,467	21,463
Paraguay	0	4,086	446	0	192	1,181	6,380
Peru	5,170	32,906	746,502	0	11,653	25,004	215,105
Uruguay	5	2,442	-7,236	0	524	528	45,423
Venezuela	393	26,431	56,353	0	249	23,997	775,643
Other South American countries	574	132	887	0	0	535	533
Latin America not allocable	*0	*0	*0	*0	*0	*11,177	*0
Other Western Hemisphere, total	452	2,701	2,048	0	2,437	98	3,097,244
Bahamas	0	15	0	0	16	0	237,737
Bermuda	0	0	0	0	11	0	2,682,249
British Virgin Islands	9	1,267	1,527	0	9	7	48,742
Netherlands Antilles	0	343	164	0	0	6	122,549
All other Western Hemisphere	442	1,074	358	0	2,401	86	5,967
Europe, total	71,496	334,922	2,479,471	0	359,067	3,597,131	56,099,306
European Union, total	69,702	265,302	1,667,928	0	286,880	1,763,308	43,290,437
Austria	315	1,265	25,798	0	107	24,494	85,501
Belgium	517	347	27,891	0	561	34,528	422,911
Czech Republic	0	11,890	3,401	0	72	601	34,557
Denmark	0	412	1,666	0	105	417,667	1,405,559
Finland	1	129	7,756	0	447	167	15,342

Footnotes at end of table.

Table 2. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country—Continued

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

Selected country	Foreign income, deductions, and taxes reported on Form 1118—continued						
	Foreign taxes paid, accrued, and deemed paid—continued						
	Foreign taxes paid or accrued—continued						Taxes deemed paid
	Taxes withheld at source on—continued	Other taxes paid or accrued on—			Service income	Other income	
Interest	Rents, royalties, and license fees	Branch income	Specifically allocable income (section 863(b))				
(17)	(18)	(19)	(20)	(21)	(22)	(23)	
Europe, total—continued							
France	1,715	959	200,771	0	9,485	47,224	1,143,726
Germany	828	13,088	287,884	0	209,292	107,610	2,361,565
Greece	922	2,782	13,976	0	-20	431	26,069
Hungary	86	200	11,260	0	156	560	17,167
Ireland	259	2,164	45,618	0	5,115	384,618	1,861,305
Italy	1,333	83,413	97,413	0	15,870	9,511	1,175,886
Luxembourg	16,576	232	41,069	0	48	6,656	7,143,584
Netherlands	15,989	2,208	86,036	0	3,863	10,069	12,192,182
Poland	139	15,239	1,799	0	1,219	3,157	209,786
Portugal	295	4,980	6,139	0	188	2,359	1,354,833
Romania	914	6,441	3,286	0	164	296	6,374
Spain	3,041	102,184	39,908	0	8,249	74,257	2,682,189
Sweden	106	321	32,748	0	2,205	5,257	540,783
United Kingdom	26,622	11,514	727,782	0	29,361	633,556	10,510,882
Other European Union countries	46	5,534	5,726	0	392	290	100,238
Other European countries, total	1,794	69,620	811,543	0	72,187	1,833,824	12,808,869
Jersey	553	0	3,339	0	0	2,642	993,560
Kazakhstan	0	1,897	643,014	0	7,583	1,706,863	16,488
Norway	747	1,590	88,839	0	833	64,943	8,740,131
Russia	218	6,543	18,407	0	5,177	38,468	129,020
Switzerland	147	38,262	34,925	0	126	12,879	2,376,771
Turkey	66	13,255	13,279	0	2,021	3,505	77,240
Ukraine	0	4,007	2,974	0	223	14	51,077
Other European countries	63	4,066	6,766	0	56,223	4,509	424,582
Africa, total	1,531	46,545	403,546	0	52,904	349,967	5,999,479
Algeria	0	580	30,364	0	4,894	19,480	125
Angola	577	7,225	21,734	0	22,607	4,100	1,273
Chad	0	5	3,934	0	211	83	544,989
Egypt	15	10,888	62,667	0	2,651	267,611	23,184
Equatorial Guinea	0	549	78,703	0	4,825	5,817	304,958
Gabon	0	867	27,099	0	883	559	4,834
Mauritius	581	3,015	3,191	0	101	85	49,516
Nigeria	0	1,938	6,834	0	986	16,425	4,388,417
South Africa	118	587	70,054	0	1,513	6,326	342,979
Other African countries	239	20,892	98,966	0	14,232	29,480	339,204
Asia, total	42,670	1,025,190	4,418,812	0	151,820	4,469,282	10,878,577
Middle East, total	2,272	67,228	2,244,166	0	35,517	1,931,519	833,951
Bahrain	0	20	721	0	2,830	0	780
Iraq	0	0	210	0	53	0	106
Israel	2,156	31,994	28,124	0	1,600	13,076	41,720
Kuwait	0	1,549	2,600	0	444	1,758	173
Lebanon	0	173	1,722	0	96	110	322
Qatar	0	427	2,146,309	0	5,747	50,449	560,877
Saudi Arabia	0	28,426	28,255	0	22,085	1,764,452	161,575
United Arab Emirates	116	3,140	32,647	0	2,200	51,250	50,087
Yemen	0	4	32	0	0	50,305	17,984

Footnotes at end of table.

Table 2. U.S. Corporation Returns with a Foreign Tax Credit, 2010: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country—Continued

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

Selected country	Foreign income, deductions, and taxes reported on Form 1118—continued						
	Foreign taxes paid, accrued, and deemed paid—continued						
	Foreign taxes paid or accrued—continued						Taxes deemed paid
	Taxes withheld at source on—continued	Other taxes paid or accrued on—			Service income	Other income	
Interest	Rents, royalties, and license fees	Branch income	Specifically allocable income (section 863(b))				
(17)	(18)	(19)	(20)	(21)	(22)	(23)	
Asia, total—continued							
Other Middle East countries	0	1,493	3,547	0	462	118	327
Southern and Southeast Asia, total	19,929	278,372	772,247	0	60,439	1,914,686	3,117,165
Bangladesh	0	102	29,414	0	701	45	994
India	2,487	83,972	305,136	0	29,310	59,062	411,437
Indonesia	8,664	19,416	128,454	0	2,621	1,543,466	1,227,808
Malaysia	1,001	37,954	16,319	0	5,570	11,704	637,702
Pakistan	5	856	18,615	0	1,485	101,591	46,995
Philippines	1,133	25,272	54,888	0	1,275	16,402	167,174
Singapore	4,737	74,526	101,321	0	6,243	32,807	362,124
Sri Lanka	0	35	8,275	0	905	350	378
Thailand	1,374	31,632	87,841	0	10,408	148,312	260,386
Vietnam	39	1,847	17,088	0	908	552	1,588
Other Southern and Southeast Asian countries	489	2,760	4,893	0	1,014	395	579
Eastern Asia, total	20,469	679,589	1,402,399	0	55,863	623,078	6,927,409
China	7,596	295,861	132,684	0	20,622	425,956	800,563
Hong Kong	1	17,584	135,440	0	3,249	13,886	364,880
Japan	8,045	15,854	938,715	0	7,476	107,877	5,262,308
South Korea, Republic of	1,580	271,105	121,571	0	7,239	55,991	318,846
Taiwan	3,248	79,182	73,989	0	16,901	19,368	180,811
Other Eastern Asian countries	0	2	0	0	377	0	0
Asia not allocable	*0	*0	*0	*0	*0	*0	*53
Oceania, total	174,428	90,594	330,589	0	24,836	610,648	2,109,117
Australia	164,475	80,517	304,168	0	23,021	526,036	2,037,798
New Zealand	9,950	8,069	25,432	0	1,168	2,672	52,372
Other countries of Oceania	2	2,008	989	0	646	81,940	18,947
Puerto Rico and U.S. Possessions, total	3,390	472,694	217,976	0	32,254	98,080	131,380
Puerto Rico	3,366	472,663	191,787	0	26,111	92,853	124,308
U.S. Possessions, total	24	31	26,189	0	6,143	5,227	7,072
American Samoa	0	4	0	0	2,132	2	0
Guam	0	27	21,051	0	2,161	3,661	1,221
Virgin Islands, U.S.	9	0	5,000	0	989	1,315	5,851
Other U.S. Possessions	15	0	138	0	861	249	0
Country not stated	14,976	1,392,025	430,651	0	126,157	757,882	499,022
Section 863 income [4]	0	0	0	39,480	0	0	0
Regulated Investment Companies [5]	0	0	0	0	132	158	234

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

[1] Total number of returns may not equal the sum of returns for specific areas or countries because a return could include two or more countries.

[2] Included in gross income (less loss), columns 2-8.

[3] Included in total deductions, column 11.

[4] Section 863 income refers to certain types of income, including certain cross-border sales and communication income, that are subject to special sourcing rules. The IRS does not require companies to source these types of income to specific countries.

[5] Regulated Investment Companies are investment companies, like mutual funds or real estate investment trusts, that are eligible to pass the taxes paid on capital gains, dividends and interest directly to their shareholders to avoid double taxation. The IRS does not require companies to source this income to specific countries.

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

Source: IRS, Statistics of Income Division, November 2013.

Unrelated Business Income Tax Returns, 2010

by Jael Jackson

Gross unrelated business income reported by tax-exempt organizations on Form 990-T for Tax Year 2010 totaled \$9.9 billion and represented a 13-percent increase from Tax Year 2009. Total unrelated business income tax liability increased even more, 28 percent, to \$341.3 million. As in previous years, charitable organizations, tax exempt under Internal Revenue Code section 501(c)(3), made up the most common Form 990-T filers, representing more than one-third (34.9 percent) of all organizations that filed the return for Tax Year 2010. These organizations reported 65 percent of all gross unrelated business income for the year, claimed nearly 67 percent of deductions, and accounted for a little more than half (58 percent) of all unrelated business income tax liability. Filers classified as corporations, whose returns comprised nearly 78 percent of all Tax Year 2010 Forms 990-T, reported the majority of gross unrelated business income, investment income, total deductions, and unrelated business income tax for the year.

Tax-exempt organizations generally operate for charitable or other beneficial purposes, with most income exempt from tax under the Internal Revenue Code (IRC). Tax-exempt organizations are permitted to engage in income-producing activities considered unrelated to their exempt purposes. However, to prevent potentially unfair competition between tax-exempt organizations and taxable for-profit entities, income derived from these unrelated activities is taxable. An organization that receives \$1,000 or more in gross unrelated business income in a tax year is required to file Form 990-T, *Exempt Organization Business Income Tax Return*, to determine the amount of unrelated business income tax liability.

Unrelated business income is produced from an activity that is conducted on a regular basis and is not directly related to an organization's tax-exempt mission. Income earned by an organization is treated as unrelated business income if it meets two basic requirements. First, the income is derived from a trade or business that is regularly carried on by the organization. Second, the income is earned from a trade or business that is not substantially related to the performance of the organization's exempt purpose or function. Even if profits from such activities are used

by tax-exempt organizations to finance their exempt purposes, income that meets these two requirements generally is treated as unrelated business income. However, certain activities are excluded from taxation, such as business activities in which substantially all of the work is performed by volunteer labor, sales of merchandise that the organization received as a gift or contribution, and the operation of certain games of chance, as specified in the Internal Revenue Code.¹

For Tax Year 2010, some 43,184 tax-exempt organizations filed Form 990-T to report unrelated business income, nearly 2 percent more than filed the return for Tax Year 2009 (Figure A). Between Tax Years 2009 and 2010, both gross unrelated business income and reported deductions increased. Gross unrelated business income is the total of all unrelated business income prior to deductions. For Tax Year 2010, tax-exempt organizations reported a 13-percent increase in the total gross unrelated business income received (\$11.0 billion). In aggregate, deductions of \$10.8 billion offset this amount. After reducing their gross unrelated business income by allowable deductions, only about half of all organizations that were required to file Form 990-T for Tax Year 2010 reported unrelated business income

Highlights

- Over 43,000 tax-exempt organizations filed a Form 990-T with the IRS for Tax Year 2010.
- Over half of all organizations that filed Form 990-T did not report unrelated business income tax liability after subtracting deductions from gross unrelated business income.
- Charitable organizations, exempt under Internal Revenue Code section 501(c)(3) accounted for the most common Form 990-T filers.
- Organizations classified as 501(c)(3) accounted for nearly two-thirds (65 percent) of all unrelated business income, two-thirds (67 percent) of all deductions, and over half (58 percent) of all unrelated business income tax liability.

¹ See "Gross unrelated business income" in the Explanation of Selected Terms for additional information.



Figure A
Unrelated Business Income Tax Returns: Selected Items from Forms 990-T, Tax Years 2009 and 2010

[Money amounts are in thousands of dollars]

Item	2009	2010	Percentage change
	(1)	(2)	
Number of returns, total	42,469	43,184	1.7
With gross unrelated business income of \$10,000 or less [1]	19,072	19,312	1.3
With gross unrelated business income over \$10,000 [1]	23,397	23,872	2.0
With unrelated business taxable income	19,368	19,874	2.6
Without unrelated business taxable income [2]	23,101	23,310	0.9
Gross unrelated business income	9,700,964	10,966,456	13.0
Total deductions [3]	9,821,097	10,882,576	10.8
Unrelated business taxable income (less deficit)	-120,133	83,880	[P]
Unrelated business taxable income	930,795	1,217,989	30.9
Deficit	1,050,928	1,134,109	7.9
Unrelated business income tax	266,421	341,361	28.1
Total tax	263,147	332,465	26.3

[1] Organizations with gross unrelated business income (UBI) between \$1,000 (the filing threshold) and \$10,000 were not required to report itemized expenses and deductions, or to complete return schedules. Those with gross UBI over \$10,000 were required to fill out a more detailed "complete" return.

[2] Includes returns with deficits and returns with equal amounts of gross unrelated business income and total deductions.

[3] Includes both expenses and deductions reported on Form 990-T, lines 13(B), 29, 31, and 33. Excludes cost of sales and services, which was subtracted from gross receipts from sales and services in computing gross profit from sales and services. Gross profit from sales and services is a component of gross unrelated business income (upon which the filing requirement is based). Total cost of sales and services was \$2.4 billion for 2009 and \$2.5 billion for 2010.

[P] Percentage change is not provided if the current year data contains a positive value (income) compared to a prior year negative value (deficit).

NOTES: Detail may not add to totals because of rounding. See the Explanation of Selected Terms section of this article for definitions of gross unrelated business income, total deductions, unrelated business taxable income (less deficit), unrelated business income tax, and total tax.

SOURCE: IRS, Statistics of Income Division, Tax Exempt Organizations, Unrelated Business Income, February 2014.

tax liability. Tax-exempt organizations reported \$341.3 million in unrelated business income tax liability, a 28-percent increase from Tax Year 2009.

Total tax reported on Forms 990-T, the sum of unrelated business income tax and certain additional taxes less credits increased sharply in 2010, to \$332.4 million (Figure B). The additional taxes included \$4.5 million of alternative minimum tax, \$1.5 million of "proxy tax" on certain nondeductible lobbying and political expenditures, and \$0.46 million of "other" taxes.² To arrive at the total tax amount, total tax credits were subtracted from the sum of unrelated business income tax plus additional taxes. Total tax credits equaled \$17.7 million for Tax Year 2010, exceeding the amount of additional taxes reported. Tax credits included the foreign tax credit (\$10.9 million), general business credit (\$4.9 million), credit for prior-year minimum tax (\$1.6 million), and "other" credits (\$0.3 million).

While both total tax and gross unrelated business income increased in 2010, total tax pales in comparison, reflecting around 3 percent of the income received.

Composition of Filers

A variety of tax-exempt organizations file Form 990-T to report unrelated business income and the associated tax (Figure C). Charitable organizations tax-exempt under IRC section 501(c)(3) are the most common Form 990-T filers. Churches are tax exempt under IRC section 501(c)(3) but are not required to apply for exemption. However, churches are required to file Form 990-T if they received \$1,000 or more of gross income from business activities that are considered unrelated to their religious purposes.³

Organizations classified by the Internal Revenue Code as 501(c)(3) made up the most common Form 990-T filers, accounting for nearly 35 percent of returns filed for Tax Year 2010 (Figure D). Additionally, 501(c)(3) charitable organizations accounted for even higher percentages of gross unrelated business income, total unrelated business income tax, and other financial

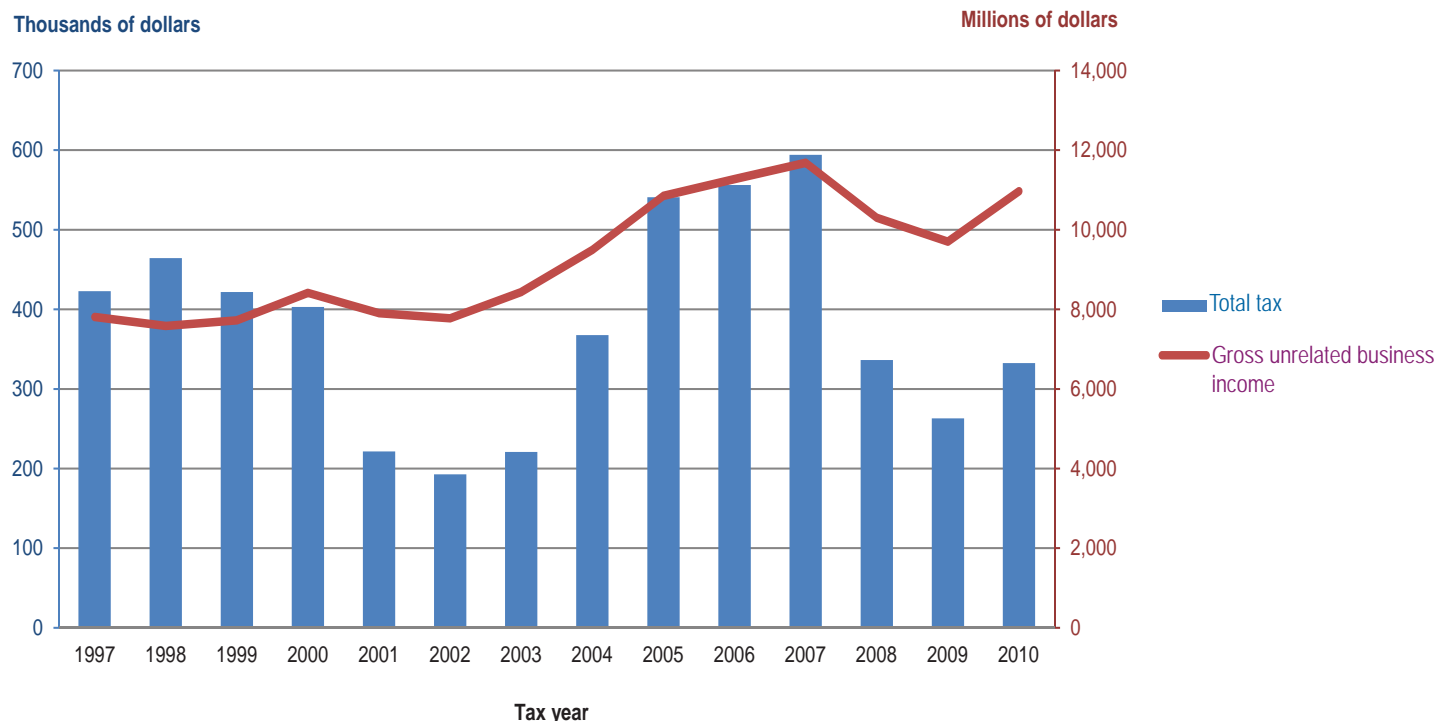
² A membership organization that was tax exempt under Internal Revenue Code sections 501(c)(4), 501(c)(5), or 501(c)(6) was liable for the proxy tax in cases where it did not notify its members of the entire amount of the shares of their dues that were allocated to the nondeductible lobbying and political expenditures. The proxy tax of \$1.4 million used in the total tax computation includes only proxy tax reported by Form 990-T filers with gross unrelated business income greater than the \$1,000 filing threshold. Filers that reported gross unrelated business income less than the \$1,000 threshold were not eligible for selection into the Statistics of Income (SOI) sample. Therefore, proxy tax reported by organizations that had no unrelated business income or those that had unrelated business income less than the filing threshold is not included.

³ Most tax-exempt organizations with receipts more than \$50,000 are required to file an annual Form 990, *Return of Organization Exempt From Income Tax*, or Form 990-EZ, *Short Form Return of Organization Exempt From Income Tax* (used by organizations with annual gross receipts of less than \$500,000 and total end-of-year assets of less than \$200,000). Private foundations, which are exempt under section 501(c)(3), file the information return Form 990-PF, *Return of Private Foundation or Section 4947(a)(1) Nonexempt Charitable Trust Treated as a Private Foundation*. Charitable remainder trusts, a type of Internal Revenue Code section 4947(a)(2) "split-interest trust," were required to report unrelated business income on Form 1041, *Estate and Trust Income Tax Return*, rather than Form 990-T, for tax years before 2007. Beginning with Tax Year 2007, charitable remainder trusts were required to report unrelated business income on Form 4720, *Return of Certain Excise Taxes Under Chapters 41 and 42 of the Internal Revenue Code*. Published statistical reports on charitable and other nonprofit organizations, private foundations, and split-interest trusts are available from the Tax Stats pages of the IRS Website at <http://www.irs.gov/taxstats> and are also available on the site in a "snapshot" page that provides data highlights and products.

Figure B

Unrelated Business Income Tax Returns: Gross Unrelated Business Income and Total Tax, Tax Years 1997–2010

[Total tax is in thousands of dollars; gross unrelated business income is in millions of dollars]



SOURCE: IRS, Statistics of Income Division, Tax Exempt Organizations, Unrelated Business Income, February 2014.

items for Tax Year 2010. Traditional Individual Retirement Accounts (IRAs), exempt under section 408(e) (18 percent), and social and recreational clubs, exempt under section 501(c)(7) (13 percent), accounted for the next-largest percentages of all Tax Year 2010 Forms 990-T filed.

While total number of returns filed has had some up and down fluctuations, the number of 501(c)(3) returns has steadily risen over the past few years with smaller variations (Figure E).

A look at selected financial items for Tax Year 2010, including gross unrelated business income and its components, the ratio of investment income to gross unrelated business income, total deductions, and unrelated business income tax, shows that charitable organizations accounted for 65 percent of the almost \$11.0 billion in gross unrelated business income reported for the year (Figure F). They claimed 67 percent of total deductions and reported 57 percent of total unrelated business income tax. Charitable organizations also reported 53 percent of total investment income for Tax Year 2010. However, investment income represented only a small percentage, about 15 percent, of gross unrelated business income reported by charitable organizations. Generally, organizations that were organized as tax-exempt trusts derived larger percentages of their gross unrelated

business income from investments. For example, traditional IRAs reported more than 96 percent of their gross unrelated business income as investment income.

Income Information, by Entity Type

A number of criteria, such as point of origination and membership status, contribute to a tax-exempt entity's choice of organizational structure. Organizations that hold funds in trust for beneficiaries are typically organized as trusts. For example, a voluntary employee beneficiary association (VEBA), exempt under Internal Revenue Code section 501(c)(9), provides a variety of supplemental employee benefits such as health, life, or accident insurance. However, for most groups, a corporate organizational structure is more beneficial, offering features such as liability protection and lower tax rates.

Generally, organizations are taxed based upon their structures and tax-exempt organizations' unrelated business taxable income is subject to the same tax rates as income reported by for-profit filers with similar organizational structures. Those classified as tax-exempt trusts pay taxes on their unrelated business income at the same rates as estate and trust filers, while all other exempt organizations classified as nonprofit corporations pay taxes at the corporate rate. Tax-exempt organizations that paid taxes at the corporate rate accounted for nearly 78 percent of all Forms 990-T filed for Tax Year 2010. Tax-exempt trusts accounted for the additional 22 percent of Forms 990-T filed

Figure C

Types of Tax-Exempt Organizations Subject to the Unrelated Business Income Tax Provisions, by Internal Revenue Code Section

Code section	Description of organization	General nature of activities
220(e)	Archer Medical Savings Accounts (MSA)	Fiduciary agent for accounts used in conjunction with high-deductible health insurance plans to save funds for future medical expenses
401(a)	Qualified pension, profit-sharing, or stock bonus plans	Fiduciary agent for pension, profit-sharing, or stock bonus plans
408(e)	Traditional Individual Retirement Accounts (IRA)	Fiduciary agent for retirement funds
408A	Roth Individual Retirement Accounts (IRA)	Fiduciary agent for retirement funds; subject to same rules as traditional IRA, except contributions are not tax deductible and qualified distributions are tax free
501(c)(2)	Title-holding corporations for exempt organizations	Holding title to property for exempt organizations
(3)	Religious, educational, charitable, scientific, or literary organizations; organizations that test for public safety. Also, organizations that prevent cruelty to children or animals, or foster national or international amateur sports competition	Activities of a nature implied by the description of the class of organization
(4)	Civic leagues, social welfare organizations, and local associations of employees	Promotion of community welfare and activities from which net earnings are devoted to charitable, educational, or recreational purposes
(5)	Labor, agricultural, and horticultural organizations	Educational or instructive groups whose purpose is to improve conditions of work, products, and efficiency
(6)	Business leagues, chambers of commerce, real estate boards, and like organizations	Improving conditions in one or more lines of business
(7)	Social and recreational clubs	Pleasure, recreation, and social activities
(8)	Fraternal beneficiary societies and associations	Lodges providing for payment of life, health, accident, or other insurance benefits to members
(9)	Voluntary employees' beneficiary associations (including Federal employees' voluntary beneficiary associations formerly covered by section 501(c)(10))	Providing for payment of life, health, accident, or other insurance benefits to members
(10)	Domestic fraternal beneficiary societies and associations	Lodges, societies, or associations devoting their net earnings to charitable, fraternal, and other specified purposes, without life, health, or accident insurance benefits to members
(11)	Teachers' retirement fund associations	Fiduciary associations providing for payment of retirement benefits
(12)	Benevolent life insurance associations, mutual ditch or irrigation companies, mutual or cooperative telephone companies, and like organizations	Activities of a mutually beneficial nature implied by the description of the class of organization
(13)	Cemetery companies	Arranging for burials and incidental related activities
(14)	State-chartered credit unions and mutual insurance or reserve funds	Providing loans to members or providing insurance of, or reserve funds for, shares or deposits in certain banks or loan associations
(15)	Mutual insurance companies or associations other than life, if written premiums for the year do not exceed \$350,000	Providing insurance to members, substantially at cost
(16)	Corporations organized to finance crop operations	Financing crop operations in conjunction with activities of a marketing or purchasing association
(17)	Supplemental unemployment benefit trusts	Fiduciary agent for payment of supplemental unemployment compensation benefits
(18)	Employee-funded pension trusts (created before June 25, 1959)	Providing for payments of benefits under a pension plan funded by employees
(19)	Posts or organizations of past or present members of the armed forces	Providing services to veterans or their dependents; advocacy of veteran's issues; and promotion of patriotism and community service programs
(21)	Black Lung Benefit Trusts	Providing funds to satisfy coal mine operators' liability for disability or death due to black lung disease
(22)	Withdrawal liability payment funds	Providing funds to meet the liability of employers withdrawing from a multiple-employer pension fund
(23)	Associations of past and present members of the armed forces founded before 1880	Providing insurance and other benefits to veterans or their dependents
(24)	Trusts described in section 4049 of the Employee Retirement Income Security Act of 1974	Providing funds for employee retirement income
(25)	Title-holding corporations or trusts with no more than 35 shareholders or beneficiaries and only one class of stock or beneficial interest	Acquiring real property and remitting all income earned from such property to one or more exempt organizations; pension, profit-sharing, or stock bonus plans; or governmental units

Footnotes at end of figure.

Figure C—Continued

Types of Tax-Exempt Organizations Subject to the Unrelated Business Income Tax Provisions, by Internal Revenue Code Section—Continued

Code section	Description of organization	General nature of activities
(26)	State-sponsored high-risk health insurance plans	Providing coverage for medical care on a not-for-profit basis to residents with pre-existing medical conditions that resulted in denied or exorbitantly priced traditional medical care coverage
(27)	State-sponsored workers' compensation reinsurance plans	Pooled employers' funds providing reimbursements to employees for losses arising under workers' compensation acts; also, State-created, -operated, and -controlled organizations providing workers' compensation
529(a)	Qualified State tuition plans	State- and agency-maintained plans that allow individuals to purchase credits or certificates, or make contributions to an account, to pay for future
530(a)	Coverdell Education Savings Accounts	Fiduciary agent for accounts created for the purpose of paying qualified higher education expenses of a designated beneficiary

NOTES: Corporations that are organized under an Act of Congress, and are instrumentalities of the United States, described in section 501(c)(1) of the Internal Revenue Code, are not subject to unrelated business income taxation. Prepaid legal service funds, previously described in section 501(c)(20) of the Internal Revenue Code, were no longer tax exempt effective for tax years beginning after June 30, 1992.

SOURCE: IRS, Statistics of Income Division, Tax Exempt Organizations, Unrelated Business Income, February 2014.

Figure D

Unrelated Business Income Tax Returns: Form 990-T Filers, by Size of Gross Unrelated Business Income, Gross Unrelated Business Taxable Income, Type of Entity, and Type of Organization, Tax Years 2009 and 2010

Category	Item	2009		2010		2009 to 2010 number of returns, percentage change
		Number of returns	Percentage of total	Number of returns	Percentage of total	
		(1)	(2)	(3)	(4)	(5)
All Forms 990-T	All returns	42,469	100.00	43,184	100.00	1.7
Type of organization	All returns, by type of organization	42,469	100.0	43,184	100.0	1.7
	501(c)(3) Religious, educational, charitable, scientific, or literary organizations	14,169	33.4	15,085	34.9	6.5
	501(c)(4) Civic leagues and social welfare organizations	1,466	3.5	1,553	3.6	5.9
	501(c)(5) Labor, agricultural, and horticultural organizations	2,084	4.9	2,007	4.6	-3.7
	501(c)(6) Business leagues, chambers of commerce, and real estate boards	5,417	12.8	4,835	11.2	-10.7
	501(c)(7) Social and recreational clubs	5,890	13.9	5,788	13.4	-1.7
	501(c)(19) War veterans' posts or organizations	1,874	4.4	1,818	4.2	-3.0
	408(e) Traditional Individual Retirement Accounts	7,025	16.5	7,645	17.7	8.8
	Other [1]	4,544	10.7	4,453	10.3	-2.0
Type of entity	All returns, by type of entity	42,469	100.0	43,184	100.0	1.7
	Corporation	33,619	79.2	33,485	77.5	-0.4
	Trust	8,850	20.8	9,699	22.5	9.6
Size of gross unrelated business income	All returns, by size of gross unrelated business income	42,469	100.0	43,184	100.0	1.7
	With gross unrelated business income of \$10,000 or less	19,072	44.9	19,312	44.7	1.3
	With gross unrelated business income over \$10,000	23,397	55.1	23,872	55.3	2.0
Presence of unrelated business taxable income (less deficit)	All returns, with and without unrelated business taxable income	42,469	100.0	43,184	100.0	1.7
	With unrelated business taxable income	19,368	45.6	19,874	46.0	2.6
	Without unrelated business taxable income	23,101	54.4	23,310	54.0	0.9

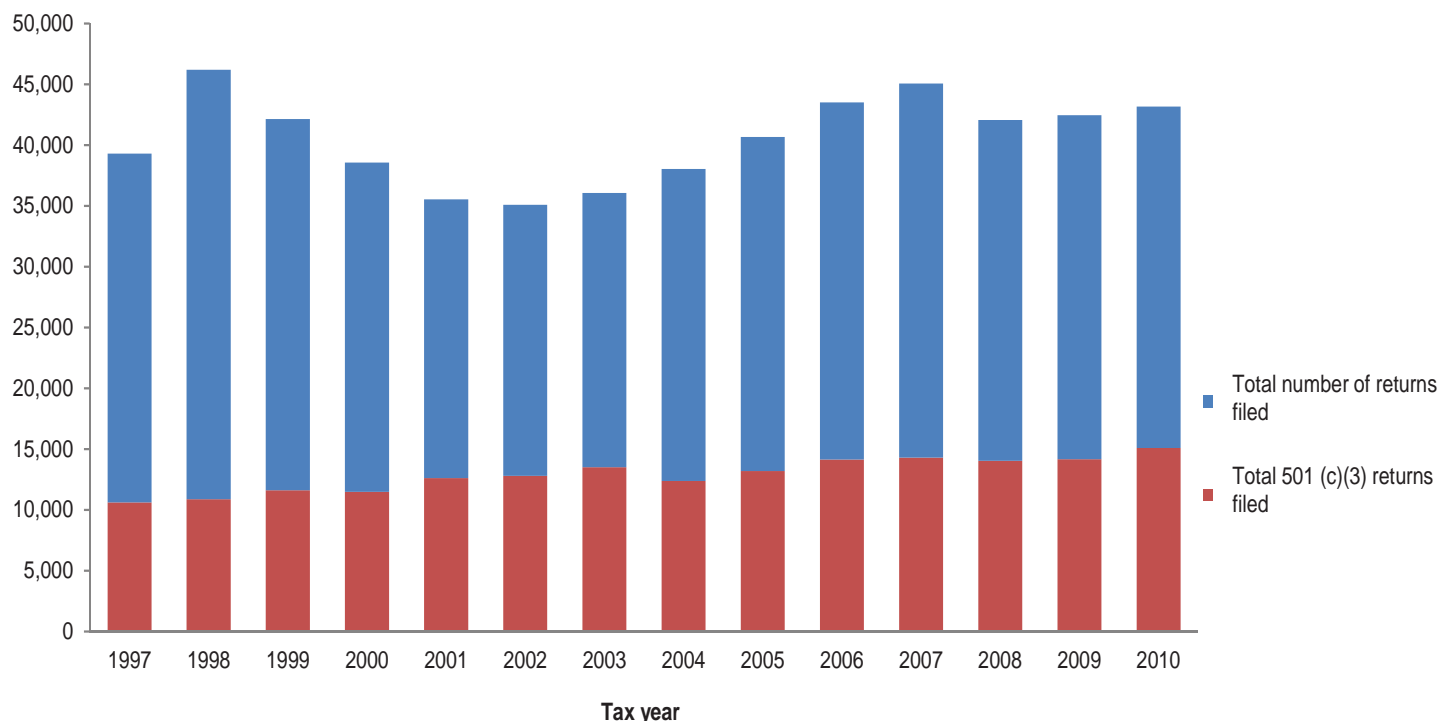
[1] This category includes organizations described under sections 501(c)(2), 501(c)(8)-(18), 501(c)(21)-(27), as well as Archer Medical Savings Accounts, exempt under section 220(e); qualified pension, profit-sharing, or stock bonus plans, exempt under section 401(a); Roth Individual Retirement Arrangements, exempt under section 408A, State-sponsored qualified tuition plans, exempt under section 529(a); and Coverdell Education Savings Accounts, exempt under section 530(a). See Figure C for additional information on the types of organizations that are required to file Form 990-T.

NOTES: Detail may not add to totals because of rounding. See the Explanation of Selected Terms section of this article for definitions of gross unrelated business income and unrelated business taxable income (less deficit).

SOURCE: IRS, Statistics of Income Division, Tax Exempt Organizations, Unrelated Business Income, February 2014.

Figure E
Unrelated Business Income Tax Returns: Number of Returns Filed and Number of 501 (c)(3) Returns Filed

Number of returns



SOURCE: IRS, Statistics of Income Division, Tax Exempt Organizations, Unrelated Business Income, February 2014.

Figure F
Unrelated Business Income Tax Returns: Selected Items for Unrelated Business Income Tax of Tax-Exempt Organizations, by Subsection Code, Tax Year 2010

[Money amounts are in thousands of dollars]

Item	Subsection code								
	All	501(c)(3)	501(c)(4)	501(c)(5)	501(c)(6)	501(c)(7)	501(c)(19)	408(e)	Other [1]
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Number of returns	43,184	15,085	1,553	2,007	4,835	5,788	1,818	7,645	4,453
Gross unrelated business income (UBI)	10,966,456	7,115,467	535,998	266,998	977,431	665,519	173,272	44,591	1,187,180
Total investment income [2]	1,961,285	1,031,988	14,288	18,740	45,591	94,438	6,985	42,808	706,447
Investment income to gross UBI (percentage)	17.9	14.5	2.7	7.0	4.7	14.2	4.0	96.0	59.5
Total deductions	10,882,576	7,238,438	535,534	248,782	972,162	639,456	176,929	21,185	1,050,090
Unrelated business taxable income (less deficit)	83,880	-122,971	464	18,216	5,270	26,064	-3,656	23,406	137,087
Unrelated business taxable income	1,217,989	647,457	16,438	42,404	76,186	72,714	6,876	25,093	330,821
Deficit	1,134,109	770,428	15,974	24,188	70,916	46,650	10,532	1,687	193,734
Unrelated business income tax	341,360	195,711	4,917	12,020	21,603	19,387	1,477	6,349	79,896
Total tax	332,465	185,533	4,707	12,022	23,220	19,089	1,479	6,345	80,070

[1] This category includes organizations described under sections 501(c)(2), 501(c)(8)-(18), 501(c)(21)-(27), as well as Archer Medical Savings Accounts, exempt under section 220(e); qualified pension, profit-sharing, or stock bonus plans, exempt under section 401(a); Roth Individual Retirement Arrangements, exempt under section 408A, State-sponsored qualified tuition plans, exempt under section 529(a); and Coverdell Education Savings Accounts, exempt under section 530(a). See Figure C for additional information on the types of organizations that are required to file Form 990-T.

[2] Total investment income includes net capital gain income, combined partnership and S corporation income, unrelated debt-financed income, and investment income of Internal Revenue Code section 501(c)(7),(9), and (17) organizations. Other types of tax-exempt organizations' investment income ordinarily are not taxed, unless the investments were purchased with borrowed funds, i.e., debt-financed.

NOTES: Detail may not add to totals because of rounding. See the Explanation of Selected Terms section of this article for definitions of gross unrelated business income, total deductions, unrelated business taxable income (less deficit), unrelated business income tax, and total tax.

SOURCE: IRS, Statistics of Income Division, Tax Exempt Organizations, Unrelated Business Income, February 2014.

for the year, which is a slightly larger percentage than the previous year. Traditional IRAs, voluntary employees' beneficiary associations, pension, profit sharing, and stock bonus plans accounted for the majority of the 9,699 tax-exempt trusts that filed Form 990-T. These organizations represented more than 79 percent of all trusts that filed the return for the year.

income reported for Tax Year 2010, corporate filers reported the majority, \$1.1 billion.

Data Sources and Limitations

To report unrelated business income of \$1,000 (the filing threshold) or more for Tax Year 2010, the required reporting period for trusts, defined in Internal Revenue Code sections 220(e), 401(a), 408(e), 408A, and 530(a), was Calendar Year 2010, and the Form 990-T filing deadline was April 15, 2011. For all other organizations, the required reporting period was any accounting period beginning in Calendar Year 2010 and, thus, ending between December 2010 and November 2011, for full-year return filers. The associated required due dates for filing Tax Year 2010 Forms 990-T generally fell from May 2011 to April 2012, but the IRS routinely granted filing extensions beyond this period to many organizations. Corresponding to the required filing dates, the SOI Tax Year 2010 study sample was drawn from Forms 990-T processed by the IRS throughout Calendar Years 2011 and 2012. Because of the various accounting periods reported by organizations filing a Tax Year 2010 return, the financial activities covered in this article span the period January 2010 through November 2011, although 55 percent of Form 990-T filers had Calendar Year 2010 accounting periods.

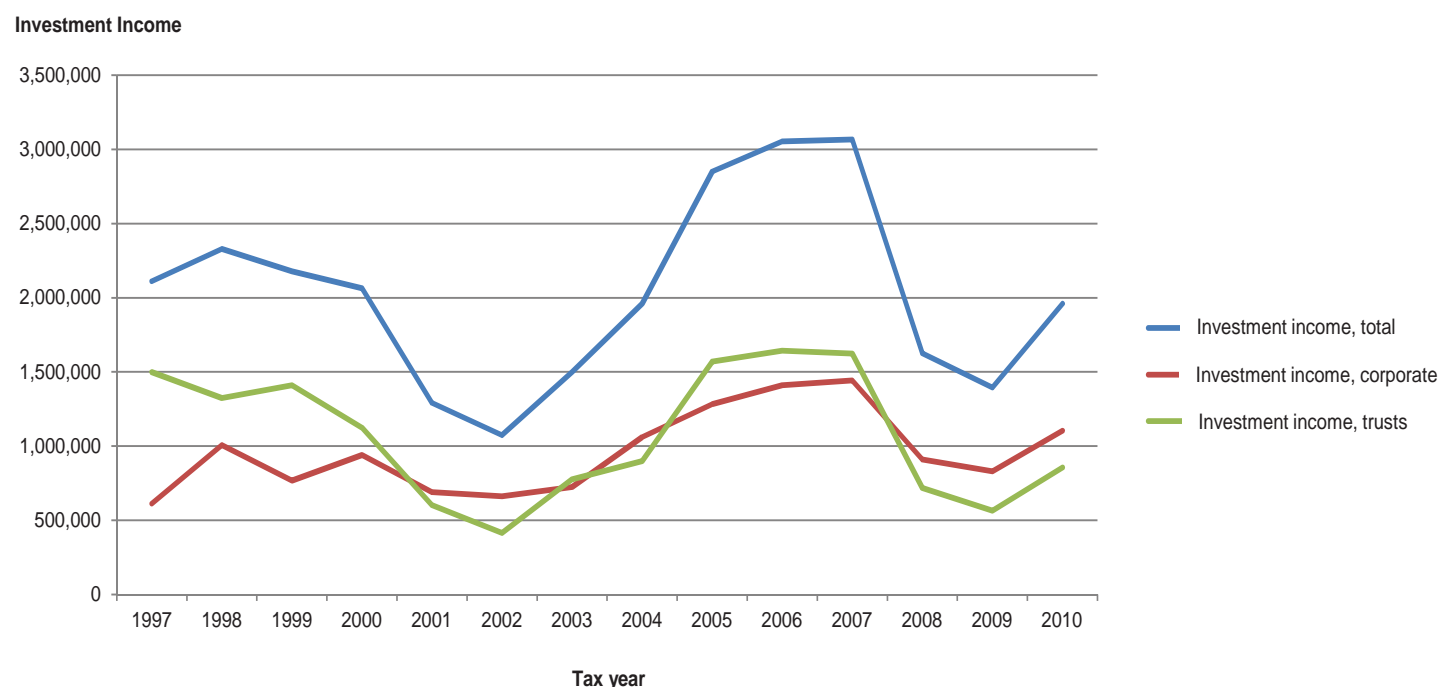
SOI drew the sample from Tax Year 2010 Form 990-T records posted to the IRS Business Master File system during 2011 and 2012. Generally, SOI excluded returns filed after Calendar Year 2012 from the sample. However, in some cases,

Investment income has shown dramatic fluctuating over the last 10 years, with trusts and corporations continuously interchanging as the largest contributor (Figure G).

Generally, corporate filers report the majority of gross unrelated business income, total deductions, positive unrelated business taxable income, and unrelated business income tax. For Tax Year 2010, corporate filers reported \$10.0 billion in gross unrelated business income, \$10.2 billion in total deductions, and \$242.5 million in unrelated business income tax. Corporate filers reported a relatively modest increase, 10 percent, in gross unrelated business income between Tax Years 2009 and 2010. Trust filers reported a more significant increase of 50 percent. Investment income represented 87 percent of gross unrelated income reported by trusts, compared to less than 10 percent for corporations (Figure G). However, the amount reported, \$856.6 million in investment income, represents an increase of 50 percent over the previous year. Of the \$2.0 billion in investment

Figure G
Unrelated Business Income Tax Returns: Investment Income for Tax-Exempt Corporate and Trust Entities, Tax Years 1997–2010

[In thousands of dollars]



SOURCE: IRS, Statistics of Income Division, Tax Exempt Organizations, Unrelated Business Income, February 2014.

SOI added large income-size case returns (over \$500,000 or more of gross unrelated business income) filed after the sampling period closed, before selecting a sample of 7,242 returns from a population of 43,370. After excluding returns that were selected for the sample but later rejected, the resulting sample size was 7,220 returns, and the estimated population size was 43,184. Rejected returns included those that had gross unrelated business income less than the \$1,000 filing threshold; were filed for a part-year 2010 accounting period and a full-year 2010 return was also filed; or were filed for a part-year accounting period that began in a year other than 2010.

The Statistics of Income (SOI) Form 990-T study incorporated a two-stage sample design consisting of a stratified random sample and a special “integrated” sample. SOI designed the stratified random sample to represent the entire population of Form 990-T filers reporting unrelated business income. It designed the integrated sample to gather information on “related” (tax exempt) and “unrelated” (taxable) income and expenses for IRC section 501(c)(3) nonprofit charitable organizations that filed both Form 990 (or Form 990-EZ) and Form 990-T. This integrated sampling program ensured that the SOI sample of Forms 990-T included any unrelated business income tax returns (with gross unrelated business income of \$1,000 or more) filed by organizations whose Form 990 or Form 990-EZ information returns were selected for the separate SOI sample of section 501(c)(3) nonprofit charitable organizations. Organizations exempt under other Code sections were not subjected to the integrated sampling program.

The Form 990-T returns were initially divided into strata, based on gross unrelated business income, and selected using Bernoulli sampling, with sample rates ranging from 3.65 percent to 100 percent. IRC section 501(c)(3) returns not selected randomly were then matched to returns in the Forms 990/990-EZ sample. These linked returns, along with any randomly selected Forms 990-T that also had counterparts in the Forms 990/990-EZ sample, formed the “integrated” IRC section 501(c)(3) portion of the Form 990-T sample.⁴

SOI obtained the information presented in this article from returns as originally filed with the Internal Revenue Service. The amount of total tax liability originally reported on Forms 990-T, as stated in these statistics, may not necessarily be the amount ultimately paid to IRS. Changes in tax liability assessments can be made after the original return is filed, either by the taxpayer on an amended return, by the IRS after examination, or through litigation. The data were subjected to comprehensive testing and correction procedures in order to improve statistical reliability and validity. In most cases, due to time constraints, changes made to the original return as a result of administrative processing, audit procedures, or a taxpayer amendment were not incorporated into the database.

Because the data are based on a sample, they are subject to sampling error. To use these statistics properly, the magnitude of the sampling error, measured by the coefficient of variation (CV), should be taken into account. Figure H shows CVs for selected financial data estimates derived from the Form 990-T stratified random sample. A discussion of the reliability of

Figure H

Unrelated Business Income Tax Returns: Coefficients of Variation by Number of Returns, Gross Unrelated Business Income, Total Deductions, Unrelated Business Taxable Income (Less Deficit), Unrelated Business Taxable Income, and Total Tax, by Type of Tax-Exempt Organization, Tax Year 2010

[Coefficients of variation are in percentages]

Type of tax-exempt organization, as defined by Internal Revenue Code section	Number of returns	Gross unrelated business income (UBI)	Total deductions		Unrelated business taxable income (less deficit)		Unrelated business taxable income [1]		Total tax	
			Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
All organizations	0.15	0.22	0.15	0.33	0.19	31.97	0.32	1.03	0.32	1.05
501(c)(2) Title-holding corporations for exempt organizations [2]	29.52	11.57	29.52	11.53	33.99	126.33	41.30	24.81	41.30	16.34
501(c)(3) Religious, educational, charitable, scientific, or literary organizations	2.70	0.34	2.70	0.44	3.14	14.99	4.97	1.10	4.93	1.01
501(c)(4) Civic leagues and social welfare organizations	11.50	1.91	11.50	2.03	13.83	547.36	22.50	8.06	22.34	10.00
501(c)(5) Labor, agricultural, and horticultural organizations	10.00	4.50	10.00	5.33	11.34	27.29	15.47	6.16	15.45	5.85
501(c)(6) Business leagues, chambers of commerce, and real estate boards	6.14	1.81	6.14	1.93	7.17	120.19	10.78	4.95	10.52	4.83
501(c)(7) Social and recreational clubs	5.75	2.94	5.80	3.37	6.84	30.49	8.61	6.32	8.74	5.77
501(c)(8) Fraternal beneficiary societies and associations	14.87	10.23	14.87	10.80	16.30	660.74	23.27	22.09	23.27	21.82
501(c)(9) Voluntary employees' beneficiary associations	15.82	1.91	15.86	2.09	20.21	4.86	21.17	3.30	21.17	3.80
501(c)(10) Domestic fraternal beneficiary societies and associations	45.45	25.84	45.46	26.87	46.23	58.41	62.54	58.20	62.54	56.41
401(a) Qualified pension, profit-sharing, or stock bonus plans	17.90	2.67	18.30	3.32	22.25	7.49	23.94	4.50	23.63	5.93
408(e) Traditional Individual Retirement Accounts	5.23	9.91	5.23	13.42	5.44	15.74	4.97	14.04	5.04	17.83
Other [3]	7.29	2.79	7.31	3.44	8.05	13.92	12.98	8.78	13.14	7.78

[1] Includes data from returns with positive amounts of unrelated business taxable income only.
 [2] Corporations that are organized under an Act of Congress and are instrumentalities of the United States, described in section 501(c)(1) of the Internal Revenue Code, are not subject to unrelated business income taxation.
 [3] This category includes organizations described under sections 501(c)(11)-(19), 501(c)(21)-(27), as well as Archer Medical Savings Accounts, exempt under section 220(e); Roth Individual Retirement Accounts, exempt under section 408A; State-sponsored qualified tuition plans, exempt under section 529(a); and Coverdell Education Savings Accounts, exempt under section 530(a).
 NOTE: For more complete descriptions of the types of tax-exempt organizations filing Form 990-T, by the Internal Revenue Code section describing them, see Figure C of this article.
 SOURCE: IRS, Statistics of Income Division, Tax Exempt Organizations, Unrelated Business Income, February 2014.

⁴ For additional information on the Forms 990 and 990-T integrated sample design, see Harte, James M., and Cecelia H. Hilgert, “Enriching One Sample While Improving Another: Linking Differently Stratified Samples of Documents Filed by Exempt Organizations,” *Statistics of Income: Compendium of Studies of Tax-Exempt Organizations, 1989–1998*, 2002.

estimates based on samples and methods for evaluating both the magnitude of sampling and nonsampling error and the precision of sample estimates can be found in SOI Sampling Methodology and Data Limitations, located near the back of this issue of the *SOI Bulletin* or at <http://www.irs.gov/uac/SOI-Tax-Stats-Statistical-Methodology>.

Explanation of Selected Terms

This section provides definitions to help the reader understand the terms contained in the article and in Tables 1 through 7 at the end of this article. In some of the following explanations, tax-exempt organizations are cited by the Internal Revenue Code section under which they are described. Figure C shows the various types of tax-exempt organizations subject to the unrelated business income tax provisions.

Charitable contributions—To the extent permissible under the Internal Revenue Code, a deduction was allowed for contributions or gifts actually paid within the tax year to, or for the use of, another entity that was a charitable or Governmental organization described in Code section 170(c). A tax-exempt corporation was allowed a deduction for charitable contributions up to 10 percent of its unrelated business taxable income computed without regard to the deduction for contributions. A tax-exempt trust was generally allowed a deduction for charitable contributions under the rules applicable to individual taxpayers, except the limit on the deduction was determined in relation to unrelated business taxable income computed without regard to the contributions deduction, rather than in relation to adjusted gross income. Contributions in excess of the respective corporate or trust limitations may be carried over to the next 5 taxable years, subject to certain rules. The contributions deduction was allowed whether or not the donated income was directly connected with the carrying on of a trade or business.

Cost of sales and services—Cost of sales and services may have included depreciation, salaries and wages, and certain other types of deductible items. For this reason, the total amount shown for some of the separately reported components of total deductions, such as “salaries and wages,” may be understated. Cost of sales and services was subtracted from gross receipts from sales and services in computing gross profit (less loss) from sales and services, which is a component of gross unrelated business income.

Gross unrelated business income—This was the total gross unrelated business income prior to reduction by allowable deductions used in computing unrelated business taxable income. All organizations were required to report detailed sources of gross unrelated business income. The components of gross unrelated business income included: gross profit (less loss) from sales and services; capital gain net income; net gain (less loss) from sales of noncapital assets; net capital loss deduction (trusts only); and income (less loss) from partnerships and S corporations. It also included: rental income; unrelated debt-financed income; investment income (less loss) of Internal Revenue Code sections 501(c)(7), (9), and (17) organizations; income (annuities, interest, rents, and royalties) from controlled organizations; “exploited exempt activity” income, except advertising; advertising

income; and “other” income (less loss). (For an explanation of these sources of income, see the separate explanations of each component.)

A tax-exempt organization’s income was treated as unrelated business income if it was from a trade or business that was regularly carried on by the organization and that was not substantially related to the performance of the organization’s exempt purpose or function (other than that the organization needed the profits derived from the unrelated activity). The term “trade or business” generally comprised any activities carried on for the production of income from selling goods or performing services. These activities did not lose their identity as trades or businesses merely because they were carried on within a larger aggregate of similar activities or within a larger complex of other endeavors that may, or may not, have been related to the exempt purposes of the organization. Soliciting, selling, or publishing commercial advertising, for example, is identified as a trade or business, even though the advertising is published in an exempt organization’s periodical that contains editorial material that is related to the organization’s exempt purpose.

Investment income (less loss)—Only organizations exempt under Internal Revenue Code sections 501(c)(7), (9), and (17) reported this income. Investment income (less loss) included income, such as gross unrelated debt-financed income, gross income from the ownership or sale of securities, and set-asides deducted from investment income in previous years that were subsequently used for a purpose other than that for which a deduction was allowed. (See, also, the explanation of Set-asides.) All gross rents (except those that were exempt-function income) from investment property of sections 501(c)(7), (9), and (17) organizations were treated as unrelated business income and were reported as “rental income.” Organizations exempt under sections other than 501(c)(7), (9), and (17) did not report “investment income (less loss).” Generally, these organizations’ investment income (dividends, interest, rents, and annuities) and royalty income were not taxed as unrelated business income, unless it was income, other than dividends, from a controlled organization or debt-financed income, or the rents were of the type described in the explanation of rental income.

Other deductions—This included all types of unrelated business deductions that were not specifically required to be reported elsewhere on the tax return. Examples are fees for accounting, legal, consulting, or financial management services; insurance costs (if not for employee-related benefits); equipment costs; mailing costs; office expenses, such as janitorial services, supplies, or security services; rent; travel expenses; educational expenses; and utilities.

Other income (less loss)—This included all types of unrelated business income that were not specifically required to be reported elsewhere on the tax return. Examples are insurance benefit fees; member support fees; commissions; returned contributions that were deducted in prior years; income from insurance activities that was not properly set aside in prior years; recoveries of bad debts; and refunds of State or local government tax payments, if the payments were previously reported as a deduction.

Proxy tax—This was a tax on certain nondeductible lobbying and political expenditures. A membership organization that was tax exempt under Internal Revenue Code sections 501(c)(4), 501(c)(5), or 501(c)(6) was liable for the proxy tax if the organization did not notify its members of the shares of their dues that were allocated to the nondeductible lobbying and political expenditures, or if the notice did not include the entire amount of dues that was allocated. The proxy tax was computed as 35 percent of the aggregate amount of nondeductible lobbying expenditures that was not included in the notices sent to the organization’s members. The proxy tax was required to be reported on Form 990-T and was included in total tax; however, there was no connection between the proxy tax and the taxation of income from an organization’s unrelated business activities.

Total deductions—Total deductions included both deductions reported on the main part of Form 990-T and expense items reported on any of six supporting schedules, which were also part of the tax form. It excluded the costs of sales and services, which the organization subtracted from gross receipts from sales and services in computing gross profit (less loss) from sales and services, a component of gross unrelated business income. (See the explanation of Cost of sales and services.)

Total tax—Total tax was unrelated business income tax less the foreign tax credit, general business credit, credit for prior-year minimum tax, and other allowable credits, plus the “proxy tax” on certain lobbying and political expenditures, the “alternative minimum tax,” and “other” taxes.

Unrelated business activity—A business activity is considered unrelated if it does not contribute importantly (other than the production of funds) to accomplishing an organization’s charitable, educational, or other purpose that is the basis for the organization’s tax exemption. In determining whether activities contribute importantly to the accomplishment of an exempt purpose, the size, extent, and nature of the activities involved must be considered in relation to the size, extent, and nature of the exempt function that they intend to serve. To the extent an activity is conducted on a scale larger than is reasonably necessary to perform an exempt purpose, it does not contribute importantly to the accomplishment of the exempt purpose. The part of the activity that is more than needed to accomplish the exempt purpose is an unrelated trade or business. Whether an activity contributes importantly depends in each case on the facts involved. See IRS Publication 598, *Tax on Unrelated Business Income of Exempt Organizations*, for additional information on unrelated business income and tax.

The following is a case example from Publication 598. An American folk art museum operates a shop in the museum that sells reproductions of works in the museum’s own collection and works from the collections of other art museums. In addition, the museum sells souvenir items of the city where the museum is located. The sale of the reproductions, regardless of which museum houses the original works, is considered to

be “related” because it contributes importantly to the achievement of the museum’s exempt educational purpose by making works of art familiar to a broader segment of the public, thereby enhancing the public’s understanding and appreciation of art. However, the sale of souvenir items depicting the city in which the museum is located is considered to be “unrelated” because it has no causal relationship to art or to artistic endeavor, and, therefore, does not contribute importantly to the accomplishment of the museum’s exempt educational purposes.

Unrelated business income—See definition of gross unrelated business income.

Unrelated business income tax—This was the tax imposed on unrelated business taxable income. It was determined based on the regular corporate or trust income tax rates that were in effect for the 2010 Tax Year, as shown in the following schedules. Trusts that were eligible for the maximum 28-percent tax rate on capital gain net income figured their tax based on Schedule D of Form 1041, *U.S. Income Tax Return for Estates and Trusts*.

Tax Rates for Corporations

Amount of unrelated business taxable income is:

Over—	But not over—	Tax is:	Of the amount over—
\$ 0	\$50,000	+ 15%	\$ 0
50,000	75,000	\$7,500 + 25%	50,000
75,000	100,000	13,750 + 34%	75,000
100,000	335,000	22,250 + 39%	100,000
335,000	10,000,000	113,900 + 34%	335,000
10,000,000	15,000,000	3,400,000 + 35%	10,000,000
15,000,000	18,333,333	5,150,000 + 38%	15,000,000
18,333,333	—	35%	0

Tax Rates for Trusts

Amount of unrelated business taxable income is:

Over—	But not over—	Tax is:	Of the amount over—
\$ 0	\$2,300	+ 15%	\$ 0
2,300	5,350	\$345 + 25%	2,300
5,350	8,200	1,107.50 + 28%	5,350
8,200	11,200	1,905.50 + 33%	8,200
11,200	—	2,895.50 + 35%	11,200

Unrelated business taxable income (less deficit)(referenced as Net unrelated business taxable income)—This was gross income derived from any unrelated trade or business regularly carried on by an exempt organization less deductions directly connected with carrying on the trade or business and less other allowable deductions not directly connected. On a return-by-return basis, the result of this computation was either positive (unrelated business taxable income), negative (deficit), or zero. Taxable income was subject to the unrelated business income tax.

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Table 1. Unrelated Business Income Tax Returns: Number of Returns, Gross Unrelated Business Income, Total Deductions, Unrelated Business Taxable Income (Less Deficit), Unrelated Business Taxable Income, and Total Tax, by Type of Tax-Exempt Organization, Tax Year 2010

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

Type of tax-exempt organization, as defined by Internal Revenue Code section	Number of returns	Gross unrelated business income	Total deductions [1,2]		Unrelated business taxable income (less deficit) [3]		Unrelated business taxable income [4]		Total tax [5]	
			Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
All organizations	43,184	10,966,456	42,963	10,882,576	33,142	83,880	19,874	1,217,989	19,742	332,465
220(e) Archer Medical Savings Accounts	d	d	d	d	d	d	d	d	d	d
401(a) Qualified pension, profit-sharing, or stock bonus plans	628	306,160	590	222,930	398	83,230	369	110,151	367	25,295
408(e) Traditional Individual Retirement Accounts	7,645	44,591	7,644	21,185	6,693	23,406	6,423	25,093	6,297	6,345
408(A) Roth Individual Retirement Accounts	280	9,095	280	2,420	280	6,675	217	7,016	217	2,278
501(c)(2) Title-holding corporations for exempt organizations [6]	261	35,419	261	34,548	186	871	146	3,752	146	854
501(c)(3) Religious, educational, charitable, scientific, or literary organizations	15,085	7,115,467	15,048	7,238,438	11,168	-122,971	5,375	647,457	5,362	185,533
501(c)(4) Civic leagues and social welfare organizations	1,553	535,998	1,553	535,534	1,084	464	429	16,438	432	4,707
501(c)(5) Labor, agricultural, and horticultural organizations	2,007	266,998	2,007	248,782	1,575	18,216	842	42,404	843	12,022
501(c)(6) Business leagues, chambers of commerce, and real estate boards	4,835	977,431	4,835	972,162	3,509	5,270	1,556	76,186	1,643	23,220
501(c)(7) Social and recreational clubs	5,788	665,519	5,675	639,456	4,171	26,064	2,766	72,714	2,687	19,089
501(c)(8) Fraternal beneficiary societies and associations	1,051	633,921	1,051	630,444	877	347	442	62,355	442	12,722
501(c)(9) Voluntary employees' beneficiary associations	391	416,236	390	280,484	300	135,753	248	182,380	248	44,413
501(c)(10) Domestic fraternal beneficiary societies and associations	90	13,612	90	14,794	89	-1,183	11	353	11	55
501(c)(11) Teachers' retirement fund associations	0	0	0	0	0	0	0	0	0	0
501(c)(12) Benevolent life insurance associations and certain mutual companies	356	76,951	356	68,559	251	8,393	220	10,994	220	3,048
501(c)(13) Cemetery companies	d	d	d	d	d	d	d	d	d	d
501(c)(14) State-chartered credit unions	1,284	249,724	1,284	326,711	1,098	-76,987	200	8,690	232	2,442
501(c)(15) Mutual insurance companies	0	0	0	0	0	0	0	0	0	0
501(c)(16) Corporations organized to finance crop operations	0	0	0	0	0	0	0	0	0	0
501(c)(17) Supplemental unemployment benefit trusts	0	0	0	0	0	0	0	0	0	0
501(c)(18) Employee-funded pension trusts	d	d	d	d	d	d	d	d	d	d
501(c)(19) War veterans' posts or organizations	1,818	173,272	1,787	176,929	1,384	-3,656	593	6,876	558	1,479
501(c)(21) Black Lung Benefit Trusts [7]	0	0	0	0	0	0	0	0	0	0
501(c)(22) Withdrawal liability payment funds	0	0	0	0	0	0	0	0	0	0
501(c)(23) Veterans' associations founded before 1880	0	0	0	0	0	0	0	0	0	0
501(c)(24) Trusts described in section 4049 of ERISA	0	0	0	0	0	0	0	0	0	0
501(c)(25) Title-holding companies with no more than 35 shareholders	0	0	0	0	0	0	0	0	0	0
501(c)(26) High-risk health insurance plans	0	0	0	0	0	0	0	0	0	0
501(c)(27) Workers' compensation reinsurance plans	d	d	d	d	d	d	d	d	d	d
529(a) Qualified State tuition plans	d	d	d	d	d	d	d	d	d	d
530(a) Coverdell Education Savings Accounts	0	0	0	0	0	0	0	0	0	0

d—Data deleted to avoid disclosure of information for specific taxpayers. However, data are included in appropriate totals.

[1] Excludes cost of sales and services, which was subtracted from gross receipts from sales and services in computing gross profit from sales and services. Gross profit from sales and services was a component of gross unrelated business income (UBI). Cost of sales and services can include amounts attributable to depreciation, salaries and wages, and certain other deductible items. For all exempt organizations reporting gross UBI, cost of sales and services was \$2.5 billion.

[2] Includes both expenses and deductions reported on Form 990-T, lines 13(B), 29, 31, and 33.

[3] Excludes data from 10,042 returns with equal amounts of gross UBI and total deductions.

[4] Includes data from returns with positive amounts of unrelated business taxable income only.

[5] Total tax is the regular unrelated business income tax after reduction by any tax credits (foreign tax credit, general business credit, prior-year minimum tax credit, and other allowable credits), plus the "alternative minimum tax," the "proxy" tax on nondeductible lobbying and political expenditures, and "other" taxes. The proxy tax was reported on Form 990-T and was included in total tax, but it had no connection to the tax on unrelated business income or an organization's involvement in unrelated business activities. For exempt organizations reporting gross UBI above the \$1,000 filing threshold, total proxy tax was \$1.5 million.

[6] Corporations that are organized under an Act of Congress and are instrumentalities of the United States, described in section 501(c)(1) of the Internal Revenue Code, are not subject to unrelated business income taxation.

[7] Prepaid legal service funds, previously described in section 501(c)(20) of the Internal Revenue Code, were no longer tax-exempt, beginning with tax years after June 30, 1992. Therefore, these organizations are not listed in this table.

NOTES: Detail may not add to totals because of rounding. For more complete descriptions of the types of tax-exempt organizations filing Form 990-T, by the Internal Revenue Code section describing them, see the Appendix to the most recent Unrelated Business Income Tax (UBIT) article listed under Publications and Papers on the Exempt Organizations' UBIT Statistics page of the IRS Website ([http://www.irs.gov/uac/SOI-Tax-Stats-Exempt-Organizations-Unrelated-Business-Income-\(UBI\)-Tax-Statistics](http://www.irs.gov/uac/SOI-Tax-Stats-Exempt-Organizations-Unrelated-Business-Income-(UBI)-Tax-Statistics)).

SOURCE: IRS, Statistics of Income Division, Tax Exempt Organizations, Unrelated Business Income, February 2014.

Table 2. Unrelated Business Income Tax Returns: Number of Returns, Gross Unrelated Business Income, Total Deductions, Unrelated Business Taxable Income (Less Deficit), Unrelated Business Taxable Income, and Total Tax, by Size of Gross UBI, Tax Year 2010

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

Size of gross unrelated business income	Number of returns	Gross unrelated business income	Total deductions [1,2]		Unrelated business taxable income (less deficit) [3]		Unrelated business taxable income [4]		Total tax [5]	
			Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Total	43,184	10,966,456	42,963	10,882,576	33,142	83,880	19,874	1,217,989	19,742	332,465
\$1,000 under \$10,001 [6]	19,312	72,578	19,153	74,722	14,662	-2,144	10,984	20,721	10,894	3,513
\$10,001 under \$100,000 [6]	14,183	613,254	14,131	649,758	11,077	-36,503	5,487	93,767	5,381	16,987
\$100,000 under \$500,000	6,617	1,596,501	6,612	1,663,108	5,065	-66,607	2,290	175,979	2,296	46,726
\$500,000 under \$1,000,000	1,398	976,575	1,396	1,020,778	1,071	-44,203	520	104,564	515	31,460
\$1,000,000 under \$5,000,000	1,320	2,728,802	1,317	2,713,706	992	15,096	453	292,395	493	90,320
\$5,000,000 or more	354	4,978,746	354	4,760,505	276	218,241	141	530,562	163	143,457

[1] Excludes cost of sales and services, which was subtracted from gross receipts from sales and services in computing gross profit from sales and services. Gross profit from sales and services was a component of gross unrelated business income (UBI). Cost of sales and services can include amounts attributable to depreciation, salaries and wages, and certain other deductible items. For all exempt organizations reporting gross UBI, cost of sales and services was \$2.5 billion.

[2] Includes both expenses and deductions reported on Form 990-T, lines 13(B), 29, 31, and 33.

[3] Excludes data from 10,042 returns with equal amounts of gross UBI and total deductions.

[4] Includes data from returns with positive amounts of unrelated business taxable income only.

[5] Total tax is the regular unrelated business income tax after reduction by any tax credits (foreign tax credit, general business credit, prior-year minimum tax credit, and other allowable credits), plus the "alternative minimum tax," the "proxy" tax on nondeductible lobbying and political expenditures, and "other" taxes. The proxy tax was reported on Form 990-T and was included in total tax; however, it had no connection to the tax on unrelated business income or an organization's involvement in unrelated business activities. For exempt organizations reporting gross UBI above the \$1,000 filing threshold, total proxy tax was \$1.5 million.

[6] The gross unrelated business income (UBI) brackets of "\$1,000 under \$10,001" and "\$10,001 under \$100,000" reflect the different filing requirements for organizations with gross UBI of \$10,000 or less (not required to report itemized expenses and deductions, or to complete return schedules) and all other Form 990-T filers (required to file a more detailed "complete" return). Organizations with gross UBI below \$1,000 were not required to file Form 990-T.

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

SOURCE: IRS, Statistics of Income Division, Tax Exempt Organizations, Unrelated Business Income, February 2014.

Table 3. Unrelated Business Income Tax Returns: Number of Returns, Gross Unrelated Business Income, Total Deductions, Unrelated Business Taxable Income (Less Deficit), and Total Tax, by Size of Unrelated Business Taxable Income or Deficit, Tax Year 2010

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

Size of unrelated business taxable income or deficit	Number of returns	Gross unrelated business income	Total deductions [1,2]		Unrelated business taxable income (less deficit)		Total tax [3]	
			Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Total	43,184	10,966,456	42,963	10,882,576	33,142	83,880	19,742	332,465
Deficit	13,268	4,575,710	13,268	5,709,819	13,268	-1,134,109	58	634
Zero [4]	10,042	2,452,080	10,042	2,452,080	0	0	225	2,959
\$1 under \$1,000	5,406	60,406	5,406	58,071	5,406	2,335	5,249	341
\$1,000 under \$10,000	8,657	294,938	8,498	263,359	8,657	31,579	8,469	5,562
\$10,000 under \$100,000	4,393	715,535	4,341	575,347	4,393	140,189	4,335	25,904
\$100,000 under \$500,000	1,032	747,806	1,027	527,582	1,032	220,224	1,027	65,762
\$500,000 under \$1,000,000	174	390,755	172	269,881	174	120,874	170	38,840
\$1,000,000 or more	212	1,729,225	209	1,026,436	212	702,789	208	192,463

[1] Excludes cost of sales and services, which was subtracted from gross receipts from sales and services in computing gross profit from sales and services. Gross profit from sales and services was a component of gross unrelated business income (UBI). Cost of sales and services can include amounts attributable to depreciation, salaries and wages, and certain other deductible items. For all exempt organizations reporting gross UBI, cost of sales and services was \$2.5 billion.

[2] Includes both expenses and deductions reported on Form 990-T, lines 13(B), 29, 31, and 33.

[3] Total tax is the regular unrelated business income tax after reduction by any tax credits (foreign tax credit, general business credit, prior-year minimum tax credit, and other allowable credits), plus the "alternative minimum tax," the "proxy" tax on nondeductible lobbying and political expenditures, and "other" taxes. The proxy tax was reported on Form 990-T and was included in total tax; however, it had no connection to the tax on unrelated business income or an organization's involvement in unrelated business activities. For exempt organizations reporting gross UBI above the \$1,000 filing threshold, total proxy tax was \$1.5 million.

[4] The Zero category includes 10,042 returns with equal amounts of gross unrelated business income and total deductions.

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

SOURCE: IRS, Statistics of Income Division, Tax Exempt Organizations, Unrelated Business Income, February 2014.

Table 4. Unrelated Business Income Tax Returns with Positive Unrelated Business Taxable Income: Number of Returns, Gross Unrelated Business Income, Total Deductions, Unrelated Business Taxable Income, and Total Tax, by Type of Entity and Size of Gross UBI, Tax Year 2010

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

Type of entity and size of gross unrelated business income	Number of returns	Gross unrelated business income	Total deductions [1,2]		Unrelated business taxable income	Total tax [3]	
			Number of returns	Amount		Number of returns	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
ALL ENTITIES							
Total	19,874	3,938,666	19,653	2,720,677	1,217,989	19,459	328,872
\$1,000 under \$10,001 [4]	10,984	36,971	10,825	16,251	20,721	10,824	3,301
\$10,001 under \$100,000 [4]	5,487	237,729	5,435	143,962	93,767	5,338	16,920
\$100,000 under \$500,000	2,290	556,280	2,285	380,301	175,979	2,223	46,447
\$500,000 under \$1,000,000	520	362,747	518	258,183	104,564	496	31,160
\$1,000,000 under \$5,000,000	453	910,210	450	617,815	292,395	442	89,534
\$5,000,000 or more	141	1,834,728	141	1,304,166	530,562	136	141,509
TAX-EXEMPT CORPORATIONS							
Total	12,211	3,357,023	12,030	2,556,440	800,583	11,947	236,885
\$1,000 under \$10,001 [4]	4,391	18,839	4,264	9,132	9,707	4,357	1,431
\$10,001 under \$100,000 [4]	4,852	219,760	4,800	141,028	78,732	4,722	12,860
\$100,000 under \$500,000	2,003	485,909	2,003	363,695	122,214	1,937	31,315
\$500,000 under \$1,000,000	467	323,686	467	247,784	75,902	445	22,754
\$1,000,000 under \$5,000,000	382	769,586	380	579,749	189,836	372	62,489
\$5,000,000 or more	116	1,539,242	116	1,215,051	324,191	114	106,036
TAX-EXEMPT TRUSTS							
Total	7,663	581,643	7,623	164,237	417,406	7,512	91,987
\$1,000 under \$10,001 [4]	6,593	18,132	6,561	7,119	11,014	6,467	1,870
\$10,001 under \$100,000 [4]	635	17,969	635	2,934	15,035	616	4,060
\$100,000 under \$500,000	286	70,371	281	16,606	53,765	286	15,132
\$500,000 under \$1,000,000	53	39,061	51	10,399	28,662	51	8,406
\$1,000,000 under \$5,000,000	71	140,624	70	38,065	102,559	70	27,045
\$5,000,000 or more	25	295,486	25	89,114	206,371	22	35,474

[1] Excludes cost of sales and services, which was subtracted from gross receipts from sales and services in computing gross profit from sales and services. Gross profit from sales and services was a component of gross unrelated business income. Cost of sales and services can include amounts attributable to depreciation, salaries and wages, and certain other deductible items. For exempt organizations reporting positive unrelated business taxable income, cost of sales and services was \$9.0 million, 99 percent of which was attributable to tax-exempt corporations.

[2] Includes both expenses and deductions reported on Form 990-T, lines 13(B), 29, 31, and 33.

[3] Total tax is the regular unrelated business income tax after reduction by any tax credits (foreign tax credit, general business credit, prior-year minimum tax credit, and other allowable credits), plus the "alternative minimum tax," the "proxy" tax on nondeductible lobbying and political expenditures, and "other" taxes. The proxy tax was reported on Form 990-T and was included in total tax; however, it had no connection to the tax on unrelated business income or an organization's involvement in unrelated business activities. For exempt organizations reporting positive unrelated business taxable income, total proxy tax was \$1.5 million.

[4] The gross unrelated business income (UBI) brackets of "\$1,000 under \$10,001" and "\$10,001 under \$100,000" reflect the different filing requirements for organizations with gross UBI of \$10,000 or less (not required to report itemized expenses and deductions, or to complete return schedules) and all other Form 990-T filers (required to file a more detailed "complete" return). Organizations with gross UBI below \$1,000 were not required to file Form 990-T.

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

SOURCE: IRS, Statistics of Income Division, Tax Exempt Organizations, Unrelated Business Income, February 2014.

Table 5. Unrelated Business Income Tax Returns: Number of Returns, Gross Unrelated Business Income, Total Deductions, Unrelated Business Taxable Income (Less Deficit), Unrelated Business Taxable Income, and Total Tax, by Primary Unrelated Business Activity or Industrial Grouping, Tax Year 2010

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

Primary unrelated business activity or industrial grouping	Number of returns	Gross unrelated business income	Total deductions [1,2]		Unrelated business taxable income (less deficit) [3]		Unrelated business taxable income [4]		Total tax [5]	
			Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
All activities and groupings	43,184	10,966,456	42,963	10,882,576	33,142	83,880	19,874	1,217,989	19,742	332,465
Agriculture, forestry, hunting, and fishing	195	42,140	195	32,089	157	10,051	93	16,208	93	4,957
Mining	418	41,207	400	26,451	321	14,755	275	16,689	274	3,403
Utilities	32	22,170	32	21,715	* 17	* 455	* 12	* 552	* 13	* 108
Construction	d	d	d	d	d	d	d	d	d	d
Manufacturing	141	61,980	136	39,778	129	22,203	85	27,841	55	6,740
Wholesale trade	67	35,083	67	20,765	67	14,318	55	16,493	53	2,081
Retail trade	1,663	820,436	1,663	866,846	1,375	-46,410	576	60,107	584	19,736
Transportation and warehousing	52	6,594	52	4,635	* 51	* 1,959	* 40	* 2,182	* 40	* 725
Information	712	175,161	712	172,739	447	2,422	200	13,709	202	4,037
Finance and insurance, total	14,086	2,038,183	14,017	1,785,917	11,303	252,266	9,391	543,209	9,336	138,657
Unrelated debt-financed activities, other than rental of real estate	828	127,272	828	108,283	693	18,989	505	35,101	508	8,187
Investment activities of Code section 501(c)(7), (9), and (17) organizations [6]	2,551	531,162	2,518	388,018	1,652	143,144	1,391	185,576	1,373	43,591
Passive income activities with controlled organizations	337	180,607	337	136,436	240	44,171	164	56,871	169	12,163
Other finance and insurance	10,370	1,199,142	10,334	1,153,180	8,718	45,962	7,331	265,661	7,286	74,716
Real estate and rental and leasing, total	7,713	1,126,421	7,648	1,161,761	6,335	-35,339	3,506	110,638	3,473	29,278
Rental of personal property	428	53,970	428	59,965	339	-5,994	184	5,629	218	1,380
Other real estate and rental and leasing	7,285	1,072,451	7,220	1,101,796	5,996	-29,345	3,322	105,009	3,255	27,898
Professional, scientific, and technical services	7,785	2,114,208	7,785	2,134,974	5,151	-20,767	2,193	136,266	2,286	40,733
Management of companies and enterprises	d	d	d	d	d	d	d	d	d	d
Administrative and support and waste management and remediation services	881	683,568	881	712,164	616	-28,595	239	21,142	216	6,584
Educational services	37	47,128	37	54,609	32	-7,482	* 6	* 758	* 6	* 236
Healthcare and social assistance	976	1,861,415	976	1,830,373	686	31,042	353	155,054	374	51,528
Arts, entertainment, and recreation	4,203	888,325	4,140	968,768	3,061	-80,442	1,332	26,793	1,281	6,204
Accommodation and food services	2,998	673,546	2,997	746,377	2,414	-72,832	875	19,021	860	4,683
Other services	577	133,695	577	142,339	458	-8,644	294	6,667	265	1,418
Exploited exempt activities	230	81,910	230	80,905	188	1,005	81	6,837	82	2,045
Other activity	305	37,736	305	29,754	268	7,982	227	11,281	207	3,464
Not allocable	d	d	d	d	d	d	d	d	d	d

* Estimate should be used with caution because of the small number of sample returns on which it is based.

d—Data were deleted to prevent disclosure of individual taxpayer data. However, the data are included in the appropriate totals.

[1] Excludes cost of sales and services, which was subtracted from gross receipts from sales and services in computing gross profit from sales and services. Gross profit from sales and services was a component of gross unrelated business income (UBI). Cost of sales and services can include amounts attributable to depreciation, salaries and wages, and certain other deductible items. For all exempt organizations reporting gross UBI, cost of sales and services was \$2.5 billion.

[2] Includes both expenses and deductions reported on Form 990-T, lines 13(B), 29, 31, and 33.

[3] Excludes data from 10,042 returns with equal amounts of gross UBI and total deductions.

[4] Includes data from returns with positive amounts of unrelated business taxable income only.

[5] Total tax is the regular unrelated business income tax after reduction by any tax credits (foreign tax credit, general business credit, prior-year minimum tax credit, and other allowable credits), plus the "alternative minimum tax," the "proxy" tax on nondeductible lobbying and political expenditures, and "other" taxes. The proxy tax was reported on Form 990-T and was included in total tax; however, it had no connection to the tax on unrelated business income or an organization's involvement in unrelated business activities. For exempt organizations reporting gross UBI above the \$1,000 filing threshold, total proxy tax was \$1.5 million.

[6] Section 501(c)(7) organizations are social and recreational clubs; section 501(c)(9) organizations are voluntary employees' beneficiary associations; and section 501(c)(17) organizations are supplemental unemployment benefit trusts. See Table 1 for separate data on each of these organizations.

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

SOURCE: IRS, Statistics of Income Division, Tax Exempt Organizations, Unrelated Business Income, February 2014.

Table 6. Unrelated Business Income Tax Returns: Sources of Gross Unrelated Business Income (UBI), by Size of Gross UBI, Tax Year 2010

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

Size of gross unrelated business income (UBI)	Gross unrelated business income (UBI)		Source of gross unrelated business income (UBI)					
			Gross profit (less loss) from sales and services		Net capital gain income		Net capital loss (trusts only)	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Total	43,184	10,966,456	16,199	6,495,136	1,773	424,266	270	626
\$1,000 under \$10,001 [1]	19,312	72,578	3,578	16,442	789	2,347	* 126	* 129
\$10,001 or more, total [1]	23,872	10,893,878	12,621	6,478,695	984	421,919	145	497
\$10,001 under \$100,000	14,183	613,254	6,560	253,195	405	8,576	**	**
\$100,000 under \$500,000	6,617	1,596,501	3,962	847,510	323	39,526	62	185
\$500,000 under \$1,000,000	1,398	976,575	925	541,292	75	20,212	18	54
\$1,000,000 under \$5,000,000	1,320	2,728,802	912	1,636,631	128	98,149	24	139
\$5,000,000 or more	354	4,978,746	262	3,200,067	53	255,456	**	**

Size of gross unrelated business income (UBI)	Source of gross unrelated business income (UBI)—continued							
	Net gain (less loss), sales of noncapital assets [2]		Income (less loss) from partnerships and S corporations		Rental income [3]		Unrelated debt-financed income	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
Total	354	4,677	10,766	556,626	4,990	345,914	3,697	566,245
\$1,000 under \$10,001 [1]	95	167	7,795	19,028	1,554	7,372	1,166	5,368
\$10,001 or more, total [1]	259	4,511	2,971	537,599	3,436	338,542	2,531	560,877
\$10,001 under \$100,000	** 76	** 74	1,517	39,639	2,257	68,439	1,520	52,507
\$100,000 under \$500,000	98	1,434	773	72,690	807	97,620	688	116,616
\$500,000 under \$1,000,000	31	222	207	46,413	183	49,642	141	60,484
\$1,000,000 under \$5,000,000	60	-1,104	315	111,922	150	68,547	136	142,765
\$5,000,000 or more	** 35	** 4,004	159	266,935	39	54,294	46	188,505

Size of gross unrelated business income (UBI)	Source of gross unrelated business income (UBI)—continued									
	Investment income (less loss) [4]		Income from controlled organizations [5]		Exploited exempt activity income, except advertising		Advertising income		Other income (less loss)	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)	(25)	(26)
Total	4,330	414,148	699	98,286	942	212,607	7,512	1,204,951	6,123	644,224
\$1,000 under \$10,001 [1]	2,112	5,383	* 222	* 726	* 160	* 893	2,651	10,894	1,637	4,088
\$10,001 or more, total [1]	2,218	408,765	478	97,561	782	211,714	4,861	1,194,056	4,486	640,136
\$10,001 under \$100,000	982	9,917	164	5,561	331	11,730	2,955	98,065	2,688	65,742
\$100,000 under \$500,000	879	45,888	166	18,165	249	24,517	1,277	213,441	1,204	119,279
\$500,000 under \$1,000,000	211	37,187	44	10,661	75	23,758	291	131,410	250	55,348
\$1,000,000 under \$5,000,000	124	124,825	75	30,191	103	73,121	269	280,033	273	163,861
\$5,000,000 or more	22	190,948	29	32,983	24	78,588	69	471,107	71	235,906

* Estimate should be used with caution because of the small number of sample returns on which it is based.

** Data in adjacent variable columns are combined to avoid disclosure of information about specific taxpayers.

[1] The gross unrelated business income (UBI) brackets of "\$1,000 under \$10,001" and "\$10,001 or more" reflect the different filing requirements for organizations with gross UBI of \$10,000 or less (not required to report itemized expenses and deductions, or to complete return schedules) and all other Form 990-T filers (required to file a more detailed "complete" return). Organizations with gross UBI below \$1,000 were not required to file Form 990-T.

[2] Property other than capital assets generally included property of a business nature, in contrast to personal property and investment property, which were capital assets.

[3] Income from real property and personal property leased with real property.

[4] Reported by Internal Revenue Code section 501(c)(7) social and recreational clubs, section 501(c)(9) voluntary employees' beneficiary associations, and section 501(c)(17) supplemental unemployment benefit trusts only. See Table 1 for separate data on each of these organizations.

[5] Annuities, interest, rents, and royalties.

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

SOURCE: IRS, Statistics of Income Division, Tax Exempt Organizations, Unrelated Business Income, February 2014.

Table 7. Unrelated Business Income Tax Returns: Types of Deductions, by Size of Gross Unrelated Business Income (UBI), Tax Year 2010

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

Item	Size of gross unrelated business income							
	All		\$1,000 under \$10,001 [1]		\$10,001 under \$100,000 [1]		\$100,000 under \$500,000	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Number of returns	43,184	N/A	19,312	N/A	14,183	N/A	6,617	N/A
Total deductions [2,3]	42,963	10,882,577	19,153	74,722	14,131	649,758	6,612	1,663,108
Organizations with gross unrelated business income (UBI) of \$1,000 under \$10,001 [1]:								
Total deductions [3,4]	19,153	74,722	19,153	74,722	N/A	N/A	N/A	N/A
Net operating loss deduction	2,318	5,385	2,318	5,385	N/A	N/A	N/A	N/A
Specific deduction	12,540	11,762	12,540	11,762	N/A	N/A	N/A	N/A
Organizations with gross unrelated business income (UBI) of \$10,001 or more [1]:								
Total deductions [3,5]	23,810	10,807,855	N/A	N/A	14,131	649,758	6,612	1,663,108
Deductions directly connected with UBI	22,649	10,150,166	N/A	N/A	13,243	617,896	6,406	1,577,170
Allocable to rental income [6]	2,000	256,665	N/A	N/A	1,307	42,295	456	77,995
Allocable to unrelated debt-financed income [6]	2,332	600,439	N/A	N/A	1,382	67,802	646	125,968
Allocable to investment income [6,7]	748	32,946	N/A	N/A	* 169	* 2,789	375	3,099
Allocable to income from controlled organizations [6]	313	82,948	N/A	N/A	107	6,676	106	15,440
Allocable to exploited exempt activity income, except advertising [6]	708	161,847	N/A	N/A	330	9,450	196	16,623
Direct advertising costs [6]	4,271	857,522	N/A	N/A	2,545	70,292	1,129	152,474
Compensation of officers, directors, and trustees	1,827	58,872	N/A	N/A	831	11,528	676	18,012
Salaries and wages	10,802	2,043,635	N/A	N/A	5,264	123,022	3,671	384,306
Repairs and maintenance	7,218	148,777	N/A	N/A	3,704	17,575	2,362	28,279
Bad debts	706	44,492	N/A	N/A	140	1,177	227	1,106
Interest	2,791	136,662	N/A	N/A	1,162	6,042	1,107	21,416
Taxes and licenses paid deduction	10,259	196,663	N/A	N/A	5,218	20,265	3,421	57,315
Depreciation	7,019	301,719	N/A	N/A	3,187	19,818	2,453	59,954
Depletion	167	15,558	N/A	N/A	* 110	* 662	* 25	* 1,183
Contributions to deferred compensation plans	1,190	20,077	N/A	N/A	350	334	521	2,240
Contributions to employee benefit programs	5,227	348,680	N/A	N/A	1,895	6,052	2,025	42,697
Net operating loss deduction	3,911	439,915	N/A	N/A	2,162	32,358	1,112	54,491
Other deductions	14,606	4,402,749	N/A	N/A	7,654	179,760	4,568	514,572
Deductions not directly connected with UBI	11,515	657,688	N/A	N/A	6,954	31,862	3,071	85,938
Specific deduction	9,643	9,129	N/A	N/A	6,108	5,714	2,384	2,275
Charitable contributions	1,991	110,313	N/A	N/A	** 937	** 4,045	640	11,691
Set-asides [7]	191	221,006	N/A	N/A	**	**	103	19,820
Excess exempt-activity expenses [8]	2,138	317,240	N/A	N/A	1,102	22,102	654	52,151

Footnotes at end of table.

Table 7. Unrelated Business Income Tax Returns: Types of Deductions, by Size of Gross Unrelated Business Income (UBI), Tax Year 2010—Continued

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

Item	Size of gross unrelated business income—continued					
	\$500,000 under \$1,000,000		\$1,000,000 under \$5,000,000		\$5,000,000 or more	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(9)	(10)	(11)	(12)	(13)	(14)
Number of returns	1,398	N/A	1,320	N/A	354	N/A
Total deductions [2,3]	1,396	1,020,778	1,317	2,713,706	354	4,760,505
Organizations with gross unrelated business income (UBI) of \$1,000 under \$10,001 [1]:						
Total deductions [3,4]	N/A	N/A	N/A	N/A	N/A	N/A
Net operating loss deduction	N/A	N/A	N/A	N/A	N/A	N/A
Specific deduction	N/A	N/A	N/A	N/A	N/A	N/A
Organizations with gross unrelated business income (UBI) of \$10,001 or more [1]:						
Total deductions [3,5]	1,396	1,020,778	1,317	2,713,706	354	4,760,505
Deductions directly connected with UBI	1,362	965,282	1,295	2,575,724	343	4,414,094
Allocable to rental income [6]	104	34,645	102	62,469	31	39,261
Allocable to unrelated debt-financed income [6]	135	57,630	128	143,575	41	205,465
Allocable to investment income [6,7]	125	4,527	72	11,397	* 6	* 11,134
Allocable to income from controlled organizations [6]	29	9,067	50	25,928	21	25,838
Allocable to exploited exempt activity income, except advertising [6]	65	19,263	95	61,193	22	55,318
Direct advertising costs [6]	274	94,788	257	199,986	65	339,982
Compensation of officers, directors, and trustees	153	6,966	135	13,300	32	9,065
Salaries and wages	814	204,042	825	561,854	227	770,411
Repairs and maintenance	498	15,669	502	34,831	152	52,423
Bad debts	95	1,640	174	12,209	70	28,360
Interest	236	9,362	214	31,929	73	67,913
Taxes and licenses paid deduction	755	25,364	658	43,647	207	50,072
Depreciation	598	37,760	597	88,810	184	95,377
Depletion	* 9	* 908	* 16	* 4,883	* 7	* 7,922
Contributions to deferred compensation plans	159	1,393	135	5,526	25	10,584
Contributions to employee benefit programs	518	54,351	604	101,366	185	144,214
Net operating loss deduction	247	32,870	301	126,640	88	193,556
Other deductions	1,049	355,036	1,033	1,046,181	302	2,307,200
Deductions not directly connected with UBI	676	55,496	623	137,982	191	346,411
Specific deduction	541	535	465	461	144	143
Charitable contributions	** 185	** 24,833	190	16,346	87	73,611
Set-asides [7]	**	**	29	39,602	12	141,371
Excess exempt-activity expenses [8]	158	30,129	174	81,573	50	131,286

* Estimate should be used with caution because of the small number of sample returns on which it is based.

** Data in adjacent items are combined to avoid disclosure of information about specific taxpayers.

N/A—Not applicable.

[1] Organizations with gross UBI between \$1,000 (the filing threshold) and \$10,000 were required to report only totals for expenses and deductions (except for the specific deduction and net operating loss deduction, which all organizations reported separately). Organizations with gross UBI over \$10,000 were required to report each expense and deduction item separately, as shown in rows 14 through 39.

[2] Excludes cost of sales and services, which was subtracted from gross receipts from sales and services in computing gross profit from sales and services.

[3] Includes both expenses and deductions reported on Form 990-T, lines 13(B), 29, 31, and 33.

[4] Excludes \$74.1 million of cost of sales and services reported by organizations with gross UBI of \$10,000 or less. See footnote 2 for explanation.

[5] Excludes \$2.4 billion of cost of sales and services reported by organizations with gross UBI over \$10,000. See footnote 2 for explanation.

[6] This deduction was required to be reported as a lump-sum total only and may have included component deductions that were of the same type shown elsewhere in this table. For example, if deductions "allocable to rental income" included depreciation, then that amount of depreciation would not be included in the separately reported item, "depreciation." Therefore, the total amount shown for some of the separately reported deductions may be understated.

[7] Reported by Internal Revenue Code section 501(c)(7) social and recreational clubs, section 501(c)(9) voluntary employees' beneficiary associations, and section 501(c)(17) supplemental unemployment benefit trusts only. See Table 1 for separate data on each of these organizations.

[8] Includes excess exempt-activity expenses from Form 990-T, Schedule I, and excess readership costs from Form 990-T, Schedule J.

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

SOURCE: IRS, Statistics of Income Division, Tax Exempt Organizations, Unrelated Business Income, February 2014.

