Controlled Foreign Corporations, 1984: An Industry Focus

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The number of foreign subsidiaries of large U.S. multinational corporations increased modestly (6 percent) from 1982 to 1984. In 1984, more than 1,100 U.S. multinational corporations controlled over 28,500 foreign corporations, 27,000 of which reported financial information [1,2]. These 27,000 Controlled Foreign Corporations (CFC's) generated receipts of $625 billion on $595 billion of assets. Earnings and profits of these same CFC's were $49 billion, on which almost $20 billion in taxes were paid to foreign countries. The U.S. parent corporations received $12 billion in dividends from their CFC's, nearly 70 percent of all distributions made by the CFC's.

Total assets and receipts of CFC's changed only slightly from 1982 levels. Assets increased 7 percent while receipts decreased less than 4 percent. The most dramatic change from 1982 was in the profit level of these foreign corporations. Pre-tax earnings and profits of CFC's increased 32 percent from 1982 while taxes paid by these same companies rose almost 40 percent. These increases resulted in a 28 percent rise in after-tax earnings and profits from 1982 to 1984.

More than one-half of active CFC's were involved mainly in manufacturing or trade activities in 1984. Another 30 percent of CFC's reported their principal activity as either finance, insurance, real estate or services. These percentages remained virtually unchanged from 1982. Almost 6,300 CFC's, 23 percent of the 27,000 total companies, were inactive during 1984.

BACKGROUND

Prior to World War II, relatively few U.S. corporations had operations outside of the United States [3]. Those corporations that did look to other countries for expansion turned mostly to Europe and Canada as stable areas in which to operate. After World War II, U.S. corporations were encouraged politically, through programs like the Marshall Plan, and economically, through various concessions by foreign countries, to expand their operations overseas. The Marshall Plan provided economic aid to countries recovering from the impact of World War II. The Plan also encouraged U.S. businesses to participate in the economic recovery of Europe. Many foreign countries, in an attempt to attract U.S. operations and dollars, offered very favorable investment climates including low taxes, ease of incorporation, and various other concessions [4].

U.S. corporations began their move overseas, usually by establishing a foreign market for exported goods and through foreign investment. Once these were established, the U.S. corporation might form a branch operation by establishing a place of business in the foreign country or by creating or purchasing a subsidiary, incorporated in the foreign country.

Public Law 86-780 was enacted in 1960 to obtain information on the foreign subsidiaries of U.S. corporations. This law required a U.S. corporation to furnish, as part of its income tax return, information on any foreign corporations it directly controlled (i.e.,"tier-one" subsidiaries) and on any foreign corporations controlled by these directly controlled foreign corporations (i.e., "tier-two" subsidiaries). Control was defined as direct or indirect ownership of more than 50 percent of the combined voting power of all classes of stock, or more than 50 percent of the total value of all shares of stock by a single shareholder during the foreign corporation's taxable year.

These foreign activities by U.S. corporations were precipitated by many factors. Some companies went overseas to move their operations closer to resources, others looked for cheaper labor and other costs, and many were attracted by favorable tax considerations and investment incentives. Still others moved to be closer to their market. U.S. tax laws made it economically beneficial for U.S. corporations to operate overseas by exempting from U.S. income tax the unrepatriated earnings and profits of a foreign subsidiary. To the extent the

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foreign taxes were lower than U.S. taxes, this exemption was an impelling reason for U.S. corporations to form overseas subsidiaries. These subsidiaries enjoyed legal status as a resident corporation in the foreign country, with the benefits of its laws and regulations, which were often less stringent than the U.S. laws. The earnings and profits of the CFC were protected from U.S. taxation until they were repatriated in the form of dividends to the U.S. parent. U.S. taxes could be delayed by deferring a distribution until such a time as it could be offset by a parent corporation's losses or excess foreign tax credits. U.S. taxes could also be lowered on repatriated earnings, for example, through an ordinary taxable liquidation, sale, or exchange of assets of the CFC. In this case, the U.S. parent company would pay tax at the lower capital gains rate that was applicable before 1987.

The Revenue Act of 1962 reduced this tax deferral by requiring the taxation of certain unrepatriated profits of a foreign subsidiary through the addition of Subpart F to the Internal Revenue Code [5]. The types of income that were then taxable by the United States were referred to as "Subpart F income" and included income from the insurance of U.S. risks, "passive" types of income in general, and income derived from certain types of sales and services [6]. In addition, the 1962 legislation restricted the conversion of tax-deferred accumulated earnings and profits into capital gains, thus preventing regular income from being taxed at the lower capital gains rate.

The 1962 Act also redefined the term Controlled Foreign Corporation. In general, a foreign corporation was considered controlled if more than 50 percent of the voting stock of the foreign corporation was owned by U.S. shareholders for 30 days or more of the foreign corporation's taxable year, but only if they had at least a 10 percent interest. All such foreign corporations' undistributed earnings and profits, to the extent such earnings and profits represented Subpart F income (see the "Explanation of Selected Terms" section at the end of this article), were subject to taxation through their U.S. shareholders. The 1962 legislation also expanded the filing requirements for CFC's to include all lower-tier foreign corporations controlled, through other foreign subsidiaries, by a U.S. corporation [7].

The Tax Reduction Act of 1975 expanded the definition of Subpart F income. An exception permitting tax deferral of a portion of Subpart F income reinvested in tax-defined "less-developed countries" was repealed for CFC's with accounting periods beginning in 1976 and thereafter. Also, before the 1975 Act, income was not treated as Subpart F if it accounted for 30 percent or less of a CFC,s gross income. This percentage was reduced to 10 percent, limiting the amount of income that could avoid treatment under Subpart F. Finally, some types of shipping income received by foreign subsidiaries of U.S. corporations, which were previously excluded from Subpart F income, were now included. As a result of these and other actions, the tax deferral privileges of CFC's were reduced, but not entirely eliminated.

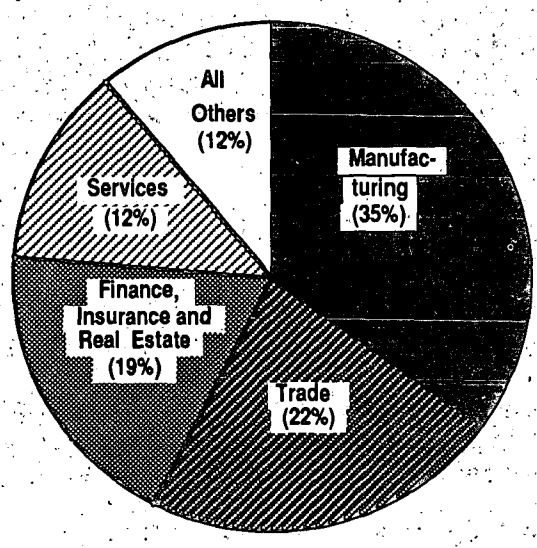
Several amendments, after 1975, to the Internal Revenue Code redefined Subpart F income [8]. For a full explanation of Subpart F, see "Explanation of Selected Terms."

INDUSTRIAL ACTIVITY OF CONTROLLED FOREIGN CORPORATIONS

In 1984, there were 20,736 foreign corporations actively involved in business operations that were controlled either directly of indirectly by large U.S. multinational or U.S. "giant" corporations. As Figure A shows, 35 percent (or 7,259) of these CFC's were primarily engaged in manufacturing activities. These manufacturing CFC's generated more business receipts ($341 billion) and pre-tax earnings and

Figure A

Active Controlled Foreign Corporations, by Industrial Division, 1984[1]



[1]Includes only those foreign corporations controlled by U. S. corporations with $250 million or more in totals assets.

profits ($23 billion) than any other industrial division, while finance, insurance, and real estate CFC's had the largest assets ($228 billion). Manufacturing; trade; finance, insurance and real estate; and service subsidiaries accounted for almost 90 percent of all active CFC's in 1984. CFC's in these four industrial divisions also held 92 percent of the assets, received 94 percent of the receipts, generated 84 percent of the pre-tax earnings and profits and reported 93 percent of the Subpart F income for all active CFC's.

As in 1982, manufacturing CFC's were primarily involved in producing chemicals, machinery, and electrical and electronic equipment, with these industries accounting for 47 percent of all manufacturing CFC's, 43 percent of manufacturing assets, and 53 percent of the pre-tax earnings and profits of manufacturing CFC's. Integrated petroleum companies and motor vehicle manufacturers, however, garnered over 40 percent of manufacturing CFC business receipts.

Wholesale trade CFC's outnumbered retail trade CFC's by more than four to one. Wholesale trade generated more receipts and earnings than retail trade and reported assets five times greater than retail trade CFC's. Of those in wholesaling, CFC's classified under integrated petroleum and petroleum products accounted for 50 percent of the assets, 64 percent of the receipts and 72 percent of the pre-tax earnings and profits.

No one specific industry dominated the finance, insurance and real estate, or service CFC's. However, CFC's in the finance, insurance and real estate industries held more assets ($228 billion) than any other industrial division. These same CFC's also accounted for 54 percent of the total reported Subpart F income.

PROFITABILITY OF CFC'S AND THEIR U.S. PARENT CORPORATIONS

CFC profitability rose 1.6 percent from 1982 to 1984 while the profitability of their U.S. parent companies rose only 0.3 percent in this same time period. Profitability (as measured by the return on assets) was determined by the ratio of earnings and profits or net income (both before taxes) to total assets [9].

Figure B shows the relative return on assets for U.S. multinationals and their CFC's by selected industry. Based on this measure, the most profitable CFC's were in the mining industry which may, in part, be due to the expensing of many costs, thus biasing downward the asset measure for this industry. Oil and gas extraction companies in particular were very profitable with a margin of nearly 30 percent. This industry also was the leader in 1982 with a 22 percent return on assets. The least profitable group was the finance, insurance and real estate division with a 3.0 percent return on assets for the CFC's, but this measure is also somewhat misleading for this industry.

Figure B.—Relative Return on Assets of Large U.S. Multinational Corporations and Their CFC's, by Selected Industry, 1984 [1]

Selected industry	Return on Assets [2]	
	U.S. corporations	CFC's
All industries [2]	2.3%	8.2%
Agriculture, forestry and fishing	10.5	3.9
Mining	1.8	25.3
Metal mining	1.1	3.1
Oil and gas extraction	1.7	29.8
Construction	0.1	9.0
Manufacturing	4.9	10.5
Food and kindred products	4.6	12.8
Apparel and other textile products	7.5	8.7
Paper and allied products	6.2	9.9
Printing and publishing	11.7	10.6
Chemicals and allied products	6.0	11.1
Petroleum (including integrated) and coal products	5.1	7.7
Rubber and miscellaneous plastic products	6.2	10.7
Stone, clay and glass products	5.1	9.3
Primary metal industries	-0.6	5.0
Fabricated metal products	4.4	10.1
Machinery, except electrical	5.8	18.8
Electrical and electronic equipment	4.0	9.5
Motor vehicles and equipment	5.7	5.8
Instruments and related products	7.7	10.7
Transportation and public utilities	2.3	4.0
Water transportation	-0.4	-0.9
Wholesale and retail trade	3.1	12.2
Finance, insurance and real estate	0.2	3.0
Banking	0.3	1.2
Credit agencies other than banks	-0.3	2.9
Insurance	0.1	4.5
Real estate	1.2	3.3
Holding and other investment companies, except bank holding companies	-0.2	4.6
Services	2.7	8.5

[1] U.S. parent corporations and CFC's were separately classified by the industry that generated the greatest portion of their total receipts.
[2] Includes CFC's the nature of whose business was not allocable by industry.
[3] The CFC return on assets is the ratio of pre-tax earnings and profits to total assets. The U.S. return on assets is the ratio of net income before tax to total assets. See also footnote 8 at the end of this article.

The only industry to post a negative CFC return was water transportation, although the transportation and public utility division as a whole had a positive return on assets of 4.0 percent. Water transportation also had a negative return on assets for 1982. The loss to asset ratio however shrank from -3.2 percent to -0.9 percent. The number of CFC's reporting their principal business activity as water transportation fell nearly 25 percent from 1982 to 1984. This was partly in response to the losses incurred in the early 1980's due to ship overbuilding during a period of world recession, and partly due to the reduction in shipping revenues due to discoveries of oil in the North Sea and Mexico which shortened the distance between source and destination [10].

The return on assets for U.S. corporations involved primarily in agriculture, forestry and fishing

exceeded that for CFC's in the same industrial division. The returns were 10.5 percent and 3.9 percent, respectively. This movement continued from 1982 when large losses were incurred by Liberian CFC's operating rubber plantations to supply the motor vehicle industry. However, these Liberian subsidiaries reported modest profits for 1984, reflecting the beginnings of economic recovery from the recession of the early 1980's [11].

TRANSACTIONS OF CONTROLLED FOREIGN CORPORATIONS

Transactions between the U.S. affiliated groups (that included the parent corporation and its U.S. subsidiaries) and their CFC's resulted in net payments to the U.S. affiliates of $27.8 billion in 1984 as shown in Figure C [12]. Therefore, these transactions (e.g., purchases or sales of stock in trade; and dividends, interest, and rents paid or received) did not contribute to the U.S. current account deficit of $106.5 billion in 1984 [13].

While the U.S. current account deficit grew over 1,100 percent from 1982 to 1984, the net payments surplus between the U.S. affiliated groups and their related CFC's fell by only 14 percent from 1982 to 1984 [14,15].

The greatest net payments surplus was realized by U.S. affiliated groups involved in the manufacturing of petroleum (including integrated) and coal products. This industry showed a surplus of $7.6 billion in 1984. Other large surpluses were realized by U.S. affiliated groups involved in manufacturing of non-electrical machinery and chemicals and allied products. Together, these top three industries accounted for 72 percent of the $27.8 billion surplus.

Net payments deficits showed up in the transportation and public utilities and finance, insurance and real estate industrial divisions. These deficits were $1.7 billion and $568 million, respectively. In 1982, the U.S. groups in the transportation and public utilities industries had a deficit of over $400 million while finance, insurance and real estate companies had a small surplus of $50 million.

Purchases of stock in trade (i.e., purchases of merchandise in the ordinary course of trade or business) by CFC's from their U.S. affiliates and related foreign companies ($71.9 billion) was greater than all other CFC payments combined, as is shown in Figure D. Most purchases of stock in trade were made from the U.S. parent corporation and its domestic affiliates, $71.1 billion, rather than from related foreign corporations. Payments to related

Figure C.—Receipts, Payments and Transaction Balance Surplus Between Controlled Foreign Corporations and Their U.S. Parent Affiliated Groups, by Selected Industry of U.S. Parent Corporation, 1984

[Money amounts are in millions of dollars]

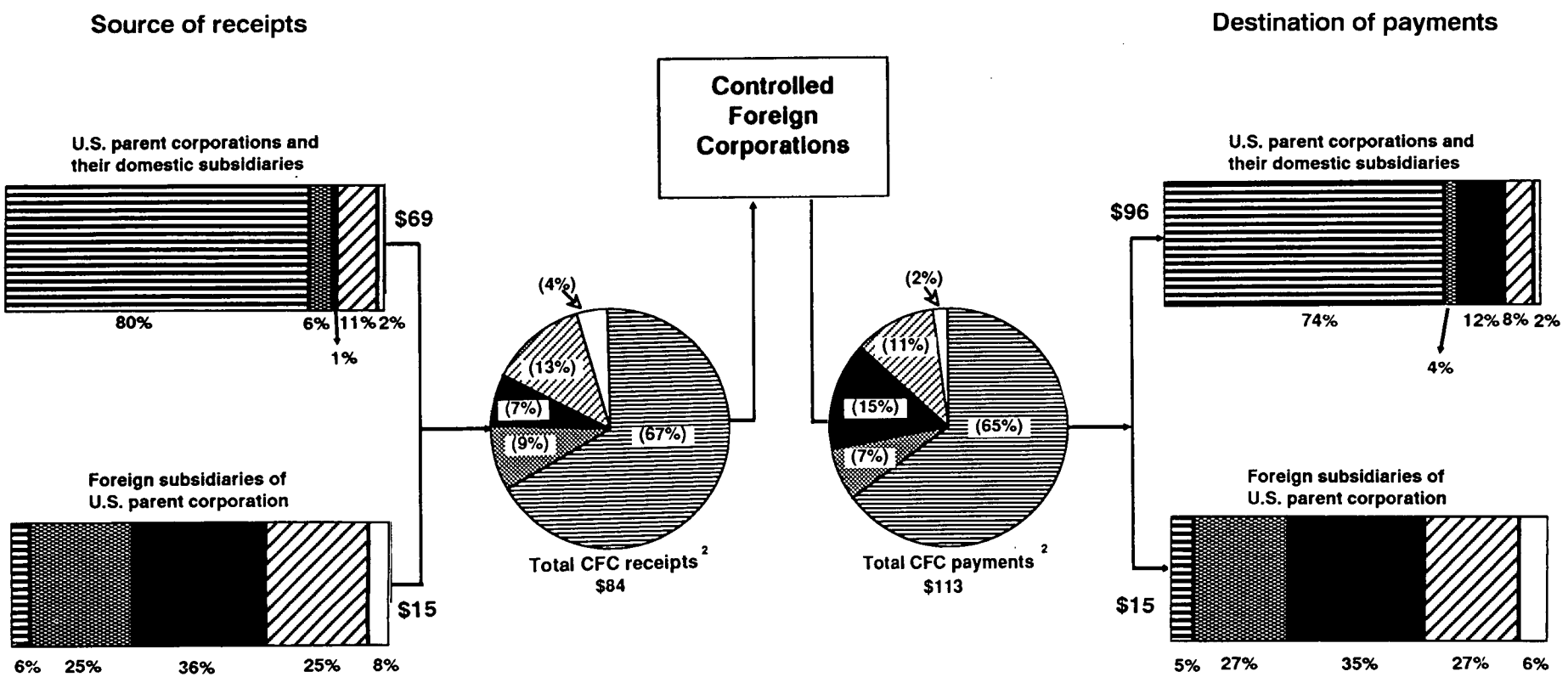
Selected U.S. industry	CFC receipts	CFC payments	Surplus
	(1)	(2)	(3)
All industries [1]	$68,590	$96,425	$27,835
Agriculture, forestry and fishing	33	40	7
Mining	378	792	414
Metal mining	15	17	2
Oil and gas extraction	359	772	413
Construction	107	250	143
Manufacturing	58,361	86,309	27,948
Food and kindred products	952	1,842	890
Apparel and other textile products	22	57	35
Paper and allied products	552	1,069	517
Printing and publishing	234	172	-62
Chemicals and allied products	3,150	9,245	6,095
Petroleum (including integrated) and coal products	18,874	26,509	7,635
Rubber and miscellaneous plastic products	808	891	83
Stone, clay and glass products	207	469	262
Primary metal industries	579	1,914	1,335
Fabricated metal products	130	1,245	1,115
Machinery, except electrical	5,555	11,973	6,418
Electrical and electronic equipment	5,714	7,205	1,491
Motor vehicles and equipment	18,907	17,750	-1,157
Instruments and related products	911	4,317	3,406
Transportation and public utilities	2,369	636	-1,733
Water transportation	144	20	-124
Wholesale and retail trade	4,132	5,483	1,351
Finance, insurance and real estate	2,996	2,428	-568
Banking	2,021	2,009	-12
Credit agencies other than banks	247	169	-78
Insurance	504	128	-376
Real estate	1	6	5
Holding and other investment companies, except bank holding companies	73	62	-11
Services	214	488	274

[1] Includes CFC's the nature of whose business was not allocable by industry.

Figure D

Flow of Receipts and Payments Between Controlled Foreign Corporations and Related Corporations, 1984[1]

(Percentage of total and billions of dollars)



[1]Data are limited to U.S. parent corporations with $250 million or more in total assets and their CFC's.

[2]Total includes receipts and payments of other noncontrolling shareholders. (See "Related Persons of Controlled Foreign Corporations" under "Explanation of Selected Terms" section.)

CFC's were more likely to be in the form of compensation for services, dividends, or interest, rents and royalties.

More than 80 percent of CFC payments to related corporations were made to their U.S. parent corporations or their domestic subsidiaries. As Figure D shows, the U.S. affiliates received $96.4 billion from CFC's in 1984, while paying them $68.6 billion in return. CFC receipts from related foreign corporations were only $14.6 billion and payments to these foreign corporations were $15 billion.

Sales of stock in trade were the largest source of receipts for CFC's. Receipts from the sale of stock in trade to the U.S. parent corporation and its domestic subsidiaries totaled $54.9 billion in 1984. This was 66 percent of all CFC receipts from related persons. CFC receipts from related foreign corporations were more often dividends ($5.2 billion); interest, rents and royalties ($3.7 billion); and compensation for services ($3.7 billion), rather than sales of stock in trade ($0.9 billion).

CFC transactions with related persons are very significant when they are compared with U.S. exports and imports. U.S. exports in 1984 totaled $217.9 billion of which almost one-third ($71.1 billion) was due to CFC purchases of stock in trade from U.S. parent corporations and their domestic subsidiaries. Sales of stock in trade by CFC's to the U.S. affiliated group ($54.9 billion) accounted for almost 17 percent of U.S. imports for 1984 ($325.7 billion). These percentages decreased only slightly compared to 1982; therefore CFC transactions with U.S. parents and affiliates did not quite keep pace with the growth in both U.S. exports and imports [16].

RECENT CFC INCORPORATIONS

Figure E shows the number of incorporations of CFC's for 1975 to 1984 and the total amount of 1984 CFC assets. New incorporations of CFC's appear to have peaked about 1980 and then began a gradual decline. There was, however, a slight rise from 1983 to 1984, possibly an effect of the recovery from the recession of the early 1980's and an eagerness for expansion by large U.S. multinationals. The number of incorporations for 1984 may actually have been larger than 1,086 since the data include only CFC's whose accounting periods ended within the parent corporation's accounting period. Those CFC's incorporated later in the year may have had accounting periods ending later than their parent's and, therefore, would not be included in the statistics.

In 1984, 1,086 CFC's were incorporated by large U.S. multinational corporations. These CFC's had just over $11 billion in assets and generated $32 million in earnings and profits before taxes as shown in Figure F. The new CFC's in mining, construction, and wholesale and retail trade generated large losses, possibly reflecting high start-up costs.

Figure E.—Number and Total Assets of CFC's Incorporated After 1974, by Year of Incorporation

[Money amounts are in millions of dollars]

Year of incorporation	Number of CFC's	1984 total assets
All years, total	27,008	$595,406
1984	1,086	11,098
1983	1,004	15,131
1982	1,129	22,844
1981	1,130	25,691
1980	1,179	19,688
1979	1,037	20,457
1978	973	18,974
1977	807	15,744
1976	755	8,893
1975	749	7,890
Pre-1975	17,159	428,996

Figure F.—Number, Total Assets and Earnings and Profits of CFC's Incorporated in 1984, by Selected Industry

[Money amounts are in millions of dollars]

Selected industrial divisions	Number of CFC incorporations	Total assets	Pre-tax earnings and profits
	(1)	(2)	(3)
All industries [1]	1,086	$11,098	$32
Mining	45	981	−46
Construction	11	37	−2
Manufacturing	189	1,381	2
Transportation and public utilities	25	310	3
Wholesale and retail trade	132	1,261	−6
Finance, insurance and real estate	149	6,308	78
Services	94	388	30
Inactive	421	211	—

[1] Includes CFC's the nature of whose business was not allocable by industry.

More than one-half of all assets held by newly incorporated CFC's were held by those in the finance, insurance and real estate division, with 25 percent of these assets held specifically by holding and other investment companies. These CFC's also generated the largest amount of pre-tax earnings and profits, $78 million. Greater than one-third of newly incorporated CFC's were inactive for 1984. This reflects the practice of incorporating to establish a presence abroad in anticipation of future operations. Many large U.S. corporations establish CFC's at the end of one tax year but do not begin operations until the next year.

Figure G shows all CFC's and their assets by selected industry compared to CFC's incorporated after 1974 and their assets. While 36 percent of all CFC's were incorporated after 1974, these CFC's held only 28 percent of all assets indicating that newer CFC's tend to be smaller. Many are nameholder corporations with few assets. More than one-half of all CFC's in the mining industry were incorporated in the 10-year period, 1975-1984, par-

Figure G.—Total Controlled Foreign Corporations Compared to Controlled Foreign Corporations Incorporated After 1974, by Selected Industry [1]

[Money amounts are in millions of dollars]

Selected CFC industry	Total number of CFC's	Total CFC assets	CFC's incorporated after 1974			
			Number	Total assets	Percentage of	
					Total number	Total assets
	(1)	(2)	(3)	(4)	(5)	(6)
All industries [2]	27,008	$595,406	9,849	$166,410	36%	28%
Agriculture, forestry and fishing	161	979	50	190	31	19
Mining	821	25,901	455	9,845	55	38
Metal mining	172	3,643	76	811	44	22
Oil and gas extraction	602	21,604	359	8,611	60	40
Construction	396	4,779	171	965	43	20
Manufacturing	7,259	219,484	2,153	31,842	30	15
Food and kindred products	650	16,138	158	2,276	24	14
Apparel and other textile products	126	1,408	41	287	33	20
Paper and allied products	167	5,107	36	347	22	7
Printing and publishing	242	1,815	64	389	26	21
Chemicals and allied products	1,698	39,610	380	4,766	22	12
Petroleum (including integrated) and coal products	125	31,596	27	3,936	22	12
Rubber and miscellaneous plastic products	213	4,108	61	310	29	8
Stone, clay and glass products	133	2,765	39	990	29	36
Primary metal industries	149	4,265	40	309	27	7
Fabricated metal products	581	6,179	183	1,334	31	22
Machinery, except electrical	782	29,499	242	2,802	31	9
Electrical and electronic equipment	934	24,239	379	6,078	41	25
Motor vehicles and equipment	249	29,757	82	2,127	33	7
Instruments and related products	342	6,668	132	1,599	39	24
Transportation and public utilities	626	16,223	258	4,315	41	27
Water transportation	261	6,960	101	1,115	39	16
Wholesale and retail trade	4,646	74,983	1,879	13,493	40	18
Finance, insurance and real estate	3,915	228,186	1,912	96,601	49	42
Banking	322	66,304	150	16,345	47	25
Credit agencies other than banks	710	59,365	370	31,005	52	52
Insurance	531	23,623	308	5,677	58	24
Real estate	385	3,237	128	1,703	33	53
Holding and other investment companies, except bank holding companies	1,291	61,088	632	32,155	49	53
Services	2,571	19,437	1,159	8,939	45	46

[1] Includes only those foreign corporations controlled by U.S. corporations with $250 million or more in total assets.
[2] Includes CFC's the nature of whose business was not allocable by industry, and inactive CFC's which are not shown separately.

ticularly oil and gas extracting corporations of which 60 percent were incorporated since 1974. Almost one-half of finance, insurance and real estate CFC's were incorporated in the same period. These industries are in sharp contrast to manufacturing companies, of which only 30 percent were incorporated since 1974.

SUMMARY

U.S. multinational corporations continued to have a strong presence abroad, controlling over 27,000 foreign corporations in 1984. These CFC's held $595 billion in assets and generated $625 billion of receipts. Pre-tax earnings and profits of all CFC's for 1984 rose 32 percent from 1982 while assets rose only seven percent. More than one-half of all active CFC's were involved in manufacturing or trade industries. Due to the much larger rise in pre-tax earnings and profits than in assets, profitability levels rose 1.6 percent from 1982, a 24 percent change. Mining (because of oil and gas extraction) was the most profitable industrial division in 1984 and finance, insurance and real estate the least profitable.

CFC payments to their U.S. parent corporations and affiliated groups exceeded receipts from these companies by $27.8 billion in 1984. In contrast, the U.S. current account deficit was $106.5 billion. CFC purchases of stock in trade from U.S. parent corporations and their domestic affiliates amounted to almost one-third of the total $218 billion of U.S. exports in 1984.

Almost 40 percent of all CFC's were incorporated in the 10-year period from 1975 through 1984. These CFC's were, however, smaller in asset size than the older CFC's. The number of new incorporations in 1984 rose slightly from 1983, possibly reversing the downward movement that took place after 1980.

DATA SOURCES AND LIMITATIONS

The statistics in this article were derived from all U.S. corporation income tax returns with total assets of $250 million or more and with accounting periods ended July 1984 through June 1985, and from attached Form(s) 5471 (Information Return with Respect to a Foreign Corporation). This form replaced Form 2952, (Information Return with Respect to Controlled Foreign Corporations), in

1983. Only a handful of Forms 2952 were filed for Income Year 1984 and are included in the data.

Sampling variability was not originally a factor in this study, since returns were selected at a rate of 100 percent and thus equaled the complete population. However, certain taxpayers did not provide the necessary information or provided only partial information for some CFC's. These CFC's (approximately 1,500 corporations) are not included in the data presented here and no attempt was made to weight the sample to adjust for them. For purposes of this article, the sample was considered to be the population (see footnote 1.)

Not all of the information regarding CFC transactions (e.g., transactions with unrelated parties) is available from Statistics of Income data. However, total business receipts, earnings and profits, foreign taxes and transactions between CFC's and related parties (U.S. parent corporations and their domestic and foreign subsidiaries) are reported as part of the parent corporation's U.S. income tax return and included in this article.

U.S. parent corporations were classified by the principal business activity reported on the corporation income tax return. Many returns were filed by diversified corporations, and therefore included significant receipts, profits, and other items related to activities other than the principal business activity.

Controlled Foreign Corporations were also classified by their principal business activity as reported on Form 5471. As such, certain receipts, profits, and transaction items may have been related to secondary business activities. It is not possible to measure the extent of these secondary operations.

When U.S. corporations filed consolidated Forms 5471 with aggregated data for several foreign companies, follow-up requests were made in cases where large money amounts were reported in an attempt to obtain the CFC information on a disaggregated basis. More than 75 percent of these requests were successful. Where no information was received, the data were left consolidated under the industry in which it was originally reported. Less than one percent of the CFC's included in the file contain financial information for a consolidated group of CFC's.

In some cases, sufficient detail was not provided to indicate by whom the CFC was directly controlled (i.e., by a domestic or a foreign parent). Data for these CFC's were corrected by using the transactions they reported with related corporations to determine the recipient of any dividends. If this information was not conclusive, a previous-year record of the CFC or other reference material was used to determine the ownership.

The 1984 data are based on returns filed by U.S. corporations with full-year accounting periods ending between July 1984 and June 1985. Generally, part-year returns were deleted from the sample to avoid double counting of financial data. According to IRS regulations, a U.S. corporation had to submit a Form 5471 for any Controlled Foreign Corporation with an accounting period ending with or within the U.S. parent's accounting period. Therefore, CFC accounting periods may have ended as early as August 1983 (and, thus, began in September 1982) or as late as June 1985. However, most CFC activity did occur in Calendar Year 1984.

EXPLANATION OF SELECTED TERMS

Business Receipts of Controlled Foreign Corporations.--Business receipts were, in general, gross receipts or gross sales less returns and allowances reported for CFC's on Forms 5471. In the finance, insurance, and real estate industries, business receipts were generally the total income or receipts of the CFC and may have included other types of income such as interest, rents, royalties and other investment income. This definition differs from that used for the business receipts statistics for domestic corporations which generally excludes investment income.

Current Earnings and Profits of Controlled Foreign Corporations.--This item represents the difference between the accumulated beginning and ending year balances of earnings and profits available for distribution to the stockholders. In this report, pretax current earnings and profits are shown. For Form 5471 purposes, the earnings and profits reported for a foreign corporation had to be calculated under U.S. accounting standards, as required by Internal Revenue regulations.

Distributions of Controlled Foreign Corporations.--The distributions of CFC's consisted mostly of dividends. Capital gain distributions, and distributions paid out of capital (including capital stock, paid-in capital, and capital surplus) were generally not included. Liquidating dividends may have also been included.

Foreign Income Taxes Paid by Controlled Foreign Corporations.--These were foreign income, war profits, and excess profits taxes paid or accrued by CFC's to foreign countries or U.S. possessions (including Puerto Rico). Also included were taxes imposed by other countries (including the United

States) in cases in which the CFC had business operations in countries other than the one in which it was incorporated.

Inactive Controlled Foreign Corporations.-- Inactive Controlled Foreign Corporations were those that reported no income, deductions, or foreign income taxes paid, but which may have reported dividends paid out of prior-year earnings and profits. These dividends, plus the total assets of these CFC's, are included in the statistics.

Related Persons of Controlled Foreign Corporations.--Five categories of related persons of CFC's were shown on Forms 5471 for the purpose of reporting transactions. They were the U.S. corporation filing the return, a domestic corporation controlled by the U.S. corporation filing the return, a foreign corporation controlled by the U.S. corporation filing the return, a 10-percent-or-more U.S. shareholder of the CFC (other than the controlling shareholder), and a 10-percent-or-more U.S. shareholder of the U.S. corporation filing the return.

Sales (and Purchases) of Stock in Trade.--These were sales (and purchases) of merchandise in the ordinary course of trade or business.

Subpart F Income.--Subpart F provisions of the Internal Revenue Service Code (section 952) allowed the United States to tax U.S. shareholders on certain types of CFC income that, although undistributed to them, were deemed to have been distributed and were thereby taxable currently, generally at the same rate(s) as dividends. Subpart F income included the following for 1984: income derived from the insurance of U.S. risks; international boycott participation income; illegal bribes, kickbacks, or other payments to a government official; and "foreign base company income" (i.e., income from a foreign personal holding company and certain types of sales, service, shipping and oil-related income from a foreign base company). Also includible as income from CFC's were amounts of previously excluded Subpart F income meeting certain criteria and increases in foreign corporations' earnings invested in U.S. property.

Transactions of Controlled Foreign Corporations.--Controlled Foreign Corporation transactions were reported on Forms 5471 for five categories of related persons (described previously under "Related Persons of Controlled Foreign Corporations") which dealt with the CFC's. The transactions shown include receipts and payments for such items as stock in trade, dividends, rents and royalties, commissions, services rendered, interest, insurance premiums, and property rights.

U.S. Affiliated Groups.--The U.S. parent corporation and all of its wholly-owned domestic subsidiaries included in the filing of a consolidated U.S. income tax return (Form 1120).

NOTES AND REFERENCES

[1] Due to incomplete reporting of financial information on Forms 5471, approximately 1,500 Controlled Foreign Corporations (CFC's) are not included in the data. However, it is estimated that the 27,008 CFC's for which data are presented in this article represent 95 percent or more of all the financial data for the population and therefore, are comparable to 1982 data. Throughout the rest of this article, all references to the CFC population will include only the data for the 27,008 CFC's. (See also "Data Sources and Limitations" at the end of this article.)

[2] For purposes of this article, data are included only for foreign corporations controlled by U.S. corporations with $250 million or more in total assets. Subsequent use of the terms "large U.S. multinationals" or "U.S. giant corporations" refers to this group of corporations. Historically, more than two-thirds of all U.S.-controlled foreign corporations have been controlled by U.S. giant corporations. More significantly, both the assets and business receipts of CFC's controlled by these large U.S. corporations have accounted for more than 90 percent of the total assets and business receipts of all CFC's. See statistics on Controlled Foreign Corporations for 1980 in the *Statistics of Income Bulletin,* Summer 1984, Volume 3, Number 4.

[3] Heller, Kenneth, *The Impact of U.S. Taxation on the Financing and Earnings Remittance Decisions of U.S.-based Multinational Firms with Controlled Foreign Corporations,* Arno Press, 1980, pp. 2-3.

[4] Heller, *Op. cit.*, pp. 3-4.

[5] Heller, *Op. cit.*, p. 87.

[6] Passive types of income include such receipts as interest, dividends and certain types of rents and royalties.

[7] Control by a U.S. corporation was extended to lower-tier foreign corporations through a chain of control. Thus, a U.S. corporation could own

more than 50 percent of a foreign corporation (first-tier) which, in turn, could own more than 50 percent of a second-tier foreign corporation, which, in turn, could own more than 50 percent of a third-tier foreign corporation, and so forth. A Form 5471 had to be filed for each of these foreign corporations.

[8] More recently, the Tax Reform Act of 1986 expanded further the definition of Subpart F income. Generally, these changes apply to taxable years of foreign corporations beginning after December 31, 1986.

[9] For purposes of this analysis, a CFC's return on assets is defined as the ratio of earnings and profits before taxes to total assets. Net income (before taxes), i.e., net income computed under provisions of the Internal Revenue Code, is used in place of earnings and profits for purposes of computing the U.S. parent corporations' return on assets because earnings and profits, as such, is not reported by the parent. To the extent that the concept of earnings and profits differs from that of net income, the comparison of a CFC's return on assets to the U.S. parent corporation's return on assets is limited.

[10] Willoughby, Jack, "Shipwreck," *Forbes,* July 29, 1985, p. 116.

[11] Simenauer, Ronald, "Controlled Foreign Corporations, 1982: An Industry Focus," *Statistics of Income Bulletin,* Summer 1986, Volume 6, Number 1.

[12] The balance of payments surplus may be somewhat misleading due to the inclusion of dividends paid and received. If dividends received and paid are excluded from the totals the balance of payments surplus would fall from $27.8 billion to $16.4 billion.

[13] U.S. Department of Commerce, Bureau of Economic Analysis, *Survey of Current Business,* June 1986. The current account is defined as the exports of goods and services (including receipt of income on U.S. assets abroad) minus both imports of goods and services (including payment of income on foreign assets in the U.S.) and net unrelated transfers (excluding military grants of goods and services).

[14] U.S. Department of Commerce, Bureau of Economic Analysis, *Survey of Current Business,* June 1985.

[15] Amounts loaned to or borrowed from U.S. affiliated groups were subtracted from 1982 transaction amounts for comparability with 1984 data. These data were not tabulated for 1984 since they were no longer required to be reported as part of the foreign corporation transaction schedule for 1984.

[16] U.S. Department of Commerce, Bureau of the Census, *Highlights of U.S. Export and Import Trade*, FT 990, monthly. Data from this source are based on the 1984 calendar year, while CFC data are based on accounting periods of U.S. parent corporations ended July 1984 through June 1985 and accounting periods of CFC's ending with, or within, the U.S. parent corporation's accounting period.

Table 1.—U.S. Corporation Returns with Total Assets of $250 Million or More: Controlled Foreign Corporation Total Assets, Receipts, Earnings, Taxes, Distributions and Subpart F Income, by Selected Industry of U.S. Corporation and Size of Total Assets of Controlled Foreign Corporation

[Money amounts are in thousands of dollars]

Selected industry of U.S. corporation filing return and size of total assets of Controlled Foreign Corporation	Number of U.S. corporation returns	Controlled Foreign Corporations								
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)	Actual distributions in current year	Subpart F income
						Current earnings and profits before taxes	Foreign income taxes (net)			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
All industries, total	**1,103**	**27,008**	**595,406,489**	**624,529,988**	**48,591,785**	**57,469,606**	**19,888,594**	**19,663,431**	**17,429,494**	**4,420,024**
Assets zero or not reported	564	3,924	—	2,784,107	71,277	295,574	63,452	66,868	83,405	42,401
$1 under $1,000,000	871	9,028	2,238,541	4,091,467	157,472	587,854	90,796	98,987	128,832	27,277
$1,000,000 under $10,000,000	817	8,129	31,613,767	44,893,839	2,636,065	4,133,612	1,252,865	1,273,754	1,139,365	247,645
$10,000,000 under $100,000,000	723	4,834	151,354,099	169,786,907	12,278,867	15,129,589	4,520,648	4,506,718	4,634,444	1,386,889
$100,000,000 or more	295	1,093	410,200,083	402,973,669	33,448,105	37,322,978	13,960,832	13,717,103	11,443,448	2,715,812
Agriculture, forestry and fishing	**4**	**116**	**936,515**	**1,102,708**	**39,232**	**59,882**	**20,042**	**21,768**	**17,851**	**1,173**
Assets zero or not reported	*	*	*	*	*	*	*	*	*	*
$1 under $1,000,000	4	36	9,432	20,689	−354	157	26	−55	32	—
$1,000,000 under $10,000,000	*	*	*	*	*	*	*	*	*	*
$10,000,000 under $100,000,000	4	24	591,670	536,075	23,591	35,093	12,284	14,079	17,403	—
$100,000,000 or more	*	*	*	*	*	*	*	*	*	*
Mining	**46**	**602**	**9,885,843**	**5,930,863**	**1,494,624**	**1,697,589**	**956,810**	**953,598**	**630,151**	**135,543**
Assets zero or not reported	25	100	—	29,077	−13,918	5,285	1,319	1,374	277	2,305
$1 under $1,000,000	35	225	43,121	26,655	−11,098	10,380	988	1,017	1,927	602
$1,000,000 under $10,000,000	31	137	606,375	394,591	38,336	75,873	15,129	14,962	41,074	19,223
$10,000,000 under $100,000,000	29	120	3,807,044	1,648,561	267,012	387,301	122,382	119,253	156,242	47,974
$100,000,000 or more	9	20	5,429,302	3,831,980	1,214,292	1,218,750	816,992	816,992	430,630	65,438
Metal mining	**6**	**54**	**1,100,961**	**121,500**	**39,570**	**43,168**	**19,542**	**18,245**	**20,325**	**1,078**
Assets zero or not reported	5	7	—	—	−1	—	—	—	—	—
$1 under $1,000,000	5	25	3,561	4,089	−45	95	1	1	32	16
$1,000,000 under $10,000,000	5	11	50,457	6,018	3,202	3,672	923	923	965	1,062
$10,000,000 under $100,000,000	*	*	*	*	*	*	*	*	*	*
$100,000,000 or more	*	*	*	*	*	*	*	*	*	*
Oil and gas extraction	**33**	**512**	**8,517,348**	**5,686,333**	**1,423,295**	**1,619,670**	**935,442**	**933,527**	**609,711**	**130,750**
Assets zero or not reported	15	83	—	6,222	−16,423	2,779	477	532	277	2,305
$1 under $1,000,000	27	185	35,614	19,317	−12,558	8,418	987	1,016	1,849	525
$1,000,000 under $10,000,000	21	119	512,608	350,475	30,091	66,986	13,222	13,054	40,040	17,773
$10,000,000 under $100,000,000	22	107	3,311,377	1,478,340	205,436	322,738	103,763	101,932	136,914	44,709
$100,000,000 or more	7	18	4,657,748	3,831,980	1,216,749	1,218,750	816,992	816,992	430,630	65,438
Construction	**19**	**384**	**3,826,697**	**2,917,905**	**416,794**	**461,479**	**122,388**	**121,488**	**194,572**	**44,664**
Assets zero or not reported	11	62	—	34	−50	—	—	—	—	—
$1 under $1,000,000	13	159	28,682	42,368	−3,544	8,203	536	555	1,586	47
$1,000,000 under $10,000,000	16	101	373,070	400,769	13,043	36,917	10,000	9,328	6,662	337
$10,000,000 under $100,000,000	14	54	1,760,669	1,432,796	196,449	205,463	62,551	62,303	115,156	20,876
$100,000,000 or more	4	8	1,664,277	1,041,938	210,896	210,896	49,301	49,301	71,167	23,404
Manufacturing	**581**	**18,805**	**390,581,396**	**500,334,516**	**40,379,971**	**47,969,980**	**17,109,507**	**16,839,916**	**14,904,646**	**3,374,696**
Assets zero or not reported	331	2,621	—	2,306,163	36,189	214,111	49,252	52,612	77,314	4,880
$1 under $1,000,000	503	5,753	1,525,040	3,050,847	173,614	455,601	62,383	60,909	95,646	18,285
$1,000,000 under $10,000,000	497	6,100	23,984,990	37,527,926	2,065,487	3,265,639	1,033,060	1,051,195	921,673	183,235
$10,000,000 under $100,000,000	438	3,617	112,023,550	138,172,141	10,262,581	12,472,787	3,796,071	3,760,837	3,866,654	1,082,154
$100,000,000 or more	175	714	253,047,816	319,277,438	27,842,100	31,561,842	12,168,739	11,914,364	9,943,360	2,086,141
Food and kindred products	**43**	**1,831**	**22,565,728**	**31,414,654**	**2,714,895**	**3,050,716**	**791,131**	**776,935**	**960,637**	**270,378**
Assets zero or not reported	26	285	—	113,891	14,409	16,308	1,111	1,160	7,604	4
$1 under $1,000,000	39	651	146,535	585,478	199,297	212,694	8,901	9,060	27,043	1,852
$1,000,000 under $10,000,000	34	502	1,974,696	3,148,578	210,353	302,510	71,148	70,992	96,839	26,842
$10,000,000 under $100,000,000	29	344	11,010,960	15,548,690	1,290,749	1,466,166	419,755	405,191	530,862	107,312
$100,000,000 or more	20	49	9,433,536	12,018,016	1,000,086	1,053,038	290,216	290,532	298,290	134,368
Chemicals and allied products	**72**	**3,940**	**58,528,756**	**60,877,842**	**6,539,859**	**7,382,393**	**2,473,937**	**2,453,161**	**2,100,613**	**813,540**
Assets zero or not reported	55	617	—	218,943	13,861	23,885	4,503	5,295	12,608	1,732
$1 under $1,000,000	65	1,182	302,072	506,548	22,874	68,769	15,231	14,374	24,868	7,920
$1,000,000 under $10,000,000	69	1,300	5,117,631	7,705,200	484,711	740,675	237,275	243,582	258,236	45,631
$10,000,000 under $100,000,000	61	730	21,995,940	24,752,002	2,252,740	2,689,183	895,578	878,910	862,636	259,243
$100,000,000 or more	36	111	31,113,113	27,695,150	3,765,674	3,859,880	1,321,350	1,310,999	942,264	499,015
Petroleum (including integrated) and coal products	**35**	**1,932**	**99,994,391**	**173,001,490**	**12,612,098**	**15,588,956**	**6,708,937**	**6,507,866**	**6,134,363**	**707,290**
Assets zero or not reported	27	299	—	365,140	−10,655	84,160	37,137	36,840	7,507	13
$1 under $1,000,000	33	654	129,726	340,701	−57,236	21,790	2,866	2,548	12,372	5,288
$1,000,000 under $10,000,000	26	472	1,907,876	4,631,655	150,542	362,922	153,596	157,601	88,949	4,580
$10,000,000 under $100,000,000	28	333	10,729,362	19,822,944	793,845	1,129,150	313,252	310,249	397,629	101,092
$100,000,000 or more	20	174	87,227,428	147,841,049	11,735,602	13,990,935	6,202,086	6,000,627	5,627,906	596,318
Primary metal industries	**40**	**1,033**	**14,034,236**	**10,486,406**	**332,153**	**771,022**	**168,394**	**134,945**	**193,123**	**126,111**
Assets zero or not reported	20	152	—	1,553	706	1,373	10	10	—	100
$1 under $1,000,000	31	352	77,154	89,038	−3,605	10,439	2,612	2,420	2,313	133
$1,000,000 under $10,000,000	36	310	1,246,683	1,339,859	63,589	121,638	27,027	29,173	30,780	8,763
$10,000,000 under $100,000,000	27	189	5,974,371	5,763,013	145,597	360,611	74,983	69,248	120,423	81,374
$100,000,000 or more	10	30	6,736,029	3,292,942	125,865	276,961	63,762	34,093	39,607	35,742
Machinery, except electrical	**68**	**1,950**	**51,882,026**	**50,103,336**	**7,430,539**	**7,989,513**	**3,045,754**	**3,020,664**	**1,883,219**	**481,385**
Assets zero or not reported	36	244	—	91,482	14,096	15,756	945	615	21	74
$1 under $1,000,000	62	497	152,225	227,601	−6,316	21,202	4,860	2,626	3,947	599
$1,000,000 under $10,000,000	62	633	2,556,437	3,030,453	194,827	314,724	96,140	97,333	57,392	21,708
$10,000,000 under $100,000,000	60	474	15,080,755	15,001,742	1,116,877	1,395,288	532,085	518,446	281,150	150,748
$100,000,000 or more	22	102	34,092,609	31,752,058	6,111,056	6,242,543	2,411,724	2,401,642	1,540,710	308,256

Footnote at end of table.

Table 1.—U.S. Corporation Returns with Total Assets of $250 Million or More: Controlled Foreign Corporation Total Assets, Receipts, Earnings, Taxes, Distributions and Subpart F Income, by Selected Industry of U.S. Corporation and Size of Total Assets of Controlled Foreign Corporation—Continued

[Money amounts are in thousands of dollars]

Selected industry of U.S. corporation filing return and size of total assets of Controlled Foreign Corporation	Number of U.S. corporation returns	Controlled Foreign Corporations								
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)	Actual distributions in current year	Subpart F income
						Current earnings and profits before taxes	Foreign income taxes (net)			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Manufacturing—Continued										
Electrical and electronic equipment	**70**	**2,270**	**37,641,993**	**39,205,015**	**2,701,272**	**3,255,924**	**733,755**	**721,578**	**838,293**	**223,498**
Assets zero or not reported	31	229	—	72,207	−17,411	2,496	211	3,391	8,937	194
$1 under $1,000,000	59	685	196,988	291,645	−11,872	26,985	7,327	9,237	6,966	153
$1,000,000 under $10,000,000	63	813	3,259,962	4,969,089	246,535	394,985	130,598	132,575	104,107	19,797
$10,000,000 under $100,000,000	52	479	14,709,565	18,211,915	1,359,948	1,635,950	347,413	352,285	539,167	94,061
$100,000,000 or more	13	64	19,475,477	15,660,159	1,124,073	1,195,509	248,206	224,090	179,115	109,292
Motor vehicles and equipment	**20**	**925**	**47,132,506**	**70,477,798**	**2,430,468**	**3,550,208**	**1,223,562**	**1,252,124**	**993,079**	**269,493**
Assets zero or not reported	15	118	—	1,178,127	−30,452	13,649	1,476	1,970	19,356	—
$1 under $1,000,000	18	235	83,825	180,533	4,971	13,585	1,336	1,325	2,370	18
$1,000,000 under $10,000,000	18	359	1,227,809	2,626,281	20,662	98,238	29,010	28,962	23,401	3,299
$10,000,000 under $100,000,000	17	137	4,690,006	7,203,992	286,911	392,849	140,435	143,287	101,549	56,050
$100,000,000 or more	10	76	41,130,866	59,288,865	2,148,376	3,031,886	1,051,305	1,076,579	846,404	210,127
Transportation equipment, except motor vehicles	**20**	**580**	**5,907,382**	**6,873,398**	**578,972**	**696,550**	**231,942**	**233,006**	**216,134**	**53,226**
Assets zero or not reported	10	61	—	13,289	26,507	26,507	−145	−145	2,453	4
$1 under $1,000,000	17	203	56,467	83,081	−441	10,325	1,733	1,724	513	572
$1,000,000 under $10,000,000	14	194	797,750	1,255,238	53,787	86,661	31,830	33,572	26,014	3,546
$10,000,000 under $100,000,000	13	115	3,630,012	4,166,019	319,817	391,681	132,742	132,073	118,008	24,332
$100,000,000 or more	5	7	1,423,152	1,355,771	179,302	181,375	65,782	65,782	69,147	24,771
Instruments and related products	**23**	**807**	**11,513,591**	**15,490,503**	**1,270,096**	**1,437,020**	**466,927**	**476,545**	**344,585**	**155,856**
Assets zero or not reported	18	77	—	643	2,920	3,236	−1	−1	2,259	—
$1 under $1,000,000	22	232	80,383	160,138	−1,031	12,554	4,418	4,297	1,262	145
$1,000,000 under $10,000,000	22	311	1,227,569	1,998,735	143,586	192,640	53,233	53,660	49,500	6,711
$10,000,000 under $100,000,000	21	167	4,619,363	6,380,418	597,038	684,240	212,671	221,983	207,502	73,557
$100,000,000 or more	5	20	5,586,276	6,950,569	527,583	544,350	196,606	196,606	84,061	75,443
Transportation and public utilities	**106**	**1,508**	**25,021,612**	**14,153,603**	**1,299,298**	**1,572,265**	**357,612**	**360,756**	**297,736**	**334,528**
Assets zero or not reported	47	218	—	45,887	−1,952	7,265	1,665	1,666	2,937	302
$1 under $1,000,000	69	577	131,211	184,577	−915	24,307	4,541	5,120	10,282	1,737
$1,000,000 under $10,000,000	56	423	1,645,036	1,625,251	121,640	180,892	39,425	41,115	54,824	16,309
$10,000,000 under $100,000,000	54	242	7,603,191	4,427,694	418,414	568,007	142,791	142,686	114,857	88,971
$100,000,000 or more	27	48	15,642,174	7,870,194	762,111	791,794	169,190	170,168	114,836	227,209
Water transportation	**10**	**142**	**760,470**	**112,346**	**18,811**	**39,466**	**1,290**	**3,534**	**13,405**	**6,368**
Assets zero or not reported	7	24	—	6,901	−351	1	—	—	—	1
$1 under $1,000,000	8	63	12,385	10,689	−251	1,206	63	77	—	622
$1,000,000 under $10,000,000	9	34	168,985	41,923	1,398	9,952	986	1,894	—	1,430
$10,000,000 under $100,000,000	*	*	*	*	*	*	*	*	*	*
$100,000,000 or more	*	*	*	*	*	*	*	*	*	*
Wholesale and retail trade	**116**	**1,404**	**32,358,191**	**72,992,450**	**1,831,937**	**2,120,430**	**487,710**	**518,299**	**559,330**	**215,031**
Assets zero or not reported	50	233	—	67,870	15,813	16,972	2,335	2,335	982	12,433
$1 under $1,000,000	81	536	112,341	244,826	−9,840	14,867	4,516	12,779	6,575	2,666
$1,000,000 under $10,000,000	76	360	1,370,838	2,232,022	106,374	178,162	47,219	45,748	33,369	13,957
$10,000,000 under $100,000,000	63	214	6,882,664	16,519,399	398,746	524,998	118,409	142,184	150,469	70,530
$100,000,000 or more	15	61	23,992,348	53,928,333	1,320,844	1,385,431	315,232	315,253	367,935	115,444
Wholesale trade	**63**	**821**	**18,094,843**	**56,901,635**	**1,016,206**	**1,217,718**	**255,192**	**287,324**	**345,663**	**72,583**
Assets zero or not reported	23	92	—	33,114	802	1,932	957	957	982	—
$1 under $1,000,000	41	334	72,179	171,974	−14,382	7,703	2,483	10,643	5,394	2,144
$1,000,000 under $10,000,000	43	227	878,805	1,516,124	80,427	119,905	28,766	28,132	27,842	8,200
$10,000,000 under $100,000,000	38	136	4,212,707	14,400,686	235,048	324,780	84,504	109,089	58,511	28,988
$100,000,000 or more	6	32	12,931,152	40,779,737	714,312	763,398	138,483	138,504	252,933	33,251
Petroleum and petroleum products	**8**	**107**	**4,297,072**	**14,932,001**	**292,660**	**319,103**	**110,508**	**112,028**	**203,395**	**33,937**
Assets zero or not reported	*	*	*	*	*	*	*	*	*	*
$1 under $1,000,000	7	34	6,848	2,288	−1,279	876	7	8	100	793
$1,000,000 under $10,000,000	7	34	150,136	134,607	8,124	13,531	4,300	4,300	2,262	1,792
$10,000,000 under $100,000,000	5	22	803,507	5,514,897	53,203	63,320	27,937	29,435	11,368	3,746
$100,000,000 or more	*	*	*	*	*	*	*	*	*	*
Retail trade	**53**	**583**	**14,263,348**	**16,090,815**	**815,731**	**902,712**	**232,518**	**230,975**	**213,667**	**142,448**
Assets zero or not reported	27	141	—	34,756	15,011	15,039	1,378	1,378	—	12,433
$1 under $1,000,000	40	202	40,162	72,852	4,542	7,164	2,033	2,137	1,181	522
$1,000,000 under $10,000,000	33	133	492,033	715,898	25,947	58,257	18,452	17,616	5,527	5,757
$10,000,000 under $100,000,000	25	78	2,669,957	2,118,713	163,698	200,218	33,906	33,095	91,958	41,542
$100,000,000 or more	9	29	11,061,197	13,148,596	606,532	622,034	176,749	176,749	115,001	82,193
Finance, insurance and real estate	**169**	**2,934**	**126,591,844**	**23,001,761**	**2,730,451**	**3,030,724**	**675,064**	**682,550**	**660,896**	**242,087**
Assets zero or not reported	68	422	—	248,703	14,571	26,477	6,577	6,582	1,549	7,482
$1 under $1,000,000	117	1,234	244,620	289,050	10,724	45,248	9,903	10,568	4,865	2,384
$1,000,000 under $10,000,000	93	615	2,223,239	1,386,476	174,789	242,050	59,964	63,561	41,538	7,445
$10,000,000 under $100,000,000	83	427	15,092,855	4,546,032	499,692	631,585	169,317	162,888	167,424	43,146
$100,000,000 or more	59	236	109,031,129	16,531,501	2,030,674	2,085,363	429,303	438,951	445,520	181,631
Banking	**59**	**1,066**	**86,236,101**	**10,870,837**	**1,510,715**	**1,605,013**	**395,072**	**396,038**	**335,258**	**122,483**
Assets zero or not reported	24	133	—	51,628	6,401	10,832	1,114	1,120	4	7,232
$1 under $1,000,000	39	369	72,086	83,412	−200	15,741	3,954	4,110	1,071	67
$1,000,000 under $10,000,000	30	211	768,996	197,966	57,672	72,712	23,221	25,211	18,635	986
$10,000,000 under $100,000,000	34	198	7,470,368	1,224,873	251,180	275,052	69,201	68,659	60,761	11,707
$100,000,000 or more	25	155	77,924,650	9,312,958	1,195,662	1,230,676	297,582	296,938	254,787	102,491

Footnote at end of table.

Table 1.—U.S. Corporation Returns with Total Assets of $250 Million or More: Controlled Foreign Corporation Total Assets, Receipts, Earnings, Taxes, Distributions and Subpart F Income, by Selected Industry of U.S. Corporation and Size of Total Assets of Controlled Foreign Corporation—Continued

[Money amounts are in thousands of dollars]

Selected industry of U.S. corporation filing return and size of total assets of Controlled Foreign Corporation	Number of U.S. corporation returns	Controlled Foreign Corporations								
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)	Actual distributions in current year	Subpart F income
						Current earnings and profits before taxes	Foreign income taxes (net)			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Finance, Insurance and real estate—Continued										
Insurance	**43**	**508**	**12,794,273**	**4,220,417**	**389,670**	**446,435**	**65,898**	**66,692**	**78,604**	**52,359**
Assets zero or not reported	17	70	—	187,998	7,971	11,925	4,494	4,494	1,300	—
$1 under $1,000,000	30	210	46,275	54,792	2,861	6,795	1,743	1,771	1,270	1,827
$1,000,000 under $10,000,000	25	110	448,217	315,176	27,745	35,937	10,164	9,800	2,211	3,199
$10,000,000 under $100,000,000	25	93	2,983,523	1,201,339	79,152	118,063	27,362	25,227	50,821	7,523
$100,000,000 or more	12	25	9,316,257	2,461,113	271,940	273,715	22,136	25,400	23,002	39,810
Holding and other investment companies, except bank holding companies	**13**	**382**	**4,366,132**	**4,263,824**	**209,824**	**241,206**	**55,487**	**52,913**	**87,498**	**21,625**
Assets zero or not reported	6	37	—	793	−308	—	—	—	—	—
$1 under $1,000,000	11	213	34,902	38,527	−2,215	2,267	520	1,066	651	79
$1,000,000 under $10,000,000	9	84	261,290	464,038	9,946	22,517	7,682	6,421	4,558	325
$10,000,000 under $100,000,000	7	42	1,392,470	1,403,300	101,736	113,366	24,340	20,309	32,351	20,806
$100,000,000 or more	5	6	2,677,470	2,357,167	100,664	103,056	22,945	25,116	49,938	416
Services	**62**	**1,255**	**6,204,392**	**4,096,183**	**399,478**	**557,259**	**159,460**	**165,056**	**164,313**	**72,302**
Assets zero or not reported	30	256	—	86,374	20,541	25,381	2,304	2,299	346	14,997
$1 under $1,000,000	49	508	144,093	232,455	−1,115	29,091	7,903	8,094	7,919	1,556
$1,000,000 under $10,000,000	45	350	1,246,974	1,024,315	98,769	129,528	40,335	40,100	39,809	5,966
$10,000,000 under $100,000,000	38	136	3,592,456	2,504,208	212,381	304,356	96,843	102,489	46,239	33,238
$100,000,000 or more	5	5	1,220,870	248,830	68,902	68,902	12,075	12,075	70,000	16,544
Business services	**22**	**625**	**1,882,986**	**1,431,781**	**152,352**	**173,463**	**64,646**	**63,057**	**33,553**	**10,307**
Assets zero or not reported	13	119	—	5,947	572	716	270	267	346	—
$1 under $1,000,000	18	255	82,579	103,102	4,535	11,201	2,583	2,516	1,605	1,261
$1,000,000 under $10,000,000	15	205	713,185	564,442	51,617	61,490	22,564	21,225	20,290	2,439
$10,000,000 under $100,000,000	16	46	1,087,223	758,290	95,628	100,056	39,229	39,048	11,313	6,607
$100,000,000 or more	—	—	—	—	—	—	—	—	—	—

* Data deleted to avoid disclosure of information for specific corporations.
Note: Detail may not add to total because of rounding.

Table 2.—U.S. Corporation Returns with Total Assets of $250 Million or More: Controlled Foreign Corporation Total Assets, Receipts, Earnings, Taxes, Distributions and Subpart F Income, by Selected Industries of U.S. Corporation and Controlled Foreign Corporation

[Money amounts are in thousands of dollars]

Selected industry of U.S. corporation filing the return and selected industry of Controlled Foreign Corporation	Number of U.S. corporation returns	Controlled Foreign Corporations								
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)	Actual distributions in current year	Subpart F income
						Current earnings and profits before taxes	Foreign income taxes (net)			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
All industries (U.S. parent)	**1,103**	**27,008**	**595,406,489**	**624,529,988**	**48,591,785**	**57,469,606**	**19,888,594**	**19,663,431**	**17,429,494**	**4,420,024**
Industry of Controlled Foreign Corporation										
Agriculture, forestry and fishing	46	161	978,638	1,006,480	38,633	88,809	31,682	33,787	19,072	—
Mining	123	821	25,901,284	19,534,830	6,564,057	7,263,299	4,016,773	4,021,775	2,088,531	151,361
Construction	51	396	4,778,866	5,840,113	431,745	561,290	164,504	165,775	171,063	14,108
Manufacturing	571	7,259	219,484,327	341,427,774	23,123,025	27,510,932	9,923,041	9,686,985	7,396,511	845,682
Transportation and public utilities	156	626	16,223,121	10,011,858	641,795	1,330,717	232,909	226,388	537,151	158,425
Wholesale and retail trade	467	4,646	74,983,155	199,002,412	9,143,205	10,579,211	3,971,057	3,977,831	4,430,170	682,542
Finance, insurance and real estate	671	3,915	228,186,477	34,113,467	6,917,561	8,143,221	1,116,328	1,100,551	2,379,836	2,391,587
Services	399	2,571	19,436,781	12,937,029	1,658,857	1,900,428	414,495	432,473	395,550	175,611
Nature of business not allocable	133	341	758,852	656,025	72,907	91,700	17,805	17,866	11,610	709
Inactive	671	6,272	4,674,988	—	—	—	—	—	—	—
Mining (U.S. parent)	**46**	**602**	**9,885,843**	**5,930,863**	**1,494,624**	**1,697,589**	**956,810**	**953,598**	**630,151**	**135,543**
Industry of Controlled Foreign Corporation										
Agriculture, forestry and fishing	*	*	*	*	*	*	*	*	*	*
Mining	32	213	5,019,834	4,741,426	1,312,456	1,427,143	905,800	902,551	514,474	65,840
Construction	3	41	726,467	142,477	43,704	80,326	30,369	31,563	7,584	—
Manufacturing	13	33	290,937	306,793	11,761	32,934	8,934	8,526	19,041	729
Transportation and public utilities	10	22	201,502	121,237	20,974	26,203	303	−994	45	1,048
Wholesale and retail trade	6	16	141,179	218,327	6,962	7,654	1,106	1,106	11,152	2,637
Finance, insurance and real estate	25	58	2,152,116	204,659	73,416	78,552	5,421	5,561	76,456	43,846
Services	9	55	588,416	187,215	25,140	43,836	4,877	5,285	1,399	21,442
Nature of business not allocable	*	*	*	*	*	*	*	*	*	*
Inactive	32	159	750,809	—	—	—	—	—	—	—
Oil and gas extraction (U.S. parent)	33	512	8,517,348	5,686,333	1,423,295	1,619,670	935,442	933,527	609,711	130,750
Industry of Controlled Foreign Corporation										
Agriculture, forestry and fishing	*	*	*	*	*	*	*	*	*	*
Mining	24	190	4,654,419	4,613,684	1,279,699	1,391,379	886,673	883,424	496,804	65,668
Construction	*	*	*	*	*	*	*	*	*	*
Manufacturing	10	30	280,808	289,196	9,901	31,066	8,152	7,744	18,971	729
Transportation and public utilities	5	8	111,935	46,988	−311	1,847	303	303	—	964
Wholesale and retail trade	5	15	133,964	217,668	6,290	6,981	1,106	1,106	11,152	2,068
Finance, insurance and real estate	17	44	1,972,296	181,352	58,596	63,304	3,962	4,103	73,801	39,878
Services	8	54	587,614	186,240	25,130	43,826	4,877	5,285	1,399	21,442
Nature of business not allocable	*	*	*	*	*	*	*	*	*	*
Inactive	21	126	35,381	—	—	—	—	—	—	—
Construction (U.S. parent)	**19**	**384**	**3,826,697**	**2,917,905**	**416,794**	**461,479**	**122,388**	**121,488**	**194,572**	**44,664**
Industry of Controlled Foreign Corporation										
Agriculture, forestry and fishing	*	*	*	*	*	*	*	*	*	*
Mining	5	54	784,681	259,945	109,694	128,317	24,346	23,214	46,608	11,959
Construction	14	95	919,228	1,311,029	113,364	128,958	25,073	25,104	49,439	770
Manufacturing	4	26	363,845	553,183	29,527	31,579	11,535	11,579	19,219	—
Transportation and public utilities	*	*	*	*	*	*	*	*	*	*
Wholesale and retail trade	*	*	*	*	*	*	*	*	*	*
Finance, insurance and real estate	8	27	958,824	115,307	37,750	44,036	5,320	5,387	20,350	21,970
Services	8	49	439,054	230,400	100,873	101,693	40,481	40,582	50,091	9,965
Nature of business not allocable	*	*	*	*	*	*	*	*	*	*
Inactive	12	110	36,915	—	—	—	—	—	—	—
Manufacturing (U.S. parent)	**581**	**18,805**	**390,581,396**	**500,334,516**	**40,379,971**	**47,969,980**	**17,109,507**	**16,839,916**	**14,904,646**	**3,374,696**
Industry of Controlled Foreign Corporation										
Agriculture, forestry and fishing	32	111	635,223	616,541	32,594	62,070	22,428	23,036	14,002	—
Mining	64	448	17,279,446	12,222,001	4,937,904	5,456,110	3,027,421	3,034,513	1,478,575	33,418
Construction	28	198	2,795,010	4,040,002	279,970	340,439	106,438	106,361	113,987	13,338
Manufacturing	496	6,686	210,635,491	327,901,939	22,592,038	26,749,926	9,691,368	9,453,536	7,169,747	838,372
Transportation and public utilities	72	260	9,347,807	4,962,562	164,113	779,909	80,797	72,545	485,642	125,081
Wholesale and retail trade	344	3,767	56,265,475	129,396,250	7,684,709	8,931,367	3,604,990	3,593,148	3,932,747	612,042
Finance, insurance and real estate	339	1,826	81,658,613	13,202,523	3,656,892	4,468,976	394,693	368,552	1,470,747	1,664,213
Services	230	1,223	9,827,041	7,803,206	982,706	1,116,275	178,070	184,862	236,810	87,522
Nature of business not allocable	91	255	408,844	189,493	49,044	64,908	3,300	3,363	2,389	709
Inactive	388	4,031	1,728,447	—	—	—	—	—	—	—

Footnotes at end of table.

Table 2.—U.S. Corporation Returns with Total Assets of $250 Million or More: Controlled Foreign Corporation Total Assets, Receipts, Earnings, Taxes, Distributions and Subpart F Income, by Selected Industries of U.S. Corporation and Controlled Foreign Corporation—Continued

[Money amounts are in thousands of dollars]

Selected industry of U.S. corporation filing the return and selected industry of Controlled Foreign Corporation	Number of U.S. corporation returns	Controlled Foreign Corporations								
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)	Actual distributions in current year	Subpart F income
						Current earnings and profits before taxes	Foreign income taxes (net)			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Manufacturing—Continued										
Food and kindred products (U.S. parent)	43	1,831	22,565,728	31,414,654	2,714,895	3,050,716	791,131	776,935	960,637	270,378
Industry of Controlled Foreign Corporation										
Agriculture, forestry and fishing	9	54	298,194	289,924	−8,293	15,462	5,147	5,195	1,967	—
Mining	*	*	*	*	*	*	*	*	*	*
Construction	*	*	*	*	*	*	*	*	*	*
Manufacturing	38	673	14,607,295	25,572,986	1,918,394	2,129,938	688,523	685,487	600,486	76,653
Transportation and public utilities	10	23	171,440	165,689	15,490	17,743	1,995	1,990	7,532	3,781
Wholesale and retail trade	28	288	1,871,291	4,248,725	188,932	223,263	70,252	68,212	47,049	29,206
Finance, insurance and real estate	33	175	4,811,333	757,287	366,278	426,341	21,150	11,054	257,043	145,720
Services	20	103	392,905	364,688	205,032	207,821	3,680	4,593	46,501	15,019
Nature of business not allocable	*	*	*	*	*	*	*	*	*	*
Inactive	31	465	340,738	—	—	—	—	—	—	—
Chemicals and allied products (U.S. parent)	72	3,940	58,528,756	60,877,842	6,539,859	7,382,393	2,473,937	2,453,161	2,100,613	813,540
Industry of Controlled Foreign Corporation										
Agriculture, forestry and fishing	6	27	100,488	76,367	15,949	18,477	9,209	9,752	4,014	—
Mining	8	53	2,559,384	1,777,493	1,170,623	1,202,367	737,557	737,731	509,229	3,748
Construction	*	*	*	*	*	*	*	*	*	*
Manufacturing	68	1,632	37,611,807	45,133,605	4,211,951	4,733,368	1,449,549	1,442,198	1,254,218	276,979
Transportation and public utilities	8	27	975,860	629,112	−99,953	9,358	−2,951	−13,638	8,031	550
Wholesale and retail trade	56	770	5,464,570	11,301,447	523,864	628,783	206,822	203,322	119,558	130,406
Finance, insurance and real estate	53	353	10,815,699	1,495,504	678,039	734,691	59,262	60,777	191,633	394,348
Services	36	161	594,210	153,519	30,429	44,633	10,598	9,712	13,928	7,510
Nature of business not allocable	*	*	*	*	*	*	*	*	*	*
Inactive	60	863	249,888	—	—	—	—	—	—	—
Petroleum (including integrated) and coal products (U.S. parent)	35	1,932	99,994,391	173,001,490	12,612,098	15,588,956	6,708,937	6,507,866	6,134,363	707,290
Industry of Controlled Foreign Corporation										
Agriculture, forestry and fishing	3	4	17,717	3,281	−581	939	145	163	30	—
Mining	22	271	12,578,869	9,697,332	3,784,806	4,201,311	2,272,745	2,276,963	956,948	25,851
Construction	4	13	435,657	1,083,196	26,913	27,142	9,012	9,012	22,134	7,763
Manufacturing	20	326	32,613,502	76,818,658	2,634,506	3,708,924	1,569,086	1,363,453	1,026,901	93,578
Transportation and public utilities	17	112	6,723,851	2,927,767	130,029	603,786	58,697	60,229	442,906	60,168
Wholesale and retail trade	29	475	26,465,364	79,961,314	5,439,453	6,051,965	2,742,609	2,740,439	3,370,711	217,341
Finance, insurance and real estate	27	204	19,875,856	2,271,174	586,917	981,180	54,598	55,083	313,659	301,720
Services	17	72	866,403	227,087	10,648	13,589	2,031	2,512	1,074	861
Nature of business not allocable	12	24	24,716	11,679	−592	119	14	12	—	10
Inactive	27	431	392,457	—	—	—	—	—	—	—
Primary metal industries (U.S. parent)	40	1,033	14,034,236	10,486,406	332,153	771,022	168,394	134,945	193,123	126,111
Industry of Controlled Foreign Corporation										
Agriculture, forestry and fishing	*	*	*	*	*	*	*	*	*	*
Mining	12	48	1,100,155	332,467	−9,149	13,133	2,717	1,777	7,300	—
Construction	*	*	*	*	*	*	*	*	*	*
Manufacturing	34	330	6,609,777	7,454,065	193,252	466,904	137,711	106,306	115,621	500
Transportation and public utilities	10	20	316,365	218,534	9,080	26,149	2,207	2,316	2,191	39,440
Wholesale and retail trade	18	114	725,969	1,199,414	29,663	47,303	12,004	13,766	40,590	10,398
Finance, insurance and real estate	29	164	4,597,138	934,333	103,061	196,750	11,853	8,562	26,730	75,554
Services	11	55	520,519	315,050	6,691	18,502	1,190	1,506	691	211
Nature of business not allocable	6	22	63,286	30,459	1,350	2,256	712	712	—	8
Inactive	23	274	93,477	—	—	—	—	—	—	—
Machinery, except electrical (U.S. parent)	68	1,950	51,882,026	50,103,336	7,430,539	7,989,513	3,045,754	3,020,664	1,883,219	481,385
Industry of Controlled Foreign Corporation										
Agriculture, forestry and fishing	*	*	*	*	*	*	*	*	*	*
Mining	5	42	333,092	313,087	748	19,665	8,325	8,260	4,509	50
Construction	4	8	82,492	64,204	23,039	23,059	1,995	1,995	1,451	3,272
Manufacturing	61	702	33,636,239	36,833,682	6,165,443	6,445,916	2,773,899	2,764,014	1,559,862	172,912
Transportation and public utilities	*	*	*	*	*	*	*	*	*	*
Wholesale and retail trade	43	469	8,250,227	9,845,001	490,672	683,638	160,496	150,929	66,328	100,568
Finance, insurance and real estate	43	168	7,143,442	1,207,273	500,854	519,993	76,074	72,784	227,389	183,852
Services	32	156	2,288,405	1,795,401	250,437	296,950	24,915	22,628	23,679	20,709
Nature of business not allocable	*	*	*	*	*	*	*	*	*	*
Inactive	45	390	107,628	—	—	—	—	—	—	—

Footnotes at end of table.

Table 2.—U.S. Corporation Returns with Total Assets of $250 Million or More: Controlled Foreign Corporation Total Assets, Receipts, Earnings, Taxes, Distributions and Subpart F Income, by Selected Industries of U.S. Corporation and Controlled Foreign Corporation—Continued

[Money amounts are in thousands of dollars]

Selected industry of U.S. corporation filing the return and selected industry of Controlled Foreign Corporation	Number of U.S. corporation returns	Controlled Foreign Corporations								
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)	Actual distributions in current year	Subpart F income
						Current earnings and profits before taxes	Foreign income taxes (net)			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Manufacturing—Continued										
Electrical and electronic equipment (U.S. parent)	70	2,270	37,641,993	39,205,015	2,701,272	3,255,924	733,755	721,578	838,293	223,498
Industry of Controlled Foreign Corporation										
Agriculture, forestry and fishing	*	*	*	*	*	*	*	*	*	*
Mining	4	17	303,224	30,498	−5,363	11,160	3,323	6,503	205	3,007
Construction	4	22	1,024,842	636,785	10,435	38,165	7,273	7,418	15,145	231
Manufacturing	55	786	18,896,896	28,301,544	1,658,208	2,021,208	514,847	503,048	540,274	51,867
Transportation and public utilities	4	27	747,080	740,031	78,907	80,275	17,655	17,655	22,245	5,904
Wholesale and retail trade	45	459	3,065,908	5,188,376	301,292	361,192	111,577	111,256	53,634	13,988
Finance, insurance and real estate	29	270	11,565,042	2,088,276	502,378	565,542	35,924	33,151	178,948	137,405
Services	22	222	1,585,688	2,117,793	165,952	177,011	42,945	42,330	26,129	10,537
Nature of business not allocable	*	*	*	*	*	*	*	*	*	*
Inactive	44	428	325,924	—	—	—	—	—	—	—
Motor vehicles and equipment (U.S. parent)	20	925	47,132,506	70,477,798	2,430,468	3,550,208	1,223,562	1,252,124	993,079	269,493
Industry of Controlled Foreign Corporation										
Agriculture, forestry and fishing	—	—	—	—	—	—	—	—	—	—
Mining	*	*	*	*	*	*	*	*	*	*
Construction	—	—	—	—	—	—	—	—	—	—
Manufacturing	19	247	29,606,718	61,223,157	1,868,236	2,847,322	1,100,282	1,134,063	882,288	20,883
Transportation and public utilities	3	14	72,640	25,757	−540	1,105	273	1,101	—	—
Wholesale and retail trade	10	313	2,437,901	6,066,726	118,139	173,080	44,298	45,852	35,304	27,415
Finance, insurance and real estate	13	137	14,511,017	3,007,099	406,362	488,108	74,103	66,219	71,538	216,891
Services	10	38	424,247	148,287	35,859	38,181	3,818	4,101	3,949	3,656
Nature of business not allocable	*	*	*	*	*	*	*	*	*	*
Inactive	15	170	45,419	—	—	—	—	—	—	—
Instruments and related products (U.S. parent)	23	807	11,513,591	15,490,503	1,270,096	1,437,020	466,927	476,545	344,585	155,856
Industry of Controlled Foreign Corporation										
Agriculture, forestry and fishing	*	*	*	*	*	*	*	*	*	*
Mining	—	—	—	—	—	—	—	—	—	—
Construction	*	*	*	*	*	*	*	*	*	*
Manufacturing	21	321	6,803,466	9,254,057	977,049	1,056,061	343,651	342,134	263,613	81,443
Transportation and public utilities	*	*	*	*	*	*	*	*	*	*
Wholesale and retail trade	15	253	3,831,795	5,728,459	240,216	314,392	110,999	113,063	66,564	54,931
Finance, insurance and real estate	15	33	550,832	69,912	42,435	44,474	1,401	1,201	12,350	19,471
Services	7	38	170,094	298,073	1,278	10,731	5,127	14,376	1,048	10
Nature of business not allocable	*	*	*	*	*	*	*	*	*	*
Inactive	19	127	24,185	—	—	—	—	—	—	—
Transportation and public utilities (U.S. parent)	**106**	**1,508**	**25,021,612**	**14,153,603**	**1,299,298**	**1,572,265**	**357,612**	**360,756**	**297,736**	**334,528**
Industry of Controlled Foreign Corporation										
Agriculture, forestry and fishing	*	*	*	*	*	*	*	*	*	*
Mining	15	63	2,337,056	2,199,681	219,499	245,508	53,450	55,995	48,875	39,797
Construction	3	52	309,069	331,942	1,422	8,254	2,617	2,709	53	—
Manufacturing	19	249	3,417,558	4,123,061	220,193	293,695	86,964	85,996	66,037	5,112
Transportation and public utilities	46	230	5,605,599	4,495,787	396,215	435,948	130,387	133,217	50,843	9,421
Wholesale and retail trade	13	146	792,255	994,733	12,308	61,618	13,638	12,326	22,718	2,855
Finance, insurance and real estate	67	199	10,835,990	1,278,569	376,172	429,626	46,296	46,496	92,180	276,303
Services	35	162	1,398,574	728,479	79,576	97,440	24,216	23,968	16,337	1,041
Nature of business not allocable	*	*	*	*	*	*	*	*	*	*
Inactive	54	379	278,115	—	—	—	—	—	—	—
Wholesale and retail trade (U.S. parent)	**116**	**1,404**	**32,358,191**	**72,992,450**	**1,831,937**	**2,120,430**	**487,710**	**518,299**	**559,330**	**215,031**
Industry of Controlled Foreign Corporation										
Agriculture, forestry and fishing	4	11	55,647	249,110	−4,837	233	—	1,474	108	—
Mining	4	16	210,977	90,395	−5,660	3,313	4,571	4,091	—	347
Construction	*	*	*	*	*	*	*	*	*	*
Manufacturing	20	76	2,117,538	4,244,541	141,488	167,938	61,356	63,050	24,231	1,468
Transportation and public utilities	13	34	165,832	13,616	−7,810	12,676	654	616	161	1,354
Wholesale and retail trade	76	585	17,104,187	66,413,414	1,362,059	1,482,147	324,146	346,212	376,123	65,008
Finance, insurance and real estate	53	186	12,033,030	1,583,399	313,850	411,036	87,133	87,883	154,155	145,662
Services	26	124	507,065	393,145	32,768	42,905	9,887	15,011	4,554	1,193
Nature of business not allocable	*	*	*	*	*	*	*	*	*	*
Inactive	65	358	150,649	—	—	—	—	—	—	—

Footnotes at end of table.

Table 2.—U.S. Corporation Returns with Total Assets of $250 Million or More: Controlled Foreign Corporation Total Assets, Receipts, Earnings, Taxes, Distributions and Subpart F Income, by Selected Industries of U.S. Corporation and Controlled Foreign Corporation—Continued

[Money amounts are in thousands of dollars]

Selected industry of U.S. corporation filing the return and selected industry of Controlled Foreign Corporation	Number of U.S. corporation returns	Controlled Foreign Corporations								
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)	Actual distributions in current year	Subpart F income
						Current earnings and profits before taxes	Foreign income taxes (net)			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Finance, insurance and real estate (U.S. parent)	**169**	**2,934**	**126,591,844**	**23,001,761**	**2,730,451**	**3,030,724**	**675,064**	**682,550**	**660,896**	**242,087**
Industry of Controlled Foreign Corporation										
Agriculture, forestry and fishing	*	*	*	*	*	*	*	*	*	*
Mining	*	*	*	*	*	*	*	*	*	*
Construction	—	—	—	—	—	—	—	—	—	—
Manufacturing	13	104	1,940,558	3,301,29	189,477	204,484	52,381	50,738	86,353	(1)
Transportation and public utilities	7	18	280,382	93,133	23,183	23,832	1,020	932	—	20,820
Wholesale and retail trade	17	86	396,148	1,278,719	29,803	39,370	11,578	8,250	14,096	—
Finance, insurance and real estate	143	1,553	118,814,266	17,513,831	2,385,410	2,630,649	571,102	581,428	540,812	206,688
Services	44	254	3,297,343	764,696	113,158	128,553	38,239	40,233	19,613	14,579
Nature of business not allocable	10	18	25,821	25,462	– 523	597	269	268	21	—
Inactive	77	872	1,581,626	—	—	—	—	—	—	—
Banking (U.S. parent)	59	1,066	86,236,101	10,870,837	1,510,715	1,605,013	395,072	396,038	335,258	122,483
Industry of Controlled Foreign Corporation										
Agriculture, forestry and fishing	*	*	*	*	*	*	*	*	*	*
Mining	—	—	—	—	—	—	—	—	—	—
Construction	—	—	—	—	—	—	—	—	—	—
Manufacturing	*	*	*	*	*	*	*	*	*	*
Transportation and public utilities	3	8	10,803	15	– 169	403	185	98	—	—
Wholesale and retail trade	*	*	*	*	*	*	*	*	*	*
Finance, insurance and real estate	54	632	83,490,053	10,795,206	1,480,689	1,570,536	385,338	385,365	334,633	116,614
Services	23	107	1,436,249	61,996	28,642	31,277	8,997	10,043	625	5,869
Nature of business not allocable	*	*	*	*	*	*	*	*	*	*
Inactive	28	298	1,214,232	—	—	—	—	—	—	—
Insurance (U.S. parent)	43	508	12,794,273	4,220,417	389,670	446,435	65,898	66,692	78,604	52,359
Industry of Controlled Foreign Corporation										
Agriculture, forestry and fishing	*	*	*	*	*	*	*	*	*	*
Mining	—	—	—	—	—	—	—	—	—	—
Construction	—	—	—	—	—	—	—	—	—	—
Manufacturing	3	37	467,618	567,886	45,841	53,070	19,002	18,851	29,552	—
Transportation and public utilities	*	*	*	*	*	*	*	*	*	*
Wholesale and retail trade	4	16	36,627	67,668	3,254	3,997	1,701	1,701	1,047	—
Finance, insurance and real estate	36	293	12,181,432	3,456,765	337,611	377,619	42,799	43,750	41,604	52,359
Services	9	44	67,312	102,348	3,519	11,149	2,123	2,123	6,401	—
Nature of business not allocable	3	8	15,817	25,401	– 496	582	266	260	—	—
Inactive	18	106	24,763	—	—	—	—	—	—	—
Services (U.S. parent)	**62**	**1,255**	**6,204,392**	**4,096,183**	**399,478**	**557,259**	**159,460**	**165,056**	**164,313**	**72,302**
Industry of Controlled Foreign Corporation										
Agriculture, forestry and fishing	—	—	—	—	—	—	—	—	—	—
Mining	*	*	*	*	*	*	*	*	*	*
Construction	*	*	*	*	*	*	*	*	*	*
Manufacturing	5	49	316,232	451,253	– 71,926	15,638	4,518	7,652	3,696	—
Transportation and public utilities	6	51	488,333	306,119	44,924	46,958	18,187	18,025	460	700
Wholesale and retail trade	8	30	195,020	284,902	38,053	45,010	11,276	11,180	72,975	—
Finance, insurance and real estate	34	61	1,708,273	210,716	70,087	76,116	6,329	5,210	20,435	31,733
Services	46	702	3,307,075	2,829,539	323,648	368,738	118,441	122,248	66,746	39,869
Nature of business not allocable	7	13	399	—	325	404	—	—	—	—
Inactive	39	339	144,893	—	—	—	—	—	—	—

1 Less than $500.
* Data deleted to avoid disclosure of information for specific corporations.
Note: Detail may not add to total because of rounding and because agriculture, forestry and fishing is not shown for U.S. parent corporations.

Table 3.—U.S. Corporation Returns with Total Assets of $250 Million or More: Controlled Foreign Corporation Total Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income and Selected Transactions, by Selected Industry of Controlled Foreign Corporation

[Money amounts are in thousands of dollars]

Selected industry of Controlled Foreign Corporation	Number of U.S. corporation returns	Controlled Foreign Corporations							
		Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign income taxes (net)	Actual distributions in current year	Subpart F income	Selected receipts by foreign corporations from: All related persons
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
All industries, total	**1,103**	**27,008**	**595,406,489**	**624,529,988**	**48,591,785**	**19,663,431**	**17,429,494**	**4,420,024**	**83,528,175**
Agriculture, forestry and fishing	**46**	**161**	**978,638**	**1,006,480**	**38,633**	**33,787**	**19,072**	**—**	**67,846**
Mining	**123**	**821**	**25,901,284**	**19,534,830**	**6,564,057**	**4,021,775**	**2,088,531**	**151,361**	**2,407,935**
Oil and gas extraction	90	602	21,603,663	17,782,883	6,438,111	3,928,638	1,902,075	150,624	2,210,309
Construction	**51**	**396**	**4,778,866**	**5,840,113**	**431,745**	**165,775**	**171,063**	**14,108**	**499,875**
Manufacturing	**571**	**7,259**	**219,484,327**	**341,427,774**	**23,123,025**	**9,686,985**	**7,396,511**	**845,682**	**46,928,489**
Food and kindred products	68	650	16,138,241	29,134,928	2,063,139	738,296	653,107	72,399	732,391
Chemicals and allied products	128	1,698	39,610,381	47,627,012	4,385,608	1,546,204	1,276,286	335,335	2,927,515
Petroleum (including integrated) and coal products	24	125	31,595,723	76,285,946	2,440,693	1,274,757	962,208	60,719	8,976,008
Fabricated metal products	122	581	6,178,961	8,082,133	625,777	270,682	338,710	25,534	308,853
Machinery, except electrical	131	782	29,499,003	32,196,493	5,546,221	2,575,740	1,504,647	106,379	4,366,548
Electrical and electronic equipment	127	934	24,238,530	34,057,306	2,291,562	686,518	555,832	69,518	6,516,443
Motor vehicles and equipment	39	249	29,756,928	61,429,201	1,737,388	1,059,071	878,329	20,489	18,954,001
Transportation and public utilities	**156**	**626**	**16,223,121**	**10,011,858**	**641,795**	**226,388**	**537,151**	**158,425**	**1,880,031**
Water transportation	75	261	6,959,562	3,021,868	−65,842	17,905	334,716	147,880	1,493,333
Wholesale and retail trade	**467**	**4,646**	**74,983,155**	**199,002,412**	**9,143,205**	**3,977,831**	**4,430,170**	**682,542**	**18,363,614**
Wholesale trade	410	3,750	62,607,143	176,186,770	8,320,183	3,715,665	4,247,344	636,362	17,942,644
Finance, insurance and real estate	**671**	**3,915**	**228,186,477**	**34,113,467**	**6,917,561**	**1,100,551**	**2,379,836**	**2,391,587**	**10,931,629**
Banking	68	322	66,304,143	8,068,427	807,198	203,329	224,415	59,202	1,181,654
Credit agencies other than banks	185	710	59,364,705	8,907,948	1,720,824	360,358	371,598	860,046	2,874,767
Insurance	277	531	23,623,480	6,049,618	1,059,011	65,850	304,532	329,057	1,364,624
Holding and other investment companies, except bank holding companies	402	1,291	61,087,974	8,204,989	2,787,916	309,936	1,370,437	1,072,009	4,845,629
Services	**399**	**2,571**	**19,436,781**	**12,937,029**	**1,658,857**	**432,473**	**395,550**	**175,611**	**2,369,132**
Business services	270	1,374	6,944,018	5,196,663	743,787	204,742	161,286	61,584	1,498,767
Nature of business not allocable	**133**	**341**	**758,852**	**656,025**	**72,907**	**17,866**	**11,610**	**709**	**79,626**
Inactive	**671**	**6,272**	**4,674,988**	**—**	**—**	**—**	**—**	**—**	**—**

Selected industry of Controlled Foreign Corporation	Controlled Foreign Corporations—Continued								
	Selected receipts by foreign corporations from—Continued								Selected payments by foreign corporations to:
	U.S. corporation filing return and its domestic subsidiaries				Any foreign corporation controlled by U.S. corporation filing return				
	Total	Sales of stock in trade	Compensation received for certain services	Interest, rents, and royalties received	Total	Sales of stock in trade	Compensation received for certain services	Interest, rents, and royalties received	All related persons
	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)
All industries, total	**68,589,582**	**54,859,629**	**4,208,307**	**7,207,392**	**14,648,044**	**873,549**	**3,718,226**	**3,734,962**	**112,600,816**
Agriculture, forestry and fishing	**62,050**	**57,319**	**4,531**	**—**	**5,796**	**—**	**963**	**3,796**	**74,764**
Mining	**1,807,587**	**1,699,925**	**38,696**	**50,585**	**599,010**	**—**	**42,287**	**249,179**	**3,367,636**
Oil and gas extraction	1,643,619	1,538,824	38,637	48,172	565,544	—	41,643	240,863	3,075,328
Construction	**270,356**	**106,679**	**143,459**	**14,907**	**228,250**	**—**	**159,412**	**16,691**	**727,907**
Manufacturing	**41,792,135**	**38,408,864**	**2,312,009**	**593,054**	**5,018,859**	**591,252**	**1,641,738**	**1,070,006**	**66,199,030**
Food and kindred products	502,265	447,446	14,630	8,236	230,126	21,479	27,637	83,217	1,742,708
Chemicals and allied products	1,955,638	1,569,053	113,574	202,580	967,478	281,503	225,337	218,868	7,427,508
Petroleum (including integrated) and coal products	7,605,285	7,459,569	77,339	66,381	1,347,249	6,741	187,818	233,747	14,016,938
Fabricated metal products	160,261	136,185	4,443	9,137	146,742	12,446	33,141	70,746	982,914
Machinery, except electrical	3,842,365	2,786,077	909,681	41,614	520,125	5,513	408,093	46,523	9,039,184
Electrical and electronic equipment	5,880,047	5,222,107	572,113	48,684	596,374	163,395	136,050	183,113	7,057,579
Motor vehicles and equipment	18,144,222	17,570,658	292,440	128,822	809,436	96,137	515,131	135,535	18,760,225
Transportation and public utilities	**1,292,696**	**393,718**	**411,812**	**425,900**	**587,304**	**20,830**	**121,444**	**153,944**	**1,587,084**
Water transportation	988,210	328,369	326,552	330,352	505,092	19,533	68,159	139,593	1,192,496
Wholesale and retail trade	**14,680,981**	**13,934,289**	**334,975**	**140,832**	**3,665,761**	**252,074**	**960,403**	**514,970**	**29,854,152**
Wholesale trade	14,400,876	13,708,695	324,649	134,317	3,526,722	251,979	948,493	425,289	28,424,067
Finance, insurance and real estate	**7,256,595**	**53,258**	**153,119**	**5,756,321**	**3,525,626**	**9,392**	**234,002**	**1,535,029**	**8,279,917**
Banking	847,444	11,503	23,527	754,081	327,193	100	8,515	264,369	1,879,587
Credit agencies other than banks	2,125,639	910	8,316	2,074,841	711,142	—	95,429	476,156	2,377,659
Insurance	886,977	118	5,528	10,318	473,821	—	19,416	63,111	586,445
Holding and other investment companies, except bank holding companies	2,977,006	35,501	43,053	2,641,751	1,769,166	9,292	54,583	615,153	3,003,269
Services	**1,415,479**	**195,507**	**808,706**	**225,215**	**949,515**	**1**	**530,923**	**181,319**	**2,471,087**
Business services	921,156	160,293	590,200	53,670	573,703	1	386,836	61,134	916,528
Nature of business not allocable	**11,7C3**	**10,069**	**1,000**	**578**	**67,923**	**—**	**27,054**	**10,028**	**39,240**
Inactive	**—**	**—**	**—**	**—**	**—**	**—**	**—**	**—**	**—**

Footnote at end of table.

Table 3.—U.S. Corporation Returns with Total Assets of $250 Million or More: Controlled Foreign Corporation Total Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income and Selected Transactions, by Selected Industry of Controlled Foreign Corporation—Continued

[Money amounts are in thousands of dollars]

Selected industry of Controlled Foreign Corporation	Controlled Foreign Corporations—Continued									
	Selected payments by foreign corporations to—Continued									
	U.S. corporation filing return and its domestic subsidiaries					Any foreign corporation controlled by U.S. corporation filing return				
	Total	Purchases of stock in trade	Compensation paid for certain services	Dividends paid: First 60 days of accounting period	Dividends paid: Remainder of accounting period	Total	Purchases of stock in trade	Compensation paid for certain services	Dividends paid: First 60 days of accounting period	Dividends paid: remainder of accounting period
	(19)	(20)	(21)	(22)	(23)	(24)	(25)	(26)	(27)	(28)
All industries, total	**96,424,708**	**71,095,809**	**4,137,396**	**1,512,881**	**10,270,943**	**14,966,599**	**757,373**	**4,013,396**	**275,864**	**4,927,884**
Agriculture, forestry and fishing	**61,388**	**41,493**	**1,149**	**659**	**8,854**	**13,376**	**—**	**556**	**185**	**8,947**
Mining	**2,041,998**	**566,837**	**150,860**	**59,496**	**1,005,969**	**1,320,354**	**—**	**58,407**	**1,130**	**985,459**
Oil and gas extraction	1,809,758	514,292	145,350	50,046	860,349	1,262,552	—	55,941	1,130	974,271
Construction	**520,703**	**312,704**	**92,013**	**8,752**	**87,308**	**190,865**	**—**	**96,409**	**6,912**	**60,396**
Manufacturing	**58,814,552**	**45,934,962**	**2,496,662**	**1,039,757**	**4,404,269**	**6,341,687**	**483,543**	**2,413,631**	**165,344**	**1,534,043**
Food and kindred products	1,256,221	557,385	75,664	48,235	393,598	483,163	53,444	66,389	45,983	146,964
Chemicals and allied products	6,085,268	4,007,850	307,361	222,442	679,450	1,338,071	195,737	371,413	29,491	305,891
Petroleum (including integrated) and coal products	12,058,965	11,499,677	106,071	95,069	286,835	1,006,499	50,508	259,681	3,784	457,986
Fabricated metal products	839,809	444,928	30,671	127,676	147,306	123,429	8,248	11,617	11,794	48,186
Machinery, except electrical	8,179,417	4,462,781	380,950	294,372	985,577	847,472	4,821	501,040	7,777	208,235
Electrical and electronic equipment	6,634,434	5,217,806	576,122	37,617	377,161	420,238	17,079	146,868	35,562	97,669
Motor vehicles and equipment	17,247,385	15,426,963	775,876	43,506	756,066	1,512,841	131,956	926,825	1,874	69,281
Transportation and public utilities	**929,211**	**68,465**	**377,074**	**8,420**	**363,168**	**645,297**	**7,313**	**123,831**	**286**	**109,148**
Water transportation	765,875	1,015	339,988	5,396	326,361	417,393	—	58,626	133	2,674
Wholesale and retail trade	**27,001,490**	**23,213,838**	**304,317**	**178,724**	**2,738,661**	**2,757,920**	**264,529**	**408,488**	**30,854**	**1,446,131**
Wholesale trade	25,724,360	22,255,197	281,100	174,910	2,596,048	2,605,870	263,060	394,483	28,091	1,419,239
Finance, insurance and real estate	**5,189,417**	**387,609**	**252,384**	**175,049**	**1,397,756**	**3,054,488**	**1,411**	**576,299**	**60,200**	**720,285**
Banking	1,553,610	15,790	28,258	23,115	167,425	291,818	—	5,647	2,115	29,717
Credit agencies other than banks	1,025,149	667	168,969	18,656	96,220	1,352,511	—	470,059	24,105	229,373
Insurance	308,830	7,042	16,171	38,307	193,960	277,004	—	28,438	10,654	54,754
Holding and other investment companies, except bank holding companies	2,064,520	345,010	11,223	93,007	902,459	937,506	1,411	29,327	14,479	350,757
Services	**1,843,926**	**553,273**	**461,437**	**42,017**	**264,341**	**625,397**	**577**	**333,427**	**10,954**	**52,492**
Business services	606,552	369,489	67,768	13,080	96,838	308,959	(1)	207,347	10,326	38,836
Nature of business not allocable	**22,024**	**16,629**	**1,501**	**6**	**617**	**17,216**	**—**	**2,347**	**—**	**10,984**
Inactive	—	—	—	—	—	—	—	—	—	—

(1) Less than $500.
Note: Detail may not add to total because of rounding.

Table 4.—Foreign Corporations Controlled by U.S. Corporations with Total Assets of $250 Million or More: Total Assets, Receipts, Earnings, Taxes, Distributions and Subpart F Income, by Selected Industry and Percentage of Direct or Indirect Ownership by U.S. Corporation

[Money amounts are in thousands of dollars]

Selected industry of U.S. corporation filing the return and percent of Controlled Foreign Corporation owned directly or indirectly by U.S. corporation filing the return	Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)	Actual distributions in current year	Subpart F income
					Current earnings and profits before taxes	Foreign income taxes (net)			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
All industries, total	**27,008**	**595,406,489**	**624,529,988**	**48,591,785**	**57,469,606**	**19,888,594**	**19,663,431**	**17,429,494**	**4,420,024**
100 percent	21,971	468,103,734	481,906,031	38,357,917	45,887,016	15,770,195	15,621,911	13,701,465	4,258,906
95 under 100 percent	1,121	31,750,910	31,350,054	2,007,159	2,370,801	971,546	952,203	465,259	99,759
90 under 95 percent	399	11,617,003	19,505,611	773,077	846,108	224,042	206,600	236,651	2,120
80 under 90 percent	514	13,690,656	20,826,698	2,284,739	2,449,973	687,167	686,612	1,184,472	23,947
70 under 80 percent	748	15,370,338	24,146,271	959,537	1,240,765	489,353	470,025	312,724	14,314
60 under 70 percent	602	25,007,013	24,770,627	2,255,429	2,385,122	934,255	936,086	927,318	8,021
More than 50 under 60 percent	652	13,240,506	11,824,361	655,137	834,654	224,318	200,884	240,886	2,480
50 percent	472	9,148,135	4,857,401	575,948	640,293	258,024	258,935	79,865	5,576
Less than 50 percent	116	1,707,153	1,587,202	41,144	75,389	16,290	16,613	5,626	126
Percentage not determinable	413	5,771,041	3,755,733	681,698	739,488	313,404	313,561	275,229	4,774
Agriculture, forestry and fishing	**116**	**936,515**	**1,102,708**	**39,232**	**59,882**	**20,042**	**21,768**	**17,851**	**1,173**
100 percent	98	791,099	857,024	30,389	46,360	13,681	15,407	17,049	1,173
95 under 100 percent	*	*	*	*	*	*	*	*	*
90 under 95 percent	*	*	*	*	*	*	*	*	*
80 under 90 percent	*	*	*	*	*	*	*	*	*
70 under 80 percent	*	*	*	*	*	*	*	*	*
60 under 70 percent	*	*	*	*	*	*	*	*	*
More than 50 under 60 percent	*	*	*	*	*	*	*	*	*
50 percent	4	17,030	2,745	−3,948	501	—	—	—	—
Less than 50 percent	*	*	*	*	*	*	*	*	*
Percentage not determinable	*	*	*	*	*	*	*	*	*
Mining	**602**	**9,885,843**	**5,930,863**	**1,494,624**	**1,697,589**	**956,810**	**953,598**	**630,151**	**135,543**
100 percent	511	9,011,878	5,617,389	1,450,873	1,618,688	936,027	934,144	610,452	133,450
95 under 100 percent	20	88,494	25,633	−2,302	4,932	1,207	1,207	35	—
90 under 95 percent	11	54,469	3,179	1,001	1,728	—	—	—	1,477
80 under 90 percent	4	26,932	284	−75	7	7	7	—	—
70 under 80 percent	16	122,758	39,859	1,062	12,279	2,444	2,444	6,694	—
60 under 70 percent	17	147,361	55,736	12,484	17,458	1,584	1,682	1,475	279
More than 50 under 60 percent	8	381,598	170,565	40,775	40,793	15,541	15,541	11,462	—
50 percent	8	45,299	9,127	−1,937	1,023	—	−1,297	32	16
Less than 50 percent	*	*	*	*	*	*	*	*	*
Percentage not determinable	*	*	*	*	*	*	*	*	*
Oil and gas extraction	**512**	**8,517,348**	**5,686,333**	**1,423,295**	**1,619,670**	**935,442**	**933,527**	**609,711**	**130,750**
100 percent	438	7,819,852	5,452,299	1,398,319	1,562,777	923,620	921,738	601,552	129,129
95 under 100 percent	19	72,940	20,727	−6,967	268	—	—	35	—
90 under 95 percent	6	32,051	3,179	1,153	1,517	—	—	—	1,342
80 under 90 percent	4	26,932	284	−75	7	7	7	—	—
70 under 80 percent	12	119,226	29,745	−652	10,558	2,444	2,444	6,649	—
60 under 70 percent	17	147,361	55,736	12,484	17,458	1,584	1,682	1,475	279
More than 50 under 60 percent	7	284,127	113,970	26,075	26,094	7,786	7,786	—	—
50 percent	4	10,514	2,029	892	991	—	—	—	—
Less than 50 percent	*	*	*	*	*	*	*	*	*
Percentage not determinable	*	*	*	*	*	*	*	*	*
Construction	**384**	**3,826,697**	**2,917,905**	**416,794**	**461,479**	**122,388**	**121,488**	**194,572**	**44,664**
100 percent	307	2,737,410	1,414,316	279,241	317,033	88,195	88,404	133,692	42,250
95 under 100 percent	18	85,313	42,029	5,800	6,468	−108	−135	7,421	2,046
90 under 95 percent	*	*	*	*	*	*	*	*	*
80 under 90 percent	4	280,739	158,596	71,012	75,337	10,826	9,854	29,635	—
70 under 80 percent	11	83,565	201,763	2,170	3,015	1,112	956	5,031	6
60 under 70 percent	15	68,183	122,107	8,146	8,759	1,951	1,992	3,097	—
More than 50 under 60 percent	14	333,448	552,928	33,530	33,846	15,692	15,696	8,677	362
50 percent	7	58,343	78,969	2,344	2,344	297	297	—	—
Less than 50 percent	*	*	*	*	*	*	*	*	*
Percentage not determinable	4	35,536	90,359	4,651	4,651	−31	−31	—	—
Manufacturing	**18,805**	**390,581,396**	**500,334,516**	**40,379,971**	**47,969,980**	**17,109,507**	**16,839,916**	**14,904,646**	**3,374,696**
100 percent	15,319	308,371,769	387,370,043	31,501,370	37,991,299	13,414,224	13,220,824	11,499,549	3,248,950
95 under 100 percent	775	15,555,741	27,296,524	1,840,711	2,150,773	908,710	886,562	431,425	89,830
90 under 95 percent	267	5,685,708	14,167,780	475,219	536,952	136,230	118,771	182,659	91
80 under 90 percent	399	11,619,328	18,791,926	2,045,178	2,199,697	650,281	648,417	1,139,259	12,000
70 under 80 percent	460	8,596,925	11,062,394	766,867	1,001,453	437,351	418,763	249,457	8,808
60 under 70 percent	427	20,448,806	22,863,088	2,117,545	2,220,615	892,821	894,852	863,922	7,568
More than 50 under 60 percent	515	10,023,361	10,199,329	542,123	683,748	170,927	149,101	211,786	1,929
50 percent	299	4,175,986	3,632,875	388,711	415,975	178,298	181,405	47,100	1,189
Less than 50 percent	78	1,610,901	1,526,486	41,721	66,801	15,530	15,857	4,298	126
Percentage not determinable	266	4,492,872	3,424,071	660,527	702,664	305,136	305,366	275,192	4,203
Food and kindred products	**1,831**	**22,565,728**	**31,414,654**	**2,714,895**	**3,050,716**	**791,131**	**776,935**	**960,637**	**270,378**
100 percent	1,441	18,415,976	25,204,141	2,400,455	2,661,163	663,856	652,796	805,158	266,258
95 under 100 percent	88	1,138,923	1,434,693	56,004	70,174	20,355	19,877	8,438	576
90 under 95 percent	8	101,184	218,106	9,460	11,030	3,716	3,717	1,419	—
80 under 90 percent	64	785,818	1,399,762	71,616	98,025	33,140	29,802	14,878	655
70 under 80 percent	73	429,395	904,728	47,191	48,362	22,513	22,430	18,670	—
60 under 70 percent	60	860,748	1,822,859	93,993	103,096	35,552	35,381	60,278	990
More than 50 under 60 percent	28	268,412	165,507	1,840	22,621	8,986	8,986	24,188	—
50 percent	22	144,708	93,449	9,801	10,545	3,331	3,338	3,124	335
Less than 50 percent	10	19,242	19,546	2,702	2,947	468	468	30	—
Percentage not determinable	37	401,321	151,863	21,832	22,752	−785	140	24,455	1,564
Chemicals and allied products	**3,940**	**58,528,756**	**60,877,842**	**6,539,859**	**7,382,393**	**2,473,937**	**2,453,161**	**2,100,613**	**813,540**
100 percent	3,330	49,559,998	53,668,886	5,960,826	6,663,667	2,206,954	2,198,993	1,878,337	802,799
95 under 100 percent	95	1,052,296	1,112,413	119,778	146,144	65,236	64,957	48,533	7,461
90 under 95 percent	29	382,836	491,528	59,631	64,102	20,448	21,304	10,088	—
80 under 90 percent	47	1,509,782	500,113	22,207	41,007	5,322	6,380	9,377	—
70 under 80 percent	70	1,586,186	1,919,987	39,870	83,931	40,660	29,196	22,382	60
60 under 70 percent	71	760,625	959,937	138,657	143,803	53,303	54,237	62,640	3,162
More than 50 under 60 percent	207	2,033,298	1,126,220	88,852	110,367	17,342	16,401	56,186	58
50 percent	47	1,523,842	990,108	105,216	116,244	58,978	58,984	8,438	—
Less than 50 percent	7	16,192	19,645	6,383	6,387	2,373	2,384	246	—
Percentage not determinable	37	103,701	89,005	−1,561	6,741	3,322	325	4,386	—

Footnotes at end of table.

Table 4.—Foreign Corporations Controlled by U.S. Corporations with Total Assets of $250 Million or More: Total Assets, Receipts, Earnings, Taxes, Distributions and Subpart F Income, by Selected Industry and Percentage of Direct or Indirect Ownership by U.S. Corporation—Continued

[Money amounts are in thousands of dollars]

Selected industry of U.S. corporation filing the return and percent of Controlled Foreign Corporation owned directly or indirectly by U.S. corporation filing the return	Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)	Actual distributions in current year	Subpart F income
					Current earnings and profits before taxes	Foreign income taxes (net)			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Petroleum (including integrated) and coal products	**1,932**	**99,994,391**	**173,001,490**	**12,612,098**	**15,588,956**	**6,708,937**	**6,507,866**	**6,134,363**	**707,290**
100 percent	1,497	71,141,988	121,156,048	8,400,725	11,170,670	4,960,771	4,783,323	4,271,200	636,306
95 under 100 percent	129	4,634,901	16,000,224	234,690	374,050	287,413	268,217	38,139	63,483
90 under 95 percent	19	479,393	2,534,292	64,597	66,985	26,736	27,058	31,610	—
80 under 90 percent	31	4,685,003	12,094,467	1,641,916	1,655,281	469,053	467,138	1,003,623	4,509
70 under 80 percent	52	1,525,943	2,467,163	367,298	373,884	162,427	159,221	82,314	—
60 under 70 percent	92	16,569,631	17,764,858	1,754,825	1,784,561	738,495	738,220	697,899	2,949
More than 50 under 60 percent	44	667,808	517,052	52,887	55,958	15,669	16,316	8,711	31
50 percent	49	251,648	438,955	95,103	98,629	46,572	46,572	127	13
Less than 50 percent	5	23,551	6,515	416	1,259	505	505	—	—
Percentage not determinable	14	14,524	21,917	−359	7,680	1,296	1,296	741	—
Primary metal industries	**1,033**	**14,034,236**	**10,486,406**	**332,153**	**771,022**	**168,394**	**134,945**	**193,123**	**126,111**
100 percent	830	9,877,768	7,697,335	203,720	498,337	79,259	64,523	123,788	124,928
95 under 100 percent	20	291,145	116,247	48,891	53,676	15,034	15,034	10,586	—
90 under 95 percent	*	*	*	*	*	*	*	*	*
80 under 90 percent	24	448,653	275,735	−26,588	9,239	651	1,350	710	—
70 under 80 percent	31	549,419	492,823	−28,682	16,115	2,730	2,389	1,405	—
60 under 70 percent	24	531,981	452,620	35,490	43,184	15,186	13,716	9,175	—
More than 50 under 60 percent	33	1,685,452	1,110,131	115,336	127,546	49,922	48,399	30,857	1,075
50 percent	18	319,726	116,528	7,112	9,752	2,742	2,853	8,564	—
Less than 50 percent	23	115,434	163,595	1,338	12,452	2,870	2,870	2,538	100
Percentage not determinable	*	*	*	*	*	*	*	*	*
Machinery, except electrical	**1,950**	**51,882,028**	**50,103,336**	**7,430,539**	**7,989,513**	**3,045,754**	**3,020,664**	**1,883,219**	**481,385**
100 percent	1,614	40,398,614	37,786,085	5,572,093	5,998,287	2,222,245	2,215,072	1,454,783	470,679
95 under 100 percent	100	3,997,481	3,952,783	1,032,751	1,054,558	398,644	398,674	207,185	696
90 under 95 percent	14	453,600	395,590	48,281	49,363	30,160	30,170	33,910	14
80 under 90 percent	27	616,846	661,300	83,071	92,481	44,148	44,192	30,040	200
70 under 80 percent	38	669,842	560,691	66,393	83,511	49,407	49,801	11,989	8,665
60 under 70 percent	27	231,593	234,407	10,632	17,206	8,009	7,924	181	—
More than 50 under 60 percent	79	2,685,051	4,213,527	32,873	98,696	−3,647	−24,145	1,998	761
50 percent	25	100,315	59,568	5,912	6,029	880	949	565	370
Less than 50 percent	11	216,019	94,994	3,423	13,137	3,964	4,134	—	—
Percentage not determinable	15	2,512,664	2,144,391	575,113	576,247	291,945	293,893	142,567	—
Electrical and electronic equipment	**2,270**	**37,641,993**	**39,205,015**	**2,701,272**	**3,255,924**	**733,755**	**721,578**	**838,293**	**223,498**
100 percent	1,920	31,709,330	33,262,920	2,436,161	2,862,992	627,132	611,198	742,071	222,755
95 under 100 percent	91	1,271,643	1,662,088	94,438	125,355	28,153	28,473	38,454	192
90 under 95 percent	38	1,119,752	1,222,360	35,980	41,070	9,626	9,807	24,168	—
80 under 90 percent	32	403,772	538,439	39,350	49,258	18,971	18,080	7,727	—
70 under 80 percent	33	935,158	477,814	−21,422	36,683	10,612	10,647	4,100	80
60 under 70 percent	58	420,015	279,420	32,822	35,996	9,050	9,575	11,804	—
More than 50 under 60 percent	14	472,770	651,089	40,319	46,250	19,434	19,434	3,328	—
50 percent	37	320,808	509,368	14,032	15,565	4,298	7,412	2,646	471
Less than 50 percent	7	180,334	173,300	3,203	5,464	3,231	3,377	1,427	—
Percentage not determinable	40	808,411	426,043	26,387	37,291	3,248	3,577	2,566	—
Motor vehicles and equipment	**925**	**47,132,506**	**70,477,798**	**2,430,468**	**3,550,208**	**1,223,562**	**1,252,124**	**993,079**	**269,493**
100 percent	594	40,551,644	57,487,857	1,956,632	3,001,301	1,097,406	1,127,605	880,829	269,493
95 under 100 percent	106	1,261,012	1,020,469	33,091	65,602	19,846	19,842	15,270	—
90 under 95 percent	91	2,511,456	8,746,742	250,986	260,155	29,504	27,435	60,307	—
80 under 90 percent	47	1,204,012	1,067,596	66,279	67,316	16,489	16,605	12,245	—
70 under 80 percent	34	693,624	1,234,892	46,309	78,065	29,673	29,976	12,078	—
60 under 70 percent	13	97,033	185,359	14,813	14,813	6,261	6,261	2,407	—
More than 50 under 60 percent	20	773,855	609,770	49,591	50,085	22,173	22,266	9,328	—
50 percent	9	11,105	26,736	38	135	3	−74	45	—
Less than 50 percent	3	12,704	27,157	4,160	4,160	2,119	2,119	58	—
Percentage not determinable	8	16,060	70,590	8,569	8,577	88	88	511	—
Transportation equipment, except motor vehicles	**580**	**5,907,382**	**6,873,398**	**578,972**	**696,550**	**231,942**	**233,006**	**216,134**	**53,226**
100 percent	451	4,156,428	4,797,299	347,258	438,152	149,273	150,784	139,113	52,686
95 under 100 percent	28	603,932	633,703	99,172	104,066	26,131	25,236	23,700	—
90 under 95 percent	4	5,618	9,153	703	703	293	293	137	77
80 under 90 percent	18	309,382	486,646	48,493	53,651	15,324	15,632	29,827	—
70 under 80 percent	19	156,442	221,136	18,744	24,114	9,794	9,803	8,385	—
60 under 70 percent	21	312,126	243,334	10,996	20,590	6,443	6,572	5,685	463
More than 50 under 60 percent	27	284,048	417,327	49,664	51,039	21,083	21,085	7,599	—
50 percent	8	74,754	64,031	3,902	4,128	3,513	3,513	1,600	—
Less than 50 percent	—	—	—	—	—	—	—	—	—
Percentage not determinable	4	4,652	769	41	107	87	87	89	—
Instruments and related products	**807**	**11,513,591**	**15,490,503**	**1,270,096**	**1,437,020**	**466,927**	**476,545**	**344,585**	**155,856**
100 percent	746	10,085,865	13,522,477	1,162,258	1,314,229	404,808	414,185	306,789	155,843
95 under 100 percent	*	*	*	*	*	*	*	*	*
90 under 95 percent	5	47,907	75,732	14,014	14,113	3,593	3,580	10,101	—
80 under 90 percent	4	108,237	154,355	20,311	20,311	9,620	9,620	8,131	3
70 under 80 percent	9	351,342	543,684	64,834	65,695	40,158	40,158	18,068	3
60 under 70 percent	*	*	*	*	*	*	*	*	*
More than 50 under 60 percent	10	14,519	15,633	179	1,631	1,190	1,205	192	(1)
50 percent	9	50,501	62,944	6,582	8,050	4,404	4,404	557	—
Less than 50 percent	3	744,249	985,777	−10,418	311	—	—	—	—
Percentage not determinable	16	63,312	78,511	8,243	8,275	1,071	1,071	382	3
Transportation and public utilities	**1,508**	**25,021,612**	**14,153,603**	**1,299,298**	**1,572,265**	**357,612**	**360,756**	**297,736**	**334,528**
100 percent	1,233	19,941,471	12,530,028	937,231	1,165,796	245,889	249,032	228,331	318,849
95 under 100 percent	48	239,915	200,242	17,020	20,410	3,492	3,492	15,323	4,689
90 under 95 percent	34	104,090	77,065	8,845	10,046	4,375	4,393	1,438	—
80 under 90 percent	17	542,371	170,737	115,779	115,864	10,937	10,937	1,948	10,652
70 under 80 percent	55	393,530	258,262	5,504	12,555	4,501	4,593	1,703	164
60 under 70 percent	28	212,856	238,591	23,039	34,718	12,542	12,415	13,932	174
More than 50 under 60 percent	22	236,428	283,763	32,302	32,969	7,857	7,857	4,187	—
50 percent	43	2,998,669	382,327	154,798	173,528	65,919	65,919	30,462	—
Less than 50 percent	6	7,743	4,303	388	1,377	73	73	412	—
Percentage not determinable	22	344,538	8,286	4,390	5,001	2,027	2,045	—	—
Water transportation	**142**	**760,470**	**112,346**	**18,811**	**39,466**	**1,290**	**3,534**	**13,405**	**6,368**
100 percent	123	679,544	98,504	11,427	30,914	1,290	3,534	—	5,524
95 under 100 percent	*	*	*	*	*	*	*	*	*
90 under 95 percent	*	*	*	*	*	*	*	*	*
80 under 90 percent	—	—	—	—	—	—	—	—	—
70 under 80 percent	—	—	—	—	—	—	—	—	—
60 under 70 percent	*	*	*	*	*	*	*	*	*
More than 50 under 60 percent	—	—	—	—	—	—	—	—	—
50 percent	9	48,393	1,323	3,356	3,356	—	—	—	—
Less than 50 percent	—	—	—	—	—	—	—	—	—
Percentage not determinable	3	6,504	—	1,503	1,503	—	—	—	—

Footnotes at end of table.

Table 4.—Foreign Corporations Controlled by U.S. Corporations with Total Assets of $250 Million or More: Total Assets, Receipts, Earnings, Taxes, Distributions and Subpart F Income, by Selected Industry and Percentage of Direct or Indirect Ownership by U.S. Corporation—Continued

[Money amounts are in thousands of dollars]

Selected industry of U.S. corporation filing the return and percent of Controlled Foreign Corporation owned directly or indirectly by U.S. corporation filing the return	Number of foreign corporations	Total assets	Business receipts	Current earnings and profits (less deficit) before taxes	Foreign corporations with current earnings and profits (+) before taxes		Foreign income taxes (net)	Actual distributions in current year	Subpart F income
					Current earnings and profits before taxes	Foreign income taxes (net)			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Wholesale and retail trade	**1,404**	**32,358,191**	**72,992,450**	**1,831,937**	**2,120,430**	**487,710**	**518,299**	**559,330**	**215,031**
100 percent	1,034	22,969,502	52,823,400	1,408,162	1,620,685	421,837	449,403	427,871	207,679
95 under 100 percent	59	373,044	630,367	14,929	19,293	1,907	1,907	435	2,030
90 under 95 percent	38	1,142,204	3,993,167	170,884	178,741	11,154	11,154	36,154	—
80 under 90 percent	19	371,609	1,511,484	30,206	34,282	7,482	10,129	8,386	—
70 under 80 percent	129	4,790,250	12,272,803	152,963	174,753	27,511	27,576	42,121	5,322
60 under 70 percent	37	2,102,577	998,872	56,281	63,260	10,377	10,377	39,624	—
More than 50 under 60 percent	34	174,700	302,706	−6,676	15,777	5,826	5,831	2,810	—
50 percent	21	333,118	430,835	−3,385	4,424	825	1,131	1,167	—
Less than 50 percent	14	64,668	16,117	4,569	4,753	78	78	763	—
Percentage not determinable	19	36,520	12,699	4,004	4,462	714	714	—	—
Wholesale trade	**821**	**18,094,843**	**56,901,635**	**1,016,206**	**1,217,718**	**255,192**	**287,324**	**345,663**	**72,583**
100 percent	546	12,175,464	39,094,731	699,933	849,309	219,349	248,763	257,820	66,629
95 under 100 percent	37	102,038	152,227	3,164	6,732	1,532	1,532	435	632
90 under 95 percent	34	1,118,095	3,990,679	170,044	177,901	11,047	11,047	36,154	—
80 under 90 percent	13	164,632	533,912	9,681	13,709	957	3,604	1,743	—
70 under 80 percent	118	3,967,626	12,099,486	111,456	133,246	11,866	11,930	35,632	5,322
60 under 70 percent	18	169,070	348,234	9,781	16,759	5,514	5,514	9,401	—
More than 50 under 60 percent	18	155,980	263,569	9,741	12,692	4,182	4,187	2,547	—
50 percent	9	176,631	395,508	−2,248	2,051	436	437	1,167	—
Less than 50 percent	13	64,658	16,117	4,566	4,750	78	78	763	—
Percentage not determinable	15	647	7,173	109	568	232	232	—	—
Retail trade	**583**	**14,263,348**	**16,090,815**	**815,731**	**902,712**	**232,518**	**230,975**	**213,667**	**142,448**
100 percent	488	10,794,038	13,728,669	708,230	771,376	202,488	200,640	170,051	141,050
95 under 100 percent	22	271,005	478,140	11,766	12,561	374	374	—	1,398
90 under 95 percent	4	24,108	2,488	840	840	107	107	—	—
80 under 90 percent	6	206,977	977,573	20,545	20,573	6,525	6,525	6,643	—
70 under 80 percent	11	822,623	173,318	41,507	41,507	15,645	15,645	6,489	—
60 under 70 percent	19	1,933,507	650,638	46,501	46,501	4,863	4,863	30,222	—
More than 50 under 60 percent	16	18,719	39,137	−16,417	3,085	1,644	1,644	262	—
50 percent	12	156,487	35,327	−1,137	2,372	390	694	—	—
Less than 50 percent	*	*	*	*	*	*	*	*	*
Percentage not determinable	*	*	*	*	*	*	*	*	*
Finance, insurance and real estate	**2,934**	**126,591,844**	**23,001,761**	**2,730,451**	**3,030,724**	**675,064**	**682,550**	**660,896**	**242,087**
100 percent	2,369	98,500,075	17,781,322	2,400,498	2,629,395	512,776	522,048	629,134	238,702
95 under 100 percent	167	15,239,392	2,903,242	123,818	158,514	51,676	54,002	10,568	1,163
90 under 95 percent	35	4,464,504	898,438	94,572	95,322	64,105	64,103	7,534	551
80 under 90 percent	54	764,676	171,272	18,621	20,214	5,441	5,074	4,624	674
70 under 80 percent	55	1,313,484	265,476	22,388	27,840	10,900	10,137	2,535	13
60 under 70 percent	48	1,939,176	299,010	28,348	29,989	11,273	11,077	4,503	—
More than 50 under 60 percent	39	2,001,650	195,276	4,473	18,741	2,127	507	778	(1)
50 percent	73	1,513,134	296,444	25,793	28,793	10,607	9,404	1,105	732
Less than 50 percent	10	19,883	39,020	2,135	2,314	608	608	115	—
Percentage not determinable	84	835,870	152,261	9,805	19,603	5,552	5,591	—	250
Banking	**1,066**	**86,236,101**	**10,870,837**	**1,510,715**	**1,605,013**	**395,072**	**396,038**	**335,258**	**122,483**
100 percent	846	65,127,958	7,908,133	1,292,849	1,363,615	274,907	276,354	322,799	122,483
95 under 100 percent	96	12,335,118	1,901,863	90,330	108,554	38,652	40,233	3,935	—
90 under 95 percent	9	2,826,420	354,964	75,137	75,137	62,187	62,187	3,645	—
80 under 90 percent	5	111,623	21,394	1,965	2,549	83	85	—	—
70 under 80 percent	22	1,066,950	117,846	6,713	7,237	2,791	2,078	1,253	—
60 under 70 percent	20	1,851,817	230,980	18,967	20,100	8,725	8,529	3,238	—
More than 50 under 60 percent	8	1,295,337	61,274	6,591	6,781	82	134	—	—
50 percent	41	1,414,335	223,172	14,017	16,375	6,866	5,659	388	—
Less than 50 percent	*	*	*	*	*	*	*	*	*
Percentage not determinable	*	*	*	*	*	*	*	*	*
Insurance	**508**	**12,794,273**	**4,220,417**	**389,670**	**446,435**	**65,898**	**66,692**	**78,604**	**52,359**
100 percent	345	8,380,584	2,612,360	344,615	376,377	53,338	54,481	66,846	51,047
95 under 100 percent	44	2,204,588	886,030	16,558	32,829	6,258	6,160	5,607	1,163
90 under 95 percent	12	1,492,773	431,489	15,691	16,191	942	943	3,875	136
80 under 90 percent	17	395,987	68,169	2,909	3,090	319	61	—	—
70 under 80 percent	13	122,140	70,926	6,924	6,951	1,538	1,538	749	13
60 under 70 percent	18	52,908	54,400	6,120	6,314	2,136	2,136	1,265	—
More than 50 under 60 percent	9	66,301	44,300	−3,008	1,649	112	112	83	—
50 percent	12	56,914	38,072	2,049	2,303	985	985	156	—
Less than 50 percent	4	1,035	1,528	95	95	22	22	23	—
Percentage not determinable	34	21,042	13,144	−2,284	636	249	254	—	—
Holding and other investment companies, except bank holding companies	**382**	**4,366,132**	**4,263,824**	**209,824**	**241,206**	**55,487**	**52,913**	**87,498**	**21,625**
100 percent	348	3,912,980	4,073,632	199,739	228,960	50,899	47,259	83,799	20,535
95 under 100 percent	*	*	*	*	*	*	*	*	*
90 under 95 percent	9	138,230	110,813	3,383	3,543	793	793	14	416
80 under 90 percent	15	194,495	50,797	7,911	8,543	3,791	3,681	3,667	674
70 under 80 percent	*	*	*	*	*	*	*	*	*
60 under 70 percent	*	*	*	*	*	*	*	*	*
More than 50 under 60 percent	*	*	*	*	*	*	*	*	*
50 percent	*	*	*	*	*	*	*	*	*
Less than 50 percent	*	*	*	*	*	*	*	*	*
Percentage not determinable	—	—	—	—	—	—	—	—	—
Services	**1,255**	**6,204,392**	**4,096,183**	**399,478**	**557,259**	**159,460**	**165,056**	**164,313**	**72,302**
100 percent	1,100	5,780,530	3,512,509	350,152	497,760	137,567	142,649	155,387	67,854
95 under 100 percent	31	98,763	132,629	5,046	8,273	3,469	3,975	51	—
90 under 95 percent	9	17,181	17,868	3,798	4,534	860	860	1,848	—
80 under 90 percent	16	54,708	19,273	3,695	4,252	2,194	2,194	621	621
70 under 80 percent	21	59,292	26,127	8,461	8,747	3,969	3,992	4,380	—
60 under 70 percent	27	81,201	187,095	7,911	8,640	2,967	2,953	764	—
More than 50 under 60 percent	19	89,320	119,795	8,610	8,778	6,348	6,350	1,186	188
50 percent	17	6,557	24,081	13,573	13,705	2,078	2,078	(1)	3,639
Less than 50 percent	4	728	1,275	131	145	1	−3	38	—
Percentage not determinable	11	16,111	55,530	−1,900	2,427	6	6	37	—
Business services	**625**	**1,882,986**	**1,431,781**	**152,352**	**173,463**	**64,646**	**63,057**	**33,553**	**10,307**
100 percent	524	1,606,131	1,132,684	123,514	143,092	51,178	49,595	27,468	10,307
95 under 100 percent	7	33,864	15,930	2,602	2,643	1,239	1,225	51	—
90 under 95 percent	6	12,143	12,697	3,277	3,277	339	339	43	—
80 under 90 percent	13	46,085	17,879	2,891	3,448	2,184	2,184	621	—
70 under 80 percent	16	43,185	15,982	7,325	7,612	3,658	3,681	4,200	—
60 under 70 percent	26	77,779	185,835	8,304	8,640	2,967	2,953	764	—
More than 50 under 60 percent	17	52,123	43,392	4,121	4,289	2,968	2,970	330	—
50 percent	5	4,690	5,192	73	205	105	105	—	—
Less than 50 percent	4	728	1,275	131	145	1	−3	38	—
Percentage not determinable	7	6,257	914	113	113	6	6	37	—

[1] Less than $500.
* Data deleted to avoid disclosure of information for specific corporations.
Note: Detail may not add to total due to rounding.