

Corporate Foreign Tax Credit, Tax Year 2013

by Scott Luttrell

For Tax Year 2013, corporations filing a U.S. corporation income tax return claimed a record high foreign tax credit of \$118.3 billion. This amount represents an increase of nearly \$8.7 billion from 2012. The 6,542 corporations which claimed foreign tax credits reported \$460.9 billion in taxable foreign-source income, paying \$126.2 billion in taxes paid, accrued, or deemed paid to foreign governments. These corporations lowered their regular U.S. tax liability (U.S. income tax before credits) by 35.9 percent, from \$329.4 billion to \$211.1 billion, under the foreign tax credit provisions. Other credits, including the general business credit, reduced their U.S. tax liability by an additional 6.6 percent to \$189.2 billion. While taxable foreign-source income for these corporations (\$460.9 billion) increased 9.8 percent from 2012, foreign taxes paid on this income rose by less than 1 percent to \$126.2 billion. Taxable foreign-source income comprised 46.4 percent of total worldwide taxable income (\$938.0 billion) for these taxpayers in 2013.

What Is the Corporate Foreign Tax Credit?

The corporate foreign tax credit is designed to alleviate potential double taxation on the foreign-source income of U.S. corporations. Double taxation occurs when an item of income is taxed by both the United States, as the corporation's country of residence, as well as by the country where the income was generated. The current provisions allow U.S. businesses to credit their foreign taxes paid, accrued, or deemed paid against their U.S. income tax liability, up to the amount of U.S. taxes owed on foreign-source income. Corporations are required to calculate this credit separately for different income categories to prevent taxpayers from combining income that is traditionally taxed at low rates, such as dividend or interest income, with income that is typically taxed at higher rates, such as active business income. Unused credits can be carried back 1 year and carried forward for 10 years. The corporate foreign tax credit is reported on Form 1118, *Foreign Tax Credit—Corporations*.

Industry Data

Manufacturing corporations typically account for the largest shares of financial measures related to the foreign tax credit, and 2013 was no exception. Manufacturers reported \$249.9 billion, or 54.2 percent, of total taxable foreign-source income (less loss). U.S. manufacturers also reported 59.4 percent of current year foreign taxes and 58.0 percent of the total foreign tax credit. Within manufacturing, the three most prominent sectors with respect to taxable foreign-source income were corporations

within the petroleum and coal products, chemical, and computer and electronic product industry groupings.

After manufacturing, the services industry was the most significant in key categories. Service corporations claimed 19.6 percent of the total foreign tax credit (\$23.2 billion) and 18.2 percent of total taxable foreign-source income (less loss) (\$78.9 billion). They also accounted for 17.2 percent of current year foreign taxes with an average foreign tax rate of 27.6 percent. Corporations classified in management of holding companies reported \$61.0 billion, or 77.4 percent, of the taxable foreign-source income for services.

Out of 6,542 corporations claiming a foreign tax credit for 2013, just 20 were classified in the petroleum and coal products grouping. However, they were prominent with respect to measures related to the foreign tax credit. These corporations combined to account for 23.6 percent of the U.S. total for taxable foreign-source income (less loss), 31.2 percent of the total current year foreign taxes, and an average foreign tax rate of nearly 38.9 percent. Corporations involved in petroleum and coal products were also notable for their ability to utilize the foreign tax credit to eliminate most of their U.S. corporate income tax liability. Foreign tax credits claimed by petroleum and coal products manufacturing corporations reduced their U.S. income tax before credits by 88.4 percent, compared to an average of 28.6 percent for all other corporations claiming a foreign tax credit (Figure A). At the opposite end of the spectrum, the foreign tax credit was far less significant in reducing U.S. tax liability for corporations involved in wholesale and retail trade (15.8 percent) and finance and insurance (15.7 percent).

Highlights

- The total foreign tax credit (\$118 billion) for 2013 was a record-high amount.
- The 6,542 corporations that claimed a foreign tax credit reduced their U.S. income tax liability by 35.9 percent.
- Corporations classified in the petroleum and coal products manufacturing industry utilized the foreign tax credit to reduce their U.S. income tax liability by 88.4 percent.
- European countries accounted for 39.3 percent of taxable foreign-source income and 46 percent of current year foreign taxes.
- Manufacturing corporations claimed 58 percent of all foreign tax credits.



Figure A

U.S. Corporation Income Tax, Foreign Tax Credit, and Percentage of Income Tax Reduced by Foreign Tax Credit, by Selected Industry, Tax Year 2013

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

Selected industry of U.S. corporation	U.S. income tax before credits	Foreign tax credit	Percentage of income tax reduced by foreign tax credit
	(1)	(2)	(3)
All industries	329,389,198	118,285,306	35.9
Manufacturing	142,059,429	68,627,970	48.3
Petroleum and coal products manufacturing	40,474,415	35,778,703	88.4
Chemical manufacturing	28,015,863	11,529,087	41.2
Wholesale and retail trade	44,526,740	7,023,586	15.8
Information	28,337,365	7,843,595	27.7
Finance and insurance	38,794,662	6,091,295	15.7
Services	59,059,009	23,232,468	39.3
Management of holding companies	43,729,155	18,252,051	41.7

SOURCE: IRS, Statistics of Income Division, Corporate Foreign Tax Credit Study, October 2016.

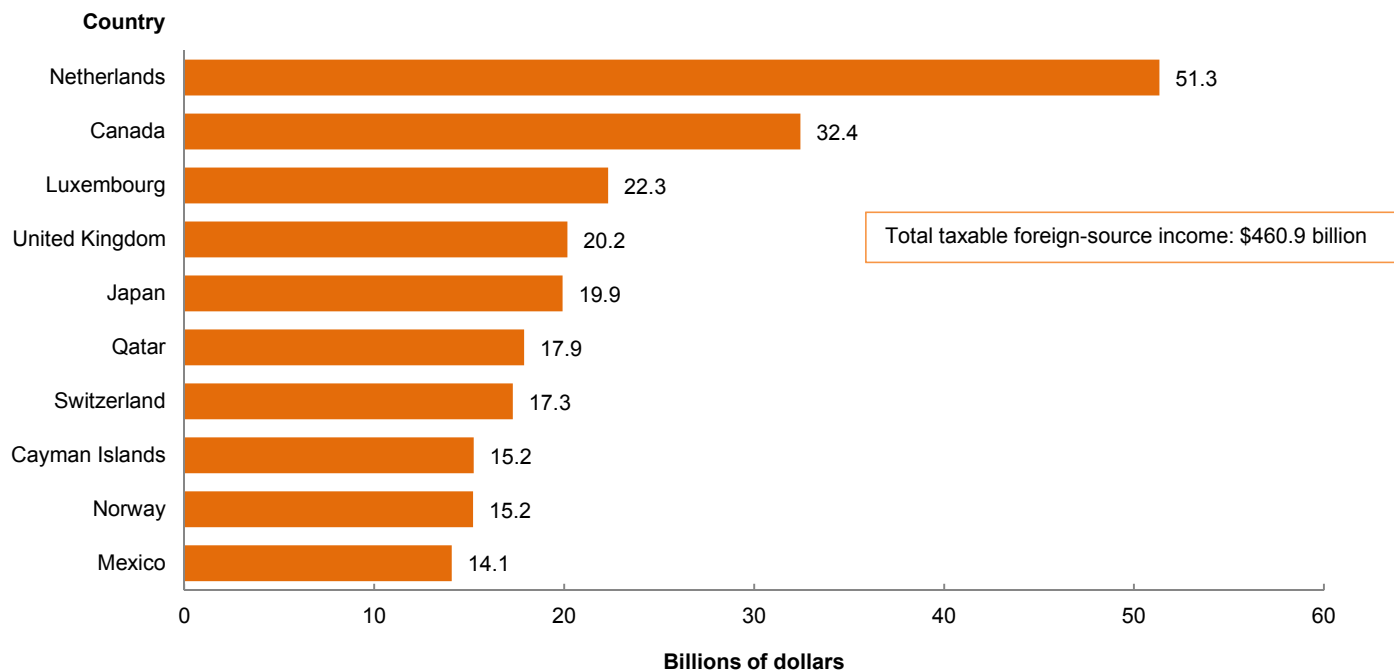
Geographic Spotlight

A substantial amount of the foreign-source income earned was concentrated among a relatively small number of countries. Figure B shows 10 leading countries in terms of taxable income. These countries combined to account for nearly half (49.0 percent) of taxable income earned by corporations claiming a foreign tax credit for 2013. With 5 members among the top 10 in generating taxable foreign-source income, Europe

was the most significant geographic region. Figure C shows taxable foreign-source income and foreign taxes paid, accrued, and deemed paid for selected geographic regions and Canada. Corporations claiming a foreign tax credit earned nearly twice as much income from Europe as the next closest area, Asia, and they paid more than twice as much in taxes to European governments as to any other area.

Figure B

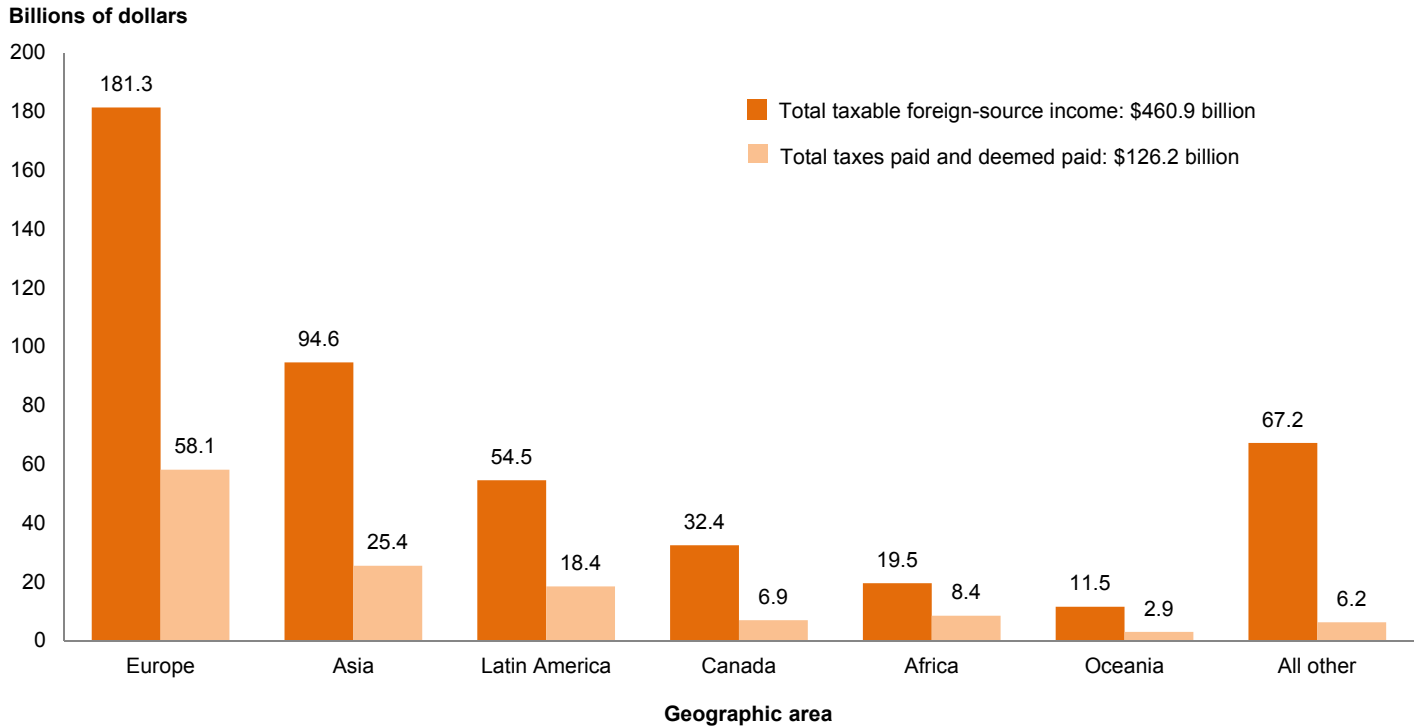
Taxable Foreign-Source Income, by Selected Country, Tax Year 2013



SOURCE: IRS, Statistics of Income Division, Corporate Foreign Tax Credit Study, October 2016.

Figure C

Taxable Foreign-Source Income, Taxes Paid and Deemed Paid, by Selected Geographic Region, Tax Year 2013



SOURCE: IRS, Statistics of Income Division, Corporate Foreign Tax Credit Study, October 2016.

Summary

There were 6,542 corporations that claimed a foreign tax credit for Tax Year 2013. These corporations earned \$938.0 billion in worldwide taxable income, and \$460.9 billion of this was earned from foreign sources. They utilized \$118.3 billion in foreign tax credits to reduce their U.S. tax liability from \$329.4 billion to \$211.1 billion. Manufacturing corporations claimed 58.0 percent of all foreign tax credits, while corporations classified in services claimed 19.6 percent of the total.

Data Sources and Limitations

Internal Revenue Code sections 901 to 909 specify the provisions for the foreign tax credit. Corporations report the foreign income and taxes related to the credit on Form 1118, *Foreign Tax Credit—Corporations*, and file it together with their corporate income tax return. The statistics in this data release are based on information reported on Forms 1118 and related corporate tax forms for those corporation income tax returns with a foreign tax credit that were included in the 2013 Statistics of Income sample of corporate returns with accounting periods ending between July 2013 and June 2014. These returns were selected after administrative processing, but prior to any amendments or audit examination. The Tax Year 2013 corporation income tax return sample included Forms 1120, 1120-F, 1120-L, 1120-PC, and 1120-REIT. However, the statistics in this data release do not include any foreign tax credit data filed specifically for the computation of the alternative minimum tax

(AMT), even if the corporation reported both the regular and AMT foreign tax credits.

There are small discrepancies between the more complete foreign tax credit data presented in this data release and those published in *Statistics of Income—2013, Corporation Income Tax Returns*. Some of the differences can be attributed to returns selected for the Statistics of Income sample that were received too late to be included in the corporation income tax statistics. Also, for the foreign tax credit statistics presented here, additional data were requested from some corporations that submitted preliminary data on their original returns because they lacked complete information on their foreign operations at the time of filing.

Foreign income and taxes available for credit are understated to the extent that they were not reported on the Form 1118 filed with the Form 1120. This study includes credits that were carried forward from prior years and were used in Tax Year 2013. However, because amended returns are not included, these statistics do not contain foreign taxes carried back to 2013 from subsequent tax years or credits for foreign taxes from 2013 that were carried back to earlier years. In addition, corporations that had foreign income and taxes but could not claim a foreign tax credit because they did not have a U.S. tax liability are not included. Finally, some corporations may have deducted their foreign taxes from their gross income rather than claim a foreign tax credit. These deductions are not included in this study. Because of the multi-tiered structure of firm ownership and the

multi-country location of firms and their subsidiaries, foreign-source income and deductions that are reported on Form 1118 as earned in one country can include income and deductions that originate in another country. In addition, deductions that are not definitely allocable are usually not reported by country. For this study, these deductions are prorated across all countries based on the gross income reported for each.

Because the estimates are based on a sample, they are subject to sampling error. Coefficients of variation (CVs) are used to measure the magnitude of this sampling error. The CV concept is defined in the section on sampling variability in the “SOI Sampling Methodology and Data Limitations” appendix found on the Tax Stats portion of the IRS Web site at <https://www.irs.gov/pub/irs-soi/sampling.pdf>. The smaller the CV, the more reliable the estimate is judged to be. The CVs for corporations with foreign tax credits are shown by selected North American Industry Classification System (NAICS) divisions and industrial sector or group (Figure D).

Description of Tables 1 and 2

In Table 1, columns 2 through 13 present statistics on assets, receipts, income, and taxes reported on the basic corporation income tax returns for those corporations claiming a foreign

tax credit. Columns 14 through 37 contain statistics from Form 1118. Foreign branch income (column 21) is also contained in the summary columns but is reported separately on Form 1118 (Schedule F, *Gross Income and Definitely Allocable Deductions for Foreign Branches*). Table 2 includes foreign income, deductions, and taxes paid, accrued, or deemed paid from Form 1118, by selected geographic region and country.

Explanation of Selected Terms

Adjustments to taxable income—Taxable foreign-source income is adjusted, when applicable, by the allocation of current year foreign losses; recharacterization of income due to prior year loss allocations; and adjustments related to overall foreign losses, including recapture of prior overall foreign losses, and allocations of current year U.S. losses. See Table 1, column 26. Adjusted taxable income is included in worldwide U.S. corporate taxable income.

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

Controlled foreign corporations (CFCs)—As defined in Internal Revenue Code section 957(a), a CFC is any foreign corporation in which U.S. shareholders own directly, indirectly, or

Figure D

Coefficients of Variation for Foreign Tax Credit, by Selected Sector or Group, Tax Year 2013

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

Selected sector or group	Number of returns	Foreign tax credit claimed (thousands of dollars)	Coefficients of variation (percentages)
	(1)	(2)	(3)
All industries	6,542	118,285,306	0.01
Mining	200	4,456,496	0.09
Construction	183	155,795	1.66
Manufacturing	1,174	68,627,970	0.01
Food manufacturing	53	1,436,409	0.07
Beverage and tobacco products	13	1,892,721	[1]
Petroleum and coal products manufacturing	20	35,778,703	[1]
Chemical manufacturing	199	11,529,087	0.04
Pharmaceutical and medicine manufacturing	45	5,761,532	0.04
Machinery manufacturing	226	3,255,156	0.05
Computer and electronic product manufacturing	159	4,675,770	0.06
Electrical equipment, appliance & component manufacturing	63	3,311,444	0.07
Transportation equipment manufacturing	89	2,690,494	0.04
Wholesale and retail trade	948	7,023,586	0.13
Transportation and warehousing	131	482,505	0.34
Information	541	7,843,595	0.07
Publishing (except Internet)	107	2,959,606	0.06
Motion picture and sound recording	316	1,087,062	0.19
Finance, insurance, real estate, rental and leasing	1,089	6,447,763	0.07
Finance and Insurance	831	6,091,295	0.07
Securities, commodity contracts, etc.	141	2,050,230	0.20
Insurance and related activities	612	2,992,119	[1]
Services	1,984	23,232,468	0.04
Management of holding companies	879	18,252,051	0.03

[1] Less than 0.005 percent.

SOURCE: IRS, Statistics of Income Division, Corporate Foreign Tax Credit Study, July 2017.

constructively more than 50 percent of either the total combined voting power or total value of all stock on any day of the taxable year of the corporation.

Deemed dividends—Certain types of income earned by controlled foreign corporations (CFCs) are recognized under section 951 of the Internal Revenue Code (“Subpart F Income”) as current-year income of the U.S. corporation, even if no income is actually received from the CFC in the current tax year. In such cases, the U.S. corporation is deemed to have received a pro rata share of this income and required to report it as a deemed dividend on Form 1118.

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

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

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

Limitation—This is the maximum amount that can be credited for each separate limitation income category. It is the U.S. income tax before credits multiplied by the ratio of the taxable foreign-source income after adjustments to the worldwide

taxable income. The foreign tax credit is the lesser of the limitation or the foreign taxes paid.

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

Section 901(j) income—This separate limitation category includes income and taxes paid to countries sanctioned by the United States. Internal Revenue Code section 901(j) denies credit for taxes paid or accrued to these countries. For 2013, countries subject to these restrictions included Cuba, Iran, North Korea, Sudan, and Syria. A separate limitation credit is computed for each section 901(j) country for informational purposes.

Additional Tabular Data on Tax Stats

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

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

Table 1. U.S. Corporation Returns With a Foreign Tax Credit, 2013: Total Assets, Income, Tax, and Credits, and Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry

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

Major and selected minor industry of U.S. corporation filing return	Number of returns	Total assets	Total receipts	Dividends received from foreign corporations	Includable income of controlled foreign corporations	Foreign dividend income from foreign taxes deemed paid (gross-up)	Net income (less deficit)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All industries	6,542	33,584,452,880	10,293,817,362	110,998,520	61,054,506	75,917,432	993,568,537
Mining	200	351,085,705	177,753,461	8,007,076	872,429	3,892,547	24,934,791
Oil and gas extraction, coal mining	159	154,842,785	95,774,813	6,557,812	d	3,400,369	13,378,807
Metal ore mining	10	116,252,839	36,567,897	1,372,311	150,670	377,927	5,870,516
Nonmetallic mineral	6	5,101,556	3,104,681	22,424	d	13,449	253,777
All other mining	25	74,888,525	42,306,070	54,529	310,125	100,802	5,431,691
Construction	183	40,829,832	47,191,887	149,254	14,791	72,921	2,218,407
Manufacturing	1,174	8,194,881,165	4,482,509,422	51,577,244	34,787,833	41,826,455	419,582,890
Food manufacturing	53	291,742,462	265,941,618	2,085,750	531,275	860,855	16,942,216
Beverage and tobacco products	13	164,981,424	101,251,318	2,386,388	871,953	1,564,459	17,434,259
Textile mills and textile product mills	7	3,913,083	3,708,208	35,000	11,080	18,047	252,481
Apparel manufacturing	8	9,419,671	11,137,710	d	d	39,944	1,112,502
Wood product manufacturing	7	12,096,596	14,711,660	d	d	733	947,875
Paper manufacturing	23	95,650,130	47,555,555	1,534,614	578,629	1,238,267	7,811,589
Printing and related support activities	12	9,651,492	6,593,128	36,856	158,283	48,786	858,630
Petroleum and coal products manufacturing	20	2,104,935,814	1,417,358,479	20,496,224	11,873,058	16,196,686	115,926,887
Chemical manufacturing	199	1,850,959,772	675,469,725	10,493,798	9,670,470	9,402,296	82,492,891
Pharmaceutical and medicine manufacturing	45	1,058,788,803	320,407,863	6,304,112	7,345,020	4,653,174	37,569,572
Other chemical manufacturing	153	792,170,968	355,061,862	4,189,686	2,325,450	4,749,122	44,923,319
Plastics and rubber products manufacturing	48	27,012,169	23,001,576	225,715	95,316	81,664	1,124,013
Nonmetallic mineral products manufacturing	16	15,813,663	12,019,811	34,688	25,523	16,575	799,826
Primary metal manufacturing	33	174,820,618	71,963,542	343,995	158,876	157,611	3,392,636
Fabricated metal products	102	104,247,453	66,946,750	459,986	265,879	321,768	5,384,429
Machinery manufacturing	226	527,733,405	298,513,104	3,472,442	1,885,268	3,090,764	29,192,016
Computer and electronic product manufacturing	159	781,508,625	444,649,477	2,732,652	4,140,542	3,267,068	66,336,405
Electrical equipment, appliance, and component manufacturing	63	985,686,765	252,926,090	3,020,602	2,133,395	2,537,862	23,520,256
Transportation equipment manufacturing	89	861,778,245	648,480,669	2,447,692	1,128,750	1,638,233	32,243,436
Motor vehicles and related manufacturing	56	421,003,556	315,500,134	1,727,309	422,315	1,072,856	10,567,773
Other transportation equipment manufacturing	33	440,774,689	332,980,534	720,382	706,435	565,377	21,675,663
Miscellaneous manufacturing and manufacturing not allocable	98	172,929,780	120,281,004	1,665,452	1,243,501	1,344,838	13,810,543
Wholesale and retail trade	948	1,964,764,737	2,194,742,309	8,354,435	6,599,848	5,542,147	132,749,115
Wholesale trade	736	1,267,399,322	1,043,911,829	4,050,325	3,601,106	2,962,633	61,782,086
Durable goods	475	217,248,314	323,038,300	1,494,829	1,910,107	1,081,348	16,783,093
Machinery, equipment, and supplies	99	30,198,614	43,230,282	26,193	47,922	21,342	2,294,721
Other miscellaneous durable goods	376	187,049,699	279,808,018	1,468,636	1,862,185	1,060,006	14,488,371
Nondurable goods	261	1,050,151,009	720,873,530	2,555,496	1,690,999	1,881,285	44,998,993
Drugs, chemicals, and allied products	103	180,487,205	282,669,662	635,802	875,576	422,219	15,194,427
Groceries and related products	26	556,182,441	217,994,549	791,676	303,604	266,041	18,533,461
Other miscellaneous nondurable goods	132	313,481,362	220,209,319	1,128,018	511,819	1,193,025	11,271,105
Retail trade	212	697,365,414	1,150,830,480	4,304,110	2,998,742	2,579,514	70,967,029
Food and beverage stores	90	48,096,027	122,478,475	1,816,247	4,764	589,096	8,754,085
Apparel and accessory stores	24	46,738,519	95,321,686	217,432	178,230	98,011	8,715,798
General merchandise stores	9	275,738,308	529,320,948	538,450	1,001,867	1,013,209	29,054,652
Miscellaneous retail trade	88	326,792,561	403,709,371	1,731,980	1,813,882	879,198	24,442,493

Footnotes at end of table.

Table 1. U.S. Corporation Returns With a Foreign Tax Credit, 2013: Total Assets, Income, Tax, and Credits, and Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Number of returns	Total assets	Total receipts	Dividends received from foreign corporations	Includable income of controlled foreign corporations	Foreign dividend income from foreign taxes deemed paid (gross-up)	Net income (less deficit)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Transportation and warehousing	131	224,063,890	197,823,380	789,493	261,770	d	19,016,672
Information	541	1,720,375,803	624,657,948	4,951,279	4,713,864	4,189,534	90,246,206
Publishing (except Internet)	107	389,242,590	182,408,549	1,399,344	1,597,736	874,913	27,881,005
Motion picture and sound recording	316	178,199,091	72,149,738	673,538	21,152	228,947	10,359,833
Broadcasting, Internet publishing	27	200,502,193	74,671,193	217,944	38,189	122,438	11,410,410
Telecommunications	45	841,997,485	239,460,758	1,705,149	2,450,755	2,097,720	31,340,076
Other information services	46	110,434,446	55,967,711	955,305	606,031	865,516	9,254,882
Finance, insurance, real estate, and rental and leasing	1,089	9,827,066,668	1,540,897,152	7,010,298	5,370,261	3,622,579	132,237,209
Finance and insurance	831	9,773,043,288	1,518,690,254	6,838,631	5,342,488	3,401,094	128,883,858
Nondepository credit intermediation	38	468,733,344	83,230,209	2,038,652	d	948,815	10,799,679
Securities, commodity contracts, and other financial investments	141	3,513,429,632	152,093,332	1,421,407	3,686,675	880,217	30,185,780
Insurance and related activities	612	5,734,082,189	1,279,413,354	3,375,368	1,366,510	1,571,583	86,399,796
Life insurance	66	3,854,031,074	571,646,140	1,815,215	497,285	911,741	38,434,979
Mutual property and casualty company (1120 PC)	107	496,825,599	174,535,884	282,728	120,746	56,389	10,130,417
Stock property and casualty company (1120 PC)	368	1,290,876,989	506,843,094	852,022	477,356	305,314	35,034,625
All other insurance-related activities	71	92,348,527	26,388,236	425,402	271,124	298,140	2,799,774
All other finance industries	40	56,798,123	3,953,359	3,204	d	479	1,498,603
Real estate and rental and leasing	258	54,023,380	22,206,899	171,667	27,773	221,485	3,353,351
Services	1,984	11,243,672,713	1,015,203,133	30,133,681	8,425,624	16,499,538	171,743,142
Professional, scientific, and technical services	688	295,358,154	213,331,124	1,278,617	660,384	642,429	19,301,591
Management of holding companies	879	10,655,855,974	599,733,785	25,121,948	6,926,655	12,266,265	126,844,486
Administrative and support and waste management and remediation	134	55,675,889	56,031,819	582,395	252,653	349,164	4,608,046
Education services, health care, and social assistance	62	36,006,410	27,173,342	94,118	22,610	33,027	2,459,074
Arts, entertainment, and recreation	124	11,909,225	6,679,477	2,565	6,472	d	806,762
Accommodation and food services	53	180,974,618	104,915,198	3,028,334	542,744	3,187,517	16,972,729
Other services	44	7,892,444	7,338,388	25,704	14,106	d	750,455
All other industries	294	17,712,367	13,038,669	25,759	8,086	d	840,105

Footnotes at end of table.

Table 1. U.S. Corporation Returns With a Foreign Tax Credit, 2013: Total Assets, Income, Tax, and Credits, and Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Income subject to U.S. tax	U.S. income tax before credits		Foreign tax credit claimed	General business credit	U.S. income tax after credits [1]
		Total [2]	Regular and alternative minimum tax			
	(8)	(9)	(10)	(11)	(12)	(13)
All industries	937,977,901	329,389,198	329,301,418	118,285,306	20,586,842	189,172,697
Mining	22,048,953	7,875,675	7,875,675	4,456,496	84,094	3,156,184
Oil and gas extraction, coal mining	11,013,342	3,852,502	3,852,502	2,357,137	30,016	1,290,666
Metal ore mining	5,376,135	2,041,008	2,041,008	1,748,545	d	292,010
Nonmetallic mineral	253,246	88,701	88,701	15,731	d	69,418
All other mining	5,406,230	1,893,465	1,893,465	335,084	52,408	1,504,090
Construction	2,193,304	774,358	772,393	155,795	11,992	606,198
Manufacturing	405,684,083	142,059,429	142,026,316	68,627,970	6,737,715	66,513,000
Food manufacturing	16,634,400	5,822,193	5,821,011	1,436,409	100,106	4,285,939
Beverage and tobacco products	17,389,571	6,086,335	6,086,281	1,892,721	23,004	4,170,604
Textile mills and textile product mills	250,151	87,356	87,356	24,534	7,464	55,327
Apparel manufacturing	1,103,337	385,989	385,989	51,890	5,593	328,506
Wood product manufacturing	866,863	303,384	303,384	43,117	159,788	97,190
Paper manufacturing	7,781,230	2,722,907	2,722,907	1,528,027	51,603	1,142,340
Printing and related support activities	644,131	225,127	225,127	72,907	7,617	128,811
Petroleum and coal products manufacturing	115,620,292	40,474,415	40,474,141	35,778,703	523,403	4,170,543
Chemical manufacturing	80,052,039	28,015,863	28,013,866	11,529,087	1,435,407	14,917,877
Pharmaceutical and medicine manufacturing	35,921,339	12,573,384	12,571,817	5,761,532	949,706	5,854,848
Other chemical manufacturing	44,130,700	15,442,479	15,442,050	5,767,555	485,702	9,063,028
Plastics and rubber products manufacturing	1,094,922	397,155	397,155	113,467	10,421	274,914
Nonmetallic mineral products manufacturing	749,294	262,174	262,174	36,395	7,793	215,583
Primary metal manufacturing	3,351,938	1,186,259	1,186,259	191,346	19,539	975,374
Fabricated metal products	5,324,104	1,862,880	1,860,943	311,318	52,705	1,498,472
Machinery manufacturing	28,683,555	10,043,403	10,042,499	3,255,156	324,318	6,454,095
Computer and electronic product manufacturing	61,996,299	21,695,845	21,695,269	4,675,770	1,554,814	15,455,721
Electrical equipment, appliance, and component manufacturing	19,350,711	6,772,940	6,771,113	3,311,444	1,497,695	1,962,606
Transportation equipment manufacturing	31,482,321	11,040,346	11,018,198	2,690,494	753,089	7,592,924
Motor vehicles and related manufacturing	10,129,182	3,552,901	3,544,770	1,697,065	167,958	1,688,118
Other transportation equipment manufacturing	21,353,139	7,487,444	7,473,428	993,429	585,131	5,904,806
Miscellaneous manufacturing and manufacturing not allocable	13,308,924	4,674,859	4,672,642	1,685,186	203,355	2,786,173
Wholesale and retail trade	127,186,769	44,526,740	44,521,001	7,023,586	2,100,829	35,278,333
Wholesale trade	57,217,582	20,033,523	20,032,788	3,612,192	1,541,855	14,758,171
Durable goods	16,163,235	5,648,579	5,648,245	1,340,740	208,712	4,097,687
Machinery, equipment, and supplies	2,284,465	796,591	796,572	40,172	3,441	752,468
Other miscellaneous durable goods	13,878,770	4,851,988	4,851,673	1,300,568	205,271	3,345,219
Nondurable goods	41,054,346	14,384,943	14,384,543	2,271,452	1,333,143	10,660,484
Drugs, chemicals, and allied products	14,667,586	5,132,508	5,132,466	673,067	430,523	3,932,845
Groceries and related products	16,711,495	5,848,469	5,848,441	407,703	869,598	4,566,026
Other miscellaneous nondurable goods	9,675,266	3,403,967	3,403,636	1,190,682	33,022	2,161,613
Retail trade	69,969,187	24,493,217	24,488,213	3,411,394	558,974	20,520,161
Food and beverage stores	8,740,792	3,058,928	3,058,928	1,522,784	23,960	1,512,184
Apparel and accessory stores	8,540,577	2,992,248	2,989,852	167,100	48,886	2,776,420
General merchandise stores	29,001,906	10,152,809	10,150,639	880,208	269,016	9,003,585
Miscellaneous retail trade	23,685,912	8,289,233	8,288,794	841,303	217,111	7,227,973

Footnotes at end of table.

Table 1. U.S. Corporation Returns With a Foreign Tax Credit, 2013: Total Assets, Income, Tax, and Credits, and Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Income subject to U.S. tax	U.S. income tax before credits		Foreign tax credit claimed	General business credit	U.S. income tax after credits [1]
		Total [2]	Regular and alternative minimum tax			
	(8)	(9)	(10)	(11)	(12)	(13)
Transportation and warehousing	18,636,136	6,522,881	6,520,642	482,505	92,784	5,946,329
Information	80,937,922	28,337,365	28,325,455	7,843,595	1,524,802	18,960,885
Publishing (except Internet)	25,126,638	8,797,043	8,796,940	2,959,606	600,498	5,229,853
Motion picture and sound recording	10,311,206	3,608,689	3,605,253	1,087,062	10,360	2,511,267
Broadcasting, Internet publishing	11,316,918	3,968,700	3,960,398	610,878	19,078	3,338,745
Telecommunications	25,202,478	8,820,393	8,820,326	2,271,502	465,237	6,082,658
Other information services	8,980,683	3,142,539	3,142,539	914,548	429,629	1,798,362
Finance, insurance, real estate, and rental and leasing	111,779,704	39,946,532	39,929,993	6,447,763	1,823,225	31,063,255
Finance and insurance	108,495,818	38,794,662	38,783,386	6,091,295	1,810,838	30,306,900
Nondepository credit intermediation	13,591,599	4,756,775	4,756,775	1,040,933	101,855	3,613,987
Securities, commodity contracts, and other financial investments	30,930,006	10,833,943	10,826,570	2,050,230	601,422	8,179,520
Insurance and related activities	62,499,342	22,687,525	22,684,902	2,992,119	1,059,993	18,055,033
Life insurance	19,969,944	6,986,792	6,986,733	1,676,383	666,138	4,544,452
Mutual property and casualty company (1120 PC)	6,660,757	2,920,095	2,920,010	114,777	22,652	2,663,097
Stock property and casualty company (1120 PC)	33,220,036	11,854,601	11,852,277	786,490	306,360	10,401,965
All other insurance-related activities	2,648,605	926,036	925,881	414,469	64,844	445,517
All other finance industries	1,474,870	516,419	515,140	8,013	47,569	458,361
Real estate and rental and leasing	3,283,885	1,151,870	1,146,607	356,468	12,387	756,355
Services	168,680,976	59,059,009	59,042,734	23,232,468	8,173,099	27,415,056
Professional, scientific, and technical services	18,718,791	6,544,123	6,543,002	1,468,290	330,888	4,733,836
Management of holding companies	124,904,248	43,729,155	43,721,831	18,252,051	7,427,362	17,853,540
Administrative and support and waste management and remediation	4,457,751	1,557,709	1,557,709	421,486	96,054	1,034,844
Education services, health care, and social assistance	2,420,995	846,352	846,352	76,806	6,219	763,271
Arts, entertainment, and recreation	785,748	273,978	273,978	32,044	15,390	226,059
Accommodation and food services	16,650,293	5,848,534	5,840,704	2,959,742	295,281	2,568,532
Other services	743,150	259,157	259,157	22,048	1,904	234,974
All other industries	830,054	287,210	287,210	15,128	38,303	233,456

Footnotes at end of table.

Table 1. U.S. Corporation Returns With a Foreign Tax Credit, 2013: Total Assets, Income, Tax, and Credits, and Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118							
	Gross income (less loss)							
	Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees	Service income	Other income	Branch income [3]
	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)
All industries	830,572,608	165,341,400	75,754,666	58,037,355	144,508,608	57,954,248	328,976,330	183,634,809
Mining	27,519,615	8,773,739	3,891,046	318,268	1,567,366	1,731,441	11,237,756	7,928,962
Oil and gas extraction, coal mining	11,766,029	6,969,112	3,400,369	2,248	d	d	1,135,074	1,027,958
Metal ore mining	10,474,498	1,496,831	377,927	144,798	d	d	8,112,082	4,547,855
Nonmetallic mineral	110,304	21,079	13,449	7,592	d	d	12,814	10,952
All other mining	5,168,784	286,716	99,301	163,630	1,401,202	1,240,148	1,977,786	2,342,197
Construction	807,596	164,299	72,913	11,442	144,847	331,223	82,871	161,445
Manufacturing	413,326,487	81,495,068	41,647,609	9,324,647	80,994,728	6,603,620	193,260,815	76,177,772
Food manufacturing	9,960,972	2,535,643	847,634	178,599	1,295,473	24,326	5,079,296	3,353,445
Beverage and tobacco products	12,201,273	3,212,339	1,564,364	d	1,043,683	d	4,427,946	3,071,339
Textile mills and textile product mills	176,076	46,081	18,047	d	38,988	d	68,297	d
Apparel manufacturing	394,747	47,408	39,944	d	287,185	d	14,477	d
Wood product manufacturing	240,736	73,858	733	d	d	d	148,665	d
Paper manufacturing	6,785,242	2,101,923	1,238,233	126,278	1,277,628	7,123	2,034,057	883,715
Printing and related support activities	353,059	194,141	48,786	d	27,481	d	69,754	35,523
Petroleum and coal products manufacturing	132,021,489	30,946,140	16,195,534	3,571,405	d	d	80,585,940	41,834,837
Chemical manufacturing	81,652,486	18,397,021	9,279,666	1,406,477	31,845,990	517,467	20,205,865	8,111,845
Pharmaceutical and medicine manufacturing	54,017,190	12,044,115	4,538,923	1,042,305	24,158,865	142,195	12,090,788	4,988,828
Other chemical manufacturing	27,635,296	6,352,906	4,740,743	364,172	7,687,126	375,272	8,115,077	3,123,017
Plastics and rubber products manufacturing	1,037,322	305,425	77,821	54,507	181,928	33,989	383,653	183,469
Nonmetallic mineral products manufacturing	338,724	55,201	16,550	24,806	9,851	97,647	134,669	69,915
Primary metal manufacturing	2,130,467	497,912	157,611	686,559	71,327	7,020	710,038	282,018
Fabricated metal products	3,081,040	695,101	322,164	47,111	461,432	96,757	1,458,475	555,863
Machinery manufacturing	22,203,753	5,320,742	3,086,166	724,157	3,319,963	483,225	9,269,500	2,560,994
Computer and electronic product manufacturing	76,432,837	5,934,847	3,247,595	821,948	30,636,978	2,503,419	33,288,050	4,275,376
Electrical equipment, appliance, and component manufacturing	22,749,493	4,701,687	2,540,598	808,367	2,328,839	181,103	12,188,899	5,157,581
Transportation equipment manufacturing	28,966,126	3,555,435	1,632,373	560,717	4,319,716	742,781	18,155,105	4,210,352
Motor vehicles and related manufacturing	19,484,383	2,145,092	1,070,765	354,496	2,411,690	62,228	13,440,112	2,048,486
Other transportation equipment manufacturing	9,481,743	1,410,342	561,608	206,221	1,908,026	680,552	4,714,993	2,161,866
Miscellaneous manufacturing and manufacturing not allocable	12,600,645	2,874,165	1,333,790	149,091	3,120,928	84,542	5,038,129	1,554,382
Wholesale and retail trade	61,976,903	13,737,768	5,532,317	1,271,674	10,520,383	3,532,172	27,382,589	8,705,133
Wholesale trade	37,621,531	7,591,979	2,957,769	613,557	6,744,517	3,028,915	16,684,794	5,351,355
Durable goods	11,875,709	3,406,495	1,078,401	119,134	3,067,103	583,043	3,621,533	900,068
Machinery, equipment, and supplies	829,013	73,595	21,341	12,866	38,119	73,850	609,241	158,980
Other miscellaneous durable goods	11,046,696	3,332,900	1,057,060	106,268	3,028,984	509,193	3,012,292	741,088
Nondurable goods	25,745,823	4,185,484	1,879,368	494,424	3,677,414	2,445,872	13,063,261	4,451,287
Drugs, chemicals, and allied products	9,562,542	1,461,188	422,219	18,256	1,517,091	2,214,744	3,929,045	1,496,774
Groceries and related products	8,274,897	1,091,928	265,876	126,605	476,380	39,718	6,274,390	1,334,154
Other miscellaneous nondurable goods	7,908,384	1,632,367	1,191,273	349,562	1,683,943	191,411	2,859,826	1,620,359
Retail trade	24,355,371	6,145,789	2,574,548	658,116	3,775,865	503,257	10,697,795	3,353,777
Food and beverage stores	6,365,714	1,821,102	589,096	0	161,620	d	d	d
Apparel and accessory stores	2,669,789	394,177	97,583	55,495	630,257	d	d	1,038,280
General merchandise stores	4,381,432	820,315	1,013,207	235,511	1,452,389	d	d	d
Miscellaneous retail trade	10,938,437	3,110,195	874,662	367,110	1,531,599	328,989	4,725,882	1,216,642

Footnotes at end of table.

Table 1. U.S. Corporation Returns With a Foreign Tax Credit, 2013: Total Assets, Income, Tax, and Credits, and Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118							
	Gross income (less loss)							
	Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees	Service income	Other income	Branch income [3]
	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)
Transportation and warehousing	19,703,237	1,045,949	d	68,246	d	12,497,854	5,572,277	d
Information	72,755,176	9,292,235	4,212,344	582,482	33,560,954	5,865,154	19,242,007	8,699,877
Publishing (except Internet)	29,537,393	2,924,570	872,069	147,749	17,121,692	768,442	7,702,870	1,868,826
Motion picture and sound recording	12,328,517	697,036	229,448	85,644	4,918,753	72,672	6,324,964	3,550,796
Broadcasting, Internet publishing	8,765,473	337,658	122,438	104,710	7,902,578	150,265	147,824	691,774
Telecommunications	17,650,703	4,127,248	2,122,873	118,716	2,243,283	4,342,475	4,696,109	2,254,158
Other information services	4,473,090	1,205,724	865,516	125,663	1,374,647	531,300	370,240	334,323
Finance, insurance, real estate, and rental and leasing	80,493,315	12,507,684	3,631,038	19,113,774	4,571,417	6,615,827	34,053,575	20,364,751
Finance and insurance	77,707,846	12,305,808	3,407,490	19,024,719	2,883,237	6,485,197	33,601,395	20,198,618
Nondepository credit intermediation	16,119,585	2,279,263	946,018	587,825	2,289,777	579,247	9,437,455	6,086,364
Securities, commodity contracts, and other financial investments	16,724,877	4,828,751	d	6,419,480	d	1,383,999	2,898,660	d
Insurance and related activities	44,596,005	5,195,284	1,580,779	11,895,488	228,820	4,495,864	21,199,770	12,168,919
Life insurance	29,799,859	2,818,888	917,440	8,405,371	152,185	2,493,534	15,012,441	7,074,393
Mutual property and casualty company (1120 PC)	2,160,050	370,140	56,356	784,092	d	d	196,209	575,590
Stock property and casualty company (1120 PC)	10,620,250	1,310,172	308,849	2,604,611	d	d	5,840,069	4,377,064
All other insurance-related activities	2,015,846	696,084	298,135	101,413	68,423	700,740	151,051	141,871
All other finance industries	267,379	2,510	d	121,926	d	26,087	65,510	d
Real estate and rental and leasing	2,785,469	201,876	223,549	89,055	1,688,180	130,629	452,180	166,133
Services	153,879,533	38,289,937	16,495,687	27,343,000	12,897,487	20,765,084	38,088,336	55,653,554
Professional, scientific, and technical services	28,277,865	1,922,704	641,200	144,560	3,513,142	18,769,188	3,287,070	11,188,608
Management of holding companies	104,841,128	31,943,216	12,265,703	26,931,205	4,797,138	792,879	28,110,986	39,275,848
Administrative and support and waste management and remediation	3,279,017	817,876	348,057	12,547	687,312	726,140	687,085	362,052
Education services, health care, and social assistance	756,431	117,173	33,027	7,371	168,687	196,139	234,034	247,111
Arts, entertainment, and recreation	523,009	7,644	d	d	222,819	d	272,971	d
Accommodation and food services	15,971,540	3,442,073	3,186,727	241,073	3,407,285	251,493	5,442,889	4,378,965
Other services	230,543	39,252	d	d	101,104	d	53,300	d
All other industries	110,746	34,722	d	3,822	d	11,873	56,103	d

Footnotes at end of table.

Table 1. U.S. Corporation Returns With a Foreign Tax Credit, 2013: Total Assets, Income, Tax, and Credits, and Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118—continued							
	Deductions			Taxable income (less loss) before adjustments	Adjustments to taxable income	Taxable income (less loss) after adjustments	Foreign taxes available for credit	
	Total	Total deductions allocable to specific types of income	Nonallocable deductions and net operating loss				Total [4]	Limitation
	(22)	(23)	(24)	(25)	(26)	(27)	(28)	(29)
All industries	369,624,244	209,017,650	160,606,594	460,948,364	27,080,379	433,867,985	228,301,786	151,845,736
Mining	10,252,141	8,179,834	2,072,307	17,267,474	3,613,289	13,654,185	9,038,133	4,778,410
Oil and gas extraction, coal mining	1,265,224	591,348	673,876	10,500,805	3,436,370	7,064,435	3,426,578	2,472,286
Metal ore mining	5,391,416	4,534,961	856,454	5,083,083	d	d	5,109,473	1,774,822
Nonmetallic mineral	51,088	37,396	13,692	59,216	d	d	18,255	21,292
All other mining	3,544,413	3,016,129	528,284	1,624,371	166,521	1,457,850	483,826	510,009
Construction	409,204	337,788	71,415	398,392	-98,727	497,119	187,837	173,648
Manufacturing	163,461,516	72,078,455	91,383,061	249,864,971	7,853,845	242,011,126	119,237,251	84,714,001
Food manufacturing	5,302,211	3,528,663	1,773,548	4,658,761	21,719	4,637,042	1,604,795	1,622,701
Beverage and tobacco products	5,115,614	2,573,545	2,542,069	7,085,659	-358,154	7,443,813	2,226,945	2,605,295
Textile mills and textile product mills	74,597	47,190	27,407	101,479	11,183	90,296	43,567	31,482
Apparel manufacturing	85,112	d	d	309,635	d	d	54,282	108,165
Wood product manufacturing	117,012	d	d	123,724	d	d	149,088	73,135
Paper manufacturing	2,195,478	1,085,170	1,110,308	4,589,764	-14,410	4,604,174	1,795,911	1,611,323
Printing and related support activities	120,924	54,871	66,053	232,135	2,087	230,048	99,603	80,417
Petroleum and coal products manufacturing	28,935,670	20,065,803	8,869,867	103,085,819	511,110	102,574,709	69,297,361	35,901,039
Chemical manufacturing	33,301,143	9,263,055	24,038,088	48,351,344	6,211,247	42,140,097	15,557,921	14,747,670
Pharmaceutical and medicine manufacturing	23,653,452	6,400,907	17,252,543	30,363,738	7,245,590	23,118,148	8,468,254	8,090,974
Other chemical manufacturing	9,647,690	2,862,147	6,785,545	17,987,606	-1,034,343	19,021,949	7,089,667	6,656,696
Plastics and rubber products manufacturing	570,239	211,310	358,929	467,083	107,259	359,824	298,129	125,277
Nonmetallic mineral products manufacturing	212,470	147,461	65,009	126,254	-27,600	153,854	138,612	53,806
Primary metal manufacturing	1,416,210	227,875	1,188,336	714,256	60,674	653,582	565,833	231,935
Fabricated metal products	1,513,191	648,774	864,417	1,567,849	493,615	1,074,234	721,843	375,389
Machinery manufacturing	9,827,339	3,717,605	6,109,735	12,376,413	97,391	12,279,022	4,845,300	4,295,820
Computer and electronic product manufacturing	35,463,977	7,942,108	27,521,868	40,968,861	5,569,703	35,399,158	9,503,291	12,388,320
Electrical equipment, appliance, and component manufacturing	15,085,889	8,557,844	6,528,045	7,663,603	-3,653,420	11,317,023	3,795,236	3,960,352
Transportation equipment manufacturing	18,302,739	11,496,793	6,805,946	10,663,387	-1,147,216	11,810,603	6,261,449	4,133,424
Motor vehicles and related manufacturing	13,978,036	9,409,906	4,568,131	5,506,347	-615,947	6,122,294	5,219,041	2,142,554
Other transportation equipment manufacturing	4,324,702	2,086,887	2,237,815	5,157,041	-531,268	5,688,309	1,042,408	1,990,870
Miscellaneous manufacturing and manufacturing not allocable	5,821,701	2,464,254	3,357,448	6,778,944	53,520	6,725,424	2,278,085	2,368,450
Wholesale and retail trade	27,865,002	19,451,642	8,413,360	34,111,900	4,172,004	29,939,896	13,069,337	10,474,943
Wholesale trade	18,243,930	12,599,726	5,644,204	19,377,601	2,252,736	17,124,865	6,408,433	5,990,181
Durable goods	4,459,183	2,684,167	1,775,017	7,416,525	1,859,022	5,557,503	2,493,537	1,942,511
Machinery, equipment, and supplies	590,277	525,851	64,426	238,735	950	237,785	51,429	82,492
Other miscellaneous durable goods	3,868,906	2,158,315	1,710,590	7,177,790	1,858,072	5,319,718	2,442,109	1,860,019
Nondurable goods	13,784,747	9,915,560	3,869,187	11,961,076	393,714	11,567,362	3,914,895	4,047,670
Drugs, chemicals, and allied products	4,910,040	3,262,441	1,647,598	4,652,502	d	d	847,524	1,567,391
Groceries and related products	5,485,777	4,797,035	688,742	2,789,120	d	d	409,663	976,644
Other miscellaneous nondurable goods	3,388,930	1,856,083	1,532,848	4,519,454	221,857	4,297,597	2,657,709	1,503,635
Retail trade	9,621,072	6,851,916	2,769,156	14,734,299	1,919,268	12,815,031	6,660,905	4,484,762
Food and beverage stores	188,402	d	d	6,177,312	d	d	1,527,578	1,929,836
Apparel and accessory stores	1,496,443	1,343,454	152,990	1,173,346	48,366	1,124,980	201,916	393,702
General merchandise stores	1,571,533	d	d	2,809,898	d	d	2,882,179	980,650
Miscellaneous retail trade	6,364,694	4,337,540	2,027,154	4,573,743	1,199,484	3,374,259	2,049,231	1,180,575

Footnotes at end of table.

Table 1. U.S. Corporation Returns With a Foreign Tax Credit, 2013: Total Assets, Income, Tax, and Credits, and Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118—continued							
	Deductions			Taxable income (less loss) before adjustments	Adjustments to taxable income	Taxable income (less loss) after adjustments	Foreign taxes available for credit	
	Total	Total deductions allocable to specific types of income	Nonallocable deductions and net operating loss				Total [4]	Limitation
	(22)	(23)	(24)	(25)	(26)	(27)	(28)	(29)
Transportation and warehousing	16,740,640	16,127,912	612,728	2,962,597	52,762	2,909,835	529,822	1,018,047
Information	37,344,932	24,767,488	12,577,443	35,410,244	2,481,531	32,928,713	10,194,193	11,521,859
Publishing (except Internet)	12,433,279	3,831,008	8,602,271	17,104,114	3,098,274	14,005,840	3,523,476	4,901,885
Motion picture and sound recording	8,723,597	7,096,867	1,626,730	3,604,920	142,400	3,462,520	1,722,758	1,209,744
Broadcasting, Internet publishing	5,261,738	4,495,693	766,045	3,503,734	-470,436	3,974,170	721,675	1,390,573
Telecommunications	9,398,401	8,234,242	1,164,160	8,252,302	-312,519	8,564,821	2,976,739	2,997,588
Other information services	1,527,916	1,109,679	418,238	2,945,174	23,811	2,921,363	1,249,545	1,022,070
Finance, insurance, real estate, and rental and leasing	36,914,020	21,762,055	15,151,965	43,579,296	10,554,786	33,024,510	18,605,366	11,556,419
Finance and insurance	35,412,129	21,240,412	14,171,718	42,295,717	10,438,451	31,857,266	18,057,734	11,148,688
Nondepository credit intermediation	10,055,852	5,298,815	4,757,037	6,063,733	1,922,084	4,141,649	3,599,469	1,449,495
Securities, commodity contracts, and other financial investments	7,884,293	4,802,133	3,082,161	8,840,584	d	d	4,932,746	3,205,812
Insurance and related activities	17,320,742	11,063,086	6,257,656	27,275,263	8,836,637	18,438,626	9,514,780	6,453,905
Life insurance	8,925,741	4,546,751	4,378,990	20,874,118	9,030,455	11,843,663	7,664,009	4,144,947
Mutual property and casualty company (1120 PC)	753,159	565,883	187,276	1,406,891	169,665	1,237,226	200,244	432,822
Stock property and casualty company (1120 PC)	6,530,502	5,273,487	1,257,016	4,089,748	-71,459	4,161,207	1,014,022	1,457,466
All other insurance-related activities	1,111,340	676,966	434,374	904,506	-292,025	1,196,531	636,505	418,669
All other finance industries	151,242	76,378	74,864	116,137	d	d	10,739	39,476
Real estate and rental and leasing	1,501,891	521,643	980,247	1,283,579	116,335	1,167,244	547,633	407,731
Services	76,563,669	46,273,821	30,289,847	77,315,864	-1,538,699	78,854,563	57,378,292	27,591,825
Professional, scientific, and technical services	21,401,999	18,385,353	3,016,646	6,875,865	508,551	6,367,314	2,643,786	2,225,059
Management of holding companies	45,817,138	20,576,990	25,240,148	59,023,990	-1,988,618	61,012,608	46,825,979	21,352,333
Administrative and support and waste management and remediation	1,592,164	1,264,373	327,791	1,686,853	163,208	1,523,645	518,315	532,734
Education services, health care, and social assistance	520,059	464,037	56,021	236,372	-25,384	261,756	104,869	91,126
Arts, entertainment, and recreation	338,153	289,630	48,523	184,857	50,582	134,275	111,924	46,790
Accommodation and food services	6,772,989	5,247,576	1,525,413	9,198,551	-247,038	9,445,589	7,145,594	3,305,668
Other services	121,167	45,862	75,305	109,376	[7]	109,376	27,825	38,114
All other industries	73,121	38,654	34,467	37,625	-10,413	48,038	61,554	16,585

Footnotes at end of table.

Table 1. U.S. Corporation Returns With a Foreign Tax Credit, 2013: Total Assets, Income, Tax, and Credits, and Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118—continued							
	Foreign taxes available for credit—continued							Taxes deemed paid
	Difference between limitation and foreign tax credit [5]	Foreign taxes paid or accrued						
		Total	Interest	Rents, royalties, and license fees	Branch income	Service income	Other income [6]	
(30)	(31)	(32)	(33)	(34)	(35)	(36)	(37)	
All industries	33,559,588	49,789,366	331,295	8,054,595	15,527,746	989,551	24,886,179	76,453,500
Mining	321,913	2,452,111	5,101	150,169	920,144	36,253	1,340,445	3,892,547
Oil and gas extraction, coal mining	115,149	274,044	d	d	d	d	d	3,400,369
Metal ore mining	26,278	1,869,592	d	58,054	731,961	d	1,076,959	377,927
Nonmetallic mineral	5,561	3,811	d	d	d	d	d	13,449
All other mining	174,926	304,664	1,851	84,308	132,248	33,104	53,153	100,802
Construction	17,852	39,844	862	20,639	7,579	8,155	2,609	72,913
Manufacturing	16,085,229	32,912,954	172,825	4,405,966	9,258,266	141,868	18,934,029	42,077,995
Food manufacturing	186,286	509,587	12,191	82,344	327,462	1,731	85,860	860,855
Beverage and tobacco products	712,574	499,471	3,846	40,869	321,528	d	d	1,564,459
Textile mills and textile product mills	6,948	4,018	d	2,330	d	d	755	18,047
Apparel manufacturing	56,275	12,988	d	11,274	d	d	1,459	39,969
Wood product manufacturing	30,019	5,074	57	572	1,639	d	d	733
Paper manufacturing	83,296	217,606	d	110,978	d	7,570	90,279	1,238,233
Printing and related support activities	7,510	7,219	d	1,109	2,329	d	3,674	48,786
Petroleum and coal products manufacturing	122,336	22,936,340	d	281,431	6,413,950	d	16,219,771	16,454,685
Chemical manufacturing	3,218,583	3,329,688	53,765	1,484,953	616,803	40,922	1,133,245	9,380,625
Pharmaceutical and medicine manufacturing	2,329,442	2,035,123	30,455	1,018,172	200,767	1,647	784,082	4,653,174
Other chemical manufacturing	889,141	1,294,565	23,311	466,781	416,036	39,275	349,163	4,727,451
Plastics and rubber products manufacturing	11,810	57,527	3,014	9,827	29,772	1,346	13,567	81,534
Nonmetallic mineral products manufacturing	17,279	16,802	5,164	1,123	8,049	1,070	1,397	16,575
Primary metal manufacturing	40,589	51,427	2,590	2,758	29,157	7,883	9,039	157,611
Fabricated metal products	64,071	96,256	1,502	20,908	34,912	17,690	21,243	322,274
Machinery manufacturing	1,040,000	548,581	18,302	156,441	223,936	25,008	124,894	3,090,760
Computer and electronic product manufacturing	7,712,551	2,239,077	11,599	1,723,364	291,063	14,489	198,562	3,264,775
Electrical equipment, appliance, and component manufacturing	648,908	935,876	11,554	116,485	367,079	4,122	436,636	2,543,207
Transportation equipment manufacturing	1,442,929	945,655	23,219	204,850	448,840	15,377	253,369	1,637,894
Motor vehicles and related manufacturing	445,489	562,166	21,840	113,060	286,839	6,092	134,335	1,072,645
Other transportation equipment manufacturing	997,440	383,489	1,379	91,791	162,001	9,284	119,034	565,248
Miscellaneous manufacturing and manufacturing not allocable	683,264	499,761	5,288	154,349	131,914	597	207,614	1,356,973
Wholesale and retail trade	3,451,356	2,456,919	20,648	400,722	541,124	46,443	1,447,983	5,543,284
Wholesale trade	2,377,989	1,095,837	10,715	191,345	376,408	40,062	477,307	2,965,435
Durable goods	601,771	418,783	3,655	109,524	48,106	19,421	238,078	1,078,080
Machinery, equipment, and supplies	42,320	16,907	460	1,273	9,149	2,104	3,921	21,362
Other miscellaneous durable goods	559,451	401,876	3,195	108,251	38,957	17,317	234,157	1,056,718
Nondurable goods	1,776,218	677,054	7,060	81,821	328,302	20,641	239,229	1,887,355
Drugs, chemicals, and allied products	894,324	202,874	963	27,938	91,669	458	81,846	428,274
Groceries and related products	568,941	143,935	220	9,503	41,998	990	91,224	266,041
Other miscellaneous nondurable goods	312,953	330,246	5,877	44,380	194,636	19,193	66,160	1,193,040
Retail trade	1,073,367	1,361,082	9,933	209,377	164,716	6,381	970,676	2,577,849
Food and beverage stores	407,052	933,145	d	d	d	d	840,687	589,096
Apparel and accessory stores	226,602	63,372	d	d	22,126	d	23,004	98,011
General merchandise stores	100,441	118,198	d	71,187	d	d	11,288	1,013,209
Miscellaneous retail trade	339,272	246,368	8,800	106,581	30,900	4,390	95,697	877,534

Footnotes at end of table.

Table 1. U.S. Corporation Returns With a Foreign Tax Credit, 2013: Total Assets, Income, Tax, and Credits, and Foreign Income, Deductions, and Taxes Reported on Form 1118, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118—continued							
	Foreign taxes available for credit—continued							Taxes deemed paid
	Difference between limitation and foreign tax credit [5]	Foreign taxes paid or accrued						
		Total	Interest	Rents, royalties, and license fees	Branch income	Service income	Other income [6]	
(30)	(31)	(32)	(33)	(34)	(35)	(36)	(37)	
Transportation and warehousing	535,542	178,848	d	d	d	27,743	52,870	d
Information	3,678,264	3,808,121	9,272	2,460,322	539,966	104,830	693,731	4,213,777
Publishing (except Internet)	1,942,279	2,031,523	7,731	1,494,720	330,657	21,160	177,257	874,806
Motion picture and sound recording	122,682	794,518	d	397,965	d	995	249,690	229,790
Broadcasting, Internet publishing	779,695	389,054	d	311,880	d	5,820	27,607	122,438
Telecommunications	726,086	330,070	1,119	22,360	11,524	72,872	222,195	2,122,862
Other information services	107,521	262,955	85	233,397	8,507	3,984	16,983	863,880
Finance, insurance, real estate, and rental and leasing	5,108,656	2,696,596	20,889	165,636	1,641,662	139,713	728,695	3,877,947
Finance and insurance	5,057,393	2,569,817	17,972	63,211	1,629,586	136,872	722,176	3,656,463
Nondepository credit intermediation	408,563	508,242	301	54,106	315,058	95,735	43,042	1,182,488
Securities, commodity contracts, and other financial investments	1,155,582	266,258	7,419	d	d	d	229,010	d
Insurance and related activities	3,461,786	1,786,668	9,089	5,042	1,297,742	29,256	445,538	1,593,795
Life insurance	2,468,564	1,351,747	2,535	d	1,019,361	d	325,134	917,445
Mutual property and casualty company (1120 PC)	318,045	89,896	d	d	67,560	d	19,122	56,356
Stock property and casualty company (1120 PC)	670,977	310,771	d	d	199,072	17,796	88,584	321,860
All other insurance-related activities	4,200	34,253	481	3,086	11,748	6,239	12,699	298,135
All other finance industries	31,463	8,649	1,163	d	d	d	4,586	d
Real estate and rental and leasing	51,263	126,778	2,917	102,425	12,076	2,840	6,519	221,484
Services	4,359,317	5,243,188	95,600	430,274	2,547,600	484,545	1,685,170	16,503,325
Professional, scientific, and technical services	756,729	762,049	9,193	85,162	135,151	431,723	100,820	642,941
Management of holding companies	3,100,282	3,864,956	78,766	104,492	2,228,665	19,912	1,433,122	12,269,704
Administrative and support and waste management and remediation	111,248	85,450	1,622	31,126	12,501	14,360	25,841	349,165
Education services, health care, and social assistance	14,320	43,210	d	2,419	24,584	d	907	33,024
Arts, entertainment, and recreation	14,746	22,744	d	7,479	d	1,940	5,746	d
Accommodation and food services	345,926	461,705	5,014	196,791	139,125	2,268	118,506	3,187,517
Other services	16,067	3,074	d	2,805	d	d	228	d
All other industries	1,457	784	d	d	d	0	648	d

d—Data suppressed to avoid disclosure of information for specific corporations.

[1] In addition to the credits shown in columns 11 and 12, this is after reduction by other credits, such as the jobs credit and the investment credit, which are not shown separately in this table.

[2] Includes adjustments and recapture of certain tax credits not included in column 10.

[3] Included in gross income (less loss), columns 14–20.

[4] Total taxes available for credit is the sum of total taxes paid or accrued (col. 31), taxes deemed paid (column 37), and carryover of foreign taxes from prior years, less any applicable reductions.

[5] This calculation does not include the reduction for participation in an international boycott and certain other adjustments. Therefore, the amounts presented in this column may differ slightly from those obtained by subtracting the foreign tax credit claimed (column 11) from the limitation (column 29). The difference between the foreign tax credit limitation and the foreign tax credit is a measure of the U.S. tax owed on foreign-source corporate income. The foreign tax credit limitation is the ratio of foreign-source income (after deductions) to total taxable income from all sources multiplied by the total U.S. income tax against which the credit is allowed. A limitation of this measure of the U.S. tax owed on foreign source corporate income is that it relies on the definition of foreign-source income contained in the tax code. Thus, it assumes that the allocation of expenses to foreign-source income accurately reflects the cost of earning that income. Current law also allows expenses allocable to foreign-source income to be deducted even when all of the income associated with those expenses is deferred. In that case, the computed residual U.S. tax would be zero, rather than negative. In addition, the definition of foreign-source income includes income that may be considered domestic source income, such as certain income from sales of U.S. inventory property.

[6] Includes taxes on dividends and section 863(b) income, in addition to other taxes not attributable to interest, rents, royalties, license fees, branch income, or services income.

[7] Less than \$500.

NOTES: Detail may not add to totals because of rounding. Columns 2 through 13 present statistics on assets, receipts, income, and taxes reported on Form 1120 (Corporation Income Tax Return) series for corporations claiming a foreign tax credit. Columns 14 through 37 present statistics from Form 1118, *Foreign Tax Credit—Corporations*.

Adjustments to taxable foreign-source income (reported in column 26) include allocations of current-year U.S.-source losses and recapture of foreign losses, as well as other adjustments. These adjustments (reported on Schedule J) affect the numerator of the limitation fraction used to compute the foreign tax credit. The taxable foreign-source income (less loss) after adjustments (the numerator of the limitation fraction) is reported in column 27. The limitation fraction, which represents the ratio of taxable foreign-source income after adjustments to total (U.S. and foreign) taxable income after adjustments, is applied to the total U.S. tax against which the credit is allowed to determine any limitation on the foreign tax credit.

Total foreign taxes paid or accrued (column 31) are the sum of columns 32 through 36.

Table 2. U.S. Corporation Returns With a Foreign Tax Credit, 2013: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country

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

Selected country	Number of returns [1]	Foreign income, deductions, and taxes reported on Form 1118				
		Gross income (less loss)				
		Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees
(1)	(2)	(3)	(4)	(5)	(6)	
All geographic areas	6,542	830,572,608	165,341,400	75,754,666	58,037,355	144,508,608
Canada	1,998	53,085,078	10,939,965	4,151,555	4,321,788	8,965,583
Latin America, total [4]	1,474	89,699,338	23,574,347	11,679,674	6,613,325	13,540,359
Mexico	957	23,413,969	4,538,875	3,313,338	895,113	4,908,974
Central America, total	372	1,878,357	397,246	140,024	120,120	513,914
Costa Rica	205	536,534	96,914	43,413	4,287	274,527
El Salvador	162	198,531	41,357	26,023	6,825	33,705
Guatemala	188	283,347	41,184	20,375	16,588	58,612
Honduras	137	126,216	9,157	3,513	8,049	38,335
Nicaragua	111	91,060	d	d	918	17,798
Panama (including Canal Zone)	256	624,910	203,398	45,297	82,264	83,152
Other Central American countries	50	17,759	d	d	1,189	7,785
Caribbean countries, total	420	21,207,786	10,119,095	4,862,460	1,623,052	1,139,161
Barbados	89	204,006	151,237	4,682	11,206	25,981
Cayman Islands (British)	247	17,601,638	9,832,696	4,800,343	1,525,378	890,314
Dominican Republic	182	326,103	25,838	7,204	41,204	65,800
Haiti	54	50,445	2,372	1,495	4,313	3,472
Jamaica	106	90,341	d	0	d	26,900
Trinidad	157	2,912,817	100,327	48,737	18,241	124,479
Other Caribbean countries	36	22,436	d	0	d	2,214
South America, total	968	41,462,953	8,519,132	3,363,852	3,690,980	6,978,310
Argentina	344	6,964,361	1,135,741	280,921	624,271	1,009,573
Bolivia	102	225,544	36,018	12,393	2,815	24,916
Brazil	652	17,552,827	3,559,914	1,309,872	2,367,028	3,878,635
Chile	376	4,223,282	1,081,437	201,296	169,002	421,783
Colombia	410	4,645,779	1,266,295	380,128	152,546	554,148
Ecuador	204	653,586	73,309	21,513	38,766	132,884
Paraguay	95	95,888	d	d	15,732	36,112
Peru	333	3,644,855	496,887	201,391	59,188	249,754
Uruguay	155	424,647	95,571	23,433	49,471	58,171
Venezuela	241	2,986,544	758,554	929,103	205,542	606,847
Other South American countries	62	45,641	d	d	6,620	5,488
Other Western Hemisphere, total	327	19,086,533	8,846,561	2,391,579	1,612,956	4,863,507
Bahamas	119	2,647,793	1,596,729	51,603	841,290	16,456
Bermuda	219	9,763,695	5,096,915	2,118,833	582,514	871,268
British Virgin Islands	97	6,145,900	2,114,092	207,990	123,423	3,656,415
Netherlands Antilles	48	29,607	542	0	10,654	14,413
All other Western Hemisphere countries	117	499,538	38,284	13,153	55,075	304,955
Europe, total	2,073	312,416,902	88,199,112	44,704,515	23,908,481	53,876,759
European Union, total	1,990	241,281,085	73,703,286	36,788,602	20,773,443	38,832,810
Austria	215	1,216,865	198,978	67,803	74,019	363,678
Belgium	354	4,511,728	827,463	408,329	125,663	912,209
Czech Republic	176	1,281,147	38,184	9,874	5,664	978,136
Denmark	252	5,635,748	2,576,036	1,330,638	132,098	222,663
Finland	185	765,000	74,101	26,731	31,110	361,106
France	636	10,678,827	1,972,382	1,335,189	519,583	2,538,535
Germany	698	22,471,946	2,324,644	1,471,714	519,202	4,697,077
Greece	155	285,664	51,869	21,431	1,741	76,441
Hungary	151	1,927,959	473,571	22,901	16,281	460,135
Ireland	335	19,659,236	3,938,791	338,730	573,772	11,400,442
Italy	444	6,913,024	434,600	1,027,350	204,145	1,207,835

Footnotes at end of table.

Table 2. U.S. Corporation Returns With a Foreign Tax Credit, 2013: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country—Continued

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

Selected country	Number of returns [1]	Foreign income, deductions, and taxes reported on Form 1118				
		Gross income (less loss)				
		Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees
(1)	(2)	(3)	(4)	(5)	(6)	
Luxembourg	277	26,398,012	14,395,121	9,828,670	840,845	634,800
Netherlands	720	60,295,338	34,747,737	15,721,792	1,599,224	5,802,596
Poland	257	1,521,602	307,610	94,044	119,997	621,653
Portugal	193	1,145,441	86,424	31,025	11,679	129,489
Romania	140	268,856	12,288	3,173	9,782	137,270
Spain	441	4,901,768	958,754	580,046	140,332	1,140,692
Sweden	324	2,540,011	706,671	262,127	149,059	883,933
United Kingdom	1,178	67,996,366	9,400,331	4,173,463	15,681,778	6,028,720
Other European Union countries	221	866,548	177,733	33,574	17,469	235,398
Other European countries, total	696	71,135,816	14,495,827	7,915,913	3,135,038	15,043,949
Jersey	49	1,144,404	334,615	52,609	276,173	266,820
Kazakhstan	124	14,652,696	191,995	61,458	70,186	72,482
Norway	228	18,042,782	1,842,411	4,291,330	2,273,284	211,514
Russia	272	4,866,991	442,434	206,672	124,714	1,338,256
Switzerland	449	28,209,400	10,271,136	2,561,861	237,570	12,537,109
Turkey	232	1,354,364	237,389	76,313	66,676	338,842
Ukraine	128	684,165	251,792	101,221	31,499	114,944
All other European countries	222	2,181,015	924,053	564,448	54,935	163,982
Africa, total	488	27,243,632	8,227,253	3,046,831	833,353	1,309,473
Algeria	52	269,672	d	d	49,080	55,697
Angola	73	1,137,566	d	d	28,322	45,483
Chad	18	1,086,150	d	d	d	8,818
Egypt	166	2,220,422	27,820	13,281	172,327	185,046
Equatorial Guinea	41	1,466,945	d	d	598	2,519
Gabon	29	167,412	d	d	d	13,882
Mauritius	92	1,121,077	482,255	220,083	52,205	45,836
Nigeria	111	13,963,245	6,139,267	2,236,236	35,894	61,089
South Africa	322	1,995,829	407,289	187,693	319,099	407,543
Other African countries	264	3,815,314	909,425	153,969	175,044	483,559
Asia, total [5]	1,710	170,150,632	19,329,553	7,613,803	7,579,374	40,416,895
Middle East, total	538	39,603,718	881,003	99,646	476,208	1,422,451
Bahrain	90	277,475	d	d	42,915	34,435
Iraq	67	981,290	d	d	15,186	42,062
Israel	330	1,551,208	417,995	80,552	88,739	278,257
Kuwait	116	367,563	d	d	5,765	67,762
Lebanon	92	29,929	3,222	1,450	4,231	6,268
Qatar	142	25,219,636	6,510	313	31,770	69,581
Saudi Arabia	217	6,306,846	132,236	12,298	22,488	400,730
United Arab Emirates	268	3,704,749	274,007	2,836	246,232	498,599
Yemen	29	983,460	0	0	2	1,739
Other Middle East countries	130	181,561	d	d	18,881	23,018
Southern and Southeast Asia, total	1,056	51,328,362	6,955,800	2,620,781	4,675,929	12,776,936
Bangladesh	57	108,752	1,241	d	d	3,164
India	648	8,547,545	694,873	481,749	2,272,718	758,124
Indonesia	275	7,534,396	1,567,931	915,269	474,962	384,841
Malaysia	364	4,140,991	281,197	102,403	42,604	685,280
Pakistan	125	355,493	19,899	10,890	49,056	20,703
Philippines	276	2,076,461	191,425	92,617	366,551	391,543
Singapore	585	19,431,159	3,459,637	684,512	883,407	9,806,753
Sri Lanka	77	107,315	12,508	1,018	23,097	16,508

Footnotes at end of table.

Table 2. U.S. Corporation Returns With a Foreign Tax Credit, 2013: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country—Continued

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

Selected country	Number of returns [1]	Foreign income, deductions, and taxes reported on Form 1118				
		Gross income (less loss)				
		Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees
	(1)	(2)	(3)	(4)	(5)	(6)
Thailand	358	4,063,578	696,994	305,671	476,701	424,348
Vietnam	153	460,338	16,800	24,463	53,130	81,222
Other Southern and Southeast Asian countries	135	4,502,333	13,295	d	d	204,450
Eastern Asia, total	1,296	79,180,826	11,492,750	4,893,376	2,390,637	26,217,508
China	796	24,654,128	2,898,696	850,936	592,666	8,664,780
Hong Kong	549	9,717,591	2,564,421	379,848	1,113,708	1,722,786
Japan	716	28,092,996	4,029,515	3,011,765	222,146	7,099,885
South Korea, Republic of	447	9,699,672	1,292,407	494,332	332,313	4,757,844
Taiwan	393	6,948,757	692,644	d	d	3,963,750
Other Eastern Asian countries	63	67,682	15,067	d	d	8,462
Oceania, total	758	21,391,255	4,091,842	1,799,924	3,192,009	2,601,852
Australia	720	19,397,706	3,783,099	1,683,709	2,967,312	2,329,464
New Zealand	309	1,620,366	289,694	106,689	196,103	258,998
Other countries of Oceania	94	373,183	19,048	9,526	28,594	13,389
Puerto Rico and U.S. Possessions, total	530	15,222,995	331,705	62,406	523,784	10,037,822
Puerto Rico	481	14,432,032	297,302	48,931	403,495	9,987,543
U.S. Possessions, total	182	790,963	34,403	13,475	120,290	50,278
American Samoa	25	15,658	0	0	d	12,969
Guam	128	356,725	13,193	6,646	87,297	10,877
Virgin Islands, U.S.	108	393,732	9,667	3,791	24,623	24,782
Other U.S. Possessions	34	24,848	11,543	3,039	d	1,650
Country not stated	3,299	79,768,072	1,372,590	303,673	9,156,361	8,656,085
Section 863(b) income	434	41,813,869	d	0	d	240,274
Regulated Investment Companies	105	694,302	d	704	d	0

Footnotes at end of table.

Table 2. U.S. Corporation Returns With a Foreign Tax Credit, 2013: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country—Continued

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

Selected country	Foreign income, deductions, and taxes reported on Form 1118—continued					
	Gross income (less loss)—continued				Total deductions	Taxable income (less loss) before adjustments
	Service income	Other income	Oil and gas extraction income [2]	Branch income [2]		
(7)	(8)	(9)	(10)	(11)	(12)	
All geographic areas	57,954,248	328,976,330	139,053,734	183,634,809	369,624,244	460,948,364
Canada	5,414,880	19,291,307	1,868,508	12,840,515	20,656,832	32,428,246
Latin America, total [4]	3,762,612	30,529,020	16,575,704	14,435,331	35,247,085	54,452,253
Mexico	1,116,732	8,640,937	135,689	3,854,971	9,341,558	14,072,411
Central America, total	235,671	471,383	115,081	391,150	895,510	982,848
Costa Rica	55,713	61,680	d	124,086	298,928	237,605
El Salvador	23,113	67,509	15,072	39,389	80,182	118,349
Guatemala	35,608	110,979	61,628	55,982	157,934	125,413
Honduras	24,285	42,878	d	17,368	77,690	48,526
Nicaragua	56,969	12,099	d	51,714	70,672	20,388
Panama (including Canal Zone)	35,968	174,831	d	92,327	205,338	419,572
Other Central American countries	4,016	1,407	d	10,284	4,765	12,995
Caribbean countries, total	195,244	3,268,774	10,695,912	1,134,008	4,221,195	16,986,590
Barbados	2,205	8,693	d	70,949	35,823	168,183
Cayman Islands (British)	26,413	526,494	8,205,764	551,128	2,370,659	15,230,980
Dominican Republic	46,605	139,453	44,412	112,888	145,902	180,201
Haiti	16,461	22,333	d	26,552	47,559	2,886
Jamaica	15,583	22,662	d	41,618	98,143	-7,802
Trinidad	77,230	2,543,804	2,431,917	329,212	1,508,120	1,404,697
Other Caribbean countries	10,747	5,336	d	1,660	14,991	7,445
South America, total	2,214,966	16,695,713	5,629,022	9,055,201	20,162,480	21,300,473
Argentina	74,762	3,839,093	2,710,610	2,232,096	3,622,319	3,342,042
Bolivia	18,913	130,489	d	17,002	49,993	175,550
Brazil	920,729	5,516,649	85,978	2,185,702	9,186,692	8,366,135
Chile	98,206	2,251,558	d	327,175	1,170,768	3,052,514
Colombia	450,310	1,842,352	460,120	966,672	2,342,934	2,302,845
Ecuador	211,699	175,415	-31,136	275,534	459,788	193,797
Paraguay	d	18,723	d	27,805	25,975	69,913
Peru	347,649	2,289,986	1,055,987	1,690,357	1,703,199	1,941,656
Uruguay	7,087	190,914	d	113,978	193,360	231,287
Venezuela	71,991	414,507	1,235,937	1,213,138	1,342,140	1,644,404
Other South American countries	d	26,026	d	5,741	65,310	-19,669
Other Western Hemisphere, total	236,472	1,135,458	2,852,109	1,996,621	3,719,644	15,366,888
Bahamas	29,999	111,717	1,401,468	837,198	425,888	2,221,905
Bermuda	149,060	945,105	1,450,584	1,124,818	1,958,388	7,805,307
British Virgin Islands	1,588	42,393	0	6,174	1,124,405	5,021,495
Netherlands Antilles	3,151	847	d	10,516	17,604	12,003
All other Western Hemisphere countries	52,675	35,396	d	17,915	193,359	306,178
Europe, total	14,964,724	86,763,310	53,992,956	69,873,532	131,131,927	181,284,975
European Union, total	13,535,575	57,647,369	24,403,756	52,963,720	108,802,858	132,478,227
Austria	17,236	495,152	0	189,909	897,438	319,427
Belgium	209,597	2,028,467	6,551	1,666,775	4,115,925	395,803
Czech Republic	7,657	241,632	d	178,451	564,399	716,748
Denmark	73,193	1,301,120	4,308,421	202,112	925,526	4,710,222
Finland	25,776	246,176	0	128,923	465,165	299,835
France	1,353,563	2,959,575	21,850	1,819,384	5,850,341	4,828,486
Germany	5,917,765	7,541,543	3,638	11,023,957	16,466,748	6,005,198
Greece	78,673	55,509	d	90,590	194,982	90,681
Hungary	17,287	937,784	0	470,365	604,211	1,323,749
Ireland	1,040,967	2,366,534	d	524,226	6,602,926	13,056,310
Italy	424,563	3,614,532	10,268	3,351,808	4,834,506	2,078,519

Footnotes at end of table.

Table 2. U.S. Corporation Returns With a Foreign Tax Credit, 2013: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country—Continued

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

Selected country	Foreign income, deductions, and taxes reported on Form 1118—continued					
	Gross income (less loss)—continued				Total deductions	Taxable income (less loss) before adjustments
	Service income	Other income	Oil and gas extraction income [2]	Branch income [2]		
(7)	(8)	(9)	(10)	(11)	(12)	
Luxembourg	247,736	450,840	7,702,948	743,690	4,080,497	22,317,515
Netherlands	197,832	2,226,158	10,373,357	2,963,127	8,961,163	51,334,175
Poland	35,875	342,422	92,518	334,567	619,362	902,240
Portugal	9,395	877,429	d	771,878	939,620	205,821
Romania	6,806	99,536	d	72,231	182,127	86,729
Spain	421,709	1,660,235	d	941,149	2,782,379	2,119,389
Sweden	118,002	420,218	d	356,576	1,353,918	1,186,093
United Kingdom	3,295,197	29,416,876	1,510,675	26,745,823	47,823,801	20,172,565
Other European Union countries	36,743	365,631	d	388,181	537,825	328,723
Other European countries, total	1,429,149	29,115,941	29,589,199	16,909,812	22,329,068	48,806,748
Jersey	d	d	0	299,923	260,192	884,212
Kazakhstan	297,243	13,959,331	13,790,907	518,974	3,877,409	10,775,288
Norway	60,453	9,363,791	15,137,240	11,895,960	2,842,266	15,200,516
Russia	292,335	2,462,579	187,296	1,781,788	2,771,667	2,095,324
Switzerland	526,829	2,074,894	d	1,644,445	10,912,029	17,297,371
Turkey	44,832	590,313	d	459,165	806,200	548,164
Ukraine	d	d	d	204,240	223,133	461,032
All other European countries	195,786	277,810	394,466	105,318	636,173	1,544,842
Africa, total	1,750,208	12,076,515	18,472,752	7,480,455	7,754,175	19,489,458
Algeria	7,691	156,921	1,037	173,081	141,368	128,304
Angola	278,092	746,158	27,262	620,463	1,123,477	14,089
Chad	866	693,695	d	212,235	48,181	1,037,969
Egypt	212,296	1,609,651	1,434,253	466,670	1,418,678	801,744
Equatorial Guinea	135,612	1,266,915	1,268,971	168,428	313,997	1,152,947
Gabon	8,039	131,807	d	135,917	74,036	93,376
Mauritius	56,611	264,088	0	175,988	479,997	641,080
Nigeria	65,806	5,424,954	13,287,766	2,954,302	1,241,610	12,721,635
South Africa	124,103	550,103	d	586,881	950,031	1,045,798
Other African countries	861,093	1,232,224	1,150,297	1,986,490	1,962,800	1,852,514
Asia, total [5]	12,032,154	83,178,853	40,108,285	57,171,462	75,561,696	94,588,936
Middle East, total	3,019,007	33,705,404	30,460,648	17,512,211	14,244,745	25,358,973
Bahrain	134,146	27,443	d	200,727	334,341	-56,866
Iraq	853,381	67,619	27,608	69,402	917,187	64,103
Israel	215,019	470,647	70	284,856	880,276	670,932
Kuwait	241,821	48,184	0	27,550	274,170	93,393
Lebanon	-195	14,953	d	9,816	27,609	2,320
Qatar	220,878	24,890,585	d	13,504,123	7,327,026	17,892,610
Saudi Arabia	739,293	4,999,801	d	800,697	1,772,846	4,534,000
United Arab Emirates	551,781	2,131,294	d	2,246,283	2,187,000	1,517,749
Yemen	66	981,654	974,616	321,438	415,339	568,121
Other Middle East countries	62,816	73,225	0	47,319	108,951	72,611
Southern and Southeast Asia, total	6,425,651	17,873,265	7,381,408	13,512,568	24,580,190	26,748,172
Bangladesh	4,880	68,309	0	62,758	74,160	34,592
India	936,989	3,403,093	50,647	4,128,195	5,441,035	3,106,510
Indonesia	175,790	4,015,603	3,565,102	2,164,092	3,177,022	4,357,374
Malaysia	83,309	2,946,199	2,462,009	331,185	1,007,505	3,133,486
Pakistan	57,783	197,162	2,503	188,554	211,203	144,290
Philippines	210,844	823,480	d	1,031,858	1,267,544	808,917
Singapore	453,816	4,143,035	512,586	3,075,149	6,991,874	12,439,285
Sri Lanka	31,326	22,858	d	76,109	41,799	65,516

Footnotes at end of table.

Table 2. U.S. Corporation Returns With a Foreign Tax Credit, 2013: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country—Continued

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

Selected country	Foreign income, deductions, and taxes reported on Form 1118—continued					
	Gross income (less loss)—continued				Total deductions	Taxable income (less loss) before adjustments
	Service income	Other income	Oil and gas extraction income [2]	Branch income [2]		
(7)	(8)	(9)	(10)	(11)	(12)	
Thailand	221,376	1,938,489	d	1,643,810	2,089,763	1,973,815
Vietnam	86,831	197,894	d	118,060	268,638	191,701
Other Southern and Southeast Asian countries	4,162,709	117,144	d	692,797	4,009,648	492,686
Eastern Asia, total	2,587,390	31,599,164	2,266,229	26,146,578	36,725,803	42,455,023
China	576,052	11,070,998	1,939,208	5,940,629	13,691,122	10,963,006
Hong Kong	412,600	3,524,227	d	5,478,479	6,423,806	3,293,785
Japan	496,498	13,233,187	d	11,428,025	8,181,555	19,911,441
South Korea, Republic of	661,026	2,161,751	d	2,035,560	4,526,540	5,173,132
Taiwan	427,889	1,591,914	d	1,263,251	3,884,362	3,064,395
Other Eastern Asian countries	13,326	17,087	0	634	18,418	49,264
Oceania, total	1,068,421	8,637,208	4,257,743	9,895,622	9,869,181	11,522,074
Australia	999,839	7,634,282	4,017,130	9,327,016	8,999,019	10,398,687
New Zealand	66,691	702,191	d	392,715	741,021	879,345
Other countries of Oceania	1,892	300,734	d	175,891	129,142	244,041
Puerto Rico and U.S. Possessions, total	579,405	3,687,872	d	2,785,261	6,588,718	8,634,277
Puerto Rico	509,143	3,185,617	d	2,513,703	5,989,202	8,442,830
U.S. Possessions, total	70,262	502,255	d	271,558	599,516	191,447
American Samoa	d	359	0	3,506	8,857	6,801
Guam	52,720	185,993	d	231,896	248,980	107,745
Virgin Islands, U.S.	15,850	315,020	d	28,816	332,536	61,196
Other U.S. Possessions	d	884	0	7,340	9,143	15,705
Country not stated	17,905,868	42,373,494	d	7,127,073	51,142,687	28,625,384
Section 863(b) income	239,503	41,303,293	d	28,938	27,794,460	14,019,409
Regulated Investment Companies	0	0	0	0	157,839	536,463

Footnotes at end of table.

Table 2. U.S. Corporation Returns With a Foreign Tax Credit, 2013: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country—Continued

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

Selected country	Foreign income, deductions, and taxes reported on Form 1118—continued							
	Foreign taxes paid, accrued, and deemed paid							Taxes deemed paid
	Total	Foreign taxes paid or accrued on—						
		Total	Interest	Rents, royalties, and license fees	Branch income	Service income	Other income [3]	
(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	
All geographic areas	126,242,866	49,789,366	331,295	8,054,595	15,527,746	989,551	24,886,179	76,453,500
Canada	6,882,175	2,655,179	26,567	356,313	867,914	43,005	1,361,380	4,226,996
Latin America, total [4]	18,383,121	6,517,556	125,655	1,702,666	1,740,662	220,102	2,728,471	11,865,565
Mexico	4,221,684	886,332	32,534	300,354	372,061	19,333	162,050	3,335,352
Central America, total	284,987	144,401	2,693	50,781	33,706	15,734	41,486	140,586
Costa Rica	85,219	41,794	429	19,112	2,756	1,517	17,980	43,425
El Salvador	42,541	16,493	d	5,939	6,106	1,540	d	26,048
Guatemala	50,531	29,659	45	10,376	5,477	2,019	11,742	20,872
Honduras	20,595	17,018	220	7,020	3,030	4,018	2,730	3,577
Nicaragua	10,651	d	d	d	2,448	3,470	d	d
Panama (including Canal Zone)	74,685	29,424	1,898	6,221	13,889	3,169	4,247	45,261
Other Central American countries	765	d	0	d	0	0	d	d
Caribbean countries, total	5,715,078	702,237	3,762	21,222	32,564	9,147	635,541	5,012,841
Barbados	7,069	2,387	0	1,635	d	d	51	4,683
Cayman Islands (British)	4,798,582	68	d	d	d	0	34	4,798,513
Dominican Republic	79,019	71,815	311	11,269	14,661	8,797	36,777	7,204
Haiti	6,415	4,921	d	d	2,082	d	212	1,495
Jamaica	4,250	4,250	202	1,965	1,465	4	613	0
Trinidad	819,743	618,796	636	6,343	13,633	330	597,854	200,947
Other Caribbean countries	0	0	0	0	0	0	0	0
South America, total	8,155,273	4,778,488	86,666	1,330,308	1,302,331	175,888	1,883,295	3,376,785
Argentina	1,210,251	928,273	13,334	264,901	340,513	18,385	291,142	281,978
Bolivia	d	28,956	d	2,442	d	1,135	22,460	d
Brazil	2,760,326	1,438,862	57,301	716,137	248,401	45,770	371,254	1,321,465
Chile	1,277,269	1,075,973	7,773	115,088	19,015	23,935	910,162	201,296
Colombia	722,085	341,957	833	99,893	81,220	17,407	142,605	380,128
Ecuador	98,806	77,293	150	25,517	13,608	21,772	16,247	21,513
Paraguay	d	d	d	d	d	d	d	d
Peru	928,510	727,119	5,472	63,422	517,916	45,115	95,194	201,391
Uruguay	38,781	15,309	259	3,873	5,102	1,051	5,024	23,473
Venezuela	1,060,317	130,970	719	33,257	70,870	825	25,299	929,347
Other South American countries	4,548	d	0	d	d	d	d	0
Other Western Hemisphere, total	2,229,444	244,987	d	242,796	307	d	1,795	1,984,457
Bahamas	51,688	5	0	d	0	0	d	51,683
Bermuda	1,711,664	d	0	d	0	0	d	d
British Virgin Islands	450,436	242,446	0	d	d	d	d	207,990
Netherlands Antilles	47	d	d	0	0	d	d	d
All other Western Hemisphere countries	15,608	2,455	d	576	d	d	1,602	13,153
Europe, total	58,074,990	13,089,056	27,500	378,265	4,107,509	282,522	8,293,260	44,985,934
European Union, total	40,643,169	3,718,811	24,295	304,805	1,424,158	252,823	1,712,732	36,924,358
Austria	124,912	57,096	d	d	39,522	0	16,826	67,816
Belgium	488,285	54,294	682	2,560	20,923	245	29,883	433,992
Czech Republic	31,651	21,770	d	14,953	5,120	d	1,496	9,881
Denmark	1,775,028	441,139	d	86	10,072	d	430,925	1,333,889
Finland	84,651	57,885	d	14	57,663	d	309	26,766
France	1,480,397	131,523	d	d	104,984	11,217	13,047	1,348,875
Germany	2,100,827	596,688	5,723	9,019	317,356	201,209	63,381	1,504,139
Greece	30,033	8,602	400	668	1,065	46	6,422	21,431
Hungary	37,360	14,455	0	54	8,809	0	5,592	22,905
Ireland	498,071	156,240	d	d	62,441	1,044	80,492	341,831
Italy	1,260,578	232,819	7,119	79,138	121,720	230	24,613	1,027,759

Footnotes at end of table.

Table 2. U.S. Corporation Returns With a Foreign Tax Credit, 2013: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country—Continued

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

Selected country	Foreign income, deductions, and taxes reported on Form 1118—continued							
	Foreign taxes paid, accrued, and deemed paid							
	Total	Foreign taxes paid or accrued on—						Taxes deemed paid
		Total	Interest	Rents, royalties, and license fees	Branch income	Service income	Other income [3]	
(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	
Luxembourg	9,926,786	87,836	63	d	50,641	d	36,828	9,838,950
Netherlands	16,485,134	710,135	2,252	7,747	76,346	2,067	621,723	15,774,999
Poland	152,155	58,143	d	22,981	18,030	d	17,094	94,013
Portugal	61,239	30,213	185	7,769	7,509	691	14,059	31,025
Romania	15,664	12,491	1,823	7,980	609	16	2,063	3,173
Spain	786,583	199,911	4,425	101,386	28,971	3,647	61,481	586,673
Sweden	315,959	52,750	d	600	44,599	d	6,710	263,209
United Kingdom	4,941,131	781,769	1,300	27,516	445,630	30,679	276,643	4,159,362
Other European Union countries	46,723	13,054	29	7,146	2,147	588	3,143	33,669
Other European countries, total	17,431,821	9,370,245	3,206	73,461	2,683,351	29,699	6,580,528	8,061,576
Jersey	65,912	13,302	d	0	d	d	d	52,609
Kazakhstan	3,962,952	3,901,190	d	5,101	d	7,271	3,857,656	61,762
Norway	8,776,942	4,430,405	2,264	-44	2,411,454	1,497	2,015,234	4,346,537
Russia	430,107	221,693	201	1,833	151,134	16,787	51,739	208,413
Switzerland	3,319,221	673,664	256	20,745	38,391	78	614,193	2,645,557
Turkey	146,976	70,663	91	21,575	22,631	894	25,472	76,313
Ukraine	136,440	35,219	0	10,102	d	d	d	101,221
All other European countries	593,272	24,109	255	14,148	7,460	1,247	999	569,164
Africa, total	8,431,627	4,903,553	5,098	72,768	400,181	51,748	4,373,758	3,528,074
Algeria	48,881	d	0	937	46,965	692	d	d
Angola	83,787	d	0	d	25,034	23,854	14,271	d
Chad	591,308	d	0	d	0	0	d	d
Egypt	363,199	349,917	1,500	11,054	40,676	421	296,265	13,281
Equatorial Guinea	414,029	398,522	d	d	34,336	479	362,552	15,507
Gabon	27,894	d	d	540	21,695	d	1,838	d
Mauritius	224,138	3,875	d	160	168	d	932	220,263
Nigeria	5,733,900	3,251,421	d	d	26,875	6,074	3,217,090	2,482,479
South Africa	505,281	83,048	d	d	55,444	2,653	24,526	422,233
Other African countries	439,212	285,242	979	54,658	148,988	17,471	63,147	153,969
Asia, total [5]	25,379,647	17,682,312	59,269	3,610,934	7,531,935	163,301	6,316,871	7,697,335
Middle East, total	8,142,842	8,040,881	1,193	351,466	4,117,714	32,273	3,538,234	101,961
Bahrain	741	d	0	0	d	0	d	d
Iraq	19,738	d	0	4,174	d	9,254	d	d
Israel	229,174	148,457	1,184	46,455	22,640	1,363	76,814	80,717
Kuwait	17,182	d	0	8,842	4,831	d	d	d
Lebanon	2,793	1,344	0	212	841	40	251	1,450
Qatar	5,080,500	d	d	251,162	4,010,195	d	d	d
Saudi Arabia	2,393,828	2,380,848	d	38,989	36,619	d	2,287,912	12,980
United Arab Emirates	228,709	224,372	0	d	32,302	d	191,743	4,338
Yemen	161,911	161,911	0	d	d	d	d	0
Other Middle East countries	8,265	d	0	1,302	5,501	d	d	d
Southern and Southeast Asia, total	6,384,874	3,747,990	24,920	544,451	1,149,380	74,905	1,954,334	2,636,883
Bangladesh	13,427	d	d	190	11,884	d	d	d
India	1,485,212	1,004,690	5,817	139,412	603,487	47,343	208,632	480,522
Indonesia	1,739,177	823,908	3,576	28,829	105,539	2,702	683,261	915,269
Malaysia	720,196	617,793	1,363	31,299	12,108	5,550	567,473	102,403
Pakistan	44,040	33,150	33	2,716	21,686	789	7,926	10,890
Philippines	262,872	170,250	9,015	37,064	82,690	4,008	37,472	92,622
Singapore	1,152,479	454,559	1,849	235,712	156,418	2,656	57,924	697,919
Sri Lanka	8,386	d	d	159	6,450	d	d	d

Footnotes at end of table.

Table 2. U.S. Corporation Returns With a Foreign Tax Credit, 2013: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country—Continued

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

Selected country	Foreign income, deductions, and taxes reported on Form 1118—continued							
	Foreign taxes paid, accrued, and deemed paid							
	Total	Foreign taxes paid or accrued on—						Taxes deemed paid
		Total	Interest	Rents, royalties, and license fees	Branch income	Service income	Other income [3]	
(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	
Thailand	888,016	578,429	3,241	59,430	126,923	6,466	382,368	309,588
Vietnam	60,303	35,841	25	6,462	19,729	4,500	5,125	24,463
Other Southern and Southeast Asian countries	10,767	9,596	d	3,179	2,466	d	3,076	1,171
Eastern Asia, total	10,851,931	5,893,440	33,156	2,715,017	2,264,841	56,123	824,303	4,958,491
China	2,472,825	1,587,250	14,279	789,153	419,222	38,369	326,228	885,575
Hong Kong	556,472	d	118	d	d	3,680	d	d
Japan	4,723,383	1,684,734	2,552	7,228	1,583,734	1,109	90,112	3,038,649
South Korea, Republic of	1,637,294	1,152,471	13,200	858,406	77,540	2,774	200,551	484,823
Taiwan	1,446,868	1,291,861	3,009	1,021,778	69,227	9,021	188,827	155,007
Other Eastern Asian countries	15,090	d	0	d	d	1,169	d	d
Oceania, total	2,855,017	1,049,532	55,147	121,289	443,845	5,870	423,381	1,805,485
Australia	2,617,501	928,321	47,478	112,309	427,618	5,186	335,729	1,689,180
New Zealand	145,661	38,920	d	7,096	d	d	7,367	106,741
Other countries of Oceania	91,856	82,291	d	1,884	d	d	80,285	9,564
Puerto Rico and U.S. Possessions, total	2,157,651	2,093,380	24,119	1,165,632	179,096	24,185	700,348	64,271
Puerto Rico	2,124,138	2,073,341	d	d	167,273	22,561	694,773	50,796
U.S. Possessions, total	33,514	20,039	d	d	11,823	1,624	5,574	13,475
American Samoa	d	d	0	d	0	0	d	0
Guam	23,910	17,264	d	d	11,335	1,524	4,249	6,646
Virgin Islands, U.S.	5,212	1,422	d	d	d	100	d	3,791
Other U.S. Possessions	d	d	0	0	d	0	d	3,039
Country not stated	1,783,265	1,488,588	d	403,931	256,297	d	621,692	294,678
Section 863(b) income	33,673	33,673	0	0	0	0	33,673	0
Regulated Investment Companies	32,255	31,551	0	0	0	0	31,551	704

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

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

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

[3] Includes taxes on dividends and section 863(b) income, in addition to other taxes not attributable to interest, rents, royalties, license fees, branch income, or service income.

[4] Includes Latin America not allocable, which is not shown separately.

[5] Includes Asia not allocable, which is not shown separately.

NOTE: Detail may not add to totals because of rounding. Form 1118 is entitled *Foreign Tax Credit—Corporations*.

SOURCE: IRS, Statistics of Income Division, Corporation Foreign Tax Credit Study, revised January 2017.