

Foreign Recipients of U.S. Income, 2011

by Scott Luttrell

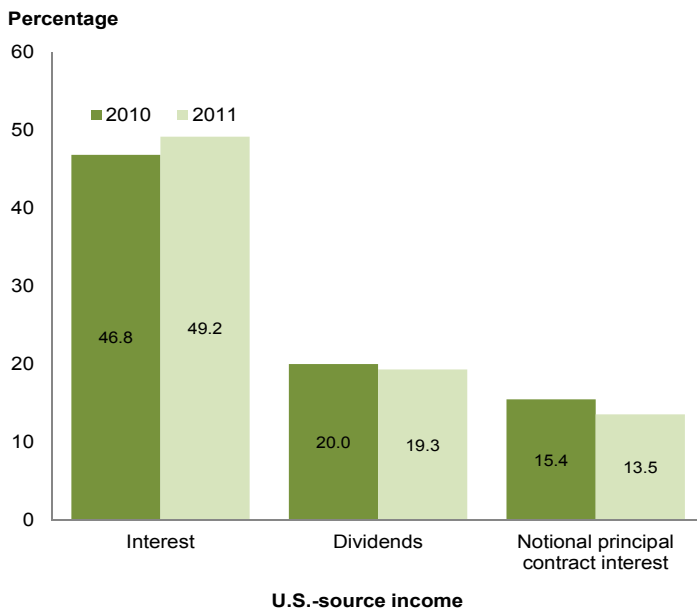
U.S.-source income paid to foreign persons, as reported on Form 1042-S, totaled \$568.5 billion for Calendar Year 2011. This represents an increase of 1.9 percent from 2010. Withholding taxes on this income fell by 11.9 percent to \$8.9 billion in 2011. Almost 90 percent of all U.S. source income paid to foreign persons was exempt from withholding tax. The residual U.S.-source income subject to tax was withheld at an average rate of 15 percent.

Withholding agents use Form 1042-S, *Foreign Person's U.S.-Source Income Subject to Withholding*, to report U.S. income payments to nonresident aliens. Entities such as financial institutions, businesses, and academic institutions that make payments of U.S. income to nonresident aliens are considered withholding agents. They are responsible for withholding the appropriate amount of U.S. tax or appointing someone else to do so. Withholding agents report the income and withholding

tax to the IRS on Form 1042-S (an information return), and provide a copy to the payee for information purposes. In addition to employment earnings, Form 1042-S is also used to report many other types of income including, but not limited to: interest, rents, royalties, corporate distributions, pension income, and gambling winnings.

Interest payments made up the largest percentage of the total U.S.-source income as reported on Form 1042-S in 2010 and 2011 (Figure A). These payments accounted for nearly half (49.2 percent) of the income and represented a 7-percent increase from 2010. Dividends (19.3 percent) and notional principal contract income (13.5 percent) accounted for the next largest shares of U.S.-source income paid to foreign persons, although both categories had smaller amounts in 2011 than they did in 2010. The largest decrease from 2010 occurred in notional principal contract income, which fell by 10.7 percent. A notional

Figure A
Percentage of U.S.-Source Income Paid to Foreign Persons, by Income Category, 2010 and 2011



NOTE: Form 1042-S, *Foreign Persons' U.S.-Source Income Subject to Withholding*, is an information return filled by the payer to report U.S. income payments to nonresident aliens.

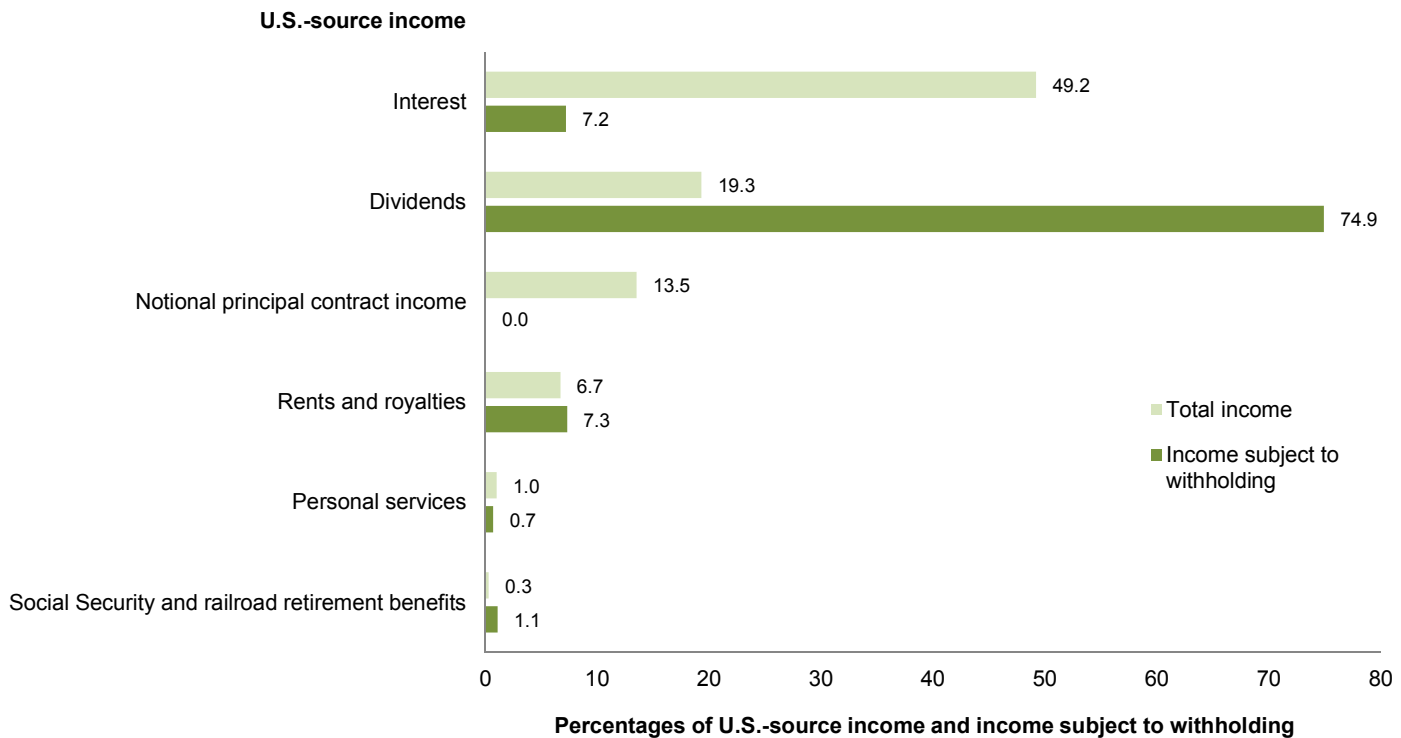
SOURCE: IRS, Statistics of Income Division, Foreign Recipients of U.S. Income, September 2013.

Highlights

- U.S.-source income paid to foreign persons, as reported on Form 1042-S, was \$568.5 billion in 2011.
- Nearly 90 percent of this U.S. income paid to foreign persons was exempt from withholding tax.
- Taxes totaling \$8.9 billion were withheld on U.S. income paid to foreign persons in 2011, which was an average effective withholding rate of 15 percent.
- Interest payments (49.2 percent) and dividends (19.3 percent) accounted for most of the U.S. income paid to foreign persons.
- Foreign persons in the United Kingdom received the most U.S.-source income (\$86.6 billion; 15.2 percent of the total).
- Foreign persons in the Cayman Islands paid more than \$1.3 billion in withholding taxes (14.7 percent of the total), the most of any country.
- Foreign partners received \$11.2 billion from U.S. partnerships and \$3.5 billion in U.S. taxes were withheld on that income.
- Sales of U.S. real property interests by foreign persons totaled \$4.2 billion and \$351 million in U.S. taxes were withheld on that income.



Figure B
Percentages of U.S.-Source Income Paid to Foreign Persons and Income Subject to Withholding as Reported on Form 1042-S, by Selected Income Category, 2011



NOTE: Form 1042-S, *Foreign Persons' U.S.-Source Income Subject to Withholding*, is an information return filed by the payer to report U.S. income payments to nonresident aliens.
 SOURCE: IRS, Statistics of Income Division, Foreign Recipients of U.S. Income, September 2013.

principal contract is one involving two parties who agree contractually to pay each other amounts at specified times, based on the underlying notional amount. The underlying amount is notional because neither party to the notional principal contract is required to actually hold the property comprising the underlying amount. Notional principal contracts are used by financial institutions to reduce the risk of changes in interest rates, commodity prices, and currency exchange rates. Interest rate swaps, currency swaps, and equity swaps are examples of notional principal contracts.

U.S.-source payments to foreign persons are commonly exempt from withholding tax. The primary reasons for withholding exemptions are that the income is exempt from withholding due to a tax treaty between the U.S. and the recipient's country of residence, or the specific type of income (portfolio or bank deposit interest, for instance) is exempt under an Internal Revenue Code section. Income effectively connected with a U.S. trade or business and income paid to a withholding foreign partnership or withholding foreign trust are also exempt from withholding.

For 2011, some \$59.3 billion (10.4 percent) of total U.S.-source income payments to foreign persons was subject to tax. Figure B presents the percentages of U.S.-source income paid to

foreign persons and income subject to withholding by income category in 2011. This figure illustrates the differences that exist with respect to the taxation of certain types of income reported on Form 1042-S. For example, dividends comprised a majority (74.9 percent) of income subject to tax, despite accounting for only 19.3 percent of total income. Dividend income subject to withholding was taxed at an average effective rate of 14.5 percent. While dividends are taxed at comparatively high rates, interest is much more likely to be exempt from withholding. For 2011, interest payments constituted the largest share of total income (49.2 percent) but only 7.2 percent of interest income was subject to withholding. Interest income subject to withholding was taxed at an average rate of 14.1 percent. As mentioned previously, notional principal contract income accounts for 13.5 percent of U.S.-source income paid to foreign persons; however, it is not generally subject to withholding tax. Rents and royalty payments are more likely to be taxed and they account for 6.7 percent of all income and 7.3 percent of income subject to withholding.

One of the primary contributors to reduced withholding taxes on U.S.-source income paid to foreign persons is tax treaties. In 2011, some 65 countries had treaties in force with the United States (Table 1). Nearly 73.8 percent (2.7 million) of

all payments go to recipients in treaty countries. Foreign recipients from tax treaty countries received 78.2 percent of total U.S. income paid to foreign persons and paid 60.6 percent of all withholding taxes. The average withholding tax rate on income subject to tax made to persons in treaty countries was 11.9 percent, compared to 25.9 percent on payments made to residents of nontreaty countries.

Residents in 12 nontreaty jurisdictions received more than \$1 billion of U.S.-source income in 2011: the Bahamas, Bermuda, the British Virgin Islands, the Cayman Islands, Gabon, Hong Kong, Kuwait, Puerto Rico, Saudi Arabia, Singapore, Taiwan, and the United Arab Emirates (Table 2). All nontreaty countries combined to account for \$123.7 billion of total U.S.-source income and \$3.5 billion of total tax withheld.

In 2011, the majority of U.S.-source income paid to foreign persons went to a small number of countries. Ten countries accounted for 72.3 percent of U.S. income paid to foreign persons (Figure C, Part 1). Foreign persons from the United Kingdom received \$86.6 billion (15.2 percent of the total) in U.S.-source income payments and \$35 billion more than any other country. U.K. corporations received 17.4 percent of all payments to corporate recipients. Recipients from Japan received \$51.6

billion (9.1 percent) of U.S.-source income, a decrease of 7.7 percent from 2010. Foreign persons from the Cayman Islands received \$50.6 billion (8.9 percent), an increase of 16.3 percent from 2010. Canadian recipients collected \$42.3 billion (7.4 percent), a jump of over 40 percent from the previous year, while German residents collected \$40.2 billion (7.1 percent) of U.S.-source income in 2011.

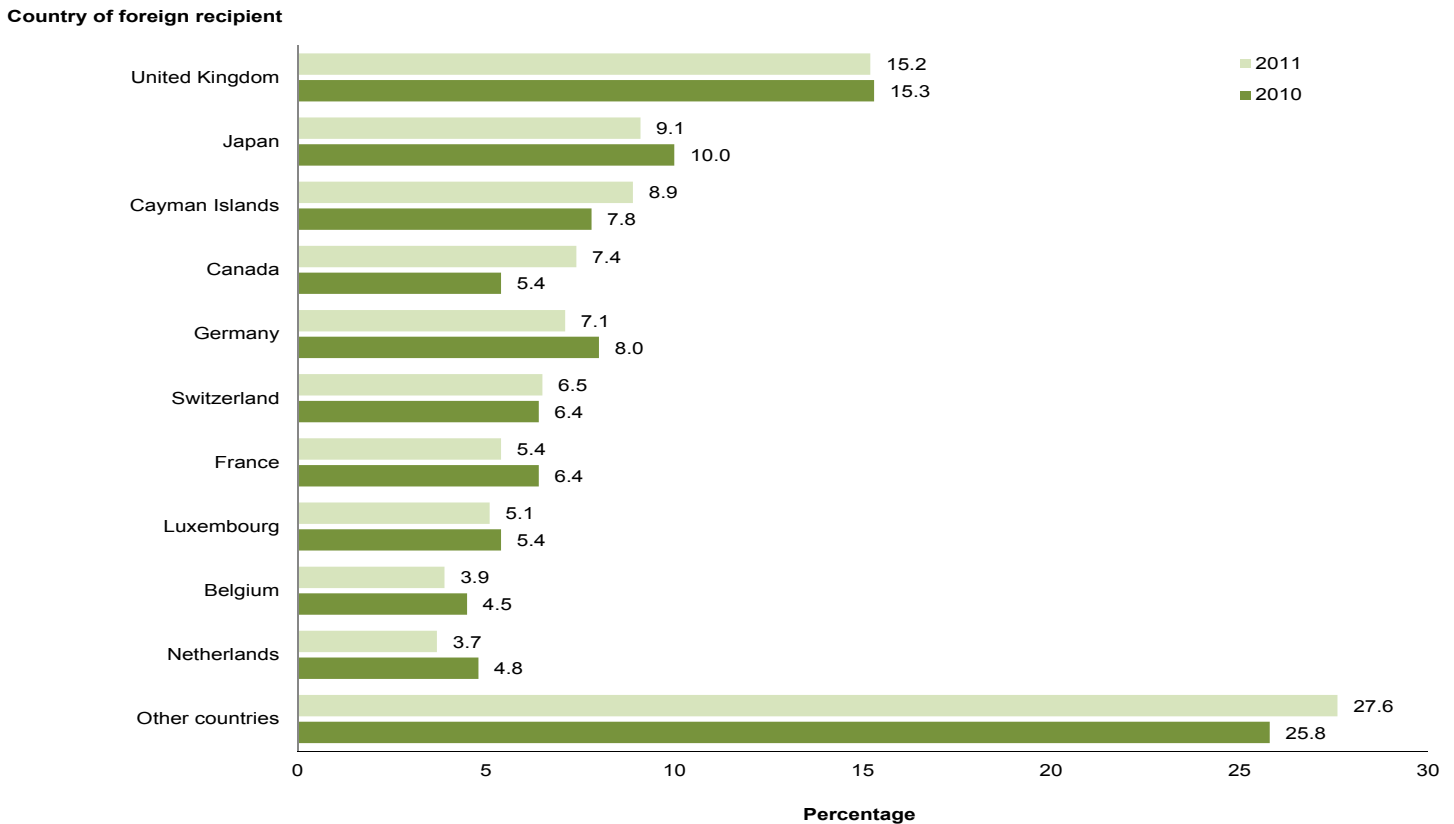
For total taxes withheld, foreign recipients in 11 countries paid at least \$200 million in taxes on U.S.-source income in 2011 (Figure C, Part 2). Combined foreign recipients located in these countries paid \$5.6 billion in withholding taxes or nearly 63 percent of the total. Recipients in the Cayman Islands paid more than \$1.3 billion in withholding taxes (14.7 percent of the total), the most of any country in 2011. Withholding taxes on payments to recipients in the Cayman Islands increased by more than 20 percent from the previous year. Canadian recipients had the largest amount of U.S.-source income subject to tax among all treaty countries paid 9 percent of total withholding taxes.

Additional Foreign Income and Withholding Data

To take a more comprehensive look at withholding tax on foreign persons' U.S. income, it is necessary to combine the data

Figure C, Part 1

Percentage of Total U.S.-Source Income Paid to Foreign Persons as Reported on Form 1042-S, by Country of Foreign Recipient, 2010 and 2011

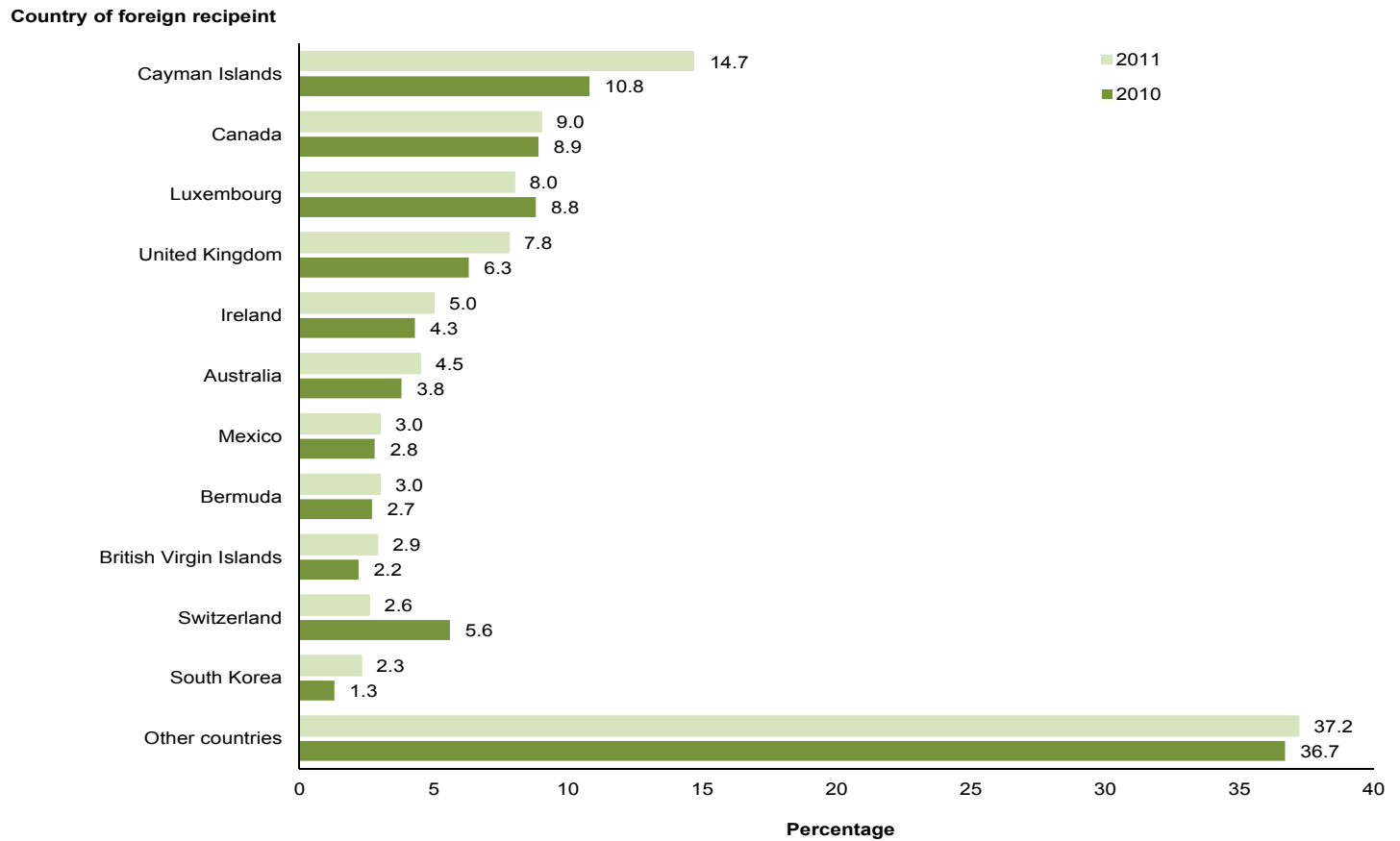


NOTE: Form 1042-S, *Foreign Persons' U.S.-Source Income Subject to Withholding*, is an information return filled by the payer to report U.S. income payments to nonresident aliens.

SOURCE: IRS, Statistics of Income Division, Foreign Recipients of U.S. Income, September 2013.

Figure C, Part 2

Percentage of Total Taxes Withheld on U.S.-Source Income as Reported on Form 1042-S, by Country of Foreign Recipient, 2010 and 2011



NOTE: Form 1042-S, *Foreign Persons' U.S.-Source Income Subject to Withholding*, is an information return filed by the payer to report U.S. income payments to nonresident aliens.
 SOURCE: IRS, Statistics of Income Division, Foreign Recipients of U.S. Income, September 2013.

from Form 1042-S with information from additional tax forms. U.S. partnership income that is allocable to foreign partners is reported on Form 8805, *Foreign Partner's Information Statement of Section 1446 Withholding Tax*. Domestic partnerships are required to withhold income tax on effectively connected taxable income deemed allocable to foreign partners. A U.S. partnership files Form 8805 to show the amount of taxable income and total tax allocable to the foreign partner for the partnership's tax year. The statutory withholding rate for partnership income allocable to foreign partners is 35 percent. Reduced withholding rates may apply if the foreign partner is an individual and the specific type of income is among those subject to preferential rates. These types of income include capital gains, depreciation recapture, and collectibles gains.

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

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

A withholding tax equivalent on foreign person's U.S. income in the form of a branch profits tax is reported on Form 1120-F, *U.S. Income Tax Return of a Foreign Corporation*. The branch profits tax was created to achieve neutrality for foreign investments in the United States through a U.S. branch or a U.S. subsidiary of a foreign parent corporation. While dividends paid by a U.S. subsidiary to its foreign parent corporation are subject to a 30-percent (or lower) withholding tax, profits of a U.S. branch of a foreign parent would not be subject to an equivalent tax absent the branch profits tax. The amount of income

Figure D

U.S.-Source Income Payments to Foreign Persons: Number of Forms, Income, Tax Withheld, and Effective Tax Rate, by IRS Form Type and Selected Country, 2011

[Money amounts are in thousands of dollars]

Form and selected country	All payments		Payments subject to withholding tax			
	Total number of forms	Income (less loss)	Number of forms [1]	Income [2]	U.S. tax withheld	Effective tax rate [3]
	(1)	(2)	(3)	(4)	(5)	(6)
All forms	3,827,265	582,050,527	2,161,975	76,286,235	12,955,105	17.0
Form 1042-S: All countries	3,607,461	568,487,347	2,058,586	59,274,041	8,937,086	15.1
United Kingdom	378,910	86,554,617	216,163	4,920,359	697,167	14.2
Japan	138,569	51,597,421	48,406	1,878,047	168,926	9.0
Cayman Islands	92,067	50,586,266	29,905	4,427,439	1,317,001	29.7
Canada	532,646	42,348,099	299,923	7,638,630	802,641	10.5
Germany	289,506	40,245,060	143,074	1,097,624	159,242	14.5
Switzerland	53,081	37,225,518	29,731	3,136,934	236,141	7.5
France	67,040	30,657,272	40,469	945,935	117,618	12.4
Luxembourg	11,195	29,161,355	4,306	6,218,414	714,789	11.5
Belgium	28,696	22,278,915	19,919	442,692	73,137	16.5
Netherlands	58,217	20,819,662	29,029	1,905,046	164,050	8.6
Ireland	52,847	15,200,008	31,802	2,759,047	450,575	16.3
Australia	187,698	12,030,737	143,511	3,214,458	400,377	12.5
Bermuda	18,056	9,074,427	7,614	911,839	270,243	29.6
China	126,139	7,344,140	42,450	281,153	63,369	22.5
Sweden	24,884	6,641,756	18,884	746,779	100,418	13.4
Mexico	166,068	6,316,946	124,299	2,088,876	267,052	12.8
Norway	10,407	6,087,637	7,178	268,482	20,832	7.8
Form 8805: All countries [4]	209,640	5,797,141	93,744	11,211,770	3,540,840	31.6
Sweden	288	1,423,738	183	1,430,791	500,729	35.0
Germany	148,354	856,058	52,669	1,486,646	392,612	26.4
Jersey	201	681,107	123	694,257	242,496	34.9
Netherlands	1,757	568,568	901	1,039,437	322,653	31.0
Australia	1,130	410,648	644	331,365	103,993	31.4
France	1,269	311,756	888	321,216	111,316	34.7
United Kingdom	7,067	303,604	4,480	791,691	262,155	33.1
Form 8288-A: All countries	8,425	4,196,317	8,425	4,196,317	351,324	8.4
United Kingdom	919	258,216	919	258,216	18,762	7.3
Canada	2,347	1,067,780	2,347	1,067,780	71,278	6.7
Germany	1,150	279,527	1,150	279,527	27,032	9.7
Netherlands	67	274,346	67	274,346	27,403	10.0
Form 1120-F: Reporting branch profits tax	1,739	3,569,722	1,220	1,604,107	125,855	7.8

[1] Number of forms in this column includes returns with income subject to taxation for Form 1042-S; positive income (excluding losses) for Form 8805; sales revenue for Form 8288-A; and branch profits tax for Form 1120-F.

[2] Amounts in this column represent income subject to taxation for Form 1042-S; positive income (excluding losses) for Form 8805; sales price for Form 8288-A; and dividend equivalent amount subject to taxation for Form 1120-F.

[3] U.S. tax withheld (column 5) divided by income (column 4).

[4] Income (less loss) for all payments (column 2) is less than income on payments subject to tax (column 4) because column 2 includes forms with losses.

NOTE: Form 1042-S, *Foreign Person's U.S.-Source Income Subject to Withholding*; Form 8805, *Foreign Partner's Information Statement of Section 1446 Withholding Tax*; Form 8288-A, *Statement of Withholding on Dispositions by Foreign Persons of U.S. Real Property Interests*; and Form 1120-F, *U.S. Income Tax Return of a Foreign Corporation*.

SOURCE: IRS, Statistics of Income Division, Foreign Recipients of U.S. Income, September 2013.

remitted from the U.S. branch to its foreign owner, known as the dividend equivalent amount, is reported on Form 1120-F, along with the associated tax on that amount (i.e., branch profits tax).

The combined withholding tax on U.S.-source income paid to foreign persons for 2011 was nearly \$13.0 billion, with an average effective tax rate of 17.0 percent (Figure D). The effective withholding rates vary widely among the various tax forms. U.S. partnership income allocable to foreign partners is subject to significantly higher rates of withholding than other types of U.S. income because it is not typically reduced by tax treaties and is far more likely to be taxed near the statutory 35-percent

tax rate. For 2011, the average effective withholding rate on U.S. partnership distributions to foreign partners was 31.6 percent. The 8.4-percent withholding rate on income from the sale of U.S. real property interests is comparatively low because the statutory rate for this type of income is just 10 percent. The average effective rate on foreign branch profits reported on Form 1120-F was less than one third of the 30-percent statutory rate because recipients frequently qualify for reduced rates through tax treaties.

The five States with the most U.S. real property interest sales in 2011 made up 72.2 percent of all transactions, 57.7 percent

of the total sales revenue, and 61.9 percent of taxes withheld (Figure E). The largest number of real property sales occurred in Florida. In fact, Florida had nearly five times more transactions than Hawaii, which had the second most transactions in 2011. Many real property sales could not be assigned to a specific State for reasons including: the real property transaction involved the transfer of stock in a portfolio of real estate holdings not specific to a geographic area, or the transaction involved the sale of an ownership interest in an entity which controlled real estate in multiple locations in the United States.

Data Sources and Limitations

Payers (or their authorized withholding agents) of most U.S.-source income to foreign persons must withhold tax in accordance with Internal Revenue Code section 1441. Form 1042-S, *Foreign Persons' U.S.-Source Income Subject to Withholding*, is filed by the payer to report this income and the U.S. tax withheld. Often a financial institution acts as the payer's withholding agent. The statistics in this data release were tabulated by calendar year, using all Forms 1042-S filed with the Internal Revenue Service during 2011. The data reflect the income that was paid and U.S. tax that was withheld for 2011.

Domestic partnerships (or their authorized withholding agents) must withhold tax in accordance with Internal Revenue Code section 1446 on distributions made to foreign partners. Form 8805, *Foreign Partner's Information Statement of Section 1446 Withholding Tax*, is filed by the payer to report income paid by U.S. partnerships to their foreign partners and the U.S. tax withheld. The statistics in this data release were tabulated by calendar year, using all Forms 8805 filed with the Internal Revenue Service during 2011. The data reflect the income that was paid and U.S. tax that was withheld for 2011.

Purchasers of U.S. real property held by foreign persons must withhold tax in accordance with Internal Revenue Code section 1445. Form 8288-A, *Statement of Withholding on Dispositions*

by *Foreign Persons of U.S. Real Property Interests*, is filed by the buyer of U.S. real property sold by foreign persons. The statistics in this data release were tabulated by calendar year using all Forms 8288-A filed with the Internal Revenue Service with a date of transfer occurring during 2011.

In accordance with Section 884(a), the Internal Revenue Code imposes a 30-percent-branch-profits tax on after-tax earnings of a foreign corporation's U.S. trade or business that are not reinvested in a U.S. trade or business by the close of the tax year or are disinvested in a later tax year. Form 1120-F, *U.S. Income Tax Return of a Foreign Corporation*, is filed by the foreign corporation. The statistics in this data release were tabulated based upon all Forms 1120-F included in the Tax Year 2011 SOI Corporate sample.

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

Explanation of Selected Terms

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

Notional principal contract income—Notional principal contracts involve two parties who agree contractually to pay each other amounts at specified times based on the underlying

Figure E
U.S. Real Property Sold by Foreign Persons: Number of Forms 8288-A Filed, Total Sales Revenue, and Tax Withheld, by Selected State, 2011

[Money amounts are in thousands of dollars]

State location of real property	Total number of forms	Total sales revenue	U.S. tax withheld
	(1)	(2)	(3)
Total	8,425	4,196,317	351,324
Florida	3,655	905,429	73,170
Hawaii	749	244,587	23,923
New York	724	779,632	78,630
California	573	376,159	30,543
Texas	384	116,084	11,152
All others	2,340	1,774,425	133,907

NOTE: Form 8288-A: *Statement of Withholding on Dispositions by Foreign Persons of U.S. Real Property Interests*, is filed by the buyer of U.S. real property sold by foreign persons. The buyer must withhold tax in accordance with Internal Revenue Code section 1445.

SOURCE: IRS, Statistics of Income Division, Foreign Recipients of U.S. Income, September 2013.

contract. The notional amount is an amount specified in the contract and, based on that amount, certain calculations are made. Generally, when amounts under the contract are due at the same time, they are netted and only one payment is made. Notional principal contract income is not subject to withholding but must be reported on Form 1042-S, if the income was effectively connected with the conduct of a trade or business in the United States.

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

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

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

Table 1. Forms 1042-S: Number, Total U.S.-Source Income, and U.S. Tax Withheld, by Tax Treaty Countries and Total Non-Tax Treaty Countries, 2011

[Money amounts are in thousands of dollars]

Treaty status and country	Number of Forms 1042-S	U.S.-source income			U.S. tax withheld
		Total	Exempt from withholding	Subject to withholding	
	(1)	(2)	(3)	(4)	(5)
Total	3,607,461	568,487,347	509,213,305	59,274,041	8,937,086
Tax treaty countries, total	2,663,461	444,754,465	399,071,211	45,683,254	5,416,826
Armenia	577	12,706	11,753	952	188
Australia [1]	188,129	12,033,064	8,817,997	3,215,068	400,549
Austria	19,479	988,522	732,047	256,475	42,589
Azerbaijan	374	1,556	840	716	124
Bangladesh	2,259	15,515	13,567	1,948	302
Barbados	2,907	334,698	278,603	56,095	10,781
Belarus	1,372	4,578	3,492	1,086	248
Belgium	28,696	22,278,915	21,836,222	442,692	73,137
Bulgaria	2,608	16,176	9,951	6,224	922
Canada	532,646	42,348,099	34,709,470	7,638,630	802,641
China	126,139	7,344,139	7,062,986	281,153	63,369
Cyprus	2,022	317,525	152,721	164,804	17,737
Czech Republic	8,784	168,978	150,038	18,940	3,524
Denmark	15,286	2,986,828	2,717,191	269,637	43,123
Egypt	5,565	67,218	46,297	20,921	3,433
Estonia	2,739	153,034	148,266	4,769	1,003
Finland	7,081	4,045,278	3,972,702	72,576	10,085
France [2]	67,242	30,658,304	29,711,966	946,338	117,719
Georgia	754	8,919	7,052	1,867	422
Germany	289,506	40,245,060	39,147,436	1,097,624	159,242
Greece	17,027	105,944	54,367	51,577	13,331
Hungary	5,525	2,369,029	1,343,192	1,025,837	54,436
Iceland	1,738	39,007	20,230	18,777	3,957
India	52,500	3,312,389	2,616,875	695,515	109,313
Indonesia	8,842	25,271	15,372	9,899	1,978
Ireland	52,847	15,200,008	12,440,961	2,759,047	450,575
Israel	39,184	3,158,334	2,287,876	870,458	146,696
Italy	59,841	2,146,889	1,259,365	887,523	72,212
Jamaica	4,374	134,840	122,443	12,397	2,688
Japan	138,569	51,597,421	49,719,374	1,878,047	168,926
Kazakhstan	1,136	28,132	14,121	14,011	1,072
Korea, Republic of (South)	31,215	3,344,437	1,984,072	1,360,365	201,939
Kyrgyzstan	298	1,727	1,042	685	95
Latvia	2,650	24,411	19,901	4,510	939
Lithuania	2,579	16,247	12,591	3,656	761
Luxembourg	11,195	29,161,355	22,942,940	6,218,414	714,789
Mexico	166,068	6,316,946	4,228,070	2,088,876	267,052
Moldova	574	3,180	2,347	833	156
Morocco	1,032	7,024	5,798	1,225	282
Netherlands	58,217	20,819,662	18,914,615	1,905,046	164,050
New Zealand	22,203	426,630	280,746	145,885	21,839
Norway	10,407	6,087,637	5,819,155	268,482	20,832
Pakistan	4,078	21,395	8,557	12,838	2,154
Philippines	19,985	838,160	713,791	124,369	33,967

Footnotes at end of table.

Table 1. Forms 1042-S: Number, Total U.S.-Source Income, and U.S. Tax Withheld, by Tax Treaty Countries and Total Non-Tax Treaty Countries, 2011—Continued

[Money amounts are in thousands of dollars]

Treaty status and country	Number of Forms 1042-S	U.S.-source income			U.S. tax withheld
		Total	Exempt from withholding	Subject to withholding	
	(1)	(2)	(3)	(4)	(5)
Poland	17,940	189,844	113,103	76,741	15,725
Portugal	10,338	126,377	65,580	60,798	10,927
Romania	4,370	19,778	11,146	8,632	1,498
Russia	19,344	655,882	331,541	324,341	21,570
Slovak Republic	2,380	23,553	16,496	7,057	1,827
Slovenia	5,181	16,798	4,090	12,708	3,203
South Africa	10,406	237,455	172,003	65,452	12,867
Spain	41,378	2,630,257	1,811,121	819,137	81,527
Sri Lanka	763	2,548	615	1,933	324
Sweden	24,884	6,641,756	5,894,977	746,779	100,418
Switzerland	53,081	37,225,518	34,088,584	3,136,934	236,141
Tajikistan	293	1,934	1,114	820	101
Thailand	11,290	110,305	72,341	37,964	6,336
Trinidad and Tobago	5,527	212,712	197,371	15,341	4,373
Tunisia	452	24,483	23,819	663	144
Turkey	7,767	67,261	30,003	37,259	5,345
Turkmenistan	108	652	351	301	41
Ukraine	6,061	30,900	21,950	8,950	1,686
United Kingdom	378,910	86,554,617	81,634,258	4,920,359	697,167
Uzbekistan	372	2,309	1,361	947	179
Venezuela	46,367	764,338	220,989	543,350	10,252
Non-tax treaty countries, total [3]	944,000	123,732,881	110,142,094	13,590,787	3,520,259

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

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

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

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

SOURCE: IRS, Statistics of Income Division, September 2013.

Table 2. Forms 1042-S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Types of Income, Selected Recipient Types, and Selected Countries of Recipients, 2011

[Money amounts are in thousands of dollars]

Selected country and selected recipient type	Number of Forms 1042-S	U.S. tax withheld	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and railroad retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Total	3,607,461	8,937,086	568,487,347	279,435,018	109,632,445	37,886,673	1,843,933	5,570,149	76,904,615
RECIPIENT TYPES									
Individuals	2,896,807	915,598	12,178,506	2,801,949	2,067,772	982,668	1,719,826	1,552,663	34,134
Corporations	439,613	5,903,765	412,425,172	190,453,985	62,368,595	35,818,287	124,106	3,796,436	75,911,359
Partnerships and trusts	167,334	543,079	19,431,240	7,228,110	9,356,546	507,954	0	90,943	218,658
U.S. branch treated as U.S. persons	727	566	2,146,955	1,221,897	101,578	1,875	0	0	695,433
Governments and international organizations	12,197	23,365	38,454,145	24,851,353	10,613,009	112,545	0	49,819	0
Tax-exempt organizations [1]	12,197	31,720	2,283,292	923,097	885,949	138,377	0	36,788	0
Private foundations	1,448	4,728	193,384	55,018	104,750	8,981	0	1,041	0
Artists and athletes	20,417	136,358	704,172	0	0	0	0	0	0
Qualified intermediary pools	27,422	1,117,072	73,332,019	48,240,053	22,921,236	131,811	0	230	47
Other and unknown	29,299	260,835	7,338,460	3,659,558	1,213,010	184,175	0	42,230	44,984
SELECTED COUNTRIES AND RECIPIENT TYPES									
Argentina	68,962	21,866	388,072	247,977	48,842	6,828	8,731	8,006	0
Individuals	66,107	15,157	261,700	186,079	40,759	1,045	8,731	5,956	0
Corporations	1,656	4,122	94,019	41,875	3,555	5,505	0	1,959	0
Qualified intermediary pools	25	0	10,118	9,885	213	0	0	20	0
Australia	187,698	400,377	12,030,737	4,039,694	4,128,643	540,235	27,463	35,132	2,394,943
Individuals	119,198	24,802	188,258	18,929	51,260	22,542	27,463	16,194	0
Corporations	24,261	268,618	9,371,509	2,931,820	3,051,911	437,281	0	17,135	2,394,943
Qualified intermediary pools	32	9	7,020	2,501	4,327	104	0	0	0
Austria	19,479	42,589	988,522	534,087	213,321	74,191	9,001	12,028	16,038
Individuals	14,777	4,881	47,435	2,881	8,862	5,777	9,001	1,785	0
Corporations	1,641	14,722	467,751	191,186	97,203	58,829	0	10,189	16,038
Qualified intermediary pools	1,427	20,565	403,913	310,047	92,947	198	0	0	0
Bahamas	14,889	58,380	1,046,810	659,656	229,512	4,375	779	1,619	0
Individuals	3,250	2,438	37,406	21,987	9,991	43	779	374	0
Corporations	10,668	42,480	780,465	511,373	131,432	4,111	0	1,234	0
Qualified intermediary pools	275	8,528	156,927	72,974	70,649	5	0	0	0
Barbados	2,907	10,781	334,698	269,739	35,638	10,199	1,340	719	241
Individuals	1,121	809	4,570	795	797	116	1,340	175	0
Corporations	1,575	8,596	290,449	235,021	29,595	10,077	0	540	241
Qualified intermediary pools	16	618	12,752	10,596	2,036	1	0	0	0
Belgium	28,696	73,137	22,278,915	18,028,897	2,704,518	254,665	7,024	38,796	64,594
Individuals	25,161	9,065	68,637	4,982	20,873	3,661	7,024	16,291	0
Corporations	1,894	11,000	6,076,596	4,641,361	704,950	250,412	0	18,860	64,594
Qualified intermediary pools	358	51,083	16,017,534	13,333,498	1,966,597	52	0	0	0
Bermuda	18,056	270,243	9,074,427	7,539,854	806,213	23,893	939	7,631	10,573
Individuals	5,301	4,748	171,374	152,144	14,324	413	939	378	0
Corporations	10,762	246,670	8,366,886	6,992,276	677,279	23,270	0	6,683	10,573
Qualified intermediary pools	33	151	34,780	25,362	9,089	32	0	0	0
Brazil	38,872	77,925	578,704	288,773	51,362	51,947	5,520	33,630	174
Individuals	35,835	20,255	144,832	44,583	17,920	2,099	5,520	18,534	0
Corporations	1,531	48,976	387,255	228,705	32,168	30,249	0	14,850	174
Qualified intermediary pools	13	1	100	92	7	0	0	0	0

Footnotes at end of table.

Table 2. Forms 1042-S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Types of Income, Selected Recipient Types, and Selected Countries of Recipients, 2011—Continued

[Money amounts are in thousands of dollars]

Selected country and selected recipient type	Number of Forms 1042-S	U.S. tax withheld	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and railroad retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
British Virgin Islands	64,344	257,586	3,775,693	2,479,937	830,631	15,352	332	1,158	0
Individuals	2,012	2,189	27,775	19,268	6,610	103	332	71	0
Corporations	61,163	245,265	3,620,649	2,383,559	793,263	11,565	0	959	0
Qualified intermediary pools	d	d	d	d	d	d	d	d	d
Burma	456	19,105	228,336	137,583	69,190	32	0	27	0
Individuals	302	184	1,836	1	162	28	0	13	0
Corporations	128	18,781	225,630	137,416	68,588	3	0	14	0
Qualified intermediary pools	0	0	0	0	0	0	0	0	0
Canada	532,646	802,641	42,348,099	12,403,716	8,685,154	1,334,307	438,267	830,070	10,193,849
Individuals	460,944	141,533	1,431,393	58,590	178,066	105,994	404,767	150,114	0
Corporations	34,521	394,157	31,716,152	8,401,649	4,932,692	1,046,877	33,499	645,717	10,193,849
Qualified intermediary pools	3,761	217,203	4,128,733	1,700,622	2,226,933	20,809	0	4	0
Cayman Islands	92,067	1,317,001	50,586,266	43,088,303	4,081,289	45,916	575	3,722	1,528
Individuals	2,179	9,420	263,905	228,505	22,516	192	575	2	0
Corporations	82,834	1,201,933	47,703,159	40,764,917	3,712,284	43,126	0	115	1,528
Qualified intermediary pools	172	2,669	104,117	54,640	43,612	0	0	0	0
Chile	25,770	96,513	779,632	395,337	315,901	3,071	5,263	5,288	10,695
Individuals	18,749	7,825	70,434	35,985	16,254	242	5,263	2,409	0
Corporations	6,640	88,545	409,683	76,090	288,833	2,772	0	896	10,695
Qualified intermediary pools	4	1	13,235	27	10,528	0	0	0	0
China	126,139	63,369	7,344,139	2,619,268	3,320,435	97,620	426	390,241	44
Individuals	123,215	13,557	547,220	15,713	35,835	4,469	426	339,641	0
Corporations	1,369	25,824	1,289,404	423,413	42,653	90,645	0	48,626	44
Qualified intermediary pools	15	0	30,880	30,449	379	0	0	0	0
Colombia	24,270	41,025	358,652	212,034	93,725	11,127	8,785	6,144	0
Individuals	21,578	8,004	59,772	24,075	6,751	938	8,785	4,125	0
Corporations	2,028	29,313	213,666	116,184	75,059	10,041	0	1,862	0
Qualified intermediary pools	0	0	0	0	0	0	0	0	0
Cyprus	2,022	17,737	317,525	159,803	86,740	30,566	769	1,643	0
Individuals	1,316	704	4,996	447	959	208	769	644	0
Corporations	572	16,750	309,837	158,129	85,257	30,240	0	992	0
Qualified intermediary pools	9	0	449	415	34	1	0	0	0
Czech Republic	8,784	3,524	168,978	115,747	10,476	6,894	1,057	16,035	0
Individuals	7,871	1,383	31,501	753	2,048	676	1,057	15,795	0
Corporations	285	1,344	30,618	12,208	6,942	6,103	0	240	0
Qualified intermediary pools	11	0	896	147	741	0	0	0	0
Denmark	15,286	43,123	2,986,828	1,273,065	865,227	306,556	5,806	241,011	0
Individuals	8,178	3,956	40,242	1,274	2,820	17,814	5,806	3,147	0
Corporations	3,251	31,245	2,054,808	795,196	524,262	285,588	0	237,825	0
Qualified intermediary pools	198	4,180	545,510	321,203	221,488	133	0	0	0
East Timor	198	135	159,642	155,480	3,691	4	0	0	0
Individuals	176	72	601	100	64	2	0	0	0
Corporations	16	63	273	31	211	0	0	0	0
Qualified intermediary pools	d	d	d	d	d	d	d	d	d
Estonia	2,739	1,003	153,034	640	2,652	399	69	146,864	0
Individuals	1,809	413	148,894	46	241	348	69	146,863	0
Corporations	760	386	2,933	477	1,900	45	0	1	0
Qualified intermediary pools	0	0	0	0	0	0	0	0	0

Footnotes at end of table.

Table 2. Forms 1042-S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Types of Income, Selected Recipient Types, and Selected Countries of Recipients, 2011—Continued

[Money amounts are in thousands of dollars]

Selected country and selected recipient type	Number of Forms 1042-S	U.S. tax withheld	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and railroad retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Finland	7,081	10,085	4,045,278	532,250	468,548	171,494	2,918	9,978	2,812,009
Individuals	5,191	1,548	162,216	611	151,537	1,320	2,918	1,154	0
Corporations	1,210	8,201	3,734,056	473,875	238,234	170,115	0	8,799	2,812,009
Qualified intermediary pools	21	0	807	15	790	0	0	0	0
France	67,040	117,618	30,657,272	11,129,880	7,474,299	4,865,868	36,519	109,965	5,757,076
Individuals	54,297	29,605	464,514	169,730	56,989	30,177	35,710	59,127	0
Corporations	7,289	81,228	28,544,368	9,847,773	7,033,072	4,821,691	809	36,236	5,757,076
Qualified intermediary pools	715	585	1,022,095	712,442	304,175	92	0	0	0
Gabon	1,361	536	3,210,300	94,390	1,419	3,542	0	23,900	3,082,168
Individuals	1,046	190	3,408	81	1,082	525	0	321	0
Corporations	200	333	3,200,423	94,226	294	1,170	0	19,210	3,082,168
Qualified intermediary pools	0	0	0	0	0	0	0	0	0
Germany	289,506	159,242	40,245,060	13,702,855	1,957,744	4,078,886	216,277	153,092	16,294,830
Individuals	265,258	35,615	861,478	41,030	145,437	225,931	126,553	63,448	0
Corporations	15,640	95,855	37,365,780	13,095,055	1,515,549	3,679,584	89,724	84,856	16,294,830
Qualified intermediary pools	402	18,297	797,435	391,578	169,357	17,427	0	0	0
Greece	17,027	13,331	105,944	14,870	31,643	6,044	35,855	4,993	0
Individuals	15,961	11,833	65,024	4,822	8,555	1,896	35,855	4,104	0
Corporations	777	1,133	22,651	9,247	8,164	3,114	0	875	0
Qualified intermediary pools	20	0	2,639	555	1,124	4	0	0	0
Guernsey	5,286	51,179	746,297	453,786	227,039	977	0	50	0
Individuals	245	304	1,628	428	994	28	0	40	0
Corporations	3,841	39,893	503,109	301,905	139,878	923	0	0	0
Qualified intermediary pools	135	2,170	126,938	69,147	55,369	22	0	0	0
Hong Kong	46,287	82,734	2,100,033	1,335,214	400,086	10,752	1,658	63,429	12,142
Individuals	41,401	21,259	121,335	35,047	52,743	2,229	1,658	6,865	0
Corporations	2,914	24,722	974,944	616,215	58,241	8,266	0	55,846	12,142
Qualified intermediary pools	208	20,815	509,781	337,851	162,527	21	0	0	0
Hungary	5,525	54,436	2,369,029	1,021,561	1,026,455	117,684	1,301	91,765	0
Individuals	4,716	1,147	20,228	420	966	1,368	1,301	3,800	0
Corporations	540	53,054	2,328,254	1,009,205	1,018,418	115,370	0	87,877	0
Qualified intermediary pools	7	50	335	2	333	0	0	0	0
India	52,500	109,313	3,312,389	194,638	452,193	98,420	3,224	1,727,234	14,169
Individuals	47,867	13,808	233,753	29,706	9,974	4,862	3,224	99,432	0
Corporations	1,201	94,020	3,016,932	136,048	441,501	86,864	0	1,612,499	14,169
Qualified intermediary pools	8	2	49	0	37	12	0	0	0
Ireland	52,847	450,575	15,200,008	9,887,231	2,842,099	1,478,388	24,925	45,561	51,953
Individuals	40,291	6,141	126,011	16,547	24,928	26,529	24,925	8,086	0
Corporations	8,189	420,324	14,647,375	9,632,198	2,654,857	1,447,637	0	32,568	51,953
Qualified intermediary pools	128	2	124,134	58,741	62,287	49	0	0	0
Israel	39,184	146,696	3,158,334	1,317,668	316,769	511,907	11,358	36,505	5,577
Individuals	35,524	17,333	161,195	28,994	31,886	29,384	11,358	23,609	0
Corporations	2,093	93,074	2,503,005	1,043,191	53,032	476,304	0	11,270	5,577
Qualified intermediary pools	193	30,593	382,695	178,184	200,494	36	0	0	0

Footnotes at end of table.

Table 2. Forms 1042-S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Types of Income, Selected Recipient Types, and Selected Countries of Recipients, 2011—Continued

[Money amounts are in thousands of dollars]

Selected country and selected recipient type	Number of Forms 1042-S	U.S. tax withheld	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and railroad retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Italy	59,841	72,212	2,146,889	832,056	768,500	203,429	102,055	52,223	9,928
Individuals	54,211	9,625	221,198	17,350	20,091	10,427	102,055	27,501	0
Corporations	2,174	50,885	966,861	181,119	480,850	184,377	0	23,754	9,928
Qualified intermediary pools	1,036	3,744	760,515	535,292	220,854	153	0	0	0
Jamaica	4,374	2,688	134,840	118,896	2,011	1,325	5,115	1,842	0
Individuals	3,770	2,444	15,908	1,859	1,045	1,041	5,115	1,836	0
Corporations	306	145	117,916	116,558	806	220	0	4	0
Qualified intermediary pools	3	3	34	3	4	28	0	0	0
Japan	138,569	168,926	51,597,421	22,891,317	10,557,632	7,355,606	191,725	129,637	5,558,054
Individuals	124,346	13,267	602,587	81,244	44,158	41,742	191,677	37,138	0
Corporations	8,260	138,898	32,724,223	10,977,984	4,837,129	7,282,570	47	92,103	5,558,054
Qualified intermediary pools	664	12,443	12,291,578	6,583,360	5,631,368	13	0	0	0
Jersey	4,515	80,152	842,261	508,177	211,391	33,515	0	2,314	0
Individuals	325	1,577	8,129	2,023	5,524	71	0	47	0
Corporations	2,747	68,266	623,307	418,025	124,893	597	0	2,225	0
Qualified intermediary pools	199	311	78,167	39,386	36,066	9	0	0	0
Korea, North	303	289	120,330	42,500	411	23	0	111	0
Individuals	229	115	591	3	56	23	0	111	0
Corporations	57	125	2,322	1,831	354	0	0	0	0
Qualified intermediary pools	0	0	0	0	0	0	0	0	0
Korea, Republic of (South)	31,215	201,939	3,344,437	1,486,645	396,509	1,038,960	7,809	53,601	0
Individuals	27,560	10,376	105,317	1,976	9,574	2,208	7,808	39,330	0
Corporations	1,081	186,284	1,633,739	242,206	153,883	1,034,424	1	14,065	0
Qualified intermediary pools	37	13	7,714	2,615	4,913	0	0	0	0
Kuwait	3,300	4,183	2,236,017	971,427	969,714	173	0	301	0
Individuals	2,048	742	5,363	1,873	2,304	150	0	301	0
Corporations	647	2,372	27,373	11,290	8,440	2	0	0	0
Qualified intermediary pools	0	0	0	0	0	0	0	0	0
Liechtenstein	817	17,376	221,436	24,193	49,267	1,469	41	42	0
Individuals	147	212	2,063	1,140	722	0	41	40	0
Corporations	423	6,044	170,163	17,599	8,083	1,464	0	2	0
Qualified intermediary pools	55	73	7,297	3,081	4,061	1	0	0	0
Luxembourg	11,195	714,789	29,161,355	20,845,074	6,863,061	627,308	520	6,387	0
Individuals	1,621	1,506	69,967	42,854	16,905	3,998	520	256	0
Corporations	8,381	468,524	21,436,347	18,052,144	2,061,559	608,865	0	855	0
Qualified intermediary pools	547	217,153	4,194,212	2,518,601	1,586,634	478	0	0	0
Malaysia	38,349	7,532	142,396	99,761	20,436	956	259	11,723	61
Individuals	37,117	3,288	23,600	7,763	8,218	650	259	793	0
Corporations	350	1,442	27,551	13,315	1,837	260	0	10,184	61
Qualified intermediary pools	4	0	6	0	5	0	0	0	0
Mexico	166,068	267,052	6,316,946	2,273,168	2,127,501	829,905	201,471	67,399	891
Individuals	157,550	94,798	728,127	261,459	108,757	11,730	201,471	36,236	0
Corporations	4,060	156,756	3,703,704	547,375	1,891,722	814,644	0	28,611	891
Qualified intermediary pools	9	1	37	0	0	0	0	36	0
Monaco	1,163	7,666	109,261	65,456	27,865	170	140	8,232	0
Individuals	885	1,306	33,781	26,506	3,383	53	140	356	0
Corporations	100	2,683	12,398	3,721	7,768	91	0	6	0
Qualified intermediary pools	83	678	42,308	31,418	10,342	11	0	0	0

Footnotes at end of table.

Table 2. Forms 1042-S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Types of Income, Selected Recipient Types, and Selected Countries of Recipients, 2011—Continued

[Money amounts are in thousands of dollars]

Selected country and selected recipient type	Number of Forms 1042-S	U.S. tax withheld	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and railroad retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Netherlands	58,217	164,050	20,819,662	10,483,906	6,055,536	1,157,865	17,863	139,892	355,857
Individuals	38,743	17,292	286,236	153,220	41,709	18,581	17,863	19,284	0
Corporations	10,024	133,715	15,263,187	7,731,232	3,646,973	1,122,483	0	119,172	355,857
Qualified intermediary pools	442	1,376	234,208	112,407	118,657	58	0	0	0
Netherlands Antilles	3,500	24,097	698,560	500,634	112,965	11,483	250	81	0
Individuals	1,735	540	5,902	3,497	1,404	54	250	77	0
Corporations	1,443	22,755	639,641	465,419	102,114	11,428	0	0	0
Qualified intermediary pools	28	0	13,226	11,358	1,856	1	0	0	0
New Zealand	22,203	21,839	426,630	182,533	165,261	32,586	1,575	5,270	0
Individuals	14,780	2,652	29,859	2,739	7,813	4,095	1,575	1,095	0
Corporations	2,561	12,064	150,649	44,418	68,954	25,815	0	4,047	0
Qualified intermediary pools	4	1	16	0	2	14	0	0	0
Norway	10,407	20,832	6,087,637	3,292,405	2,500,779	62,927	0	18,003	0
Individuals	7,600	3,768	26,422	2,708	2,796	5,004	0	7,359	0
Corporations	1,312	16,124	1,528,229	1,053,298	240,140	57,554	0	10,529	0
Qualified intermediary pools	4	1	14	1	4	9	0	0	0
Oman	732	1,383	226,535	182,719	41,400	56	7	1	0
Individuals	478	219	1,615	339	313	35	7	1	0
Corporations	54	582	2,898	973	1,919	0	0	0	0
Qualified intermediary pools	0	0	0	0	0	0	0	0	0
Panama	21,028	45,468	669,887	469,281	138,228	4,088	1,974	2,505	0
Individuals	4,213	6,352	37,389	12,798	16,483	284	1,974	1,749	0
Corporations	16,524	37,522	564,158	395,217	118,871	1,535	0	743	0
Qualified intermediary pools	33	376	15,846	14,529	1,294	0	0	0	0
Peru	7,654	18,880	438,418	360,172	64,860	1,700	2,142	1,192	0
Individuals	7,154	2,530	25,220	12,629	2,631	222	2,142	1,096	0
Corporations	336	16,075	166,604	102,119	62,067	1,477	0	13	0
Qualified intermediary pools	d	d	d	d	d	d	d	d	d
Philippines	19,985	33,967	838,160	679,195	18,951	12,076	34,768	3,807	0
Individuals	18,889	14,742	69,772	4,984	6,538	347	34,768	3,089	0
Corporations	254	2,384	25,537	10,899	1,731	11,665	0	692	0
Qualified intermediary pools	d	d	d	d	d	d	d	d	d
Poland	17,940	15,725	189,844	93,384	3,048	28,265	36,497	10,104	0
Individuals	17,296	12,469	61,660	1,188	2,111	5,608	36,497	7,629	0
Corporations	250	2,264	119,233	92,072	623	16,397	0	2,370	0
Qualified intermediary pools	7	5	45	9	35	0	0	0	0
Portugal	10,338	10,927	126,377	49,662	30,060	2,021	22,481	5,480	894
Individuals	9,315	7,506	47,663	10,854	3,375	427	22,481	4,815	0
Corporations	392	1,600	44,909	26,199	6,769	1,535	0	658	894
Qualified intermediary pools	64	46	6,785	2,709	3,847	2	0	0	0
Puerto Rico	5,806	4,949	1,408,254	1,334,041	52,110	805	0	1,798	0
Individuals	981	270	5,161	2,750	180	65	0	33	0
Corporations	3,790	4,442	1,003,225	962,193	28,043	699	0	1,713	0
Qualified intermediary pools	0	0	0	0	0	0	0	0	0
Russia	19,344	21,570	655,882	88,399	302,333	27,662	46	124,101	0
Individuals	17,926	3,615	51,511	3,315	5,778	7,916	46	7,611	0
Corporations	426	16,338	530,332	66,388	294,362	10,737	0	84,111	0
Qualified intermediary pools	6	1	10	0	9	0	0	0	0
Saudi Arabia	6,206	13,622	2,056,566	1,297,613	514,653	454	32	896	0
Individuals	5,320	3,585	18,418	3,954	8,950	284	32	532	0
Corporations	413	8,679	115,194	66,253	14,209	52	0	338	0
Qualified intermediary pools	10	1	17	1	16	0	0	0	0

Footnotes at end of table.

Table 2. Forms 1042-S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Types of Income, Selected Recipient Types, and Selected Countries of Recipients, 2011—Continued

[Money amounts are in thousands of dollars]

Selected country and selected recipient type	Number of Forms 1042-S	U.S. tax withheld	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and railroad retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Singapore	92,017	65,808	4,922,766	3,493,943	959,877	13,222	246	9,139	5,124
Individuals	84,804	17,140	109,292	17,583	50,404	1,856	246	3,101	0
Corporations	3,641	38,293	717,423	475,121	156,836	5,830	0	4,926	5,124
Qualified intermediary pools	153	1,082	223,279	130,734	74,034	110	0	0	0
South Africa	10,406	12,867	237,455	110,212	53,933	9,501	1,301	2,655	0
Individuals	8,899	4,449	37,521	1,561	11,080	1,314	1,301	1,655	0
Corporations	535	4,916	140,112	85,950	33,946	7,903	0	630	0
Qualified intermediary pools	11	8	164	51	103	0	0	0	0
Spain	41,378	81,527	2,630,257	1,003,939	492,454	222,211	28,807	32,222	644,493
Individuals	35,884	14,543	123,085	23,713	34,186	3,418	28,807	8,975	0
Corporations	2,955	56,174	2,114,969	729,658	337,971	217,070	0	18,464	644,493
Qualified intermediary pools	211	2,280	190,771	116,965	72,555	20	0	0	0
Sweden	24,884	100,418	6,641,756	1,688,996	1,413,823	1,065,238	14,376	16,101	187
Individuals	20,717	14,061	171,193	1,846	128,384	4,312	14,376	6,498	0
Corporations	2,037	51,034	5,302,151	1,203,905	824,532	1,057,255	0	9,326	187
Qualified intermediary pools	127	32,448	380,170	117,393	261,604	34	0	50	0
Switzerland	53,081	236,141	37,225,518	15,030,009	4,740,638	6,650,742	18,985	64,886	4,546,348
Individuals	34,653	17,509	306,426	34,133	71,936	102,157	18,983	23,294	0
Corporations	8,896	173,756	32,765,794	12,903,067	3,213,166	6,492,811	2	29,312	4,546,348
Qualified intermediary pools	2,429	34,677	2,392,862	1,197,289	1,124,829	662	0	0	0
Taiwan	71,865	154,157	4,627,454	3,862,326	550,641	33,519	512	81,144	1,095
Individuals	66,470	18,225	198,315	57,936	46,358	4,519	512	65,735	0
Corporations	2,304	115,474	2,868,553	2,454,924	321,223	28,940	0	14,011	1,095
Qualified intermediary pools	19	0	13,412	9,392	3,397	1	0	0	0
Thailand	11,290	6,336	110,305	57,850	20,074	3,305	4,183	6,261	0
Individuals	10,526	3,384	31,334	3,549	6,504	626	4,183	2,996	0
Corporations	416	2,707	54,821	44,208	3,630	2,639	0	3,249	0
Qualified intermediary pools	8	0	23	16	2	4	0	0	0
Trinidad and Tobago	5,527	4,373	212,712	178,640	24,177	347	2,010	840	1,080
Individuals	4,572	1,778	11,630	2,093	2,025	322	2,010	823	0
Corporations	684	2,218	45,528	37,638	5,612	24	0	6	1,080
Qualified intermediary pools	0	0	0	0	0	0	0	0	0
United Arab Emirates	9,241	20,235	1,631,404	719,051	860,056	4,508	45	1,173	0
Individuals	7,653	1,929	16,044	5,995	4,357	1,377	45	457	0
Corporations	694	12,275	117,677	48,195	48,398	2,927	0	703	0
Qualified intermediary pools	9	50	298	55	77	160	0	0	0
United Kingdom	378,910	697,167	86,554,617	31,424,671	17,495,851	3,731,457	124,374	517,352	24,049,704
Individuals	315,421	74,947	1,409,335	257,781	296,578	215,531	124,351	149,397	0
Corporations	27,865	358,178	71,629,035	23,232,903	13,591,752	3,251,305	23	328,766	24,049,663
Qualified intermediary pools	1,218	92,949	6,362,903	4,926,088	1,062,978	87,474	0	60	41
Uruguay	12,958	6,115	194,931	161,737	20,951	1,408	1,030	957	0
Individuals	9,918	3,031	46,969	32,953	6,152	1,298	1,030	581	0
Corporations	2,909	2,967	92,616	75,063	13,836	90	0	322	0
Qualified intermediary pools	25	0	11,739	10,920	773	0	0	0	0
Venezuela	46,367	10,252	764,338	205,291	532,043	4,015	1,002	5,308	797
Individuals	43,649	6,586	199,686	158,231	22,347	2,118	1,002	5,211	0
Corporations	2,088	3,466	553,575	40,252	509,241	1,753	0	26	797
Qualified intermediary pools	15	18	407	333	14	0	0	60	0

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

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

NOTES: Detail may not add to totals because of rounding. Form 1042-S is entitled *Foreign Person's U.S. Source Income Subject to Withholding*. All countries with total U.S.-source income over \$100 million for Tax Year 2011 were selected for this table.

SOURCE: IRS, Statistics of Income Division, Foreign Recipients of U.S. Income, September 2013.