

Foreign Recipients of U.S. Income, Calendar Year 2015

by Scott Luttrell

U.S.-source income payments to foreign persons, as reported on Form 1042-S, *Foreign Person's U.S.-Source Income Subject to Withholding*, rose to \$824.3 billion for Calendar Year 2015. This represents an increase of 13.2 percent from 2014. U.S.-source income payments subject to withholding tax rose by 24.2 percent from 2014, which fueled an increase in withholding taxes of 13.1 percent. Despite these increases, 85.7 percent of all U.S.-source income paid to foreign persons remained exempt from withholding tax. The residual U.S.-Source income subject to tax was withheld at an average rate of 15.6 percent.

Entities such as financial institutions, businesses, and academic institutions that report U.S. payments to nonresident aliens are considered withholding agents. The Internal Revenue Code (IRC) requires withholding agents to withhold tax from U.S.-source fixed, determinable, annual, or periodic (FDAP) income paid to foreign persons. This is commonly referred to as Chapter 3 withholding or nonresident alien (NRA) withholding. The withholding agent is required to report aggregate U.S.-source FDAP payments made and any associated tax withheld in a calendar year on Form 1042, *Annual Withholding Tax Return for U.S.-Source Income of Foreign Persons*. Furthermore, payments to foreign recipients are reported to the IRS on Form 1042-S; a copy is provided to the payee. Form 1042-S is used to report many types of income, including, but not limited to, interest, rents, royalties, corporate distributions, pension income, and gambling winnings.

Data Overview for 2015

In 2015, the majority of U.S.-source income paid to foreign persons (69.1 percent) went to only 12 countries (Figure A, Part 1). Foreign persons from the United Kingdom received \$108.6 billion (13.2 percent of the total) in U.S.-source income payments, a decrease of 24.7 percent from 2014. Recipients from the United Kingdom received \$40.7 billion more than any other country. United Kingdom corporations received 24.8 percent of all payments to corporate recipients. Recipients from the Cayman Islands received \$71.2 billion (8.6 percent), an increase of 36.8 percent from 2014. Japanese recipients of U.S.-source income collected \$67.9 billion (8.2 percent) and Canadian recipients collected \$49.3 billion (6.0 percent). Meanwhile, Luxembourg (\$47.1 billion) and China (\$46.7 billion) each accounted for approximately 5.7 percent of U.S.-source income in 2015.

Foreign recipients located in the 12 countries displayed in Figure A, Part 2, combined, paid \$9.7 billion in withholding

taxes, or 65.1 percent of the total, in 2015. Recipients in the Cayman Islands paid \$2.6 billion in withholding taxes (14.0 percent of the total), the most of any country, which was an increase of 12.3 percent from 2014. Recipients from Luxembourg paid nearly \$2.1 billion in withholding taxes (11.2 percent), a jump of 20.5 percent from the previous year.

Treaty vs. nontreaty countries

Tax treaties are one of the primary reasons behind relatively low withholding tax rates on payments of U.S.-source income to foreign persons. Some 66 countries had treaties in force with the United States (Table 1) in 2015. Nearly 75.2 percent of all payments reported on Form 1042-S went to recipients in treaty countries during 2015. Foreign recipients from tax treaty countries received 70.2 percent of total U.S. income paid to foreign persons and paid 61.4 percent of all withholding taxes. Canadian recipients had the largest amount of U.S.-source income subject to tax among all treaty countries and paid 8.7 percent of total withholding taxes. Recipients from the United Kingdom paid \$1.2 billion in withholding taxes in 2015 (6.5 percent). Recipients of U.S. income payments subject to withholding from treaty countries had taxes withheld at an average rate of

Highlights

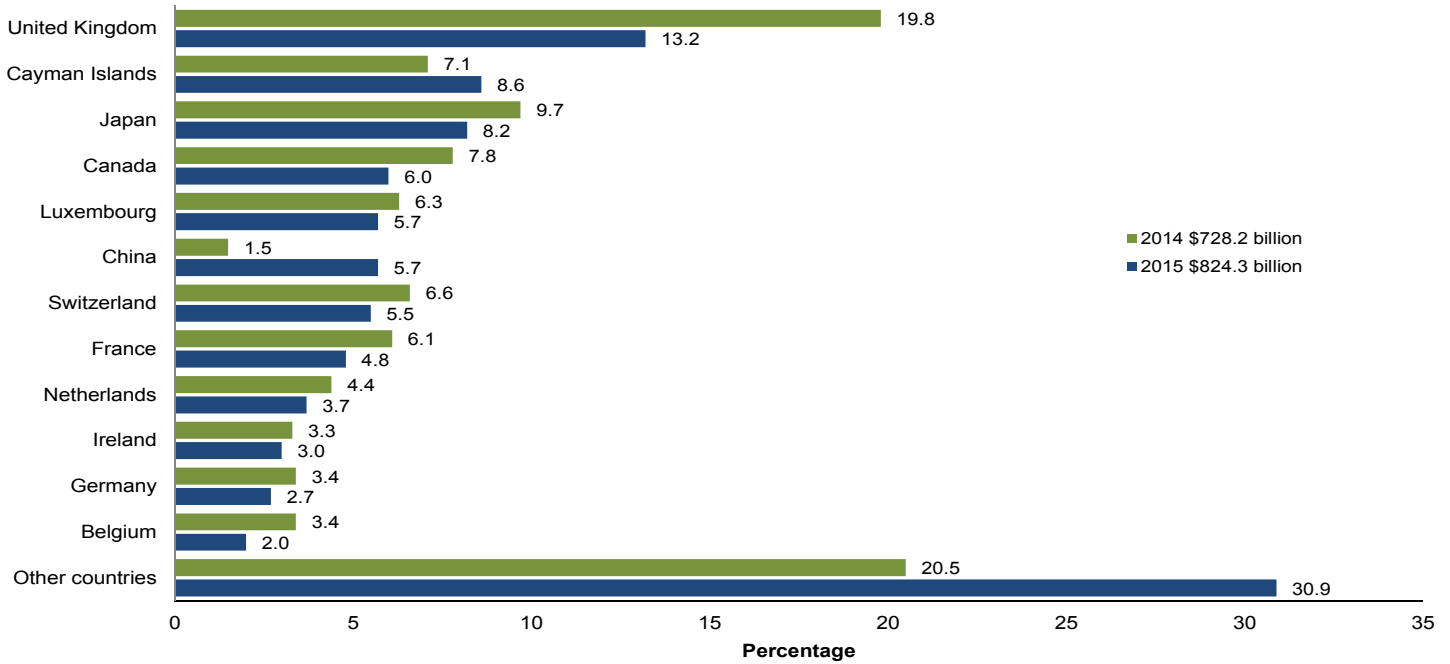
- U.S.-source income paid to foreign persons, as reported on Form 1042-S, was \$824.3 billion for 2015.
- Nearly 86 percent of U.S. income paid to foreign persons was exempt from withholding tax.
- Taxes totaling \$18.4 billion were withheld on U.S. income paid to foreign persons in 2015, for an average effective withholding rate of 15.6 percent.
- Interest payments (49.6 percent) and dividends (24.9 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 (\$108.6 billion; 13.2 percent of the total).
- Foreign persons in the Cayman Islands paid more than \$2.6 billion in withholding taxes (14.0 percent of the total), the most of any country.
- Foreign partners received \$13.5 billion in income from U.S. partnerships from which \$4.6 billion in U.S. taxes were withheld.
- Sales of U.S. real property interests by foreign persons totaled \$10.5 billion; U.S. taxes withheld on that income totaled \$922 million.



Figure A1

Percentage of Total U.S.-Source Income Paid to Foreign Persons Under Chapter 3, as Reported on Form 1042-S, by Country of Foreign Recipient, Calendar Years 2014 and 2015

Country of foreign recipient

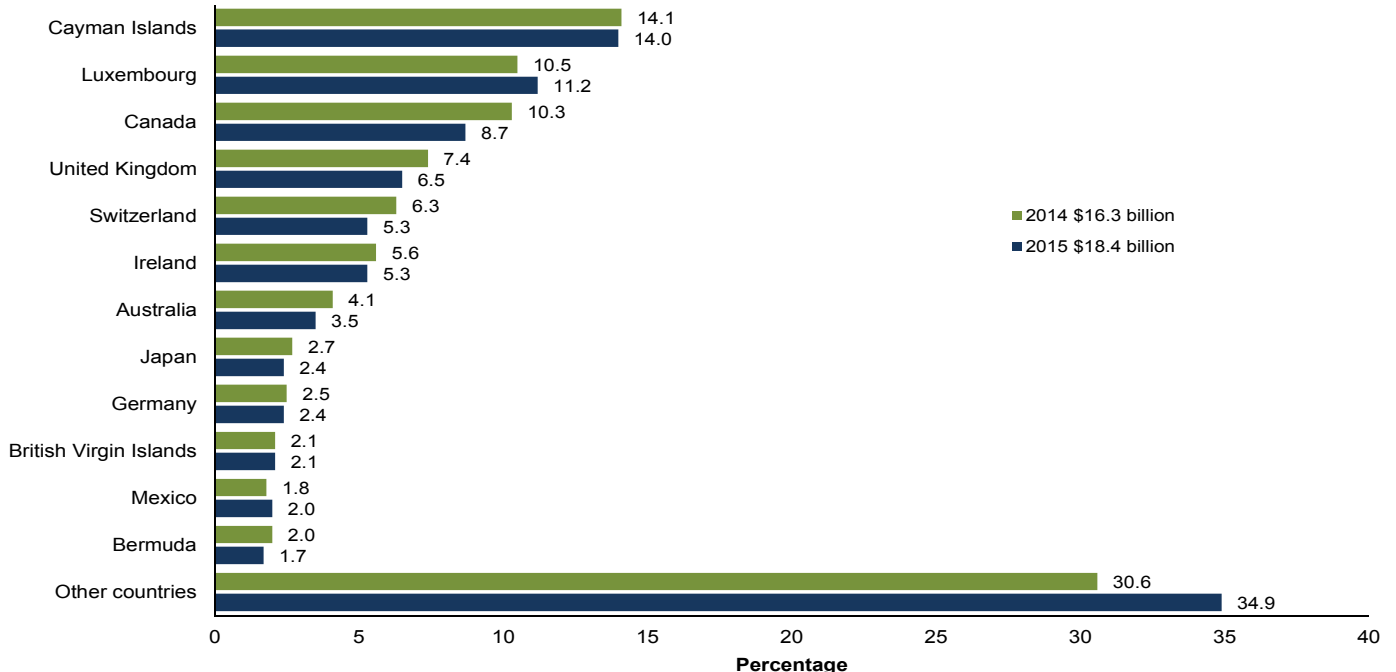


NOTE: Form 1042-S, *Foreign Person's U.S.-Source Income Subject to Withholding*.
 SOURCE: IRS, Statistics of Income Division, Individuals, Withholding on Foreign Recipients of U.S. Income, October 2017.

Figure A2

Percentage of Total Taxes Withheld on U.S.-Source Income Paid to Foreign Persons Under Chapter 3, as Reported on Form 1042-S, by Country of Foreign Recipient, Calendar Years 2014 and 2015

Country of foreign recipient



NOTE: Form 1042-S, *Foreign Person's U.S.-Source Income Subject to Withholding*.
 SOURCE: IRS, Statistics of Income Division, Individuals, Withholding on Foreign Recipients of U.S. Income, October 2017.

15.1 percent, compared to 15.6 percent on payments made to residents of nontreaty countries.

Residents in 14 nontreaty jurisdictions received more than \$1 billion of U.S.-source income in 2015: the Bahamas, Bermuda, Brazil, the British Virgin Islands, the Cayman Islands, Chile, Guernsey, Hong Kong, Jersey, Kuwait, Saudi Arabia, Singapore, Taiwan, and the United Arab Emirates. Nontreaty countries combined to account for \$245.8 billion of total U.S.-source income and \$7.1 billion of total tax withheld.

Types of U.S.-source income

The primary types of U.S.-source income paid to foreign recipients as reported on Form 1042-S in 2015 remained consistent with previous years (Figure B). Interest payments totaled \$408.7 billion, which was an increase of 36.4 percent from 2014, and accounted for 49.6 percent of total gross income, an increase of 8.4 percentage points from the previous year. Dividends paid to foreign persons rose by 2.6 percent to \$205.2 billion, and they accounted for 24.9 percent of total gross income. Payments of rents and royalties to foreign persons totaled \$50.7 billion or 6.2 percent of total gross income. Notional principal contract income fell by 29.7 percent to \$47.2 billion in 2015, and it was the only major income category that declined from 2014. (See the Explanation of Selected Terms section of this article for a definition of notional principal contract.)

Income subject to withholding

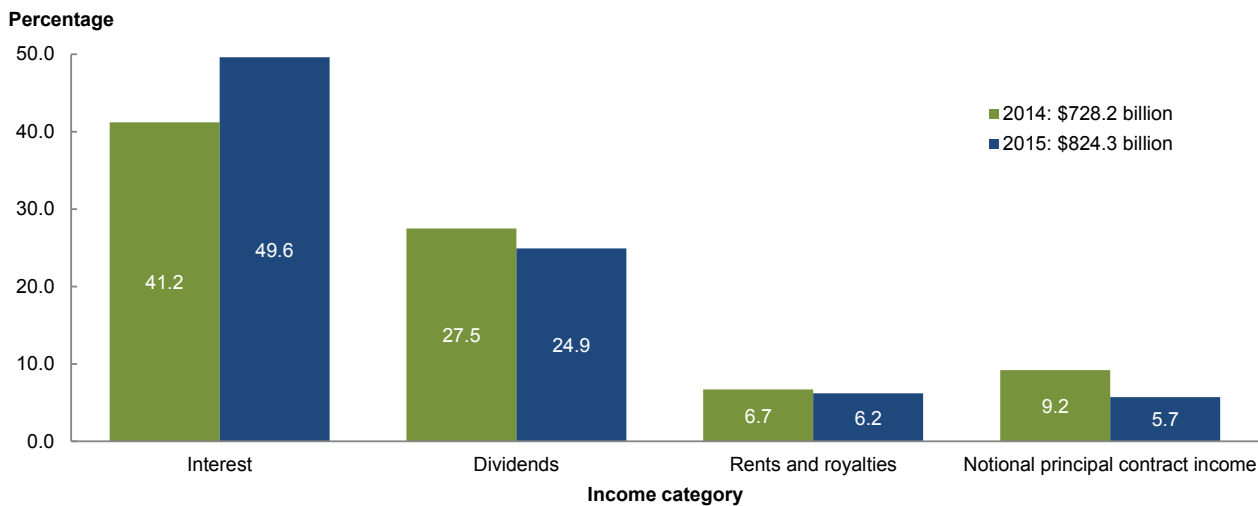
U.S.-source payments to foreign persons are commonly exempt from withholding tax. The primary reasons for withholding

exemptions are either due to a tax treaty between the United States and the recipient's country of residence, or the fact that 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 is also exempt from withholding. However, over \$118.2 billion (14.3 percent) of total U.S.-source income payments to foreign persons was subject to tax in 2015.

Figure C presents the percentages of U.S.-source income paid to foreign persons and income subject to withholding by income category in 2015. 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 (78.3 percent) of income subject to tax, despite accounting for only 24.9 percent of total income. Dividend income subject to withholding was taxed at an average effective rate of 15.9 percent. While dividends are taxed at comparatively high rates, interest is much more likely to be exempt from withholding. For 2015, interest payments constituted the largest share of total income (49.6 percent) but made up only 6.3 percent of all U.S.-source income subject to withholding. Furthermore, a mere 1.8 percent of interest income was subject to withholding; it was taxed at an average rate of 11.1 percent. As mentioned previously, notional principal contract income accounts for 5.7 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 accounted for 6.2 percent of all income and 5.1 percent of income subject to withholding.

Figure B

Percentage of Total U.S.-Source Income Paid to Foreign Persons Under Chapter 3, as Reported on Form 1042-S, by Selected Income Category, Calendar Years 2014 and 2015

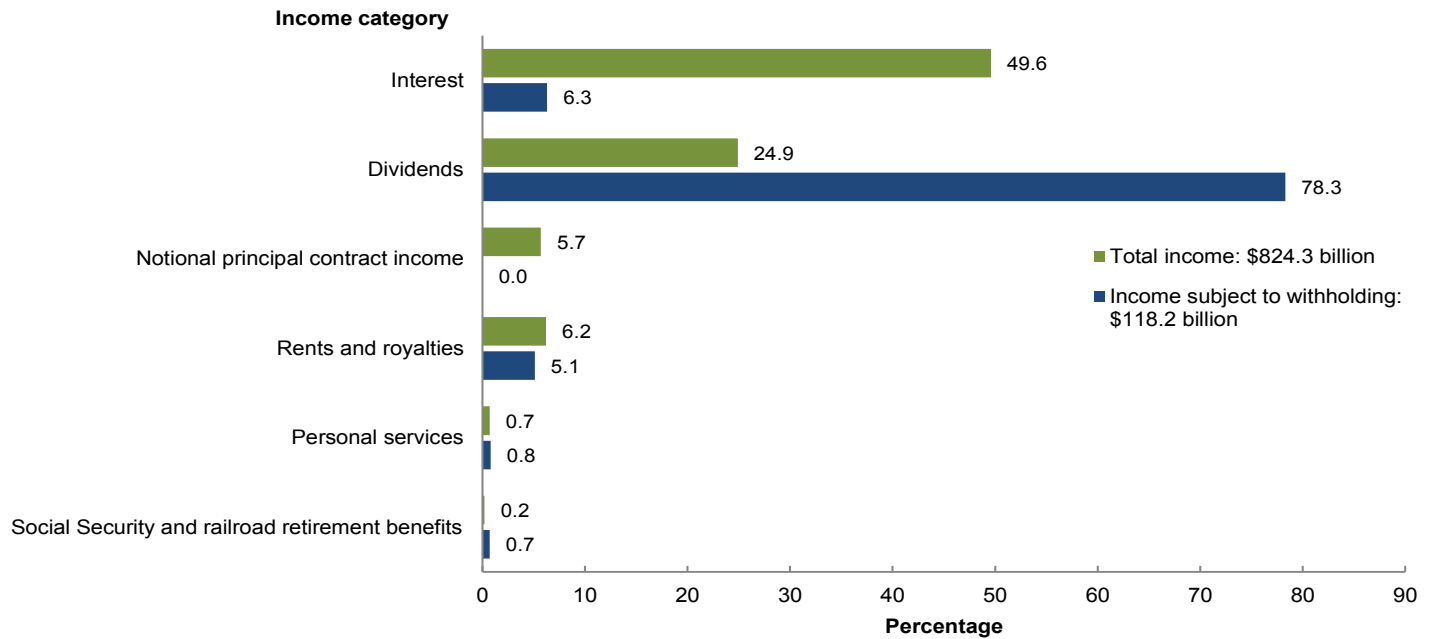


NOTE: Form 1042-S, Foreign Person's U.S.-Source Income Subject to Withholding.

SOURCE: IRS, Statistics of Income Division, Individuals, Withholding on Foreign Recipients of U.S. Income, October 2017.

Figure C

Percentage of Total U.S.-Source Income Paid to Foreign Persons and Income Subject to Withholding Under Chapter 3, as Reported on Form 1042-S, by Selected Income Category, Calendar Year 2015



NOTE: Form 1042-S, *Foreign Person's U.S.-Source Income Subject to Withholding*.
 SOURCE: IRS, Statistics of Income Division, Individuals, Withholding on Foreign Recipients of U.S. Income, October 2017.

Additional Foreign Income and Withholding Data

While the majority of U.S. income paid to foreign recipients is subject to withholding under Chapter 3 of the IRC and is reported on Form 1042-S, information from other tax forms is useful for providing a comprehensive look at withholding tax of foreign persons' U.S. income.

Foreign partner's partnership income

U.S. partnership income that is allocable to foreign partners is reported on Form 8805, *Foreign Partner's Information Statement of Section 1446 Withholding Tax*. Partnerships are required to withhold income tax on effectively connected taxable income deemed allocable to foreign partners. A U.S. or foreign partnership files a 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.

Sales of U.S. real property

Another tax form that provides information about withholding on foreign persons' U.S. income is Form 8288-A, *Statement of Withholding on Dispositions by Foreign Persons of U.S. Real Property Interests*. The Foreign Investment in Real Property Tax Act of 1980 (FIRPTA) was introduced to ensure that the

United State collected a portion of the capital gains realized by foreigners from the sales of U.S. real property interests. Form 8288-A is used to report the sales price of U.S. real property sold by the foreign person and the tax withheld on that sales price. Typically, the sales price is subject to 10-percent withholding, although corporations may be taxed at rates up to 35 percent in certain circumstances.¹ 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.

Branch profits tax

A withholding tax equivalent on a 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 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).

¹ The withholding rate has been increased from 10 percent to 15 percent for sales occurring on or after February 16, 2016.

Effective withholding tax rates

The combined withholding tax on U.S.-source income paid to foreign persons for 2015 was nearly \$24.1 billion, with an average effective tax rate of 16.8 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 2015, the average effective withholding rate on U.S. partnership distributions to foreign partners was 34.1 percent. The 8.8-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 (13.2 percent) reported on Form 1120-F was less than the 30-percent

Figure D

U.S.-Source Income Payments to Foreign Persons: Number of Forms, Income, Tax Withheld, and Effective Tax Rate, by Form Type and Selected Country of Foreign Recipient, Calendar Year 2015

[Money amounts are in thousands of dollars]

Form type 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	5,482,134	849,599,048	3,370,663	143,542,245	24,086,993	16.8
Form 1042-S: All countries [4]	5,291,778	824,296,819	3,192,701	118,203,479	18,383,639	15.6
United Kingdom	543,026	108,585,916	370,379	9,103,932	1,189,289	13.1
Cayman Islands	117,307	71,242,438	35,805	13,615,537	2,566,652	18.9
Japan	192,669	67,894,317	64,166	4,433,159	441,732	10.0
Canada	599,565	49,276,346	376,623	14,515,532	1,593,078	11.0
Luxembourg	20,317	47,114,896	7,449	7,546,268	2,066,322	27.4
China	225,561	46,739,096	77,888	558,016	80,574	14.4
Switzerland	72,147	45,050,005	38,291	7,322,275	975,902	13.3
France	87,210	39,354,665	55,172	1,542,718	331,810	21.5
Netherlands	69,560	30,270,556	39,407	1,584,243	233,313	14.7
Ireland	271,079	25,098,685	244,133	4,550,928	968,247	21.3
Germany	359,288	21,876,693	167,143	3,104,787	438,859	14.1
Belgium	31,836	16,734,389	23,004	1,585,976	315,426	19.9
Taiwan	113,326	15,510,854	72,046	692,454	193,968	28.0
Australia	303,261	11,975,657	268,410	4,613,719	647,663	14.0
Singapore	98,051	9,546,063	79,435	568,987	159,848	28.1
Norway	22,474	9,473,014	18,082	406,481	66,023	16.2
Bermuda	19,158	7,761,419	7,935	1,160,514	312,466	26.9
South Korea	44,659	6,357,447	28,336	1,063,013	160,987	15.1
Mexico	254,458	6,076,085	142,117	2,197,402	359,363	16.4
Form 8805: All countries [5]	161,329	12,087,215	149,812	13,499,640	4,605,974	34.1
Germany	68,592	1,294,500	67,477	1,363,765	468,291	34.3
United Kingdom	8,653	1,113,547	6,750	1,281,633	456,859	35.6
Canada	12,792	890,608	11,458	1,089,140	346,492	31.8
Sweden	182	730,542	135	738,629	278,017	37.6
Netherlands	1,393	502,769	1,099	556,550	141,660	25.5
Cayman Islands	1,399	237,371	954	375,918	130,091	34.6
Norway	132	216,369	118	218,307	76,309	35.0
Form 8288-A: All countries	26,137	10,515,458	26,137	10,515,458	922,292	8.8
Canada	8,781	2,886,598	8,781	2,886,598	254,327	8.8
Germany	2,823	910,250	2,823	910,250	64,479	7.1
United Kingdom	2,160	676,825	2,160	676,825	59,411	8.8
Japan	1,241	393,611	1,241	393,611	38,858	9.9
Italy	285	313,327	285	313,327	29,639	9.5
Form 1120-F: Reporting branch profits tax	2,890	2,699,556	2,013	1,323,668	175,088	13.2

[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 revenue 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] Amounts shown are subject to withholding under Chapter 3; Chapter 4 amounts are shown separately in Table 3.

[5] 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: The titles of the forms are: 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, August 2018.

statutory rate because recipients frequently qualify for reduced rates through tax treaties.

Real property sales

The eight States with the most U.S. real property interest sales in 2015 made up 75.4 percent of all transactions, 68.9 percent of the total sales revenue, and 69.4 percent of taxes withheld (Figure E). The largest number of real property sales occurred in Florida. In fact, Florida had more than the other top seven States combined in 2015. New York had the highest sales revenue (nearly \$1.2 million) per transaction. 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 that controlled real estate in multiple locations in the United States.

Withholding Under Chapter 4

The Foreign Account Tax Compliance Act (FATCA) became U.S. Federal law in 2010 as part of the Hiring Incentives to Restore Employment (HIRE) Act. Under FATCA, foreign financial institutions and certain other nonfinancial foreign entities are required to report on the foreign assets held by their U.S. account holders or be subject to withholding on withholdable payments. FATCA requires U.S. withholding agents to withhold tax on certain payments to foreign financial institutions (FFIs) that do not agree to report certain information to the IRS regarding their U.S. account, and on certain payments to certain nonfinancial foreign entities (NFFE) that do not provide information on their substantial U.S. owners to withholding agents.

Figure E
U.S. Real Property Interests Sold by Foreign Persons: Number of Forms 8288-A Filed, Total Sales Revenue, and Tax Withheld, by State Location of the Property, Calendar Year 2015

[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	26,137	10,515,458	922,292
Florida	11,368	2,832,671	232,649
California	2,565	1,705,839	159,544
Hawaii	1,492	467,320	44,829
Arizona	1,398	285,790	25,840
New York	1,066	1,261,273	110,572
Texas	899	212,041	20,761
Washington	647	185,078	17,939
Massachusetts	253	290,688	27,588
All others and nonallocable	6,449	3,274,758	282,570

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, August 2018. These data were not previously available on the IRS Tax Statistics Web site.

Payments subject to withholding under FATCA are now subject to the laws of Chapter 4 of the IRC, which were implemented beginning July 1, 2014. As a result, the Tax Year 2015 data presented in Table 3 represent the first full year of data under the new provisions.²

Some 20.4 percent of the U.S.-source income reported under Chapter 4 was subject to withholding (Table 3), and the average withholding rate for these payments was 12.7 percent. Interest was the largest category of Chapter 4 income (\$1.3 billion), and most of that (76.1 percent) was exempt from withholding. Dividends accounted for 48.0 percent of Chapter 4 income subject to withholding while interest payments accounted for 41.3 percent. Tax withheld on dividends (45.8 percent) and interest (36.0 percent) comprised a majority of the tax withheld on Chapter 4 payments.

Data Sources and Limitations

The statistics in this data release were tabulated by calendar year using information from the following four forms and are subject to nonsampling error :

Form 1042-S

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 Person's 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 2015. The data reflect the income that was paid and U.S. tax that was withheld for 2015.

Form 8805

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 2015. The data reflect the income that was paid and U.S. tax that was withheld for 2015.

Form 8288-A

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 2015.

² SOI also published 2014 data for Chapter 4, but because the new laws went into effect in mid-2014, the 2014 data only cover that last 6 months of that year. See Table 3 for Tax Year 2014 at <https://www.irs.gov/statistics/soi-tax-stats-form-1042s-table-3>.

Form 1120-F

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 2015 SOI Corporation sample.

Nonsampling error

Because the populations 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 that 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 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. It 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. 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.

Withholding rate pool—A withholding rate pool is a payment of a single type of income, determined in accordance with the categories of income reported on Form 1042-S that is subject to a single rate of withholding.

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

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Table 1. Foreign Recipients of U.S. Income Under Chapter 3 Withholding Filing Forms 1042-S: Number, Total U.S.-Source Income, and U.S. Tax Withheld, by Tax Treaty Countries and Total Nontreaty Countries, Calendar Year 2015

(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	5,291,778	824,296,819	706,093,337	118,203,483	18,383,639
Tax treaty countries, total	3,979,785	578,459,158	503,812,559	74,646,609	11,293,358
Armenia	656	3,732	2,848	884	175
Australia [1]	303,717	11,986,877	7,368,060	4,618,817	648,094
Austria	24,233	1,176,957	808,930	368,028	71,672
Azerbaijan	399	2,902	2,145	758	146
Bangladesh	4,548	34,176	31,342	2,834	410
Barbados	3,189	5,735,080	5,696,536	38,545	8,198
Belarus	1,736	9,593	6,883	2,710	707
Belgium	31,836	16,734,389	15,148,413	1,585,976	315,426
Bulgaria	4,122	22,557	12,251	10,307	1,222
Canada	599,565	49,276,346	34,760,814	14,515,532	1,593,078
China	225,561	46,739,096	46,181,081	558,016	80,574
Cyprus	2,639	106,510	84,918	21,591	4,585
Czech Republic	10,943	283,862	238,110	45,752	7,528
Denmark	21,346	5,443,418	4,273,956	1,169,462	147,798
Egypt	7,347	79,840	50,385	29,455	4,280
Estonia	3,293	28,680	17,978	10,701	2,287
Finland	11,307	1,925,867	1,746,854	179,014	29,892
France [2]	87,418	39,356,136	37,812,848	1,543,288	331,957
Georgia	762	10,135	7,949	2,186	502
Germany	359,288	21,876,693	18,771,907	3,104,787	438,859
Greece	21,188	129,580	74,004	55,577	14,268
Hungary	6,826	1,957,454	1,750,604	206,850	13,613
Iceland	2,557	47,896	37,491	10,406	2,049
India	111,218	4,316,028	3,931,510	384,517	66,741
Indonesia	11,248	536,104	520,745	15,360	2,922
Ireland	271,079	25,098,685	20,547,757	4,550,928	968,247
Israel	54,993	2,191,165	1,172,396	1,018,769	206,441
Italy	77,460	2,600,944	1,709,397	891,547	110,634
Jamaica	5,542	260,456	244,754	15,701	3,279
Japan	192,669	67,894,317	63,461,158	4,433,159	441,732
Kazakhstan	1,864	60,594	58,185	2,409	478
Korea, Republic of (South)	44,659	6,357,447	5,294,434	1,063,013	160,987
Kyrgyzstan	311	977	508	469	73
Latvia	2,134	55,293	50,197	5,096	1,307
Lithuania	2,225	126,777	122,987	3,791	723
Luxembourg	20,317	47,114,896	39,568,628	7,546,268	2,066,322
Malta	3,469	247,223	129,431	117,792	28,029
Mexico	254,458	6,076,085	3,878,682	2,197,402	359,363
Moldova	676	5,950	4,881	1,070	249
Morocco	1,515	62,592	60,069	2,523	473
Netherlands	69,560	30,270,556	28,686,313	1,584,243	233,313
New Zealand	43,984	533,967	347,822	186,146	35,740
Norway	22,474	9,473,014	9,066,533	406,481	66,023
Pakistan	6,283	26,515	16,817	9,698	1,812
Philippines	28,117	1,117,099	939,278	177,821	49,500
Poland	36,983	516,244	352,538	163,707	28,175
Portugal	12,104	1,470,072	1,401,500	68,572	10,536
Romania	7,061	64,609	55,312	9,297	2,023
Russia	28,670	1,608,112	1,553,643	54,470	11,500

Footnotes at end of table.

Table 1. Foreign Recipients of U.S. Income Under Chapter 3 Withholding Filing Forms 1042-S: Number, Total U.S.-Source Income, and U.S. Tax Withheld, by Tax Treaty Countries and Total Nontreaty Countries, Calendar Year 2015—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)
Slovak Republic	3,623	52,244	40,379	11,865	2,525
Slovenia	5,510	32,848	11,998	20,851	4,991
South Africa	26,523	480,948	251,554	229,393	39,747
Spain	82,356	3,626,855	2,943,060	683,795	84,596
Sri Lanka	1,355	19,006	14,238	4,768	793
Sweden	28,749	5,741,113	4,226,981	1,514,133	254,955
Switzerland	72,147	45,050,005	37,727,731	7,322,275	975,902
Tajikistan	229	549	197	351	53
Thailand	21,396	416,185	374,556	41,629	7,812
Trinidad and Tobago	6,793	250,165	225,704	24,461	7,126
Tunisia	1,122	12,751	11,123	1,627	305
Turkey	11,369	265,742	228,852	36,890	6,664
Turkmenistan	127	562	285	277	38
Ukraine	9,971	29,607	18,835	10,773	2,078
United Kingdom	543,026	108,585,916	99,481,983	9,103,932	1,189,289
Uzbekistan	462	1,798	483	1,315	287
Venezuela	119,478	2,839,367	192,818	2,646,549	142,255
Nontreaty countries, total [3]	1,311,993	245,837,661	202,280,778	43,556,874	7,090,281

[1] Includes Ashmore and Cartier Islands, Christmas Island, Cocos (Keeling) Islands, Coral Sea Islands Territory, and Norfolk Island. These countries are included with Australia in this table because they are included under the tax treaty agreement with Australia. Please note that these countries are not included with Australia in Table 2.

[2] Includes Guadeloupe, French Guiana, Martinique, and Reunion. These countries are included with France in this table because they are included under the tax treaty agreement with France. Please note that these countries are not included with France in Table 2.

[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, Foreign Recipients of U.S. Income, October 2017.

Table 2. Foreign Recipients of U. S. Income Under Chapter 3 Withholding Filing 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, Calendar Year 2015

[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	5,291,778	18,383,639	824,296,819	408,661,752	205,167,036	50,716,067	1,928,987	5,979,793	47,233,239
RECIPIENT TYPES									
Individuals	3,870,025	1,221,250	13,357,905	1,898,087	2,589,078	1,829,460	1,928,987	1,553,820	4,916
Corporations	619,412	9,919,577	435,937,400	205,142,336	89,710,948	34,136,414	0	3,966,774	36,566,117
Partnerships and trusts	175,300	726,216	21,992,305	7,302,467	9,536,435	1,799,310	0	34,762	0
U.S. branches treated as U.S. persons	2,241	22,283	14,017,617	6,988,793	2,839,852	14,029	0	2,823	2,747,578
Governments and international organizations	254,639	150,437	126,325,596	91,648,190	25,948,278	472,106	0	56,864	0
Tax-exempt organizations [1]	12,965	54,197	1,516,437	342,078	689,398	149,416	0	15,146	0
Withholding foreign partnerships and trusts	3,052	9,356	2,301,429	1,010,758	343,520	15,186	0	1,813	709,931
Artists and athletes	29,984	250,350	1,066,770	42,248	6,142	78,286	0	1,767	0
Withholding rate pools (general)	35,724	4,724,935	86,960,654	42,111,617	35,632,878	191,911	0	438	0
Withholding rate pools (tax-exempt)	1,092	4,098	19,279,065	12,027,563	7,056,675	1,926	0	5	0
Other and unknown	287,344	1,300,939	101,541,642	40,147,614	30,813,832	12,028,023	0	345,581	7,204,698
SELECTED COUNTRIES AND RECIPIENT TYPES									
Argentina	73,002	23,688	252,833	143,652	61,525	5,921	8,243	5,691	0
Individuals	68,903	16,853	194,458	119,441	46,249	2,050	8,243	2,709	0
Corporations	1,537	2,067	28,755	15,027	6,714	1,426	0	512	0
Withholding rate pools (general)	55	2,340	11,810	3,980	7,815	d	0	0	0
Australia	303,261	647,663	11,975,657	4,828,746	4,080,251	522,422	35,132	24,519	977,153
Individuals	135,290	33,406	242,342	12,613	92,051	34,805	35,132	5,144	0
Corporations	17,523	364,911	6,173,334	2,017,379	2,084,642	364,647	0	15,610	972,082
Withholding rate pools (general)	143	3,887	86,654	59,904	24,851	150	0	0	0
Austria	24,233	71,672	1,176,957	585,210	314,754	148,829	9,616	5,615	0
Individuals	16,373	5,445	45,267	2,028	11,192	4,921	9,616	826	0
Corporations	1,707	7,673	326,085	181,331	56,146	27,051	0	3,298	0
Withholding rate pools (general)	1,882	47,862	468,057	250,141	209,370	187	0	0	0
Bahamas	21,004	118,955	1,184,402	616,888	376,288	4,029	771	6,316	0
Individuals	2,459	3,385	17,695	4,157	5,607	236	771	315	0
Corporations	16,508	82,328	859,898	448,002	264,038	300	0	d	0
Withholding rate pools (general)	295	18,715	136,124	65,185	65,365	11	0	0	0
Barbados	3,189	8,198	5,735,080	302,653	28,494	6,615	1,266	206	5
Individuals	1,459	604	3,866	549	723	101	1,266	201	0
Corporations	1,376	6,441	5,681,467	258,599	23,438	6,414	0	d	5
Withholding rate pools (general)	25	85	7,873	6,250	1,149	0	0	0	0
Belgium	31,836	315,426	16,734,389	11,425,085	3,732,892	252,506	7,911	18,839	8,063
Individuals	25,150	9,172	81,930	5,665	32,612	3,604	7,911	7,923	0
Corporations	2,382	58,458	2,192,640	1,230,623	150,795	240,437	0	9,593	33
Withholding rate pools (general)	468	244,473	8,085,013	4,334,792	3,104,802	127	0	0	0
Bermuda	19,158	312,466	7,761,419	6,160,395	1,006,396	19,604	1,365	11,514	0
Individuals	5,809	3,625	180,778	163,735	10,305	1,552	1,365	488	0
Corporations	10,451	201,715	6,757,445	5,700,642	611,643	13,989	0	8,128	0
Withholding rate pools (general)	79	7,054	134,520	101,785	23,342	d	0	0	0
Brazil	76,674	96,766	3,477,363	3,037,933	162,739	67,319	5,370	10,480	0
Individuals	52,799	21,847	172,091	51,526	36,120	34,675	5,370	7,149	0
Corporations	1,850	66,126	447,576	181,946	108,953	21,813	0	1,609	0
Withholding rate pools (general)	49	16	316	284	30	d	0	0	0
British Virgin Islands	98,460	382,600	3,932,061	1,915,417	1,375,937	15,597	199	221	0
Individuals	2,363	5,138	35,318	15,917	16,877	170	199	45	0
Corporations	92,750	361,373	3,678,208	1,833,205	1,248,638	11,986	0	173	0
Withholding rate pools (general)	9	d	64	59	4	d	0	0	0

Footnotes at end of table.

Table 2. Foreign Recipients of U. S. Income Under Chapter 3 Withholding Filing 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, Calendar Year 2015—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)
Brunei	693	1,853	119,204	43,074	65,193	59	0	d	0
Individuals	414	28	173	33	64	4	0	d	0
Corporations	33	25	1,104	884	149	0	0	0	0
Withholding rate pools (general)	d	d	d	d	d	d	d	d	d
Canada	599,565	1,593,078	49,276,346	14,148,939	18,903,370	1,563,600	410,873	542,764	2,718,515
Individuals	425,624	120,626	1,566,107	29,613	149,205	191,504	410,873	128,900	0
Corporations	46,100	471,173	21,581,656	6,365,234	5,236,212	1,111,936	0	390,638	2,123,840
Withholding rate pools (general)	972	811,330	11,920,811	3,512,421	6,946,786	1,148	0	0	0
Cayman Islands	117,307	2,566,652	71,242,438	48,100,047	12,004,739	218,190	626	1,429	3,129,356
Individuals	1,505	14,091	270,790	256,263	12,121	149	626	d	0
Corporations	106,553	2,426,661	58,966,566	44,590,219	6,728,571	199,009	0	49	277
Withholding rate pools (general)	180	2,083	98,619	89,275	5,762	2,744	0	0	0
Chile	31,105	163,052	1,281,345	482,584	550,849	3,292	7,211	2,488	2,886
Individuals	19,534	7,409	59,349	25,396	15,026	461	7,211	958	0
Corporations	9,987	152,502	911,056	188,898	502,654	2,401	0	96	353
Withholding rate pools (general)	10	4	35	21	14	d	0	0	0
China	225,561	80,574	46,739,096	38,289,719	6,366,027	279,615	416	386,425	0
Individuals	207,200	20,801	576,421	34,639	49,707	16,441	416	321,471	0
Corporations	2,109	45,426	1,364,772	540,991	77,276	213,042	0	35,761	0
Withholding rate pools (general)	136	3	48	17	25	6	0	0	0
Colombia	32,773	84,886	674,443	336,126	239,808	11,360	9,763	3,335	0
Individuals	25,234	8,248	51,760	12,904	8,485	3,005	9,763	2,573	0
Corporations	3,200	74,788	367,095	82,233	224,500	5,669	0	556	0
Withholding rate pools (general)	24	4	35	20	9	6	0	0	0
Cyprus	2,639	4,585	106,510	35,090	12,828	16,420	798	11,617	0
Individuals	1,535	569	4,276	309	1,485	516	798	169	0
Corporations	775	3,652	92,862	27,823	10,125	15,327	0	11,353	0
Withholding rate pools (general)	8	d	15	0	5	9	0	0	0
Czech Republic	10,943	7,528	283,862	87,166	58,147	15,789	1,358	107,611	0
Individuals	9,491	1,803	15,058	716	4,444	641	1,358	2,330	0
Corporations	395	1,857	129,713	6,928	3,969	12,218	0	105,218	0
Withholding rate pools (general)	151	1,833	27,139	13,608	11,832	8	0	0	0
Denmark	21,346	147,798	5,443,418	1,544,072	2,650,055	499,674	6,554	6,793	0
Individuals	10,198	4,470	32,151	755	5,321	6,970	6,554	2,008	0
Corporations	4,428	81,195	3,251,739	751,097	1,895,068	213,986	0	4,491	0
Withholding rate pools (general)	230	45,355	732,941	273,551	296,567	37	0	0	0
East Timor	413	351	209,569	124,015	83,519	49	0	0	0
Individuals	157	89	683	49	35	14	0	0	0
Corporations	229	255	8,359	6,177	788	0	0	0	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Finland	11,307	29,892	1,925,867	1,155,410	586,814	73,575	3,338	3,107	0
Individuals	8,681	1,944	14,941	198	2,435	1,273	3,338	742	0
Corporations	1,495	22,956	705,949	195,521	398,259	44,788	0	1,831	0
Withholding rate pools (general)	202	2,185	26,606	2,398	23,816	d	0	0	0
France	87,210	331,810	39,354,665	16,219,219	6,806,081	1,985,534	39,851	76,204	10,599,273
Individuals	67,936	30,967	247,058	7,187	65,549	26,732	39,851	42,543	0
Corporations	8,244	94,472	21,848,210	4,562,754	2,808,239	1,762,545	0	25,085	9,921,557
Withholding rate pools (general)	1,182	139,439	2,797,341	1,957,160	548,928	272	0	0	0
Gabon	1,894	2,580	180,295	40,550	1,417	52,850	0	7,943	0
Individuals	612	349	3,058	74	256	632	0	165	0
Corporations	238	56	118,606	22,038	52	28,281	0	7,578	0
Withholding rate pools (general)	d	d	d	d	d	d	d	d	d

Footnotes at end of table.

Table 2. Foreign Recipients of U. S. Income Under Chapter 3 Withholding Filing 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, Calendar Year 2015—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)
Germany	359,288	438,859	21,876,693	8,247,883	4,826,058	4,684,306	137,475	113,268	1,362,445
Individuals	307,681	46,337	780,961	170,145	182,259	66,370	137,475	48,612	0
Corporations	20,672	172,570	13,782,616	4,270,879	2,612,282	4,143,676	0	59,238	1,261,687
Withholding rate pools (general)	9,661	171,390	3,764,321	2,173,215	1,101,375	1,117	0	0	0
Gibraltar	611	4,982	239,097	20,232	214,955	73	10	55	0
Individuals	185	181	768	102	536	14	10	0	0
Corporations	300	1,643	216,759	10,343	203,205	7	0	55	0
Withholding rate pools (general)	39	1,702	13,192	6,747	6,179	d	0	0	0
Greece	21,188	14,268	129,580	16,805	11,292	5,681	35,886	3,647	0
Individuals	19,098	12,449	61,488	4,242	7,970	713	35,886	3,210	0
Corporations	617	722	51,542	3,588	2,188	3,799	0	4	0
Withholding rate pools (general)	30	8	7,622	7,595	24	d	0	0	0
Guernsey	10,659	134,274	1,521,257	681,923	478,304	530	161	0	0
Individuals	258	1,560	9,410	4,127	5,082	18	161	0	0
Corporations	8,183	87,630	1,085,985	574,062	282,796	334	0	0	0
Withholding rate pools (general)	234	33,026	185,223	33,217	130,751	169	0	0	0
Hong Kong	66,009	232,247	5,048,680	2,954,673	1,518,590	91,152	1,845	3,484	0
Individuals	57,420	32,922	160,102	30,285	95,404	11,439	1,845	2,238	0
Corporations	3,768	47,625	777,242	534,268	86,012	35,443	0	1,082	0
Withholding rate pools (general)	446	121,321	1,486,605	811,709	452,693	115	0	0	0
Hungary	6,826	13,613	1,957,454	933,421	199,593	33,798	1,267	3,896	0
Individuals	5,279	1,337	12,703	381	1,877	1,082	1,267	2,727	0
Corporations	517	2,648	1,658,836	839,428	16,451	30,965	0	980	0
Withholding rate pools (general)	43	d	1,271	1,257	d	13	0	0	0
India	111,218	66,741	4,316,028	1,217,349	100,799	128,652	4,082	1,271,949	24,192
Individuals	98,813	17,211	278,166	3,640	20,713	4,551	4,082	19,857	0
Corporations	1,535	32,929	2,704,304	60,002	77,045	86,430	0	1,246,089	21,874
Withholding rate pools (general)	81	7	71	0	4	41	0	0	0
Indonesia	11,248	2,922	536,104	471,508	5,593	2,439	393	1,317	0
Individuals	9,886	2,164	21,315	1,993	4,182	1,773	393	1,220	0
Corporations	205	339	8,458	7,114	503	114	0	63	0
Withholding rate pools (general)	116	7	46	0	36	10	0	0	0
Ireland	271,079	968,247	25,098,685	14,742,007	4,367,421	4,586,329	26,553	89,060	3,694
Individuals	252,294	9,516	101,798	3,628	41,594	14,665	26,553	1,523	0
Corporations	13,976	919,553	20,322,759	13,903,122	4,143,486	1,027,851	0	86,174	3,694
Withholding rate pools (general)	54	222	2,588	400	1,961	137	0	0	0
Israel	54,993	206,441	2,191,165	1,132,349	615,584	204,615	13,246	23,241	1,198
Individuals	44,701	16,951	159,265	41,953	42,903	7,153	13,246	16,888	0
Corporations	4,855	46,001	513,352	280,800	43,398	123,056	0	3,482	0
Withholding rate pools (general)	371	108,481	847,713	326,002	443,360	34	0	0	0
Italy	77,460	110,634	2,600,944	1,198,497	554,282	277,077	98,577	34,939	91
Individuals	64,283	10,425	362,722	12,759	25,077	7,511	98,577	20,668	0
Corporations	3,157	33,528	735,422	275,038	132,380	187,221	0	10,230	36
Withholding rate pools (general)	1,701	43,047	710,426	358,426	287,245	58	0	0	0
Jamaica	5,542	3,279	260,456	241,671	3,229	2,408	4,211	2,130	0
Individuals	4,295	2,253	13,937	779	1,156	1,119	4,211	2,106	0
Corporations	479	364	237,673	235,696	1,603	116	0	d	0
Withholding rate pools (general)	d	d	d	d	d	d	d	d	d
Japan	192,669	441,732	67,894,317	35,158,401	11,487,347	5,751,959	292,060	178,774	4,177,933
Individuals	175,835	18,224	795,682	26,224	94,974	267,310	292,060	31,710	0
Corporations	8,160	92,543	29,657,990	13,035,120	2,377,658	4,946,783	0	141,623	1,190,214
Withholding rate pools (general)	962	316,693	13,451,772	5,700,241	6,676,892	9	0	0	0

Footnotes at end of table.

Table 2. Foreign Recipients of U. S. Income Under Chapter 3 Withholding Filing 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, Calendar Year 2015—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)
Jersey	6,597	97,384	2,660,391	2,052,244	347,660	2,510	215	291	0
Individuals	413	1,949	7,418	757	6,016	51	215	220	0
Corporations	4,063	64,112	2,416,981	1,987,858	202,714	2,377	0	72	0
Withholding rate pools (general)	220	17,598	135,122	50,587	67,699	5	0	0	0
Korea, Republic of (South)	44,659	160,987	6,357,447	3,306,408	1,465,595	408,992	12,750	58,365	0
Individuals	36,606	11,374	104,041	3,355	12,052	10,458	12,750	25,769	0
Corporations	1,447	114,215	1,177,615	422,963	266,783	330,077	0	27,431	0
Withholding rate pools (general)	273	5,743	219,050	163,732	49,710	25	0	0	0
Kuwait	3,839	3,990	4,069,947	955,797	2,584,070	271	0	d	0
Individuals	2,025	998	4,342	467	2,688	235	0	d	0
Corporations	609	1,663	23,489	14,459	5,317	d	0	0	0
Withholding rate pools (general)	d	d	d	d	d	d	d	d	d
Libya	231	2,912	110,358	19,324	90,252	0	0	7	0
Individuals	196	108	778	14	8	0	0	7	0
Corporations	11	2,803	27,450	18,106	9,320	0	0	0	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Liechtenstein	1,116	49,698	374,404	149,509	168,360	865	33	41	0
Individuals	117	102	433	65	257	0	33	41	0
Corporations	539	6,321	46,756	3,900	19,596	655	0	0	0
Withholding rate pools (general)	134	24,033	201,393	87,523	83,212	45	0	0	0
Lithuania	2,225	723	126,777	117,715	862	1,497	99	629	0
Individuals	1,869	318	2,890	58	606	184	99	449	0
Corporations	131	175	119,269	116,464	168	1,252	0	165	0
Withholding rate pools (general)	51	d	7	0	0	7	0	0	0
Luxembourg	20,317	2,066,322	47,114,896	33,438,217	9,456,409	810,654	607	3,047	0
Individuals	2,064	2,965	40,703	3,101	18,321	15,076	607	380	0
Corporations	16,249	1,182,557	30,296,091	23,445,986	4,075,972	327,503	0	2,640	0
Withholding rate pools (general)	1,081	854,597	9,437,075	5,665,375	2,928,364	321	0	0	0
Malaysia	48,882	11,830	998,496	821,007	142,362	2,541	453	586	0
Individuals	44,961	5,342	26,466	5,323	13,895	1,257	453	265	0
Corporations	294	1,524	25,177	4,455	2,331	1,123	0	318	0
Withholding rate pools (general)	83	13	42	0	37	6	0	0	0
Malta	3,469	28,029	247,223	53,383	15,974	26,129	2,502	983	0
Individuals	2,467	22,173	79,725	1,058	1,329	90	2,502	429	0
Corporations	770	4,506	151,550	43,221	9,352	25,826	0	553	0
Withholding rate pools (general)	27	458	6,650	3,713	2,794	0	0	0	0
Mauritius	971	7,604	112,204	57,608	18,362	1,117	76	14,934	0
Individuals	447	199	1,246	91	323	16	76	6	0
Corporations	349	7,181	100,297	49,358	17,705	1,091	0	14,928	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Mexico	254,458	359,363	6,076,085	1,461,002	812,245	1,020,624	241,775	530,953	20
Individuals	220,510	107,199	1,097,243	148,515	125,566	14,526	241,775	466,296	0
Corporations	6,270	144,350	3,146,091	322,653	322,708	973,169	0	51,725	0
Withholding rate pools (general)	44	14	165	59	92	4	0	0	0
Monaco	1,380	32,766	257,503	126,315	89,705	13,444	542	103	0
Individuals	910	4,377	20,806	2,849	8,146	5,166	542	103	0
Corporations	87	2,676	11,782	2,717	777	7,887	0	0	0
Withholding rate pools (general)	261	22,576	211,278	119,581	79,284	31	0	0	0
Netherlands	69,560	233,313	30,270,556	9,202,114	15,693,325	1,562,229	20,417	344,395	197,191
Individuals	44,498	15,013	124,753	21,229	38,983	5,291	20,417	9,157	0
Corporations	9,495	90,780	17,129,090	5,503,091	8,034,082	1,166,056	0	235,149	46,310
Withholding rate pools (general)	375	61,320	1,205,933	264,403	721,630	58,128	0	0	0

Footnotes at end of table.

Table 2. Foreign Recipients of U. S. Income Under Chapter 3 Withholding Filing 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, Calendar Year 2015—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)
New Zealand	43,984	35,740	533,967	168,176	271,986	23,911	1,704	14,229	0
Individuals	26,758	6,671	48,277	1,922	17,941	8,393	1,704	769	0
Corporations	3,071	10,131	99,605	20,816	45,513	9,888	0	12,940	0
Withholding rate pools (general)	22	d	21	4	0	17	0	0	0
Norway	22,474	66,023	9,473,014	3,611,877	4,954,038	50,011	21,515	78,023	5,482
Individuals	19,102	10,031	69,873	579	13,866	8,226	21,515	17,838	0
Corporations	1,652	38,667	845,654	313,792	248,493	37,523	0	38,678	3,787
Withholding rate pools (general)	24	9,677	184,242	46,282	62,611	37	0	0	0
Oman	828	3,178	344,729	221,453	86,709	16	0	92	0
Individuals	556	185	1,406	501	470	15	0	0	0
Corporations	39	28	27,826	574	45	0	0	92	0
Withholding rate pools (general)	d	d	d	d	d	d	d	d	d
Panama	30,047	47,062	572,784	395,212	139,468	1,483	2,414	1,614	0
Individuals	5,162	3,103	24,312	9,087	4,134	257	2,414	1,531	0
Corporations	22,347	38,807	449,914	309,888	119,634	951	0	13	0
Withholding rate pools (general)	73	1,653	15,396	8,798	5,451	9	0	0	0
Peru	17,267	54,247	512,011	307,448	173,546	943	2,279	894	0
Individuals	9,307	2,570	21,787	9,214	3,635	424	2,279	487	0
Corporations	799	51,133	262,771	75,886	169,176	273	0	278	0
Withholding rate pools (general)	11	8	36	6	26	0	0	0	0
Philippines	28,117	49,500	1,117,099	819,317	15,891	12,761	32,877	2,757	0
Individuals	23,041	14,059	64,830	4,569	8,652	1,139	32,877	1,536	0
Corporations	496	3,034	103,151	33,189	4,150	5,965	0	881	0
Withholding rate pools (general)	15	0	3	0	0	3	0	0	0
Poland	36,983	28,175	516,244	327,739	23,106	56,740	63,273	10,736	0
Individuals	33,120	19,217	90,917	3,811	4,220	7,550	63,273	4,738	0
Corporations	552	5,326	67,851	4,404	9,232	29,108	0	5,525	0
Withholding rate pools (general)	325	6	49	0	d	49	0	0	0
Portugal	12,104	10,536	1,470,072	1,357,925	41,453	4,892	19,366	4,693	0
Individuals	10,511	6,516	37,807	1,717	6,260	500	19,366	3,840	0
Corporations	487	1,371	1,363,525	1,342,418	4,359	1,344	0	146	0
Withholding rate pools (general)	106	183	3,016	1,675	1,245	18	0	0	0
Puerto Rico	9,736	8,307	994,618	882,871	78,594	664	541	814	0
Individuals	725	572	2,733	455	272	37	541	21	0
Corporations	6,409	6,140	626,558	563,797	40,893	185	0	747	0
Withholding rate pools (general)	d	d	d	d	d	d	d	d	d
Russia	28,670	11,500	1,608,112	1,353,337	23,147	24,323	77	17,811	0
Individuals	22,910	3,349	69,728	10,466	12,831	12,645	77	11,501	0
Corporations	573	5,353	207,110	39,037	7,631	6,293	0	6,080	0
Withholding rate pools (general)	721	207	12,859	12,573	245	41	0	0	0
Saudi Arabia	7,743	14,850	2,484,380	1,552,445	737,625	1,078	19	535	0
Individuals	5,964	2,870	16,063	3,787	6,523	363	19	486	0
Corporations	463	8,029	218,993	137,532	28,175	344	0	45	0
Withholding rate pools (general)	5	0	4,069	d	d	d	d	d	d
Senegal	1,940	3,389	512,771	22,549	6,951	2,746	22	2,090	0
Individuals	1,339	666	3,904	535	1,556	25	22	157	0
Corporations	222	1,852	487,921	16,119	2,410	14	0	1,858	0
Withholding rate pools (general)	13	815	5,576	2,261	2,862	d	0	0	0
Singapore	98,051	159,848	9,546,063	4,832,471	3,266,576	33,140	563	5,378	4,916
Individuals	85,217	26,510	109,836	10,621	74,477	3,223	563	1,213	4,916
Corporations	4,373	55,235	1,369,052	1,071,725	156,923	22,504	0	3,107	0
Withholding rate pools (general)	440	59,734	393,222	170,367	202,529	198	0	0	0

Footnotes at end of table.

Foreign Recipients of U.S. Income, Calendar Year 2015

Table 2. Foreign Recipients of U. S. Income Under Chapter 3 Withholding Filing 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, Calendar Year 2015—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)
South Africa	26,523	39,747	480,948	186,198	214,121	9,447	1,418	1,327	0
Individuals	21,152	5,489	36,907	2,240	18,775	3,144	1,418	979	0
Corporations	1,816	16,730	225,570	92,092	102,399	5,198	0	111	0
Withholding rate pools (general)	31	18	136	17	116	d	0	0	0
Spain	82,356	84,596	3,626,855	1,364,755	338,659	232,622	29,979	229,582	1,014,022
Individuals	68,405	19,028	136,555	19,439	47,723	8,705	29,979	6,456	0
Corporations	7,052	33,460	1,454,464	231,186	158,283	108,858	0	220,021	387,600
Withholding rate pools (general)	453	16,652	225,201	103,148	107,078	61	0	0	0
Swaziland	313	38,390	270,028	101,664	121,745	2,728	17	d	0
Individuals	199	164	2,713	24	80	1,562	17	d	0
Corporations	13	62	4,722	3,421	1,227	0	0	0	0
Withholding rate pools (general)	71	38,127	260,708	97,635	120,439	39	0	0	0
Sweden	28,749	254,955	5,741,113	1,628,993	2,295,073	1,157,236	17,633	10,045	0
Individuals	22,877	8,734	55,533	2,258	10,743	6,241	17,633	3,239	0
Corporations	2,953	105,454	3,028,667	601,722	1,116,544	866,986	0	5,560	0
Withholding rate pools (general)	172	132,428	918,482	102,505	810,456	10	0	0	0
Switzerland	72,147	975,902	45,050,005	20,664,743	10,890,385	5,398,342	22,012	396,803	1,368,770
Individuals	39,659	25,768	649,315	20,502	128,437	431,588	22,012	7,531	0
Corporations	11,599	250,516	23,873,314	9,889,122	4,812,156	2,511,419	0	386,742	1,073,785
Withholding rate pools (general)	3,773	684,337	7,853,366	3,453,241	4,103,644	890	0	95	0
Taiwan	113,326	193,968	15,510,854	13,941,274	884,194	17,367	736	23,538	15,956
Individuals	105,469	27,983	153,761	39,094	72,768	1,656	736	953	0
Corporations	4,695	147,038	2,887,563	2,189,351	461,150	2,912	0	22,203	15,956
Withholding rate pools (general)	54	1,445	53,337	46,499	4,778	6	0	0	0
Thailand	21,396	7,812	416,185	342,348	40,906	3,816	5,940	4,003	0
Individuals	16,510	4,320	33,485	3,537	8,900	1,869	5,940	3,556	0
Corporations	533	1,654	28,290	15,534	9,743	468	0	366	0
Withholding rate pools (general)	1,226	7	67	3	0	63	0	0	0
Trinidad and Tobago	6,793	7,126	250,165	198,032	41,823	348	1,878	655	0
Individuals	5,320	1,801	11,474	2,425	2,891	161	1,878	604	0
Corporations	890	4,652	92,215	74,046	16,008	34	0	5	0
Withholding rate pools (general)	d	d	d	d	d	d	d	d	d
Turkey	11,369	6,664	265,742	210,222	10,179	7,858	1,544	752	0
Individuals	9,704	4,410	31,167	2,018	5,776	1,269	1,544	705	0
Corporations	322	1,655	47,249	27,477	3,647	3,328	0	6	0
Withholding rate pools (general)	124	4	23	0	15	9	0	0	0
United Arab Emirates	12,547	29,859	2,758,533	904,085	1,324,280	4,518	83	10,804	0
Individuals	10,263	4,803	21,190	1,804	11,092	1,343	83	172	0
Corporations	871	18,704	294,241	74,685	64,483	1,703	0	3,288	0
Withholding rate pools (general)	11	25	86	d	84	d	0	0	0
United Kingdom	543,026	1,189,289	108,585,916	45,941,718	24,705,043	3,554,310	133,220	403,305	21,342,196
Individuals	435,042	111,407	1,229,642	108,110	465,393	205,149	133,220	50,226	0
Corporations	36,777	492,112	71,739,842	31,453,811	10,755,055	2,447,837	0	317,745	19,394,142
Withholding rate pools (general)	1,734	330,383	11,552,986	5,083,167	3,789,816	122,639	0	0	0
Uruguay	13,058	8,130	176,221	139,653	24,096	875	1,016	3,403	0
Individuals	9,349	2,405	39,062	27,177	7,058	371	1,016	1,125	0
Corporations	2,526	3,884	64,172	47,473	12,261	210	0	2,259	0
Withholding rate pools (general)	183	893	22,685	19,138	3,149	3	0	0	0
Venezuela	119,478	142,255	2,839,367	176,347	45,469	4,058	1,010	5,445	0
Individuals	105,071	10,646	194,675	134,636	38,275	2,739	1,010	3,915	0
Corporations	4,072	1,465	46,022	36,288	6,027	750	0	17	0
Withholding rate pools (general)	19	15	259	162	93	0	0	0	0
Vietnam	4,264	1,670	102,145	92,271	559	247	33	377	0
Individuals	3,845	1,382	8,751	211	404	193	33	237	0
Corporations	61	30	141	9	53	27	0	24	0
Withholding rate pools (general)	13	d	6	0	5	d	0	0	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 Calendar Year 2015 were selected for this table.

SOURCE: IRS, Statistics of Income Division, Foreign Recipients of U.S. Income, October 2017.

Table 3. Recipients of U.S. Income Under Chapter 4 Withholding Filing Forms 1042-S: Number, Total U.S.-Source Income, and U.S. Tax Withheld, by Selected Income Types, Calendar Year 2015

[Money amounts are in thousands of dollars]

Income types	Number of Forms 1042-S [1]	U.S.-source income			U.S. tax withheld
		Total	Exempt from withholding	Subject to withholding	
	(1)	(2)	(3)	(4)	(5)
Total	72,350	3,670,206	2,922,205	748,001	95,006
Dividends	37,083	579,699	220,353	359,346	43,469
Interest	27,803	1,291,907	983,337	308,569	34,223
Rents and royalties	1,475	601,065	557,979	43,086	6,735
Return on capital	520	52,435	46,838	5,597	1,512
Compensation for independent personal services	498	48,356	45,509	2,847	785
Pensions, annuities, alimony, and/or insurance premiums	105	23,589	21,670	1,919	525
Notional principal contract income	22	758,160	758,160	0	0
Scholarship or fellowship grants	16	12,601	2,131	10,470	3,493
All other income types	4,828	302,394	286,226	16,168	4,264

[1] Data in this table are based on returns filed pursuant to Chapter 4 of the Internal Revenue Code. Returns that were filed pursuant to Chapter 3 of the Code are not included in this table; however, they are included in Tables 1 and 2.

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, Foreign Recipients of U.S. Income, October 2017.