

# Foreign Recipients of U.S. Income, Calendar Year 2017

by Scott Luttrell

U.S.-source income payments to foreign persons, as reported on *Foreign Person's U.S.-Source Income Subject to Withholding* (Form 1042-S), rose to \$882.1 billion for Calendar Year 2017. This represents an increase of 3.4 percent from 2016. Withholding taxes on this income rose by just 0.2 percent as 86.5 percent of all U.S.-source income paid to foreign persons was exempt from withholding tax. Taxes on the residual U.S.-source income subject to tax were withheld at an average rate of 16.4 percent.

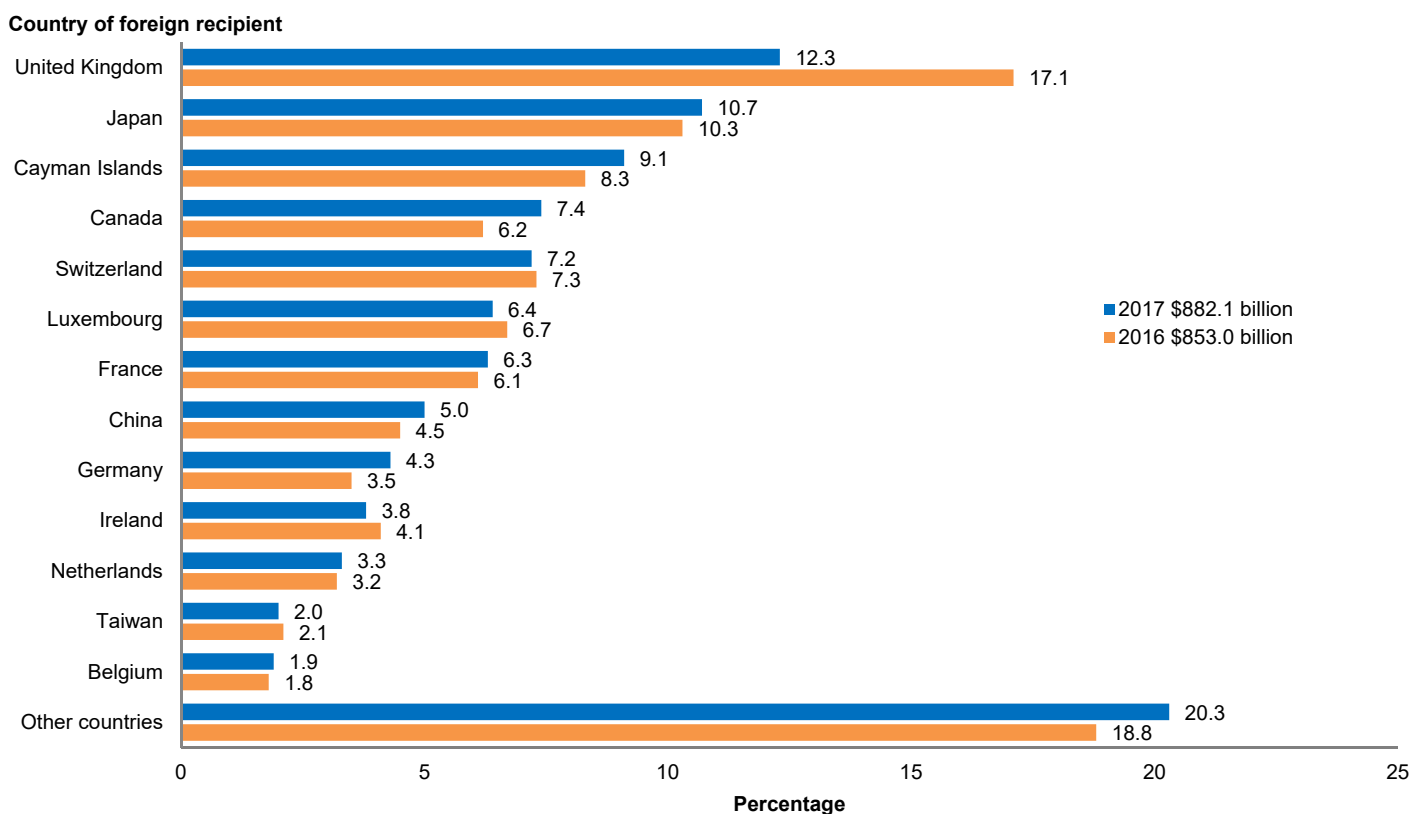
Entities such as financial institutions, businesses, and academic institutions that report U.S. payments to nonresident aliens are considered withholding agents. The Internal Revenue Code (IRC) requires withholding agents to withhold tax from U.S.-source fixed, determinable, annual, or periodic (FDAP) 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 *Annual Withholding Tax Return for U.S.-Source Income of Foreign Persons* (Form 1042). 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 2017

In Calendar Year 2017, the majority of U.S.-source income paid to foreign persons (79.7 percent) was paid to persons in just 13 countries (Figure A1). Foreign persons from the United

**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 2016 and 2017



NOTE: U.S.-source income paid to foreign persons is reported on *Foreign Person's U.S.-Source Income Subject to Withholding* (Form 1042-S).  
SOURCE: IRS, Statistics of Income Division, Individuals, Withholding on Foreign Recipients of U.S. Income, October 2019.



Kingdom received \$108.2 billion (12.3 percent of the total) in U.S.-source income payments, a decrease of 25.8 percent from 2016. Despite this decrease, recipients from the United Kingdom received nearly \$14.0 billion more than any other country. United Kingdom corporations received 15.6 percent of all payments to corporate recipients. Japanese recipients of U.S.-source income collected \$94.2 billion (10.7 percent), an increase of 10.9 percent from 2016. Recipients from the Cayman Islands collected \$80.7 billion (9.1 percent) and Canadian recipients collected \$65.1 billion (7.4 percent). In addition, recipients from Switzerland (\$63.9 billion), Luxembourg (\$56.0 billion), France (\$55.7 billion), and China (\$44.2 billion) each accounted for at least 5.0 percent of U.S.-source income paid to foreign persons in 2017.

Foreign recipients located in the 12 countries displayed in Figure A2, combined, paid \$13.3 billion in withholding taxes (72.4 percent of the total) in 2017. Recipients in the Cayman

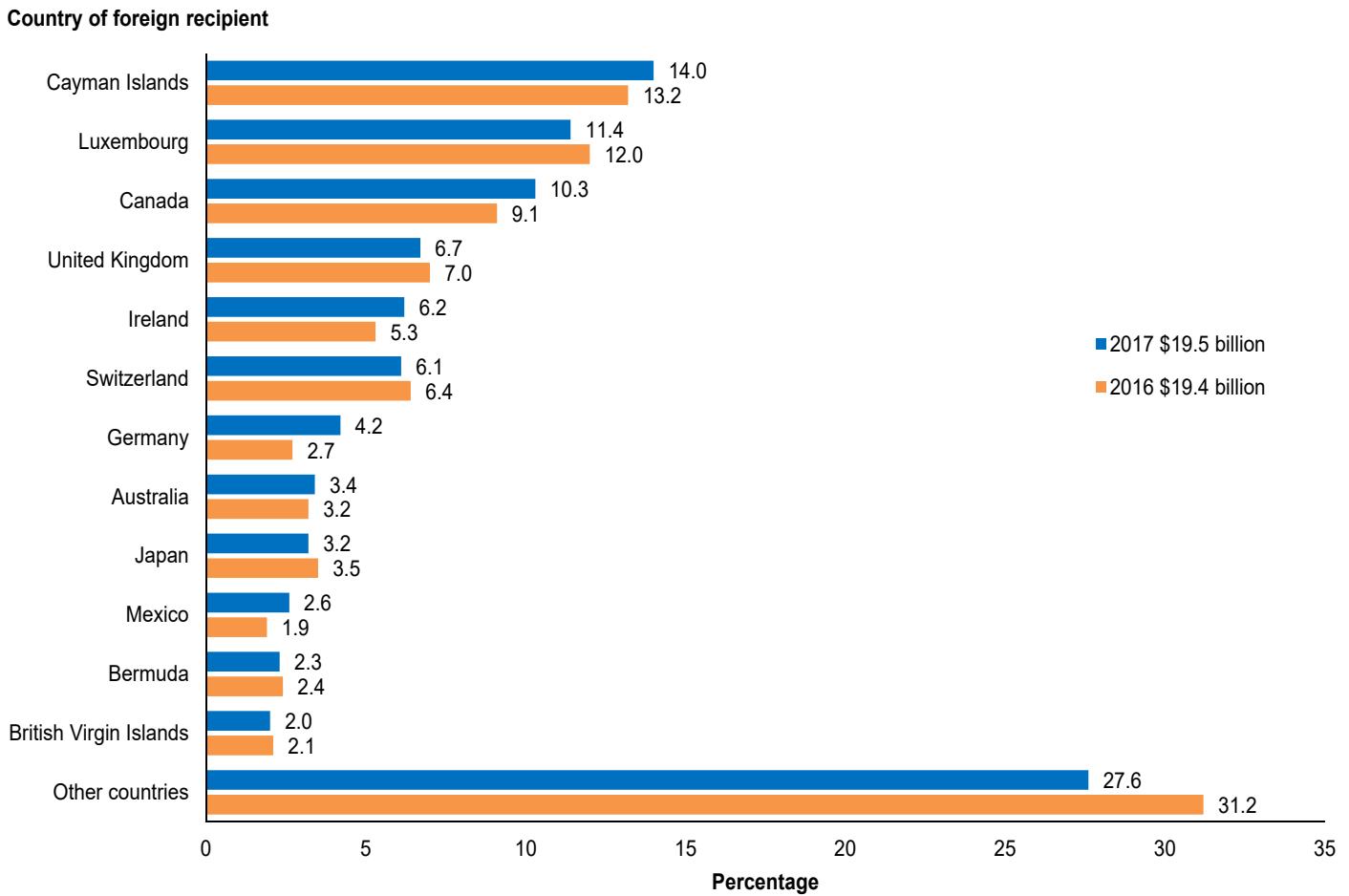
Islands paid \$2.6 billion in withholding taxes (14.0 percent of the total), the most of any country, which was an increase of 6.2 percent from 2016. Recipients from Luxembourg paid nearly \$2.1 billion in withholding taxes (11.4 percent of the total), a decrease of 4.7 percent from the previous year.

### Treaty vs. nontreaty countries

One of the primary reasons behind relatively low withholding tax rates on payments of U.S.-source income to foreign persons is reciprocal tax treaties. Some 66 countries had treaties in force with the United States (Table 1) in 2017. Nearly 75.6 percent of all payments reported on Form 1042-S went to recipients in treaty countries during 2017. Foreign recipients from tax treaty countries received 79.2 percent of total U.S. income paid to foreign persons and paid 67.8 percent of all withholding taxes on foreign-source income. Canadian recipients had the largest amount of U.S.-source income subject to tax among all treaty

**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 2016 and 2017**



NOTE: U.S.-source income paid to foreign persons is reported on *Foreign Person's U.S.-Source Income Subject to Withholding* (Form 1042-S).  
SOURCE: IRS, Statistics of Income Division, Individuals, Withholding on Foreign Recipients of U.S. Income, October 2019.

countries and paid 9.8 percent of the total withholding taxes. Recipients from the United Kingdom paid \$1.2 billion (6.3 percent) in withholding taxes in 2017. Recipients of U.S. income payments subject to withholding from treaty countries had taxes withheld at an average rate of 14.0 percent, compared to 25.7 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 2017: 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. All nontreaty countries combined accounted for \$183.7 billion of the total U.S.-source income received and \$6.3 billion of the total tax withheld for the year.

### Types of U.S.-source income

The primary types of U.S.-source income paid to foreign recipients reported on Form 1042-S in 2017 were consistent with previous years (Figure B). Interest payments totaled \$457.1 billion, which was an increase of 11.0 percent from 2016, and accounted for 51.8 percent of total gross income. Dividends paid to foreign persons rose by 3.8 percent to \$185.1 billion, and accounted for 21.0 percent of total gross income. Payments of rents and royalties to foreign persons totaled \$63.9 billion or 7.2 percent of total gross income. Notional principal contract income totaled \$37.3 billion in 2017 and was the only major

income category that declined from 2016. (See the Explanation of Selected Terms section of this article for a definition of notional principal contract.)

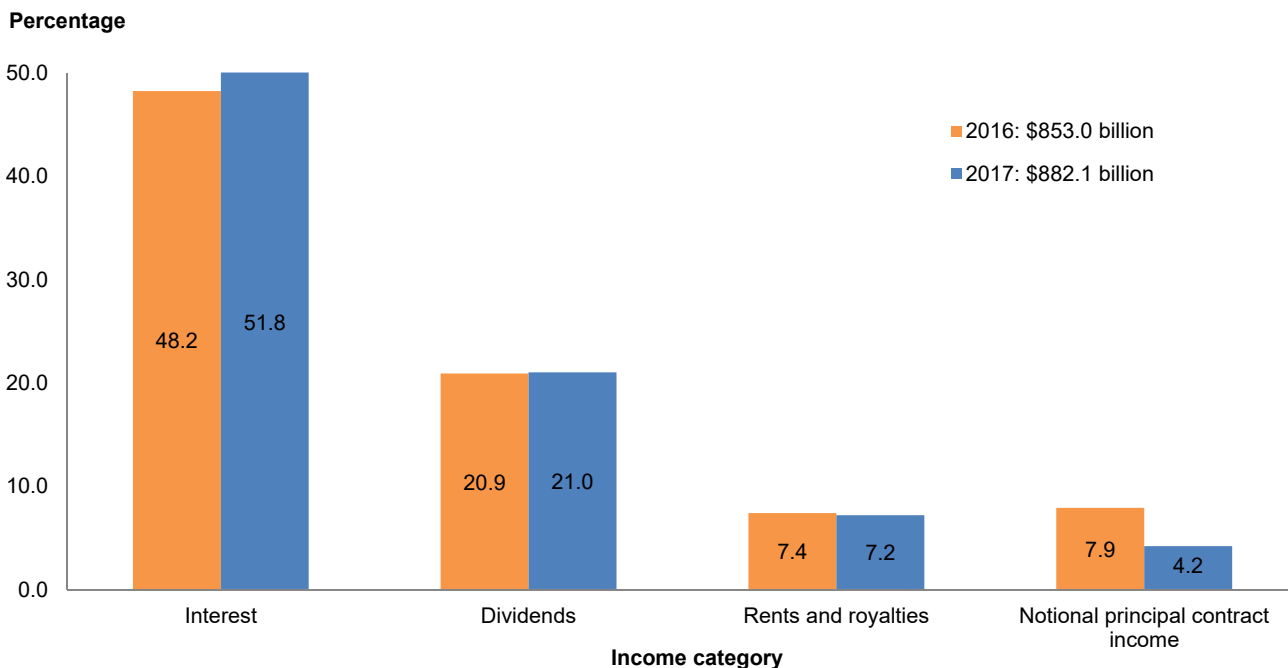
### Income subject to withholding

U.S.-source payments to foreign persons are commonly exempt from withholding tax. The primary reason for this is either a tax treaty between the United States 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 is also exempt from withholding. However, over \$118.7 billion (13.5 percent) of total U.S.-source income payments to foreign persons was subject to tax in 2017.

Figure C presents the percentages of U.S.-source income paid to foreign persons and income subject to withholding by income category in 2017. This figure illustrates the differences that exist with respect to the taxation of certain types of income. For example, dividends comprised a majority (77.2 percent) of income subject to tax, despite accounting for only 21.0 percent of total income. Dividend income subject to withholding was taxed at an average effective rate of 16.8 percent. While dividends are taxed at comparatively high rates, interest is much more likely to be exempt from withholding. For 2017, interest payments constituted the largest share of total income (51.8 percent) but made up only 8.8 percent of all U.S.-source income subject to

**Figure B**

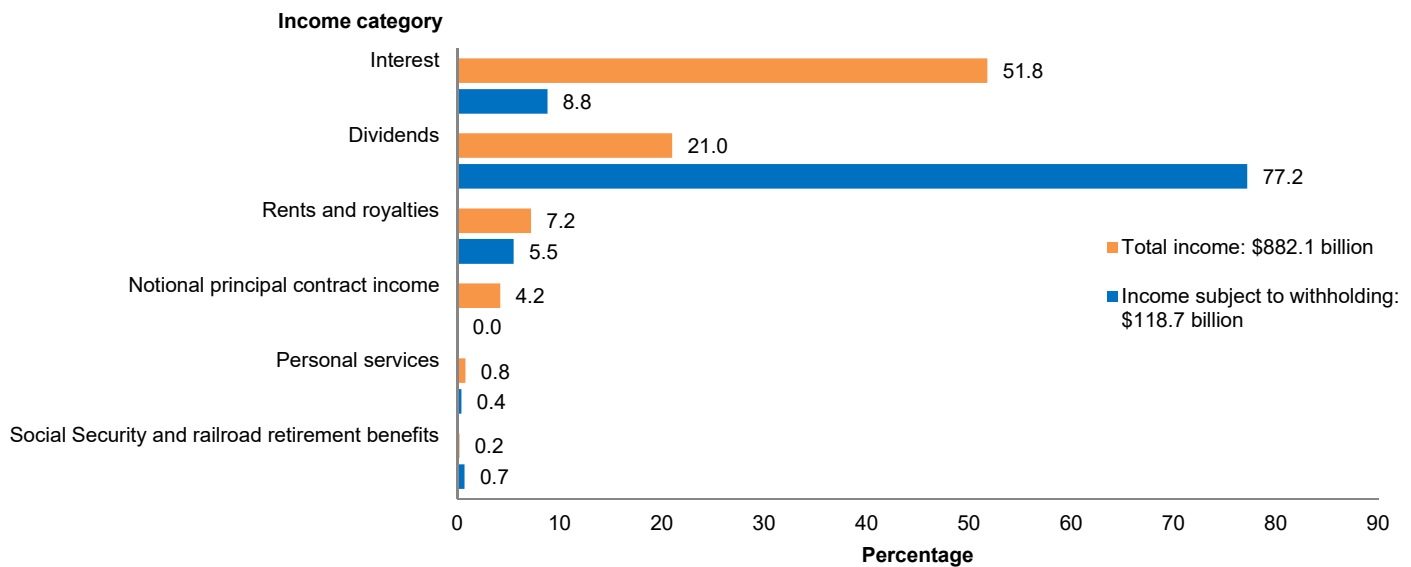
**Percentage of Total U.S.-Source Income Paid to Foreign Persons Under Chapter 3, as Reported on Form 1042-S, by Selected Income Category, Calendar Years 2016 and 2017**



NOTE: U.S.-source income paid to foreign persons is reported on *Foreign Person's U.S.-Source Income Subject to Withholding* (Form 1042-S).  
SOURCE: IRS, Statistics of Income Division, Individuals, Withholding on Foreign Recipients of U.S. Income, October 2019.

**Figure C**

**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 Year 2017**



NOTE: U.S.-source income paid to foreign persons is reported on *Foreign Person's U.S.-Source Income Subject to Withholding* (Form 1042-S).  
 SOURCE: IRS, Statistics of Income Division, Individuals, Withholding on Foreign Recipients of U.S. Income, October 2019.

withholding. Furthermore, a mere 2.3 percent of interest income was subject to withholding; it was taxed at an average rate of 7.9 percent. Notional principal contract income accounts for 4.2 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 7.2 percent of all U.S.-source income and 5.5 percent of income subject to withholding.

**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 *Foreign Partner's Information Statement of Section 1446 Withholding Tax* (Form 8805). Partnerships are required to withhold income tax on effectively connected taxable income deemed allocable to foreign partners. A U.S. or foreign 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. For tax years beginning on or before December 31, 2017, the statutory withholding rate for partnership income allocable

to corporate foreign partners was 35 percent; 39.6 percent for noncorporate partners.<sup>1</sup> Reduced withholding rates may apply if the foreign partner is an individual and the specific type of income is among income that is 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 *Statement of Withholding on Dispositions by Foreign Persons of U.S. Real Property Interests* (Form 8288-A). The Foreign Investment in Real Property Tax Act of 1980 (FIRPTA) was introduced to ensure that the United States 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 15-percent withholding, although corporations may be taxed at rates up to 35 percent in certain circumstances.<sup>2</sup> In some instances, the seller may elect to pay a 35-percent tax on the capital gain rather than a 15-percent withholding tax on the sales price.<sup>3</sup> 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.

<sup>1</sup> For tax years beginning after December 31, 2017, the statutory rate for foreign corporate partners decreased to 21 percent; 37 percent for noncorporate foreign partners.

<sup>2</sup> The withholding rate increased from 10 percent to 15 percent for sales occurring on or after February 16, 2016.

<sup>3</sup> This rate decreased from 35 percent to 21 percent for distributions made after December 31, 2017.

## 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 *U.S. Income Tax Return of a Foreign Corporation* (Form 1120-F). 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 by 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).

## Effective withholding tax rates

The combined withholding tax on U.S.-source income paid to foreign persons for 2017 was \$24.7 billion, with an average effective tax rate of 17.4 percent (Figure D). The effective withholding rates vary widely among the various tax forms. U.S.

**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 2017**

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)
<b>All forms</b>	<b>6,162,057</b>	<b>904,613,355</b>	<b>3,460,203</b>	<b>142,306,276</b>	<b>24,727,206</b>	<b>17.4</b>
<b>Form 1042-S: All countries [4]</b>	<b>5,963,143</b>	<b>882,114,975</b>	<b>3,275,037</b>	<b>118,743,768</b>	<b>19,460,085</b>	<b>16.4</b>
United Kingdom	567,774	108,168,066	314,267	10,717,323	1,224,376	11.4
Japan	272,563	94,170,504	79,689	6,085,184	582,726	9.6
Cayman Islands	139,893	80,675,814	34,312	9,830,883	2,569,255	26.1
Canada	747,135	65,115,684	449,096	14,767,805	1,900,372	12.9
Switzerland	81,405	63,865,610	39,849	11,983,183	1,128,382	9.4
Luxembourg	25,666	56,046,471	8,600	7,552,675	2,097,622	27.8
France	106,692	55,700,556	60,862	1,767,757	337,030	19.1
China	341,028	44,150,637	117,157	1,102,869	123,385	11.2
Germany	390,593	37,595,424	178,588	7,270,794	771,536	10.6
Ireland	85,424	33,929,856	50,626	5,461,175	1,133,772	20.8
Netherlands	80,725	29,354,183	39,028	2,130,629	226,192	10.6
Taiwan	149,792	17,676,614	95,785	1,070,598	246,876	23.1
Belgium	39,833	16,388,655	25,387	2,188,473	444,472	20.3
Singapore	114,556	12,623,202	77,660	877,247	252,479	28.8
Australia	286,508	11,396,493	235,351	4,799,746	625,571	13.0
South Korea	55,418	10,705,631	33,243	2,615,740	390,669	14.9
Bermuda	20,208	10,430,331	7,500	1,456,207	426,763	29.3
<b>Form 8805: All countries [5]</b>	<b>160,552</b>	<b>8,969,338</b>	<b>147,742</b>	<b>10,924,461</b>	<b>3,653,262</b>	<b>33.4</b>
United Kingdom	9,156	1,528,460	6,854	1,664,648	606,753	36.4
Germany	58,688	1,162,020	58,098	1,292,377	452,767	35.0
Canada	12,740	836,817	10,709	1,058,634	325,006	30.7
Cayman Islands	1,869	588,529	1,164	775,670	261,229	33.7
Netherlands	1,586	248,189	1,347	298,757	88,105	29.5
Denmark	436	243,758	302	337,809	88,361	26.2
Hong Kong	2,212	235,732	1,542	257,370	82,827	32.2
Israel	6,351	226,138	6,234	229,051	58,331	25.5
Australia	1,659	215,024	1,337	286,201	97,524	34.1
<b>Form 8288-A: All countries</b>	<b>35,354</b>	<b>10,978,659</b>	<b>35,354</b>	<b>10,978,659</b>	<b>1,332,719</b>	<b>12.1</b>
Canada	9,672	2,354,265	9,672	2,354,265	253,623	10.8
United Kingdom	2,590	1,121,536	2,590	1,121,536	131,388	11.7
Germany	9,180	765,451	9,180	765,451	100,042	13.1
Sweden	187	631,107	187	631,107	93,189	14.8
China	694	425,889	694	425,889	54,840	12.9
Japan	1,754	407,490	1,754	407,490	53,281	13.1
Cayman Islands	172	394,266	172	394,266	54,979	13.9
British Virgin Islands	117	332,389	117	332,389	43,353	13.0
<b>Form 1120-F: Reporting branch profits tax</b>	<b>3,008</b>	<b>2,550,383</b>	<b>2,070</b>	<b>1,659,388</b>	<b>281,140</b>	<b>16.9</b>

[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 2020.



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 tax rate. For 2017, the average effective withholding rate on U.S. partnership distributions to foreign partners was 33.4 percent. The 12.1-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 15 percent. The average effective rate on foreign branch profits (16.9 percent) reported on Form 1120-F was less than the 30-percent 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 2017 made up 61.6 percent of all transactions, 80.8 percent of the total sales revenue, and 78.6 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 2017. New York had the highest sales revenue (nearly \$1.27 million) per transaction, followed by California (\$0.90 million) and Massachusetts (\$0.83 million). 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.

**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 2017**

[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)
<b>Total</b>	<b>35,354</b>	<b>10,978,659</b>	<b>1,332,719</b>
Florida	12,568	3,035,210	318,661
California	2,596	2,339,868	295,289
New York	992	1,259,723	143,846
Texas	1,117	717,095	95,143
Hawaii	2,018	514,167	72,611
Washington	784	397,917	54,618
Arizona	1,425	386,734	37,447
Massachusetts	262	217,124	30,252
All others and nonallocable	13,592	2,110,821	284,852

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

SOURCE: IRS, Statistics of Income Division, Foreign Recipients of U.S. Income, August 2020.

## 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: (a) certain payments to foreign financial institutions (FFIs) that do not agree to report particular information to the IRS regarding their U.S. account; and (b) certain payments to particular nonfinancial foreign entities (NFFE) that do not provide information on their substantial U.S. owners to withholding agents. Payments subject to withholding under FATCA are subject to the laws of Chapter 4 of the IRC, which were implemented beginning July 1, 2014.

Some 36.6 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 20.0 percent. Interest was the largest category of Chapter 4 income (\$2.2 billion), and most of that (82.6 percent) was exempt from withholding. Dividends accounted for 60.5 percent of Chapter 4 income subject to withholding while interest payments accounted for 17.8 percent. Tax withheld on dividends (62.1 percent) and interest (20.1 percent) comprised the majority of tax withheld on Chapter 4 payments.

## Data Sources and Limitations

Because the populations of Forms 1042-S, 8805, and 8288-A were used for the statistics in this article, 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, as well as the calculation of the correct tax withheld, the possibility of error cannot be completely eliminated.

The Form 1120-F statistics in this article are based on information reported on Form 1120-F corporation income tax returns that were included in the 2017 Statistics of Income sample of corporate returns. Because the estimates are based on a sample, they are subject to sampling error.<sup>4</sup>

## 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. *Foreign Person's U.S.-Source Income Subject to Withholding* (Form 1042-S) 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 2017. The data reflect the income that was paid and U.S. tax that was withheld for 2017.

<sup>4</sup> For a more complete description of the SOI Corporate Sample, see <https://www.irs.gov/pub/irs-pdf/pl6.pdf#page=10>.

## 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. *Foreign Partner's Information Statement of Section 1446 Withholding Tax* (Form 8805) 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 2017. The data reflect both the income paid and U.S. tax withheld for 2017.

## Form 8288-A

Purchasers of U.S. real property held by foreign persons must withhold tax in accordance with Internal Revenue Code section 1445. *Statement of Withholding on Dispositions by Foreign Persons of U.S. Real Property Interests* (Form 8288-A) 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 2017.

## 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. *U.S. Income Tax Return of a Foreign Corporation* (Form 1120-F) 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 2017 SOI Corporation sample.

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

**Table 1. Foreign Recipients of U.S. Income Under Chapter 3 Withholding: Number of Forms 1042-S, Total U.S.-Source Income, and U.S. Tax Withheld, by Total Tax Treaty Countries and Non-Tax Treaty Countries, Calendar Year 2017**  
 [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)
<b>Total</b>	<b>5,963,143</b>	<b>882,114,975</b>	<b>763,371,207</b>	<b>118,743,768</b>	<b>19,460,085</b>
<b>Tax treaty countries, total</b>	<b>4,509,811</b>	<b>698,444,531</b>	<b>604,084,322</b>	<b>94,360,209</b>	<b>13,184,659</b>
Armenia	1,362	9,682	7,811	1,872	449
Australia [1]	286,800	11,398,750	6,598,157	4,800,593	625,735
Austria	28,160	2,241,691	1,113,438	1,128,253	99,495
Azerbaijan	833	2,539	1,302	1,236	283
Bangladesh	8,395	38,361	33,984	4,377	656
Barbados	3,512	4,681,983	4,523,087	158,896	18,756
Belarus	3,165	24,560	19,890	4,670	1,182
Belgium	39,833	16,388,655	14,200,182	2,188,473	444,472
Bulgaria	6,723	37,843	18,302	19,541	3,243
Canada	747,135	65,115,684	50,347,879	14,767,805	1,900,372
China	341,028	44,150,637	43,047,767	1,102,869	123,385
Cyprus	4,124	265,964	177,020	88,944	16,459
Czech Republic	17,270	632,423	567,699	64,724	11,006
Denmark	25,452	5,084,450	4,263,925	820,525	131,540
Egypt	9,074	143,390	112,967	30,424	4,878
Estonia	4,682	25,219	12,868	12,351	2,452
Finland	14,679	3,175,926	2,809,138	366,788	42,472
France [2]	106,796	55,701,512	53,932,915	1,768,597	337,266
Georgia	1,104	21,511	17,914	3,597	941
Germany	390,593	37,595,424	30,324,629	7,270,794	771,536
Greece	22,245	123,455	57,948	65,507	17,081
Hungary	10,575	2,504,507	1,991,597	512,910	29,369
Iceland	3,168	192,429	182,479	9,950	1,691
India	177,333	6,889,034	6,017,609	871,425	125,737
Indonesia	15,494	774,991	751,269	23,721	3,634
Ireland	85,424	33,929,856	28,468,681	5,461,175	1,133,772
Israel	73,603	3,161,111	1,699,740	1,461,371	273,011
Italy	91,159	3,620,182	1,876,782	1,743,401	140,975
Jamaica	6,398	231,560	202,808	28,753	6,193
Japan	272,563	94,170,504	88,085,321	6,085,184	582,726
Kazakhstan	3,082	62,881	58,067	4,815	957
Korea, Republic of (South)	55,418	10,705,631	8,089,891	2,615,740	390,669
Kyrgyzstan	414	1,076	507	569	84
Latvia	3,555	91,290	81,342	9,948	2,283
Lithuania	3,622	20,611	14,479	6,132	1,180
Luxembourg	25,666	56,046,471	48,493,796	7,552,675	2,097,622
Malta	4,090	207,971	68,168	139,802	17,376
Mexico	295,443	7,648,049	4,757,066	2,890,983	470,071
Moldova	1,341	10,094	8,440	1,654	396
Morocco	2,326	239,442	236,543	2,899	596
Netherlands	80,725	29,354,183	27,223,554	2,130,629	226,192
New Zealand	36,651	738,630	439,367	299,263	49,360
Norway	26,071	9,454,012	9,177,035	276,977	45,005
Pakistan	8,599	45,730	33,809	11,922	2,199
Philippines	33,497	915,995	805,699	110,296	24,934
Poland	46,263	1,091,606	585,623	505,983	50,952
Portugal	14,146	1,186,262	1,054,013	132,248	13,882
Romania	10,446	76,411	54,109	22,302	3,561
Russia	57,807	1,869,004	1,726,135	142,869	14,888

Footnotes at end of table.



**Table 1. Foreign Recipients of U.S. Income Under Chapter 3 Withholding: Number of Forms 1042-S, Total U.S.-Source Income, and U.S. Tax Withheld, by Total Tax Treaty Countries and Non-Tax Treaty Countries, Calendar Year 2017—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	6,455	70,352	47,480	22,873	5,239
Slovenia	5,985	45,714	25,509	20,205	4,163
South Africa	40,406	614,586	433,977	180,609	29,734
Spain	86,177	3,896,243	2,489,607	1,406,636	166,177
Sri Lanka	1,962	29,633	24,811	4,822	687
Sweden	34,330	7,317,849	5,389,876	1,927,973	298,016
Switzerland	81,405	63,865,610	51,882,427	11,983,183	1,128,382
Tajikistan	332	696	321	376	55
Thailand	26,865	1,175,514	1,018,467	157,047	24,842
Trinidad and Tobago	7,915	257,259	233,507	23,752	6,982
Tunisia	1,486	12,779	9,937	2,841	559
Turkey	15,999	501,224	424,393	76,830	11,973
Turkmenistan	275	777	485	292	50
Ukraine	20,177	45,546	14,517	31,029	6,257
United Kingdom	567,774	108,168,066	97,450,743	10,717,323	1,224,376
Uzbekistan	742	3,887	2,656	1,232	225
Venezuela	103,682	339,615	262,858	76,757	13,968
<b>Non-tax treaty countries, total [3]</b>	<b>1,453,332</b>	<b>183,670,444</b>	<b>159,286,885</b>	<b>24,383,559</b>	<b>6,275,426</b>

[1] Includes the following countries which are part of the same tax treaty: Ashmore and Cartier Islands, Christmas Island, Cocos (Keeling) Islands, Coral Sea Islands Territory, and Norfolk Island. These countries are not included with Australia in Table 2.

[2] Includes the following countries which are part of the same tax treaty: Guadeloupe, French Guiana, Martinique, and Reunion. 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 2019.

**Table 2. Foreign Recipients of U.S. Income Under Chapter 3 Withholding: Number of Forms 1042-S, U.S. Tax Withheld, U.S.-Source Income, and Principal Types of Income, by Selected Recipient Types and Selected Countries and Selected Recipient Types, Calendar Year 2017**

[Money amounts are in thousands of dollars]

Recipient types and 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)
<b>Total</b>	<b>5,963,143</b>	<b>19,460,085</b>	<b>882,114,975</b>	<b>457,059,653</b>	<b>185,100,076</b>	<b>63,905,180</b>	<b>2,049,350</b>	<b>7,068,195</b>	<b>37,341,604</b>
<b>RECIPIENT TYPES</b>									
Individuals	4,439,105	1,567,407	15,363,099	1,969,711	3,206,922	2,155,891	2,049,350	1,281,104	446
Corporations	715,877	10,506,486	524,209,269	271,464,074	86,090,444	51,941,519	0	4,896,114	35,018,702
Partnerships and trusts	185,730	755,652	26,571,413	10,292,177	9,670,785	2,594,754	0	332,068	194,494
U.S. branches treated as U.S. persons	3,233	83,602	29,637,382	18,840,134	5,133,284	73,724	0	6,105	1,459,768
Governments and international organizations	64,858	78,889	128,702,010	84,066,174	23,663,554	119,013	0	43,148	16
Tax-exempt organizations [1]	13,969	8,938	1,388,713	489,860	522,781	205,632	0	25,032	0
Withholding foreign partnerships and trusts	4,045	7,179	3,712,793	1,346,648	1,082,983	27,956	0	27,956	264,191
Artists and athletes [2]	32,083	273,280	1,204,810	4,015	2,543	97,552	0	1,636	0
Withholding rate pools (general)	27,411	5,000,023	92,027,890	48,127,480	37,483,176	66,348	0	0	0
Withholding rate pools (tax-exempt)	725	2,100	10,855,839	4,468,047	6,146,583	0	0	0	0
Other and unknown	476,107	1,176,529	48,441,757	15,991,333	12,097,021	6,622,791	0	455,032	403,987
<b>SELECTED COUNTRIES AND RECIPIENT TYPES</b>									
Algeria	902	706	260,456	251,570	7,233	76	0	2	0
Individuals	851	263	1,610	105	361	68	0	1	0
Corporations	13	437	255,878	248,533	6,858	3	0	0	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Argentina	79,885	35,868	446,291	179,404	62,025	42,254	7,764	24,411	0
Individuals	72,788	25,596	249,954	131,581	45,254	21,235	7,764	19,874	0
Corporations	1,718	6,882	105,508	29,573	4,944	7,688	0	3,874	0
Withholding rate pools (general)	32	111	2,082	1,634	445	0	0	0	0
Australia	286,508	625,571	11,396,493	4,543,862	3,619,261	967,133	40,848	70,159	64,661
Individuals	164,114	40,060	284,571	12,740	89,279	42,568	40,848	17,948	0
Corporations	17,783	307,036	5,827,157	2,706,460	1,394,173	802,659	0	47,555	31,132
Withholding rate pools (general)	65	3,966	44,910	21,143	22,981	3	0	0	0
Austria	28,160	99,495	2,241,691	639,727	1,143,253	200,584	10,195	17,001	570
Individuals	21,360	10,698	75,097	6,554	16,656	6,186	10,195	1,540	0
Corporations	2,024	28,254	1,390,461	246,924	844,214	111,766	0	12,926	0
Withholding rate pools (general)	1,657	48,777	553,729	330,005	220,363	402	0	0	0
Bahamas	22,545	171,347	1,800,022	1,119,649	499,570	1,233	695	2,005	0
Individuals	2,909	2,399	16,375	5,760	3,581	193	695	73	0
Corporations	17,677	129,861	1,422,851	898,601	371,623	167	0	926	0
Withholding rate pools (general)	377	21,210	213,742	135,068	74,546	8	0	0	0
Barbados	3,512	18,756	4,681,983	607,378	29,625	309,399	1,221	140	0
Individuals	1,611	692	5,515	878	653	172	1,221	48	0
Corporations	1,498	17,437	4,661,372	595,775	27,333	307,411	0	89	0
Withholding rate pools (general)	7	157	661	0	477	0	0	0	0
Belgium	39,833	444,472	16,388,655	11,245,333	3,682,990	438,040	8,830	31,378	2,859
Individuals	30,983	11,229	92,153	6,221	37,164	8,194	8,830	12,048	0
Corporations	3,225	9,244	5,126,082	4,072,981	180,258	392,911	0	13,094	2,859
Withholding rate pools (general)	480	420,212	8,749,898	4,892,940	3,415,442	51	0	0	0
Bermuda	20,208	426,763	10,430,331	8,518,549	1,190,768	46,509	1,691	18,217	558
Individuals	5,679	3,934	140,067	120,336	9,538	1,856	1,691	398	0
Corporations	11,259	282,487	9,212,928	7,937,382	628,463	11,524	0	17,776	558
Withholding rate pools (general)	27	1,158	9,443	5,633	3,182	0	0	0	0
Brazil	80,280	74,581	4,160,612	3,799,636	76,364	60,727	5,329	29,375	4
Individuals	66,009	25,826	192,592	69,337	32,428	17,712	5,329	13,300	4
Corporations	2,400	39,490	309,121	138,413	35,986	32,491	0	5,747	0
Withholding rate pools (general)	37	219	3,003	2,282	710	0	0	0	0
British Virgin Islands	99,380	371,445	4,220,590	2,611,821	1,121,525	10,116	194	17,726	0
Individuals	1,443	905	17,258	13,439	2,019	141	194	369	0
Corporations	95,743	360,221	4,038,895	2,497,885	1,073,628	6,528	0	17,204	0
Withholding rate pools (general)	13	59	432	226	201	0	0	0	0

Footnotes at end of table.

**Table 2. Foreign Recipients of U.S. Income Under Chapter 3 Withholding: Number of Forms 1042-S, U.S. Tax Withheld, U.S.-Source Income, and Principal Types of Income, by Selected Recipient Types and Selected Countries and Selected Recipient Types, Calendar Year 2017—Continued**  
 [Money amounts are in thousands of dollars]

Recipient types and 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	889	629	149,178	40,214	81,646	168	0	0	0
Individuals	503	69	322	38	210	3	0	0	0
Corporations	30	91	1,606	1,364	86	0	0	0	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Cameroon	1,022	363	188,395	119	285	185,749	9	139	0
Individuals	961	314	2,066	80	285	30	9	66	0
Corporations	13	39	589	23	0	63	0	29	0
Withholding rate pools (general)	d	0	d	d	0	0	0	0	0
Canada	747,135	1,900,372	65,115,684	22,250,704	20,125,882	3,142,082	417,308	959,964	1,867,828
Individuals	555,439	166,454	2,136,238	50,923	209,234	280,971	417,308	127,071	0
Corporations	66,813	535,323	32,362,726	13,373,266	6,008,363	2,483,615	0	732,468	1,620,564
Withholding rate pools (general)	908	1,023,753	13,790,343	3,993,412	8,572,398	2,411	0	0	0
Cayman Islands	139,893	2,569,255	80,675,814	64,373,975	8,241,772	89,434	744	25,640	193,646
Individuals	2,305	4,460	86,406	69,735	12,572	459	744	11	0
Corporations	129,134	2,485,671	74,146,774	60,612,168	7,045,114	84,755	0	2,237	0
Withholding rate pools (general)	94	3,012	59,115	48,338	10,504	0	0	0	0
Chile	29,675	150,685	1,445,317	335,025	444,353	24,258	8,047	3,925	235
Individuals	d	d	d	d	d	d	d	d	d
Corporations	7,240	138,282	997,352	264,552	422,846	22,253	0	1,419	235
Withholding rate pools (general)	d	d	d	d	d	d	d	d	d
China	341,028	123,385	44,150,637	38,329,295	3,243,586	277,815	457	563,651	1,798
Individuals	322,378	30,523	817,430	95,987	95,031	29,488	457	384,820	0
Corporations	4,025	77,528	2,964,539	2,107,241	334,517	211,536	0	101,227	1,798
Withholding rate pools (general)	20	13	177	6	120	40	0	0	0
Colombia	32,831	95,256	879,257	387,629	269,166	56,294	10,494	5,593	0
Individuals	25,370	8,791	54,926	13,920	7,675	2,491	10,494	1,939	0
Corporations	3,423	44,461	289,064	121,935	130,194	9,251	0	1,853	0
Withholding rate pools (general)	d	0	d	d	0	0	0	0	0
Cyprus	4,124	16,459	265,964	100,533	29,982	105,896	789	4,991	0
Individuals	2,278	1,726	18,729	11,951	2,546	882	789	195	0
Corporations	1,601	12,598	168,884	79,293	20,016	46,328	0	4,543	0
Withholding rate pools (general)	51	903	8,360	2,572	5,369	0	0	0	0
Czech Republic	17,270	11,006	632,423	360,269	81,778	64,601	1,864	66,929	0
Individuals	13,954	2,584	24,767	1,574	5,056	2,241	1,864	3,321	0
Corporations	689	1,502	118,286	9,612	8,889	25,997	0	62,672	0
Withholding rate pools (general)	78	3,752	43,295	17,710	23,863	12	0	0	0
Denmark	25,452	131,540	5,084,450	2,256,989	1,265,498	966,954	7,537	32,503	0
Individuals	11,533	5,656	37,961	1,377	3,999	9,871	7,537	3,726	0
Corporations	5,241	60,851	3,387,227	1,574,146	574,285	897,930	0	27,238	0
Withholding rate pools (general)	143	45,346	434,120	133,817	295,678	3	0	0	0
East Timor	597	1,321	167,178	162,522	3,557	15	0	0	0
Individuals	267	127	1,116	339	150	14	0	0	0
Corporations	316	1,192	165,914	162,044	3,406	0	0	0	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Egypt	9,074	4,878	143,390	62,423	17,539	1,258	100	6,115	0
Individuals	8,101	4,261	79,791	6,708	13,655	818	100	4,752	0
Corporations	269	264	13,292	10,704	178	358	0	1,337	0
Withholding rate pools (general)	d	0	d	d	0	0	0	0	0
El Salvador	9,980	7,218	309,703	209,837	3,207	6,799	1,668	63,119	0
Individuals	8,415	5,661	32,626	6,615	2,323	3,132	1,668	687	0
Corporations	348	713	263,848	195,201	646	3,103	0	61,679	0
Withholding rate pools (general)	d	d	d	0	0	d	0	0	0
Finland	14,679	42,472	3,175,926	720,416	648,834	1,532,439	3,457	5,017	0
Individuals	9,746	2,345	36,513	15,656	2,197	3,570	3,457	3,448	0
Corporations	2,259	33,966	2,519,875	299,871	496,170	1,499,266	0	1,002	0
Withholding rate pools (general)	42	3,250	47,896	17,653	30,018	0	0	0	0

Footnotes at end of table.

**Table 2. Foreign Recipients of U.S. Income Under Chapter 3 Withholding: Number of Forms 1042-S, U.S. Tax Withheld, U.S.-Source Income, and Principal Types of Income, by Selected Recipient Types and Selected Countries and Selected Recipient Types, Calendar Year 2017—Continued**  
 [Money amounts are in thousands of dollars]

Recipient types and 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)
France	106,692	337,030	55,700,556	20,862,795	8,280,623	4,885,365	42,468	142,109	14,057,499
Individuals	79,713	37,924	334,380	12,067	63,367	51,361	42,468	58,070	0
Corporations	10,256	72,746	34,310,078	9,978,297	3,107,950	3,685,775	0	56,752	13,708,365
Withholding rate pools (general)	1,418	195,310	3,206,811	2,345,202	752,158	78	0	0	0
Gabon	2,452	1,369	382,716	19,951	2,364	11,510	0	48,072	16,555
Individuals	944	769	10,311	158	1,634	1,730	0	179	0
Corporations	944	189	354,190	18,776	160	7,830	0	40,218	16,555
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Gambia	557	163	336,961	9,691	179	324,783	4	6	0
Individuals	208	109	606	17	179	6	4	6	0
Corporations	40	1	11,575	9,674	0	2	0	0	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Germany	390,593	771,536	37,595,424	11,099,684	13,226,453	8,868,255	139,968	318,791	429,899
Individuals	331,751	53,069	993,705	85,386	229,048	239,481	139,968	69,972	0
Corporations	25,468	270,780	24,888,662	6,775,414	7,320,370	7,738,022	0	225,555	314,041
Withholding rate pools (general)	8,230	202,030	3,905,729	2,335,776	1,357,582	1,250	0	0	0
Greece	22,245	17,081	123,455	26,140	17,915	6,104	35,371	5,995	0
Individuals	20,615	13,698	70,713	4,921	7,831	1,877	35,371	4,349	0
Corporations	493	1,003	27,778	5,422	3,202	3,425	0	1,411	0
Withholding rate pools (general)	6	3	3,020	d	d	d	0	0	0
Guernsey	10,901	130,249	1,578,695	881,616	435,512	1,103	147	0	0
Individuals	307	211	34,665	32,954	380	98	147	0	0
Corporations	8,471	103,271	1,277,229	722,826	311,588	744	0	0	0
Withholding rate pools (general)	117	16,028	103,195	18,885	79,131	d	0	0	0
Hong Kong	78,822	310,793	6,790,084	4,201,771	1,579,772	52,151	2,226	22,873	28
Individuals	67,196	43,402	218,714	52,230	100,453	8,613	2,226	7,657	0
Corporations	5,662	96,802	2,033,854	1,181,525	164,291	38,745	0	10,149	28
Withholding rate pools (general)	488	144,317	1,809,553	1,185,601	556,102	73	0	0	0
Hungary	10,575	29,369	2,504,507	1,258,547	502,358	95,925	2,581	4,296	0
Individuals	7,938	1,800	22,957	1,969	2,559	1,715	2,581	3,053	0
Corporations	667	7,389	734,587	335,147	111,594	86,214	0	655	0
Withholding rate pools (general)	6	0	201	d	d	d	0	0	0
Iceland	3,168	1,691	192,429	120,081	13,035	7,900	498	1,121	0
Individuals	1,697	441	4,747	61	439	1,098	498	456	0
Corporations	298	132	15,357	2,822	1,053	6,123	0	588	0
Withholding rate pools (general)	10	65	435	d	432	0	0	0	0
India	177,333	125,737	6,889,034	1,861,653	379,465	239,885	4,565	1,670,368	32,090
Individuals	135,863	30,357	222,130	19,508	30,797	10,615	4,565	33,271	0
Corporations	2,598	65,088	4,747,547	243,986	230,032	188,967	0	1,614,294	32,090
Withholding rate pools (general)	7	16	108	d	d	96	0	0	0
Indonesia	15,494	3,634	774,991	529,020	5,948	5,099	440	3,797	0
Individuals	14,372	2,481	21,698	1,408	3,997	4,277	440	2,207	0
Corporations	260	812	37,172	34,350	921	455	0	1,015	0
Withholding rate pools (general)	6	d	22	d	d	0	0	0	0
Ireland	85,424	1,133,772	33,929,856	21,123,380	5,194,469	3,997,181	26,791	277,707	2,077
Individuals	59,800	9,179	176,832	1,920	36,519	21,675	26,791	4,937	0
Corporations	17,108	1,022,685	28,802,662	19,429,893	4,614,000	1,469,275	0	269,419	2,077
Withholding rate pools (general)	78	4,230	26,066	601	21,072	1,618	0	0	0
Isle of Man	1,649	7,022	125,773	100,015	20,575	939	357	37	0
Individuals	389	831	3,700	1,954	562	587	357	37	0
Corporations	1,010	5,826	117,824	96,495	18,320	331	0	0	0
Withholding rate pools (general)	d	d	d	0	d	d	0	0	0
Israel	73,603	273,011	3,161,111	1,717,168	804,474	139,574	15,211	80,046	0
Individuals	57,574	52,291	360,611	67,309	164,658	18,771	15,211	36,470	0
Corporations	9,762	88,308	996,687	575,909	124,578	106,591	0	40,579	0
Withholding rate pools (general)	300	113,027	914,028	442,300	446,711	63	0	0	0
Italy	91,159	140,975	3,620,182	1,467,670	980,912	622,083	95,172	87,598	49,219
Individuals	74,812	14,207	323,800	17,341	35,119	18,014	95,172	33,467	0
Corporations	4,988	68,902	1,577,001	575,504	546,231	232,846	0	43,972	37,803
Withholding rate pools (general)	1,429	44,400	837,030	498,306	325,379	93	0	0	0

Footnotes at end of table.

**Table 2. Foreign Recipients of U.S. Income Under Chapter 3 Withholding: Number of Forms 1042-S, U.S. Tax Withheld, U.S.-Source Income, and Principal Types of Income, by Selected Recipient Types and Selected Countries and Selected Recipient Types, Calendar Year 2017—Continued**

[Money amounts are in thousands of dollars]

Recipient types and 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)
<b>Jamaica</b>	6,398	6,193	231,560	199,403	3,946	4,357	4,135	2,640	0
Individuals	4,696	4,308	21,964	1,184	1,250	1,454	4,135	1,410	0
Corporations	593	760	197,922	194,116	2,432	731	0	4	0
Withholding rate pools (general)	d	d	d	0	0	d	0	0	0
<b>Japan</b>	272,563	582,726	94,170,504	43,715,778	18,712,059	13,757,112	343,294	245,991	2,119,152
Individuals	233,273	20,240	725,539	23,350	91,643	89,450	343,294	37,382	0
Corporations	13,891	181,348	55,760,234	22,827,360	9,283,401	13,007,870	0	199,188	1,432,378
Withholding rate pools (general)	953	364,076	16,318,647	7,812,352	7,592,243	28,628	0	0	0
<b>Jersey</b>	7,164	97,202	1,234,013	758,478	311,745	18,453	213	281	0
Individuals	385	572	35,730	33,491	1,374	420	213	194	0
Corporations	4,467	70,391	977,318	621,577	205,336	17,605	0	81	0
Withholding rate pools (general)	241	18,721	150,629	76,970	71,331	0	0	0	0
<b>Korea, Republic of (South)</b>	55,418	390,669	10,705,631	4,468,542	2,506,288	1,449,891	16,650	43,198	0
Individuals	43,671	19,097	159,588	9,270	14,720	26,293	16,650	35,080	0
Corporations	3,060	288,354	3,553,587	1,324,767	573,835	1,172,294	0	5,824	0
Withholding rate pools (general)	182	12,582	406,737	314,875	86,992	73	0	0	0
<b>Kuwait</b>	4,415	4,247	5,062,961	1,349,433	2,734,339	729	0	711	0
Individuals	2,448	1,188	7,562	2,735	2,279	624	0	706	0
Corporations	580	1,136	33,615	26,142	3,648	10	0	0	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
<b>Liberia</b>	981	6,212	132,674	17,561	16,212	34,429	108	31	0
Individuals	344	120	883	32	0	11	108	5	0
Corporations	611	6,011	126,296	16,496	15,966	34,401	0	16	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
<b>Libya</b>	200	3,219	120,657	20,640	99,639	3	0	13	0
Individuals	169	52	429	67	33	2	0	13	0
Corporations	14	3,166	27,794	17,225	10,521	0	0	0	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
<b>Liechtenstein</b>	1,227	37,098	319,703	184,272	107,383	12,509	54	2,378	0
Individuals	110	190	889	272	476	0	54	0	0
Corporations	435	6,871	41,024	13,780	10,086	10,978	0	2,322	0
Withholding rate pools (general)	156	21,907	189,277	110,815	74,059	46	0	0	0
<b>Luxembourg</b>	25,666	2,097,622	56,046,471	42,881,551	9,371,020	1,466,825	732	13,795	83
Individuals	2,363	721	44,094	38,575	1,292	174	732	674	0
Corporations	20,965	1,335,575	40,373,738	32,834,638	4,571,243	1,281,710	0	12,869	0
Withholding rate pools (general)	1,070	748,187	9,487,437	6,521,650	2,555,813	241	0	0	0
<b>Macau</b>	1,090	1,219	118,339	49,195	54,045	118	32	59	0
Individuals	929	378	1,771	446	585	79	32	22	0
Corporations	58	776	8,925	8,421	366	0	0	36	0
Withholding rate pools (general)	d	d	d	0	0	d	0	0	0
<b>Malaysia</b>	54,153	16,554	944,408	733,991	162,477	7,519	584	760	0
Individuals	49,907	7,661	38,243	3,829	19,596	5,699	584	215	0
Corporations	513	4,166	39,119	20,663	4,206	1,380	0	290	0
Withholding rate pools (general)	6	16	95	d	d	d	0	0	0
<b>Malta</b>	4,090	17,376	207,971	160,339	17,642	9,207	2,523	5,520	0
Individuals	2,523	3,571	28,390	20,184	2,807	113	2,523	300	0
Corporations	1,308	11,896	150,039	117,601	11,892	6,299	0	5,179	0
Withholding rate pools (general)	49	361	15,161	12,959	2,041	7	0	0	0
<b>Mauritius</b>	1,577	25,483	293,747	84,685	106,456	12,508	64	44,377	0
Individuals	867	1,044	4,682	470	2,814	24	64	4	0
Corporations	539	17,982	205,481	82,785	56,337	470	0	44,373	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
<b>Mexico</b>	295,443	470,071	7,648,049	1,835,560	1,228,886	1,380,527	262,392	244,466	0
Individuals	254,964	238,581	1,174,378	155,628	133,747	15,058	262,392	38,919	0
Corporations	7,030	181,550	4,681,747	622,142	850,347	1,328,973	0	172,518	0
Withholding rate pools (general)	6	0	10	d	d	d	0	0	0
<b>Monaco</b>	1,766	27,430	210,873	108,827	74,388	8,814	586	605	0
Individuals	1,220	3,312	17,644	4,970	7,697	591	586	214	0
Corporations	173	3,158	19,657	8,186	2,312	7,876	0	350	0
Withholding rate pools (general)	248	18,703	164,496	95,399	64,267	15	0	0	0

Footnotes at end of table.



**Table 2. Foreign Recipients of U.S. Income Under Chapter 3 Withholding: Number of Forms 1042-S, U.S. Tax Withheld, U.S.-Source Income, and Principal Types of Income, by Selected Recipient Types and Selected Countries and Selected Recipient Types, Calendar Year 2017—Continued**  
 [Money amounts are in thousands of dollars]

Recipient types and 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)
Morocco	2,326	596	239,442	20,635	887	212,672	175	362	0
Individuals	2,115	560	5,936	323	810	405	175	353	0
Corporations	43	7	1,391	656	20	19	0	d	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Netherlands	80,725	226,192	29,354,183	11,547,105	9,976,621	2,068,333	21,450	307,776	16,630
Individuals	53,599	18,865	181,167	35,015	45,991	17,961	21,450	16,254	0
Corporations	9,843	131,265	18,871,057	8,438,806	4,520,021	1,920,549	0	160,050	934
Withholding rate pools (general)	280	35,795	394,614	137,909	194,814	185	0	0	0
New Zealand	36,651	49,360	738,630	237,471	283,048	73,363	1,765	12,859	0
Individuals	22,649	6,084	53,048	1,336	13,461	12,548	1,765	2,062	0
Corporations	3,351	23,891	202,413	65,204	62,847	48,666	0	10,110	0
Withholding rate pools (general)	17	29	188	8	130	17	0	0	0
Norway	26,071	45,005	9,454,012	3,370,028	4,929,228	112,867	21,121	60,145	312
Individuals	21,057	10,752	73,003	2,542	12,633	14,648	21,121	9,816	0
Corporations	2,090	19,621	1,074,374	364,156	133,695	75,932	0	46,054	312
Withholding rate pools (general)	17	11,522	252,382	104,329	75,713	159	0	0	0
Oman	1,114	3,959	433,013	107,065	73,148	95	0	109	0
Individuals	719	260	1,456	280	681	62	0	d	0
Corporations	48	587	96,580	2,582	215	0	0	105	0
Withholding rate pools (general)	d	d	d	0	d	0	0	0	0
Panama	33,251	62,519	802,620	550,699	148,564	24,301	2,716	2,923	0
Individuals	7,096	9,795	43,172	7,216	3,753	593	2,716	743	0
Corporations	24,543	47,664	610,338	417,605	129,316	23,092	0	783	0
Withholding rate pools (general)	91	1,641	17,347	12,062	4,974	1	0	0	0
Peru	13,197	67,360	533,153	263,233	209,664	3,003	2,371	3,665	0
Individuals	10,452	3,511	29,886	11,446	3,403	826	2,371	2,824	0
Corporations	1,013	40,164	215,121	72,245	129,389	1,880	0	192	0
Withholding rate pools (general)	d	d	d	d	d	0	0	0	0
Philippines	33,497	24,934	915,995	210,217	22,616	45,428	33,259	11,555	0
Individuals	28,520	16,361	76,003	4,459	8,641	3,248	33,259	2,400	0
Corporations	647	5,169	174,257	62,232	6,758	18,581	0	8,287	0
Withholding rate pools (general)	d	d	d	0	d	0	0	0	0
Poland	46,263	50,952	1,091,606	495,512	324,441	117,507	71,372	10,738	6,606
Individuals	41,606	23,240	114,685	3,226	7,487	11,140	71,372	7,206	0
Corporations	928	10,790	218,593	50,407	15,731	102,920	0	2,645	6,606
Withholding rate pools (general)	5	d	107	d	d	d	0	0	0
Portugal	14,146	13,882	1,186,262	1,001,383	69,072	34,192	18,871	10,382	0
Individuals	11,832	7,402	54,485	10,027	7,370	2,034	18,871	5,246	0
Corporations	630	3,987	1,026,038	948,503	34,704	12,741	0	4,004	0
Withholding rate pools (general)	22	82	861	269	518	2	0	0	0
Puerto Rico	9,377	9,407	713,482	589,784	63,383	7,896	309	1,180	0
Individuals	866	540	4,342	72	112	130	309	31	0
Corporations	6,007	7,543	539,135	468,143	45,526	7,678	0	996	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Qatar	1,925	10,620	279,855	77,354	77,119	559	0	81	0
Individuals	1,460	586	4,397	1,808	1,562	337	0	77	0
Corporations	234	9,746	65,231	47,834	8,001	1	0	3	0
Withholding rate pools (general)	d	d	d	0	d	0	0	0	0
Russia	57,807	14,888	1,869,004	1,536,117	113,983	48,540	41	20,362	0
Individuals	52,846	5,484	113,092	28,481	16,078	24,872	41	9,999	0
Corporations	1,059	5,285	236,853	55,616	96,053	13,317	0	6,333	0
Withholding rate pools (general)	41	132	9,718	9,197	507	9	0	0	0
Saudi Arabia	9,830	21,651	2,682,275	1,263,938	594,108	3,675	4	200	0
Individuals	7,851	5,072	29,186	8,424	10,331	2,609	4	177	0
Corporations	572	15,381	302,178	133,681	24,128	62	0	2	0
Withholding rate pools (general)	6	0	4	d	d	0	0	0	0
Senegal	1,818	2,560	145,218	42,768	2,266	4,193	61	222	1,054
Individuals	1,372	817	10,603	4,491	614	323	61	36	0
Corporations	304	1,313	116,416	30,106	1,645	3,747	0	33	1,054
Withholding rate pools (general)	d	d	d	0	0	d	0	0	0

Footnotes at end of table.

**Table 2. Foreign Recipients of U.S. Income Under Chapter 3 Withholding: Number of Forms 1042-S, U.S. Tax Withheld, U.S.-Source Income, and Principal Types of Income, by Selected Recipient Types and Selected Countries and Selected Recipient Types, Calendar Year 2017—Continued**

[Money amounts are in thousands of dollars]

Recipient types and 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)
<b>Singapore</b>	114,556	252,479	12,623,202	3,979,040	3,777,941	82,288	953	13,452	11,700
Individuals	99,102	29,602	143,855	21,694	79,380	6,617	953	4,975	442
Corporations	4,922	98,995	2,161,753	853,535	235,068	73,459	0	5,739	11,258
Withholding rate pools (general)	607	100,559	826,599	470,092	338,790	1,226	0	0	0
<b>South Africa</b>	40,406	29,734	614,586	235,149	218,442	14,783	1,587	9,267	0
Individuals	31,266	7,365	52,690	2,880	26,882	3,977	1,587	1,480	0
Corporations	5,018	11,989	271,302	55,819	139,516	6,575	0	6,961	0
Withholding rate pools (general)	10	15	129	d	103	d	0	0	0
<b>Spain</b>	86,177	166,177	3,896,243	1,752,970	957,944	208,530	31,354	54,339	509,962
Individuals	69,800	20,681	160,863	16,960	38,866	18,894	31,354	9,587	0
Corporations	6,943	113,367	2,550,351	768,403	774,641	167,730	0	42,350	499,674
Withholding rate pools (general)	345	19,500	288,042	158,232	123,604	782	0	0	0
<b>Sweden</b>	34,330	298,016	7,317,849	2,573,820	2,585,958	1,023,896	18,765	25,210	0
Individuals	24,816	11,671	79,759	2,598	13,834	11,427	18,765	7,934	0
Corporations	4,295	157,075	4,354,709	1,119,779	1,615,340	902,808	0	15,831	0
Withholding rate pools (general)	179	121,022	980,185	163,280	784,168	7	0	0	0
<b>Switzerland</b>	81,405	1,128,382	63,865,610	29,470,750	17,226,127	7,405,832	23,105	204,998	1,073,753
Individuals	48,500	47,747	1,168,085	31,363	351,906	664,045	23,105	14,520	0
Corporations	14,565	464,834	41,470,521	17,608,423	9,690,596	6,070,706	0	125,975	1,072,135
Withholding rate pools (general)	3,908	587,719	9,807,596	5,101,579	4,496,681	449	0	0	0
<b>Taiwan</b>	149,792	246,876	17,676,614	11,953,470	995,202	107,122	1,069	6,765	2,167
Individuals	138,655	33,465	198,643	57,848	88,257	7,283	1,069	2,102	0
Corporations	5,047	195,599	7,198,791	6,046,590	772,464	46,962	0	3,497	2,167
Withholding rate pools (general)	52	2,504	98,839	90,113	8,280	4	0	0	0
<b>Thailand</b>	26,865	24,842	1,175,514	940,352	38,915	20,873	7,144	4,757	0
Individuals	24,237	7,063	50,168	4,039	10,301	6,978	7,144	2,458	0
Corporations	601	16,065	148,347	109,624	25,303	10,102	0	1,986	0
Withholding rate pools (general)	7	2	69	46	d	0	0	0	0
<b>Trinidad and Tobago</b>	7,915	6,982	257,259	194,057	39,788	1,783	1,875	665	0
Individuals	6,265	2,067	14,130	3,306	3,546	1,319	1,875	580	0
Corporations	944	4,672	88,358	68,762	15,453	94	0	26	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
<b>Turkey</b>	15,999	11,973	501,224	424,427	18,262	16,648	1,532	3,847	0
Individuals	13,861	4,919	40,186	3,406	6,098	5,516	1,532	991	0
Corporations	604	5,285	59,552	29,347	6,387	9,132	0	2,713	0
Withholding rate pools (general)	7	1	6	d	5	0	0	0	0
<b>United Arab Emirates</b>	17,342	50,536	3,623,549	639,372	1,730,344	7,199	34	3,730	0
Individuals	13,400	7,097	43,352	12,654	15,916	3,041	34	2,050	0
Corporations	1,401	17,225	256,918	93,565	109,702	2,246	0	918	0
Withholding rate pools (general)	25	882	6,978	3,952	2,544	260	0	0	0
<b>United Kingdom</b>	567,774	1,224,376	108,168,066	46,160,732	22,504,388	5,760,525	137,487	877,582	16,878,520
Individuals	428,778	182,357	1,802,876	141,934	709,849	311,062	137,487	124,022	0
Corporations	60,175	463,757	81,898,833	33,899,355	15,347,735	4,974,921	0	497,531	16,222,253
Withholding rate pools (general)	1,745	309,731	9,471,450	5,631,109	2,693,056	27,018	0	0	0
<b>Uruguay</b>	16,740	9,149	269,209	191,887	25,905	1,134	1,004	16,140	0
Individuals	13,015	3,159	47,575	33,847	8,090	476	1,004	806	0
Corporations	2,782	4,334	117,299	66,920	13,690	274	0	14,758	0
Withholding rate pools (general)	116	833	28,026	24,731	3,080	125	0	0	0
<b>Venezuela</b>	103,682	13,968	339,615	245,119	48,295	8,837	938	8,598	0
Individuals	97,173	10,653	225,990	154,812	40,804	6,094	938	6,412	0
Corporations	2,895	2,246	88,888	80,643	6,025	215	0	132	0
Withholding rate pools (general)	11	4	64	34	27	0	0	0	0
<b>Vietnam</b>	10,485	4,508	165,011	140,799	541	9,280	100	844	0
Individuals	9,568	4,092	20,040	366	432	8,703	100	570	0
Corporations	149	161	7,827	4,810	94	432	0	31	0
Withholding rate pools (general)	d	d	d	0	d	0	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.

[2] The majority of income for this recipient category is reported in a separate income code, specifically for artist and athlete income.

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 2017 were selected for this table.

SOURCE: IRS, Statistics of Income Division, Foreign Recipients of U.S. Income, October 2019.

**Table 3. Recipients of U.S. Income Under Chapter 4 Withholding: Number of Forms 1042-S, Total U.S.-Source Income, and U.S. Tax Withheld, by Selected Income Types, Calendar Year 2017**  
 [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)
<b>Total</b>	<b>200,593</b>	<b>5,780,130</b>	<b>3,662,012</b>	<b>2,118,118</b>	<b>424,483</b>
Dividends	128,909	1,868,798	586,863	1,281,935	263,569
Interest	62,141	2,167,885	1,790,975	376,910	85,267
Rents and royalties	1,615	394,625	373,191	21,434	3,973
Return on capital	1,190	444,120	248,297	195,823	4,874
Personal services income	546	28,564	21,883	6,681	1,575
Pensions, annuities, alimony, and/or insurance premiums	754	295,887	292,070	3,817	979
Scholarship or fellowship grants	237	13,005	11,810	1,195	68
All other income types	5,201	567,246	336,923	230,323	64,178

[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 2019.