

# Corporate Foreign Tax Credit, 2004

by Scott Luttrell

**F**or 2004, corporations filing a U.S. tax return claimed foreign tax credits worth \$56.6 billion, which represents an all-time high and a 13.2-percent increase over the previous high amount. The 5,502 corporations claiming a foreign tax credit reduced their U.S. tax on worldwide income by 30.2 percent, from \$187.5 billion to \$130.9 billion. Other credits, including the general business credit and the possessions tax credit, further reduced their U.S. tax on worldwide income to \$118.9 billion. This group of corporations reported \$533.2 billion in worldwide taxable income. \$241.5 billion of worldwide taxable income (45.3 percent) and \$61.2 billion of the U.S. tax liability (32.6 percent) were reported as foreign-source on Form 1118, *Computation of Foreign Tax Credit—Corporations*.

Corporations whose primary business is manufacturing claimed 65.6 percent of the total foreign tax credit, while earning 44.6 percent of the worldwide taxable income and paying 44.5 percent of U.S. income tax before credits for Tax Year 2004. Within the manufacturing category, petroleum and coal products manufacturing and chemical manufacturing companies combined to account for 42.6 percent of the total foreign tax credit and nearly a quarter of the worldwide taxable income (24.8 percent) and U.S. income tax before credits (24.8 percent). Services (11.1 percent), finance and insurance (10.1 percent), wholesale and retail trade (5.3 percent), and information (4.9 percent) were next among leading contributors to the foreign tax credit. Meanwhile, finance and insurance (17.3 percent and 17.5 percent), services (15.9 percent and 15.9 percent), wholesale and retail trade (11.8 percent and 11.8 percent), and information (6.7 percent and 6.7 percent), were next in terms of worldwide taxable income and U.S. tax liability, respectively.

Among corporations claiming foreign tax credits, the geographic regions with largest amounts of foreign-source taxable income were Europe (41.0 percent), Asia (19.0 percent), and Latin America (8.3 percent). Canada (11.7 percent), the United Kingdom (10.2 percent), South Korea (5.5 percent), and the Netherlands (5.1 percent) were the leading sources

of foreign-source taxable income among individual countries. The largest amounts of current-year foreign taxes were paid to Canada (13.5 percent), the United Kingdom (11.8 percent), Norway (9.3 percent), and South Korea (7.1 percent).

Corporations report their foreign-source incomes and taxes in separate limitation categories or “baskets” depending on the nature of the income (see Explanation of Terms section for details). A separate limitation is computed for each basket, and the total foreign tax credit claimed is the sum of credits computed for each basket. In 2004, there were 10 different baskets. The General Limitation basket is by far the most frequently filed basket, and it contains the majority of all taxable income and income taxes reported on Form 1118. 58.3 percent of corporations claiming a foreign tax credit in 2004 filed a General Limitation basket, which accounted for 73.4 percent of total foreign-source taxable income and 80.9 percent of total foreign taxes.

## Data Sources and Limitations

The statistics in this data release were compiled based on corporation income tax returns with a foreign tax credit that were included in the 2004 Statistics of Income sample of returns with accounting periods ending between July 2004 and June 2005.

These returns were selected after administrative processing but prior to any amendments or audit examination. The 2004 corporation income tax return sample included Forms 1120, 1120-F, 1120-L, 1120-PC, and 1120-REIT.

The foreign tax credit is provided under section 901 of the Internal Revenue Code. Corporations report the foreign income and taxes related to the credit on Form 1118, filed with their income tax returns. The statistics in this data release are based on information reported on Forms 1118 and related corporate returns. In addition to current-year foreign taxes, foreign taxes available for credit shown in this data release include only those carried forward to 2004 from previous years. Corporations with an “alternative minimum tax” (AMT) liability are required to compute a separate “alternative minimum tax foreign tax credit.” The AMT foreign tax credit data are not reflected in the statistics in this data release, even if the corporation reported both the “regular” foreign tax credit and the AMT foreign tax credit. Corporations reporting only the AMT computation had no

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# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

regular tax and therefore were not included in the foreign tax credit statistics.

There are small discrepancies between the more complete foreign tax credit data presented in this data release and those published in *Statistics of Income—2004, Corporation Income Tax Returns*. These differences can be attributed to several factors. For instance, some of the returns designated for the Statistics of Income sample were received too late to be included in the regular corporation statistics, but were included in the foreign tax credit statistics presented in this data release. Additionally, certain corporations submitted preliminary data on their original returns because they lacked complete information on their foreign operations at the time of filing. On a case-by-case basis, additional information was requested directly from the taxpayer. However, amended returns filed at a later date, including those with carrybacks of foreign taxes to be credited for 2004, were not included in the statistics.

The 2004 foreign tax credit statistics in this data release do not represent the final amounts credited that year. A complete foreign tax credit amount for 2004 would reflect the results of any audits, as well as the carryback of any foreign tax credits from 2005 and 2006. Also, some corporations did not file Form 1118 because they did not have a U.S. income tax liability, and were thus unable to credit any foreign taxes paid, accrued, or deemed paid for 2004. Finally, other corporations could have deducted their foreign taxes from their gross incomes instead of claiming a foreign tax credit. Accordingly, foreign income and taxes are understated in this data release to the extent that they were not reported on Form 1118.

Because the estimates are based on a sample, they are subject to sampling error. Coefficients of Variation (CVs) are used to measure the magnitude of this sampling error. The CV concept is defined in the section on sampling variability in the “SOI Sampling Methodology and Data Limitations” appendix of this publication. Figure A presents CVs for foreign tax credits by selected North American Industry Classification System (NAICS) divisions, industrial sectors, and sectors. The smaller the CV, the more reliable the estimate is judged to be.

**Figure A**

## Coefficients of Variation for Foreign Tax Credit, by Selected Sector or Group, Tax Year 2004

Selected sector or group	Coefficients of variation for foreign tax credit (percentages)
<b>All industries</b>	0.03
<b>Agriculture, forestry, fishing, and hunting</b>	2.70
<b>Mining</b>	0.51
<b>Utilities</b>	0.25
<b>Construction</b>	1.65
<b>Manufacturing</b>	0.01
Food manufacturing	0.03
Beverage and tobacco products	[1]
Petroleum and coal products manufacturing	[1]
Chemical manufacturing	0.03
Pharmaceutical and medicine manufacturing	0.02
Fabricated metal products	0.14
Machinery manufacturing	0.13
Computer and electronic product manufacturing	0.04
Electrical equipment, appliance and component manufacturing	0.02
Transportation equipment manufacturing	0.05
<b>Wholesale and retail trade</b>	0.07
<b>Transportation and warehousing</b>	0.08
<b>Information</b>	0.29
Publishing (except Internet), motion picture and sound recording	0.24
<b>Finance, insurance, real estate, rental and leasing</b>	0.08
Finance and Insurance	0.08
Securities, commodity contracts, etc.	0.27
Insurance and related activities	[1]
<b>Services</b>	0.14
Management of holding companies	0.15

[1] less than 0.005 percent

The industry classification used in this data release is based on NAICS, created under the auspices of the governments of the United States, Mexico, and Canada in response to the North American Free Trade Agreement (NAFTA). NAICS is unique among industry classifications in that the economic units that have similar production processes are classified in the same industry. In 1997, NAICS replaced the Standard Industrial Classification (SIC) of the United States. Prior to 1996, the SIC system was the basis for industrial groupings in data releases by Statistics of Income on the foreign tax credit.

### Description of Tables 1-3

Table 1, columns 2 through 15, present statistics on assets, receipts, income, and taxes reported on the basic corporation income tax returns for those corporations claiming a foreign tax credit. Columns 16 through 51 present statistics from Form 1118, *Foreign Tax Credit—Corporations*. Columns 16 through 35 present statistics on foreign income (i.e., income from sources outside the United States, including U.S. Possessions) and deductions, reported primarily on Form 1118, Schedule A, *Income or Loss Before Adjustments*.

Although the amounts of oil and gas income and deductions (columns 23 and 35, respectively) are included in the summary columns (i.e., columns 16 through 22 and 26 through 34), these amounts are also reported separately (on Form 1118, Schedule I, *Reduction of Oil and Gas Extraction Taxes*) because oil and gas extraction income is subject to special rules under Internal Revenue Code section 907, which effectively requires a separate limitation calculation for taxes related to oil and gas extraction income. This may result in a reduction of foreign taxes available for credit. Reductions in creditable oil and gas extraction income taxes are included with several other types of reductions in column 40 of Table 1.

Similarly, foreign branch income is also included in the summary amounts reported in columns 16 through 22 of Table 1, and is also reported separately (on Form 1118, Schedule F, *Gross Income and Definitely Allocable Deductions for Foreign Branches*) in column 24 of Table 1. For Tax Year 2004, Code section 863(b) income (income partly from within and partly from outside the United States) is included in the summary amounts reported in columns 16 through 22 of Table 1, and is aggregated on Form 1118, Schedule A, *Income or (Loss) Before Adjustments*, using a special country code.

Total deductions not definitely allocable to specific types of income (column 31 of Table 1) are equal to the sum of columns 32 through 34, relating to research and development, interest, and any other “not definitely allocable expenses” (any differences are due to taxpayer reporting). Total foreign-source gross income (Table 1, column 16) less total foreign deductions (Table 1, column 25) is equal to foreign-source taxable income before adjustments (Table 1, column 36).

Adjustments to foreign-source taxable income (reported in column 37 of Table 1) include the allocation of: (1) current-year foreign-source losses, (2) overall foreign losses, and (3) current-year U.S.-source losses, as well as the recapture of prior-year overall foreign losses and recharacterization of prior-year foreign-source losses. These adjustments (reported on Schedule J, *Separate Limitation Loss Allocations and Other Adjustments Necessary To Determine Numerators of Limitation Fractions, Year end Recharacterization Balances, and Overall Foreign Loss Account Balances*) affect the numerator of the limitation fraction used to compute the foreign tax credit. The income after adjustments (the numerator of the limitation fraction) is reported in column 38 of Table 1. The limitation fraction, foreign-source taxable income divided by total taxable income from all sources, is applied to the total U.S. tax against which the credit is allowed to determine any limitation on the foreign tax credit. Taxpayers are required to calculate this limitation for each income basket.

Statistics on foreign taxes are reported in columns 39 through 51 of Table 1. Data on foreign income taxes paid, accrued, and “deemed paid” (through Controlled Foreign Corporations) from Form 1118, Schedule B, *Foreign Tax Credit—Corporations*, are reported in columns 42 through 51 of Table 1. Total foreign taxes paid or accrued (Table 1, column 43) are the sum of columns 44 through 50 (any differences are due to taxpayer reporting). Table 1, column 41 shows carryovers of excess or unused taxes from prior years, which can be added to the 2004 pool of creditable foreign taxes. Total foreign taxes paid, accrued, and “deemed paid,” plus carryover, are then adjusted for certain items (e.g., reductions of foreign taxes related to oil and gas extraction income under Internal Revenue Code section 907 and reductions of foreign taxes related to income earned in sanctioned countries under Internal Revenue Code section 901(j), as well as other reductions of creditable taxes) in column 40. Thus, total foreign taxes available for credit (Table 1, column 39) are equal to total foreign taxes paid, accrued, and “deemed paid” (column 42), plus any carryover of prior-year excess or unused foreign taxes (column 41), less any reduction in foreign taxes (column 40).

Tables 2 and 3 are similar in column format to Table 1 except that they provide data only from

## Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

Form 1118 without the data from the basic corporation income tax return (for example, total assets and total receipts). Table 2 presents data reported by industrial grouping and separate income basket, while Table 3 presents data by selected geographic region and country.

### Explanation of Selected Terms

*Adjustments to taxable income*—This includes several types of adjustments reported on Schedule J of Form 1118, *Computation of Foreign Tax Credit—Corporations*. These include the allocation of current-year foreign losses, overall foreign losses, and current-year U.S.-source losses. Adjustments due to prior-year loss allocations are also made, including the recapture of foreign-source losses and the recharacterization of foreign-source income. The overall result of these adjustments is shown in column 37 of Table 1 and column 23 of Table 2.

*Carryover of foreign taxes*—Under Internal Revenue Code section 904, for taxes arising in tax years beginning prior to October 22, 2004, “U.S. persons” are allowed a 2-year carryback and 5-year carryforward of excess or unused foreign taxes for purposes of computing the final foreign tax credit for those years. Excess foreign taxes arising in tax years beginning after October 22, 2004, are allowed a 1-year carryback and a 10-year carryforward. Such taxes were included in the computation of the current-year foreign tax credit to the extent that they did not exceed the credit limitation for the current year. The 2004 statistics used for this article include only those foreign taxes that were carried forward from previous years (1999-2003). See column 41 of Table I and column 27 of Table 2.

*Controlled foreign corporation (CFC)*—Under Internal Revenue Code section 957, a foreign corporation is a “controlled foreign corporation” if more than 50 percent of its outstanding voting stock, or more than 50 percent of the value of all its outstanding stock, is owned (directly, indirectly, or constructively) by “U.S. shareholders” on any day during the foreign corporation’s tax year. Internal Revenue Code section 951(b) defines a “U.S. shareholder” as a U.S. person with 10 percent or more of the total combined voting stock of the foreign corporation. Ownership attribution rules are provided in Internal Revenue Code section 958. See also *Deemed dividends* and *Subpart F*.

*Current-year foreign taxes*—Current-year foreign taxes include foreign income taxes paid, accrued, or “deemed paid” and are shown in column 42 of Table 1, column 28 of Table 2, and column 14 of Table 3. Current-year foreign taxes do not include any carryback or carryforward of foreign taxes from other tax years.

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

*Dividend gross-up*—Since a dividend represents a distribution from after-tax earnings, the amount of income that a domestic corporation recognizes on receiving a dividend from a foreign corporation is net of all the foreign income taxes paid by that foreign corporation. U.S. corporations that satisfy ownership and other requirements are permitted to take an indirect foreign tax credit for taxes paid on the profits from which the dividends were distributed. Under Internal Revenue Code section 78, these taxes are “deemed paid” by the U.S. corporations under Internal Revenue Code sections 902 and 960(a). Consequently, the dividend income is “grossed-up” by the amount of the taxes deemed paid on the income from which the dividend was paid. This prevents U.S. corporations from crediting the foreign taxes deemed paid and deducting the same taxes in computing foreign-source taxable income.

*Financial services income*—This separate limitation category or basket applies to certain income from financial services activities. Financial services income includes all income, including “passive income” (see below), that is generated from banking, insurance, financing, or similar activities, and from certain types of insurance investments. Financial services income excludes “high withholding tax interest,” dividends from noncontrolled foreign corporations as defined in Internal Revenue Code section 902, and certain types of export financing interest.

*Foreign oil and gas extraction income (FOGEI)*—FOGEI is the gross income from the extraction of oil and gas, as well as from the sale of assets used in the extraction of oil and gas, or from related services, working capital, dividend and partnership distributions, and any other oil and gas extraction income. In general, a foreign tax credit is not permitted for foreign taxes paid, accrued, or deemed paid in connection with the purchase or sale of oil or gas extracted in a foreign country if the taxpayer has no economic interest in the oil or gas and if the purchase or sales price differs from the fair market value.

*Foreign sales corporation (FSC)*—A foreign sales corporation was a company incorporated abroad and controlled by a “U.S. person.” A portion of the FSC’s “foreign trade income” was exempt from U.S. taxation. Although these statistics do not include FSC returns (Forms 1120-FSC), FSC dividends received by corporations claiming a foreign tax credit are included. Dividends and interest generated by a FSC or former FSC comprise a separate limitation category. In July 1999, the World Trade Organization (WTO) declared FSC provisions to be an illegal export subsidy. Congress repealed the FSC provisions and created the Extraterritorial Income Exclusion Act in November 2000, which allowed U.S. corporations to continue operating FSCs until December 2001.

*Foreign-source taxable income*—Foreign-source taxable income is equal to gross income (less loss) less deductions from sources outside the United States, including U.S. possessions, and is included in the taxable income of U.S. corporations.

*Foreign trade income*—This includes gross receipts from foreign trade earned by a foreign sales corporation (FSC) from: 1) the sale of “export property,” 2) the leasing of export property for use outside the United States, or 3) services in connection with the sale or leasing of export property. The related separate limitation category, taxable income attributable to foreign trade income, is unusual in the 2004 statistics. Code section 923(b), which permits the foreign trade income basket, has since been repealed, effective September 30, 2000.

*General limitation income*—This separate limitation category or basket comprises foreign income not included in any other separate limitation category.

*High withholding tax interest*—This separate limitation category or basket includes interest income subject to a withholding tax greater than or equal to

5 percent. This basket does not include interest received from the financing of certain export activities.

*Income resourced by bilateral tax treaty*—Selected U.S. income tax treaties contain provisions reclassifying certain income items of U.S.-source income as foreign-source income (for instance, when the tax treaty allows the other country to tax what would otherwise be U.S.-source income). Certain dividends, capital gains, and income from a U.S.-owned foreign corporation can be included in this category. A separate foreign tax credit limitation has to be computed for each amount resourced by a tax treaty.

*Domestic international sales corporation (DISC)*—DISCs (now referred to as IC-DISCs) were small domestic corporations formed to export U.S. products. A DISC could defer the tax liability on a portion of its income but had to ultimately pay the deferred tax plus interest. Under the DISC provisions, a U.S. manufacturer could set up a DISC (located in the United States) whose income was not taxed at the entity level. Instead, the corporate shareholder was taxed directly on a portion of the DISC’s income that was deemed distributed. The portion of the income not deemed distributed was not subject to U.S. taxation until it was actually distributed. The foreign trading partners of the United States that are party to the General Agreement on Tariffs and Trade (GATT) maintained that the DISC provisions constituted an illegal export trade subsidy because they allowed indefinite deferral of direct taxes on income from exports earned in the United States. Essentially, this pre-1985 system of tax deferral for export income was replaced by the exemption system of Foreign sales corporations (FSCs), now also repealed. To elect DISC status, at least 95 percent of the corporation’s gross receipts had to be “qualified export receipts,” and at least 95 percent of its assets “qualified export assets.” Distributions from a DISC or former DISC are a separate limitation category.

*Certain dividends from 10/50 corporations*—A noncontrolled foreign corporation is defined by Internal Revenue Code section 902 as a foreign corporation in which a U.S. corporation possesses at least 10 percent of the voting stock and the U.S. shareholders own no more than 50 percent of the stock measured by voting power or value. These foreign corporations are also referred to as “10/50 companies.” Previously, taxpayers were required to segregate dividends from each noncontrolled section 902 foreign cor-

## Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

poration into separate baskets. The American Jobs Creation Act of 2004 eliminated the separate basket requirement.

*Passive foreign investment company (PFIC)*—A PFIC is a passive investment company, one whose income is mainly passive or that uses at least half of its assets to create passive income.

*Passive income*—This separate limitation category includes dividends, interest (with the exception noted below), rents, royalties, annuities, and net capital gains, as well as commodity transactions not connected with the active conduct of a trade or business. Interest subject to a high withholding tax is categorized in a separate basket (see *High withholding tax interest*, above). Furthermore, income that by definition is passive, yet is subject to a foreign tax rate exceeding the highest applicable U.S. rate, is placed in the general limitation basket instead of the passive income basket.

*Section 901(j) income*—Internal Revenue Code section 901(j) denies credit for taxes paid or accrued to select foreign governments that the United States deems ineligible. These countries include the following: (1) countries not recognized by the United States, (2) countries with which the United States has severed or does not conduct diplomatic relations, or (3) countries identified by the United States as providing support for terrorism. For 2004, countries subject to these restrictions were Cuba, Iran, Iraq, Libya, North Korea, Sudan, and Syria. Income and deductions from section 901(j) countries are reported on Form 1118, even though these taxes are not creditable. A separate limitation credit is computed for informational purposes and is not included in the foreign tax credit of the corporation.

*Shipping income*—This separate limitation category or basket applies to certain income from shipping-related activities. Shipping income includes the following: (1) all income from the use (or leasing for

use) of a vessel or aircraft in foreign commerce, (2) income from services directly related to the use of a vessel or aircraft, (3) gains on the sale or exchange of a vessel or aircraft used in the performance of such services, and (4) income generated from other space and oceanic activities not included elsewhere. Income that would be foreign-base company shipping income for purposes of determining the income received from controlled foreign corporations, under Internal Revenue Code section 954(f), is also classified as shipping income.

*Specifically allocable income*—Internal Revenue Code section 863(b) provides special rules for determining taxable income from sources outside the United States with respect to gross income derived partly from within and partly from outside the United States. The income apportioned to sources outside the United States under these special rules is commonly referred to as “section 863(b) income.”

*Subpart F income*—Provisions of the Internal Revenue Code limit the ability of U.S. taxpayers to defer U.S. taxes by shifting certain types of income to lower-tax foreign countries. Subpart F (i.e., Internal Revenue Code sections 951-965) identifies certain types of income, primarily passive investment income, earned by certain controlled foreign corporations (CFCs), and requires the U.S. corporation to report a pro-rata share of this current-year income for U.S. tax purposes, regardless of whether or not the income was actually repatriated to the U.S. corporation in the current tax year. See also *Controlled foreign corporation* and *Deemed dividends*.

*Tax deemed paid*—See *Dividend gross-up*.

*U.S. person*—A U.S. person is any citizen or resident of the United States, domestic partnership, corporation, association, company, or any estate or trust that is not considered foreign. See Internal Revenue Code section 7701 for more information on the definition of a U.S. person.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 1. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Total Assets, Income, Taxes, and Credits, and Foreign Income, Deductions, and Taxes, by Major and Selected Minor Industry**

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

Major and selected minor industry of U.S. corporation filing return	Number of returns	Total assets	Total receipts	Dividends received from foreign corporations	Dividends received from IC-DISC's or former DISC's [1]	Includable income of controlled foreign corporations	Foreign dividend income from foreign taxes deemed paid (gross-up)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
<b>All industries</b>	<b>5,502</b>	<b>25,290,504,785</b>	<b>6,917,754,854</b>	<b>37,358,533</b>	<b>8,162</b>	<b>41,559,877</b>	<b>33,112,410</b>
<b>Agriculture, forestry, fishing, and hunting</b>	<b>210</b>	<b>6,517,157</b>	<b>2,732,554</b>	<b>* 29,198</b>	<b>0</b>	<b>* 14</b>	<b>* 6,573</b>
<b>Mining</b>	<b>112</b>	<b>110,207,132</b>	<b>47,148,873</b>	<b>466,457</b>	<b>0</b>	<b>264,731</b>	<b>151,399</b>
Oil and gas extraction	87	38,794,601	14,993,252	34,691	0	* 27,649	* 25,432
Coal mining, metal ore mining	6	* 29,908,419	* 6,474,774	* 104,850	0	* 82,698	* 28,109
Nonmetallic minerals	6	* 4,768,627	* 3,871,595	* 11,706	0	* 5,529	* 4,260
Support activities for mining	13	36,735,486	21,809,253	* 315,211	0	* 148,854	* 93,598
<b>Utilities</b>	<b>7</b>	<b>* 33,884,369</b>	<b>* 23,271,942</b>	<b>* 128,792</b>	<b>0</b>	<b>* 9,324</b>	<b>* 23,904</b>
<b>Construction</b>	<b>235</b>	<b>16,558,584</b>	<b>29,663,763</b>	<b>15,338</b>	<b>0</b>	<b>* 7,854</b>	<b>8,788</b>
Construction of buildings	39	11,615,290	24,512,059	9,384	0	* 1,240	* 4,843
Heavy and civil engineering construction	40	3,091,931	2,159,496	* 2,310	0	* 4,164	* 1,039
Special trade contractors	155	1,851,363	2,992,208	* 3,644	0	* 2,451	* 2,907
<b>Manufacturing</b>	<b>1,039</b>	<b>5,506,544,210</b>	<b>3,032,693,340</b>	<b>25,459,266</b>	<b>7,426</b>	<b>27,549,087</b>	<b>24,910,024</b>
Food manufacturing	83	247,002,003	203,755,390	1,778,733	* 225	3,096,230	1,697,366
Beverage and tobacco products	14	84,931,534	67,524,926	* 953,994	0	* 729,504	* 546,575
Tobacco manufacturing	4	* 21,238,847	* 15,557,615	* 1,461	0	* 9,521	* 6,006
Textile mills and textile product mills	5	* 3,299,004	* 2,015,780	* 29,322	0	* 38,564	* 29,786
Apparel manufacturing	13	14,242,207	16,503,577	* 47,988	0	* 75,142	* 58,931
Leather and allied product manufacturing	8	* 3,221,523	* 3,953,771	* 1,468	0	0	* 537
Wood product manufacturing	9	* 2,437,467	* 5,988,537	* 6,196	0	* 2,767	* 4,510
Paper manufacturing	17	84,787,929	55,415,240	* 760,622	* 388	352,860	702,651
Printing and related support activities	14	6,430,076	5,647,938	* 9,510	0	* 8,113	* 9,777
Petroleum and coal products manufacturing	19	1,463,642,327	902,051,742	11,747,884	0	5,584,511	10,289,382
Chemical manufacturing	162	930,188,555	433,581,446	3,555,521	* 764	5,187,340	5,036,053
Pharmaceutical and medicine manufacturing	41	595,104,770	238,071,660	1,691,237	0	3,536,125	3,563,129
Other chemical manufacturing	121	335,083,785	195,509,786	1,864,284	* 764	1,651,214	1,472,924
Plastics and rubber products manufacturing	43	26,172,157	19,140,477	96,103	0	99,231	93,023
Nonmetallic mineral product manufacturing	44	25,435,702	20,107,563	68,782	* 2,017	28,239	26,666
Primary metal manufacturing	26	91,032,225	41,899,198	* 215,329	0	* 338,747	* 226,668
Fabricated metal products	98	197,180,299	83,366,430	922,631	* 878	382,491	775,545
Machinery manufacturing	131	227,753,413	168,146,786	820,418	* 1,319	773,405	581,509
Computer and electronic product manufacturing	114	301,944,103	306,274,458	2,062,638	0	2,157,996	1,232,472
Electrical equipment, appliance and component manufacturing	74	1,043,994,229	204,513,068	1,182,119	* 342	4,932,634	2,120,630
Transportation equipment manufacturing	62	664,246,348	414,981,141	913,360	* 3	2,986,765	1,114,765
Motor vehicles and related manufacturing	38	541,893,518	296,130,599	649,472	* 3	2,206,470	729,689
Other transportation equipment manufacturing	24	122,352,830	118,850,541	263,888	0	780,294	385,076
Furniture and related products	22	9,940,355	13,173,733	* 29,056	0	* 9,727	* 18,680
Miscellaneous manufacturing and manufacturing not allocable	80	78,662,755	64,652,139	257,592	* 1,489	764,824	344,499
<b>Wholesale and retail trade</b>	<b>658</b>	<b>1,006,536,246</b>	<b>1,218,304,368</b>	<b>3,005,584</b>	<b>* 12</b>	<b>2,634,926</b>	<b>2,432,170</b>
Wholesale trade	487	616,595,889	571,146,246	2,786,389	* 12	1,788,977	1,893,683
Durable goods	290	95,036,907	154,155,653	208,624	0	377,155	194,921
Machinery, equipment, and supplies	66	6,587,589	10,354,213	* 8,783	0	* 1,514	* 1,553
Other miscellaneous durable goods	224	88,449,317	143,801,440	199,841	0	375,641	193,368
Nondurable goods	197	521,558,982	416,990,593	2,577,765	* 12	1,411,822	1,698,762
Drugs, chemicals, and allied products	41	84,576,916	211,623,674	141,816	0	* 191,300	64,328
Groceries and related products	48	308,992,631	95,768,777	* 180,307	0	* 79,251	* 66,134
Petroleum and petroleum products	11	44,432,628	24,166,195	* 1,360,421	0	* 31,589	* 706,057
Other miscellaneous nondurable goods	96	81,744,466	85,238,080	886,100	* 12	1,109,681	856,903

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 1. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Total Assets, Income, Taxes, and Credits, and Foreign Income, Deductions, and Taxes, by Major and Selected Minor Industry—Continued**

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

Major and selected minor industry of U.S. corporation filing return	Number of returns	Total assets	Total receipts	Dividends received from foreign corporations	Dividends received from IC-DISC's or former DISC's [1]	Includable income of controlled foreign corporations	Foreign dividend income from foreign taxes deemed paid (gross-up)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Retail trade	171	389,940,356	647,158,121	219,194	0	845,949	538,487
Motor vehicle, parts dealers, and gas stations	33	7,432,138	19,890,390	5,935	0	* 724	* 3,243
Building materials, garden equipment, and supplies	22	* 111,211,881	* 70,730,392	* 25	0	* 263,767	* 150,492
Food and beverages stores	10	5,850,586	15,603,048	* 26	0	* 1,366	* 203
Apparel and accessory stores	24	38,727,475	64,628,923	* 37,285	0	357,028	35,249
General merchandise stores	8	* 167,786,882	* 364,242,198	* 73,775	0	* 184,464	* 283,343
Miscellaneous retail trade (incl. furniture and home furnishings stores)	74	58,931,394	112,063,170	102,148	0	38,600	65,957
<b>Transportation and warehousing</b>	<b>68</b>	<b>167,899,586</b>	<b>139,786,280</b>	<b>124,361</b>	<b>0</b>	<b>609,212</b>	<b>103,691</b>
Air, rail, and water transportation	11	94,883,785	30,118,625	* 83,766	0	* 500,590	* 13,818
Water transportation	7	* 4,644,956	* 5,152,144	* 15,624	0	* 487,419	* 2,490
Air and rail transportation	4	* 90,238,829	* 24,966,481	* 68,142	0	* 13,171	* 11,328
Other transportation (including pipeline transportation and warehousing)	57	73,015,801	109,667,655	40,594	0	108,622	89,873
<b>Information</b>	<b>607</b>	<b>579,780,011</b>	<b>276,313,995</b>	<b>2,723,574</b>	<b>0</b>	<b>2,100,540</b>	<b>1,345,019</b>
Publishing (except internet), motion picture, and sound recording	485	258,722,300	127,707,874	1,024,651	0	1,358,241	685,026
Broadcasting, internet publishing	78	77,903,242	46,394,624	* 113,368	0	* 68,397	* 70,076
Telecommunications	22	188,071,466	69,824,454	1,415,106	0	* 4,849	* 93,593
Internet service providers, web search portals, data processing services	9	* 31,145,785	* 17,686,128	* 146,676	0	* 597,117	* 455,193
Other information services (includes internet publishing and broadcasting)	13	23,937,218	14,700,915	23,773	0	71,936	41,132
<b>Finance, insurance, real estate, and rental and leasing</b>	<b>965</b>	<b>9,011,349,757</b>	<b>1,455,904,414</b>	<b>2,735,131</b>	<b>* 724</b>	<b>4,942,919</b>	<b>1,497,862</b>
Finance and insurance	571	8,974,764,691	1,445,221,673	2,729,432	* 724	4,883,021	1,488,454
Commercial banking and other depository credit agencies	22	98,971,705	5,804,295	346	0	* 922	* 11
Nondepository credit intermediation	57	333,313,724	53,285,301	* 149,696	0	* 330,295	* 49,416
Securities, commodity contracts, and other	94	3,458,238,004	198,425,484	835,348	0	1,090,066	539,314
Insurance and related activities	325	5,045,072,002	1,185,786,012	1,743,711	* 724	3,328,662	812,143
Insurance agencies and brokerages	54	64,863,989	16,797,136	170,190	0	* 204,440	* 175,186
Funds, trusts, and other financial vehicles	72	39,169,256	1,920,580	* 331	0	* 133,077	* 87,571
Real estate and rental and leasing	394	36,585,065	10,682,741	5,699	0	* 59,898	* 9,408
Real estate	374	7,344,793	2,159,103	4,265	0	* 58,143	* 2,745
Rentals and leasing	20	29,240,272	8,523,638	* 1,434	0	* 1,755	* 6,663
<b>Services</b>	<b>1,603</b>	<b>8,851,227,733</b>	<b>691,935,324</b>	<b>2,670,831</b>	<b>0</b>	<b>3,441,268</b>	<b>2,632,978</b>
Professional, scientific, and technical services	594	96,382,135	73,860,166	230,318	0	301,720	192,515
Management of holding companies	807	8,506,781,950	463,852,289	1,750,775	0	2,890,811	1,926,517
Administrative and support and waste management and remediation	63	53,094,782	34,168,719	265,731	0	79,803	130,929
Education services, health care, and social assistance	31	38,542,258	26,203,645	* 30,616	0	* 44,555	* 4,501
Arts, entertainment, and recreation	36	5,289,386	3,562,172	* 23,575	0	* 1,973	* 6,090
Accommodation and food services	47	145,952,505	86,072,631	367,008	0	* 56,408	341,985
Accommodation	14	69,543,493	26,285,487	* 60,077	0	* 24,951	* 57,453
Food services and drinking places	33	76,409,012	59,787,144	* 306,932	0	* 31,457	* 284,532
Other services	24	5,184,717	4,215,703	* 2,808	0	* 65,998	* 30,441
Repair and maintenance services	15	* 704,475	* 777,639	* 181	0	* 2,180	* 800
Personal services	6	* 4,374,558	* 3,331,683	* 2,024	0	* 63,818	* 29,641
Religious, grantmaking, civic, professional, and similar organizations	3	* 105,684	* 106,381	* 603	0	0	0



# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 1. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Total Assets, Income, Taxes, and Credits, and Foreign Income, Deductions, and Taxes, by Major and Selected Minor Industry—Continued**

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

Major and selected minor industry of U.S. corporation filing return	Net income (less deficit)	Income subject to U.S. tax	U.S. income tax before credits		Foreign tax credit claimed	U.S. possessions tax credit
			Total	Regular and alternative minimum tax		
	(8)	(9)	(10)	(11)	(12)	(13)
<b>All industries</b>	<b>558,505,871</b>	<b>533,194,188</b>	<b>187,480,142</b>	<b>187,679,640</b>	<b>56,593,276</b>	<b>271,709</b>
<b>Agriculture, forestry, fishing, and hunting</b>	<b>442,721</b>	<b>298,828</b>	<b>103,425</b>	<b>103,425</b>	<b>11,559</b>	<b>* 19</b>
<b>Mining</b>	<b>6,690,737</b>	<b>6,562,286</b>	<b>2,337,064</b>	<b>2,337,038</b>	<b>1,434,081</b>	<b>0</b>
Oil and gas extraction	3,517,300	3,439,768	1,211,291	1,211,291	567,093	0
Coal mining, metal ore mining	* 1,915,503	* 1,887,381	* 684,459	* 684,459	* 635,754	0
Nonmetallic minerals	* 293,377	* 290,329	* 102,578	* 102,578	* 5,790	0
Support activities for mining	964,558	944,808	338,735	338,709	225,443	0
<b>Utilities</b>	<b>* 767,632</b>	<b>* 756,881</b>	<b>* 264,891</b>	<b>* 264,891</b>	<b>* 29,961</b>	<b>0</b>
<b>Construction</b>	<b>1,332,583</b>	<b>1,303,359</b>	<b>455,431</b>	<b>453,504</b>	<b>21,821</b>	<b>0</b>
Construction of buildings	879,485	876,914	307,971	306,170	7,268	0
Heavy and civil engineering construction	312,836	289,932	101,533	101,528	7,300	0
Special trade contractors	140,262	136,514	45,927	45,807	7,253	0
<b>Manufacturing</b>	<b>243,418,308</b>	<b>237,880,892</b>	<b>83,484,837</b>	<b>83,466,195</b>	<b>37,151,333</b>	<b>270,913</b>
Food manufacturing	16,411,186	15,400,723	5,392,072	5,393,122	1,988,946	* 1,792
Beverage and tobacco products	9,391,508	9,116,444	3,190,650	3,190,644	830,576	* 62,711
Tobacco manufacturing	* 1,440,700	* 1,393,615	* 487,771	* 487,765	* 39,539	* 4,660
Textile mills and textile product mills	* 269,514	* 263,601	* 92,827	* 92,827	* 32,816	0
Apparel manufacturing	1,362,691	1,321,275	462,178	462,178	72,950	* 2,137
Leather and allied product manufacturing	* 244,273	* 208,963	* 72,965	* 72,965	* 6,897	0
Wood product manufacturing	* 507,780	* 505,638	* 176,759	* 176,759	* 8,307	0
Paper manufacturing	5,656,981	5,604,729	1,961,976	1,961,948	729,609	0
Printing and related support activities	586,920	573,726	200,577	200,577	12,805	* 1,445
Petroleum and coal products manufacturing	89,426,232	88,714,195	31,108,397	31,101,209	18,768,417	0
Chemical manufacturing	47,041,788	43,589,358	15,305,875	15,305,401	5,359,338	* 189,638
Pharmaceutical and medicine manufacturing	32,353,601	29,626,672	10,390,455	10,390,399	3,450,949	* 187,353
Other chemical manufacturing	14,688,187	13,962,687	4,915,420	4,915,002	1,908,389	* 2,284
Plastics and rubber products manufacturing	1,072,950	851,514	299,562	299,938	88,914	* 226
Nonmetallic mineral product manufacturing	1,562,412	1,468,034	525,755	525,755	56,901	0
Primary metal manufacturing	2,770,495	2,559,607	912,424	912,421	533,058	0
Fabricated metal products	8,275,339	7,941,420	2,781,067	2,780,741	924,396	0
Machinery manufacturing	7,049,817	6,086,632	2,153,647	2,152,316	827,624	* 11,152
Computer and electronic product manufacturing	27,879,039	25,248,378	8,873,474	8,873,157	2,595,831	0
Electrical equipment, appliance and component manufacturing	12,958,597	12,504,868	4,383,381	4,381,646	2,772,017	* 1,813
Transportation equipment manufacturing	4,126,408	9,794,039	3,447,637	3,437,980	1,106,093	0
Motor vehicles and related manufacturing	-2,008,428	3,685,243	1,300,457	1,300,470	462,740	0
Other transportation equipment manufacturing	6,134,836	6,108,796	2,147,180	2,137,510	643,353	0
Furniture and related products	529,707	519,320	181,519	181,519	21,908	0
Miscellaneous manufacturing and manufacturing not allocable	6,294,671	5,608,429	1,962,095	1,963,092	413,930	0
<b>Wholesale and retail trade</b>	<b>65,121,081</b>	<b>63,131,970</b>	<b>22,111,524</b>	<b>22,343,433</b>	<b>2,985,951</b>	<b>0</b>
Wholesale trade	29,062,603	27,686,841	9,702,993	9,702,882	2,236,742	0
Durable goods	5,375,960	4,977,509	1,746,683	1,746,657	302,649	0
Machinery, equipment, and supplies	940,327	916,110	319,540	319,540	10,738	0
Other miscellaneous durable goods	4,435,633	4,061,398	1,427,143	1,427,118	291,911	0
Nondurable goods	23,686,643	22,709,332	7,956,310	7,956,225	1,934,093	0
Drugs, chemicals, and allied products	3,679,949	3,548,630	1,247,350	1,247,350	132,634	0
Groceries and related products	10,647,556	9,995,147	3,497,784	3,497,698	95,046	0
Petroleum and petroleum products	3,425,169	3,355,508	1,177,193	1,177,193	714,176	0
Other miscellaneous nondurable goods	5,915,845	5,791,924	2,027,407	2,027,407	986,087	0

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 1. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Total Assets, Income, Taxes, and Credits, and Foreign Income, Deductions, and Taxes, by Major and Selected Minor Industry—Continued**

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

Major and selected minor industry of U.S. corporation filing return	Net income (less deficit)	Income subject to U.S. tax	U.S. income tax before credits		Foreign tax credit claimed	U.S. possessions tax credit
			Total	Regular and alternative minimum tax		
	(8)	(9)	(10)	(11)	(12)	(13)
<b>Retail trade</b>	<b>36,058,477</b>	<b>35,445,129</b>	<b>12,408,531</b>	<b>12,640,551</b>	<b>749,209</b>	<b>0</b>
Motor vehicle, parts dealers, and gas stations	532,955	528,428	183,307	184,426	7,787	0
Building materials, garden equipment, and supplies	* 6,870,131	* 6,867,482	* 2,403,553	* 2,403,553	* 170,823	0
Food and beverages stores	312,252	282,923	98,632	98,764	5,244	0
Apparel and accessory stores	4,942,443	4,911,235	1,718,507	1,955,295	118,507	0
General merchandise stores	* 17,584,610	* 17,451,920	* 6,114,082	* 6,108,064	* 334,978	0
Miscellaneous retail trade (incl. furniture and home furnishings stores)	5,816,086	5,403,141	1,890,450	1,890,449	111,870	0
<b>Transportation and warehousing</b>	<b>8,909,927</b>	<b>8,659,025</b>	<b>3,032,180</b>	<b>3,032,140</b>	<b>197,508</b>	<b>0</b>
Air, rail, and water transportation	1,182,057	1,010,282	356,100	356,100	21,985	0
Water transportation	* 784,233	* 781,844	* 274,481	* 274,481	* 10,190	0
Air and rail transportation	* 397,824	* 228,438	* 81,619	* 81,619	* 11,795	0
Other transportation (including pipeline transportation and warehousing)	7,727,869	7,648,743	2,676,080	2,676,041	175,524	0
<b>Information</b>	<b>40,646,179</b>	<b>35,937,456</b>	<b>12,601,181</b>	<b>12,600,545</b>	<b>2,764,509</b>	<b>0</b>
Publishing (except internet), motion picture, and sound recording	27,400,946	23,050,552	8,089,636	8,088,773	1,799,365	0
Broadcasting, internet publishing	3,596,977	3,430,087	1,202,189	1,201,187	278,804	0
Telecommunications	5,183,549	5,118,047	1,789,674	1,790,903	89,725	0
Internet service providers, web search portals, data processing services	* 2,449,762	* 2,397,499	* 838,795	* 838,795	* 542,812	0
Other information services (includes internet publishing and broadcasting)	2,014,945	1,941,272	680,887	680,887	53,804	0
<b>Finance, insurance, real estate, and rental and leasing</b>	<b>104,263,876</b>	<b>93,746,105</b>	<b>33,356,183</b>	<b>33,348,281</b>	<b>5,745,227</b>	<b>* 4</b>
Finance and insurance	102,149,197	92,402,963	32,880,765	32,873,721	5,713,926	* 4
Commercial banking and other depository credit agencies	1,077,416	989,426	345,363	345,342	65,267	0
Nondepository credit intermediation	6,507,619	6,344,671	2,223,273	2,221,894	197,303	0
Securities, commodity contracts, and other	18,133,735	16,726,370	5,864,980	5,864,980	1,660,026	0
Insurance and related activities	74,659,050	66,587,253	23,827,649	23,822,005	3,295,173	* 4
Insurance agencies and brokerages	1,739,953	1,698,363	593,959	593,882	223,396	0
Funds, trusts, and other financial vehicles	1,771,377	1,755,244	619,499	619,499	496,158	0
Real estate and rental and leasing	2,114,678	1,343,142	475,419	474,560	31,300	0
Real estate	546,932	500,274	172,301	172,070	13,542	0
Rentals and leasing	1,567,746	842,867	303,118	302,490	17,758	0
<b>Services</b>	<b>86,912,827</b>	<b>84,917,385</b>	<b>29,733,427</b>	<b>29,730,188</b>	<b>6,251,328</b>	<b>* 773</b>
Professional, scientific, and technical services	6,183,462	6,011,090	2,102,691	2,101,999	466,771	0
Management of holding companies	68,523,433	67,468,343	23,620,404	23,618,731	4,733,584	0
Administrative and support and waste management and remediation	2,778,962	2,235,075	784,466	784,466	244,760	0
Education services, health care, and social assistance	2,684,103	2,604,949	910,985	910,985	23,564	0
Arts, entertainment, and recreation	352,095	312,747	111,485	111,485	49,734	0
Accommodation and food services	6,015,790	5,935,043	2,081,228	2,080,236	696,903	* 773
Accommodation	1,994,903	1,932,686	680,938	679,962	139,431	* 773
Food services and drinking places	4,020,887	4,002,358	1,400,290	1,400,273	557,472	0
Other services	374,983	350,138	122,167	122,286	36,011	0
Repair and maintenance services	* 41,190	* 18,151	* 6,004	* 6,123	* 1,525	0
Personal services	* 330,255	* 328,747	* 115,041	* 115,041	* 34,034	0
Religious, grantmaking, civic, professional, and similar organizations	* 3,539	* 3,241	* 1,122	* 1,122	* 452	0

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 1. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Total Assets, Income, Taxes, and Credits, and Foreign Income, Deductions, and Taxes, by Major and Selected Minor Industry—Continued**

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

Major and selected minor industry of U.S. corporation filing return	General business credit	U.S. income tax after credits [3]	Foreign income and taxes			
			Gross income (less loss)			
			Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest
	(14)	(15)	(16)	(17)	(18)	(19)
<b>All industries</b>	<b>7,166,067</b>	<b>118,907,935</b>	<b>485,354,155</b>	<b>86,339,067</b>	<b>33,129,305</b>	<b>57,724,090</b>
<b>Agriculture, forestry, fishing, and hunting</b>	* 1,928	89,765	176,994	29,340	* 6,573	* 2,556
<b>Mining</b>	<b>10,407</b>	<b>866,460</b>	<b>8,507,542</b>	<b>731,192</b>	<b>151,399</b>	<b>439,454</b>
Oil and gas extraction	* 3,341	624,560	2,894,515	62,368	* 25,432	34,893
Coal mining, metal ore mining	0	* 48,705	* 3,520,299	* 187,525	* 28,109	* 217,267
Nonmetallic minerals	* 397	* 96,391	* 41,884	* 17,235	* 4,260	* 6,952
Support activities for mining	* 6,669	96,805	2,050,844	* 464,065	* 93,598	180,341
<b>Utilities</b>	<b>* 245</b>	<b>* 196,055</b>	<b>* 170,777</b>	<b>* 138,116</b>	<b>* 23,904</b>	<b>* 8,181</b>
<b>Construction</b>	<b>5,760</b>	<b>338,984</b>	<b>270,747</b>	<b>32,902</b>	<b>8,788</b>	<b>* 1,755</b>
Construction of buildings	* 5,432	206,891	121,466	20,463	* 4,843	* 446
Heavy and civil engineering construction	* 285	93,475	90,961	6,337	* 1,039	* 1,224
Special trade contractors	* 42	38,617	58,320	6,102	* 2,907	* 85
<b>Manufacturing</b>	<b>3,753,251</b>	<b>40,656,848</b>	<b>251,450,340</b>	<b>55,924,861</b>	<b>24,912,421</b>	<b>8,515,131</b>
Food manufacturing	65,008	3,306,866	13,640,787	5,784,063	1,697,394	159,719
Beverage and tobacco products	* 5,299	2,291,590	8,418,721	1,696,191	* 546,575	* 287,504
Tobacco manufacturing	* 843	* 442,729	* 1,627,330	* 10,926	* 6,006	* 2,334
Textile mills and textile product mills	* 3,309	* 56,614	* 225,918	* 67,794	* 29,786	* 4,453
Apparel manufacturing	* 494	384,325	390,142	* 123,046	* 58,914	* 29,992
Leather and allied product manufacturing	* 1,461	* 64,300	* 170,892	* 1,468	* 537	* 765
Wood product manufacturing	* 1,454	* 166,928	* 66,402	* 8,966	* 4,510	* 597
Paper manufacturing	* 52,821	1,006,948	3,793,961	1,113,315	702,651	128,422
Printing and related support activities	* 1,477	184,448	109,240	* 18,070	* 9,777	* 1,614
Petroleum and coal products manufacturing	* 454,049	11,269,901	72,378,677	17,692,043	10,289,240	2,571,500
Chemical manufacturing	781,722	8,889,253	45,155,896	9,683,776	5,036,730	483,516
Pharmaceutical and medicine manufacturing	647,460	6,033,450	30,759,412	6,173,192	3,562,787	275,549
Other chemical manufacturing	134,263	2,855,803	14,396,484	3,510,583	1,473,943	207,967
Plastics and rubber products manufacturing	6,166	201,441	625,838	198,805	93,023	22,614
Nonmetallic mineral product manufacturing	4,119	460,480	408,343	95,041	26,666	72,806
Primary metal manufacturing	* 510	351,026	3,153,089	544,046	* 226,668	443,501
Fabricated metal products	63,235	1,773,700	5,772,137	1,304,447	775,545	132,871
Machinery manufacturing	157,531	1,141,632	10,006,464	1,694,515	581,089	509,666
Computer and electronic product manufacturing	1,718,236	4,434,983	47,982,029	4,792,558	1,232,472	474,539
Electrical equipment, appliance and component manufacturing	155,650	930,503	20,482,562	6,122,377	2,120,956	2,382,411
Transportation equipment manufacturing	190,591	2,127,801	13,680,250	3,890,063	1,114,572	744,252
Motor vehicles and related manufacturing	71,808	743,719	10,545,906	2,850,036	729,517	677,495
Other transportation equipment manufacturing	118,783	1,384,082	3,134,344	1,040,027	385,055	66,756
Furniture and related products	* 4,148	154,765	150,894	* 39,258	* 18,680	* 6,105
Miscellaneous manufacturing and manufacturing not allocable	85,970	1,459,342	4,838,099	1,055,019	346,638	58,284
<b>Wholesale and retail trade</b>	<b>308,983</b>	<b>18,614,177</b>	<b>21,889,530</b>	<b>6,371,758</b>	<b>2,437,526</b>	<b>550,021</b>
Wholesale trade	194,322	7,093,241	17,113,543	4,702,408	1,899,039	475,671
Durable goods	34,827	1,401,326	4,261,866	674,369	200,516	106,946
Machinery, equipment, and supplies	* 218	307,671	150,183	15,766	* 1,553	10,035
Other miscellaneous durable goods	34,610	1,093,655	4,111,683	658,603	198,964	96,911
Nondurable goods	159,495	5,691,915	12,851,677	4,028,039	1,698,523	368,725
Drugs, chemicals, and allied products	* 31,699	1,060,517	2,374,896	332,805	64,328	18,506
Groceries and related products	* 32,027	3,370,637	2,674,002	259,557	* 65,891	* 141,446
Petroleum and petroleum products	* 53,930	299,570	2,358,149	* 1,392,011	* 706,057	* 19,445
Other miscellaneous nondurable goods	41,837	960,765	5,424,294	2,034,545	856,907	186,533

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 1. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Total Assets, Income, Taxes, and Credits, and Foreign Income, Deductions, and Taxes, by Major and Selected Minor Industry—Continued**

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

Major and selected minor industry of U.S. corporation filing return	General business credit	U.S. income tax after credits [3]	Foreign income and taxes			
			Gross income (less loss)			
			Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest
	(14)	(15)	(16)	(17)	(18)	(19)
<b>Retail trade</b>	114,661	11,520,936	4,775,987	1,669,350	538,487	74,350
Motor vehicle, parts dealers, and gas stations	* 3,627	163,145	57,843	6,659	* 3,243	* 9,615
Building materials, garden equipment, and supplies	* 3,397	* 2,229,333	* 545,661	* 263,793	* 150,492	* 15,750
Food and beverages stores	* 5,975	* 72,880	58,559	* 1,398	* 203	* 1,300
Apparel and accessory stores	10,228	1,589,771	1,005,983	391,510	35,249	22,635
General merchandise stores	* 80,378	* 5,698,726	* 1,757,099	* 258,239	* 283,343	* 18,150
Miscellaneous retail trade (incl. furniture and home furnishings stores)	11,056	1,767,081	1,350,842	747,751	65,957	6,900
<b>Transportation and warehousing</b>	<b>31,222</b>	<b>2,780,737</b>	<b>13,611,474</b>	<b>727,022</b>	<b>103,691</b>	<b>105,312</b>
Air, rail, and water transportation	* 516	311,524	2,881,632	* 579,038	* 13,818	* 1,784
Water transportation	* 126	* 245,521	* 2,728,627	* 503,044	* 2,490	* 609
Air and rail transportation	* 390	* 66,003	* 153,005	* 75,994	* 11,328	* 1,175
Other transportation (including pipeline transportation and warehousing)	30,706	2,469,214	10,729,841	147,985	89,873	103,528
<b>Information</b>	<b>271,414</b>	<b>9,543,782</b>	<b>36,404,233</b>	<b>8,462,463</b>	<b>1,344,901</b>	<b>283,657</b>
Publishing (except internet), motion picture, and sound recording	184,578	6,085,158	25,517,727	6,010,515	684,907	148,102
Broadcasting, internet publishing	* 7,892	915,462	4,965,617	* 192,465	* 70,076	* 103,244
Telecommunications	* 24,374	1,674,666	2,265,137	1,419,985	* 93,593	* 21,692
Internet service providers, web search portals, data processing services	* 39,217	* 256,766	* 3,060,740	* 743,790	* 455,193	* 5,682
Other information services (includes internet publishing and broadcasting)	15,353	611,729	595,011	95,708	41,132	4,936
<b>Finance, insurance, real estate, and rental and leasing</b>	<b>910,386</b>	<b>24,602,780</b>	<b>77,132,720</b>	<b>7,956,569</b>	<b>1,497,838</b>	<b>25,242,705</b>
Finance and insurance	906,839	24,172,471	76,030,709	7,398,381	1,488,430	25,231,374
Commercial banking and other depository credit agencies	* 1,114	258,234	252,361	203	* 11	* 251,949
Nondepository credit intermediation	* 100,864	1,924,470	7,302,181	302,536	* 49,419	1,390,372
Securities, commodity contracts, and other	60,985	3,665,117	23,034,121	1,859,372	539,314	10,115,644
Insurance and related activities	729,751	18,220,171	43,620,169	5,102,870	812,114	11,981,155
Insurance agencies and brokerages	* 4,434	340,873	1,580,354	378,381	* 175,187	* 152,425
Funds, trusts, and other financial vehicles	* 14,125	104,479	1,821,877	* 133,400	* 87,571	1,492,254
Real estate and rental and leasing	3,547	430,309	1,102,010	558,187	9,408	11,331
Real estate	* 19	157,942	177,679	62,308	* 2,745	7,184
Rentals and leasing	* 3,529	272,367	924,331	* 495,879	* 6,663	* 4,147
<b>Services</b>	<b>1,872,471</b>	<b>21,218,347</b>	<b>75,739,797</b>	<b>5,964,842</b>	<b>2,642,262</b>	<b>22,575,318</b>
Professional, scientific, and technical services	54,200	1,576,664	8,902,144	530,825	197,204	96,361
Management of holding companies	1,601,398	16,996,922	56,555,702	4,481,352	1,926,436	22,066,995
Administrative and support and waste management and remediation	29,753	502,777	2,729,046	359,895	135,606	29,805
Education services, health care, and social assistance	* 9,479	877,012	252,975	75,043	* 4,501	* 2,579
Arts, entertainment, and recreation	* 45	61,585	755,068	* 25,548	* 6,090	* 4,068
Accommodation and food services	174,842	1,120,167	6,240,604	423,376	341,985	369,358
Accommodation	* 37,175	427,874	1,756,431	* 84,987	* 57,453	* 102,007
Food services and drinking places	137,667	692,293	4,484,173	* 338,389	* 284,532	267,351
Other services	* 2,755	83,220	304,259	* 68,803	* 30,441	* 6,152
Repair and maintenance services	* 20	* 4,459	* 16,249	* 2,361	* 800	0
Personal services	* 2,735	* 78,091	* 282,586	* 65,840	* 29,641	* 6,152
Religious, grantmaking, civic, professional, and similar organizations	0	* 669	* 5,423	* 603	0	0

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 1. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Total Assets, Income, Taxes, and Credits, and Foreign Income, Deductions, and Taxes, by Major and Selected Minor Industry—Continued**

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

Major and selected minor industry of U.S. corporation filing return	Foreign income and taxes—continued						
	Gross income (less loss)—continued					Deductions	
	Rents, royalties, and license fees	Service income	Other income	Oil and gas extraction income [4]	Foreign branch income [4]	Total	Deductions allocable to specific types of income
	(20)	(21)	(22)	(23)	(24)	(25)	Total
<b>All industries</b>	<b>79,964,798</b>	<b>26,382,011</b>	<b>201,814,884</b>	<b>49,446,665</b>	<b>97,936,689</b>	<b>243,861,018</b>	<b>133,043,631</b>
<b>Agriculture, forestry, fishing, and hunting</b>	<b>* 13,425</b>	<b>0</b>	<b>125,100</b>	<b>0</b>	<b>* 13,640</b>	<b>69,258</b>	<b>* 47,287</b>
<b>Mining</b>	<b>169,573</b>	<b>353,116</b>	<b>6,662,808</b>	<b>2,633,006</b>	<b>2,804,878</b>	<b>4,088,567</b>	<b>3,066,442</b>
Oil and gas extraction	* 515	* 106,720	2,664,587	2,633,006	514,123	1,215,692	975,585
Coal mining, metal ore mining	* 29,264	* 119,009	* 2,939,125	0	* 491,956	* 1,550,725	* 1,080,356
Nonmetallic minerals	* 996	0	* 12,441	0	* 19,861	* 13,834	* 3,707
Support activities for mining	* 138,798	* 127,387	* 1,046,655	0	* 1,778,938	* 1,308,316	* 1,006,793
<b>Utilities</b>	<b>* 7,217</b>	<b>* 20,360</b>	<b>* -27,002</b>	<b>0</b>	<b>* 17,627</b>	<b>* 80,889</b>	<b>* 26,240</b>
<b>Construction</b>	<b>* 49,246</b>	<b>95,355</b>	<b>82,702</b>	<b>0</b>	<b>* 33,325</b>	<b>162,578</b>	<b>140,768</b>
Construction of buildings	* 33,456	* 16,538	* 45,720	0	* 7,931	* 81,304	* 79,528
Heavy and civil engineering construction	* 12,499	* 49,733	20,129	0	* 6,382	46,254	27,916
Special trade contractors	* 3,291	* 29,084	* 16,853	0	* 19,012	* 35,020	* 33,325
<b>Manufacturing</b>	<b>49,310,395</b>	<b>5,817,481</b>	<b>106,970,051</b>	<b>* 44,744,997</b>	<b>21,703,179</b>	<b>96,857,064</b>	<b>50,761,023</b>
Food manufacturing	1,128,893	* 21,185	4,849,532	0	1,749,538	5,981,117	4,344,058
Beverage and tobacco products	* 1,749,196	* 1,004,129	3,135,126	0	* 2,447,239	4,400,011	* 2,025,253
Tobacco manufacturing	* 132,163	* 700	* 1,475,201	0	* 1,302,850	* 1,334,604	* 1,320,782
Textile mills and textile product mills	* 47,985	0	* 75,900	0	0	* 85,603	* 56,859
Apparel manufacturing	* 129,852	* 9,339	* 38,999	0	* 19,538	* 93,397	* 48,275
Leather and allied product manufacturing	* 46,439	* 83,700	* 37,982	0	* 98,138	* 105,611	* 97,675
Wood product manufacturing	* 3,767	* 372	* 48,190	0	0	* 39,465	* 37,103
Paper manufacturing	* 702,766	* 1,485	1,145,323	0	* 335,728	1,292,844	524,534
Printing and related support activities	* 36,653	* 10,068	* 33,058	0	* 25,232	* 34,652	* 27,715
Petroleum and coal products manufacturing	389,002	* 10,527	41,426,365	* 44,744,997	* 4,968,475	17,814,178	14,961,996
Chemical manufacturing	14,989,224	510,279	14,452,372	0	4,405,187	18,514,297	9,186,934
Pharmaceutical and medicine manufacturing	11,190,525	* 346,193	9,211,166	0	2,284,254	12,404,756	6,806,533
Other chemical manufacturing	3,798,699	164,086	5,241,206	0	2,120,932	6,109,541	2,380,401
Plastics and rubber products manufacturing	170,273	* 2,911	138,213	0	* 12,326	252,916	87,800
Nonmetallic mineral product manufacturing	41,897	* 9,139	162,794	0	* 46,498	201,512	79,150
Primary metal manufacturing	1,222,396	* 74,745	641,733	0	* 190,579	1,536,587	672,657
Fabricated metal products	783,319	* 27,453	2,748,503	0	2,296,441	2,670,596	2,116,661
Machinery manufacturing	1,662,383	214,874	5,343,936	0	2,079,419	5,768,598	1,879,914
Computer and electronic product manufacturing	19,015,570	2,853,362	19,613,528	0	1,579,752	21,543,457	6,559,888
Electrical equipment, appliance and component manufacturing	2,238,847	54,584	7,563,388	0	374,500	10,271,383	5,061,111
Transportation equipment manufacturing	3,403,945	907,662	3,619,757	0	629,358	3,963,886	1,676,085
Motor vehicles and related manufacturing	2,863,880	* 528,572	2,896,406	0	* 509,055	3,044,725	1,339,873
Other transportation equipment manufacturing	540,066	* 379,089	723,351	0	* 120,303	919,161	336,211
Furniture and related products	* 7,699	* 1,035	* 78,116	0	* 27,526	* 72,328	* 48,249
Miscellaneous manufacturing and manufacturing not allocable	1,540,290	* 20,632	1,817,236	0	417,704	2,214,627	1,269,107
<b>Wholesale and retail trade</b>	<b>4,460,939</b>	<b>740,485</b>	<b>7,328,800</b>	<b>* 2,000,154</b>	<b>4,991,158</b>	<b>10,219,946</b>	<b>7,533,917</b>
Wholesale trade	3,271,289	728,641	6,036,494	* 2,000,154	4,161,942	8,337,910	5,944,136
Durable goods	1,897,065	312,919	1,070,051	0	378,935	2,472,693	1,902,894
Machinery, equipment, and supplies	* 15,131	* 8,889	98,810	0	* 71,846	100,251	81,122
Other miscellaneous durable goods	1,881,934	304,030	971,241	0	307,089	2,372,442	1,821,772
Nondurable goods	1,374,224	415,722	4,966,443	* 2,000,154	3,783,007	5,865,217	4,041,242
Drugs, chemicals, and allied products	834,865	* 10,674	1,113,718	0	* 1,042,078	1,574,298	975,908
Groceries and related products	* 80,753	* 230,844	* 1,895,511	0	* 1,940,871	2,086,498	1,954,846
Petroleum and petroleum products	* 226	* 83,995	* 156,415	* 2,000,154	* 234,730	* 295,185	* 79,498
Other miscellaneous nondurable goods	456,031	* 89,478	1,800,799	0	564,598	1,907,222	1,030,190

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 1. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Total Assets, Income, Taxes, and Credits, and Foreign Income, Deductions, and Taxes, by Major and Selected Minor Industry—Continued**

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

Major and selected minor industry of U.S. corporation filing return	Foreign income and taxes—continued						
	Gross income (less loss)—continued					Deductions	
	Rents, royalties, and license fees	Service income	Other income	Oil and gas extraction income [4]	Foreign branch income [4]	Total	Deductions allocable to specific types of income Total
	(20)	(21)	(22)	(23)	(24)	(25)	(26)
<b>Retail trade</b>	1,189,650	* 11,844	1,292,306	0	829,216	1,882,037	1,589,780
Motor vehicle, parts dealers, and gas stations	* 2,588	* 100	* 35,638	0	* 7,459	* 20,325	* 18,600
Building materials, garden equipment, and supplies	* 113,242	0	* 2,384	0	0	* 15,217	* 104
Food and beverages stores	* 54,933	0	* 725	0	0	* 4,567	* 4,031
Apparel and accessory stores	180,280	* 1,514	374,795	0	* 208,606	271,289	190,173
General merchandise stores	* 721,380	* 380	* 475,607	0	* 351,540	* 654,887	* 508,789
Miscellaneous retail trade (incl. furniture and home furnishings stores)	117,227	9,850	403,157	0	261,611	915,752	868,083
<b>Transportation and warehousing</b>	<b>180,074</b>	<b>6,843,294</b>	<b>5,652,080</b>	<b>* 3,023</b>	<b>4,839,547</b>	<b>11,167,148</b>	<b>9,831,704</b>
Air, rail, and water transportation	* 25,557	* 51,880	* 2,209,555	0	* 349,958	* 2,184,505	* 951,247
Water transportation	0	* 20,351	* 2,202,133	0	* 348,153	* 2,154,430	* 940,230
Air and rail transportation	* 25,557	* 31,529	* 7,422	0	* 1,805	* 30,074	* 11,017
Other transportation (including pipeline transportation and warehousing)	154,517	6,791,414	3,442,525	* 3,023	4,489,589	8,982,643	8,880,457
<b>Information</b>	<b>17,706,348</b>	<b>1,748,029</b>	<b>6,858,835</b>	<b>0</b>	<b>5,606,565</b>	<b>21,823,468</b>	<b>15,163,309</b>
Publishing (except internet), motion picture, and sound recording	12,712,254	116,408	5,845,540	0	4,703,744	14,986,098	9,444,965
Broadcasting, internet publishing	* 4,081,129	* 224,240	* 294,463	0	* 248,522	* 4,148,560	* 3,785,720
Telecommunications	* 27,079	* 537,251	* 165,537	0	* 29,868	852,717	* 536,997
Internet service providers, web search portals, data processing services	* 643,987	* 852,813	* 359,275	0	* 324,202	* 1,485,971	* 1,155,410
Other information services (includes internet publishing and broadcasting)	241,899	17,316	194,020	0	300,229	350,121	240,218
<b>Finance, insurance, real estate, and rental and leasing</b>	<b>2,254,302</b>	<b>4,409,215</b>	<b>35,772,090</b>	<b>0</b>	<b>19,629,429</b>	<b>47,548,294</b>	<b>24,434,181</b>
Finance and insurance	1,849,768	4,400,288	35,662,468	0	19,597,021	46,775,351	23,723,422
Commercial banking and other depository credit agencies	* 30	0	* 168	0	0	* 20,232	* 19,514
Nondepository credit intermediation	* 85,503	* 365,919	* 5,108,431	0	* 1,721,673	5,871,565	4,334,783
Securities, commodity contracts, and other	* 513,344	541,372	9,465,074	0	1,244,207	15,469,882	6,054,375
Insurance and related activities	1,250,890	3,492,440	20,980,700	0	16,631,141	25,126,472	13,240,591
Insurance agencies and brokerages	* 2,519	* 239,844	* 631,997	0	* 587,750	* 883,670	* 702,960
Funds, trusts, and other financial vehicles	0	* 557	* 108,095	0	0	* 287,200	* 74,159
Real estate and rental and leasing	404,534	* 8,927	109,622	0	* 32,408	772,943	710,758
Real estate	* 34,819	* 2,107	68,517	0	0	54,002	45,503
Rentals and leasing	369,716	* 6,820	* 41,106	0	* 32,408	718,941	665,255
<b>Services</b>	<b>5,813,279</b>	<b>6,354,676</b>	<b>32,389,420</b>	<b>* 65,485</b>	<b>38,297,342</b>	<b>51,843,806</b>	<b>22,038,761</b>
Professional, scientific, and technical services	935,088	3,711,494	3,431,172	0	4,573,570	6,569,624	5,697,653
Management of holding companies	2,278,149	1,598,132	24,204,638	* 65,485	29,997,550	38,613,152	11,815,326
Administrative and support and waste management and remediation	335,272	479,391	1,389,077	0	862,879	1,760,163	1,003,104
Education services, health care, and social assistance	* 26,904	128,743	* 15,206	0	* 30,936	155,530	121,394
Arts, entertainment, and recreation	185,776	* 219,348	* 314,238	0	* 77,544	* 504,767	* 430,077
Accommodation and food services	2,002,843	197,199	2,905,843	0	2,628,807	4,084,288	2,836,684
Accommodation	* 396,282	* 147,215	* 968,488	0	* 743,006	1,255,066	787,098
Food services and drinking places	1,606,561	* 49,984	1,937,355	0	* 1,885,800	2,829,222	2,049,586
Other services	* 49,247	* 20,368	* 129,247	0	* 126,057	* 156,282	* 134,523
Repair and maintenance services	* 295	* 12,793	0	0	0	* 4,677	* 4,677
Personal services	* 47,429	* 4,278	* 129,247	0	* 122,759	* 147,481	* 127,140
Religious, grantmaking, civic, professional, and similar organizations	* 1,523	* 3,297	0	0	* 3,297	* 4,124	* 2,706

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 1. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Total Assets, Income, Taxes, and Credits, and Foreign Income, Deductions, and Taxes, by Major and Selected Minor Industry—Continued**

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

Major and selected minor industry of U.S. corporation filing return	Foreign income and taxes—continued					
	Deductions—continued					
	Deductions allocable to specific types of income—continued				Deductions not allocable to specific types of income	
	Depreciation, depletion, and amortization	Other expenses	Service expenses	Other definitely allocable deductions	Total	Research and development
(27)	(28)	(29)	(30)	(31)	(32)	
<b>All industries</b>	<b>1,860,464</b>	<b>4,571,450</b>	<b>15,009,924</b>	<b>111,601,793</b>	<b>110,817,387</b>	<b>13,485,504</b>
<b>Agriculture, forestry, fishing, and hunting</b>	* 150	0	0	* 47,137	* 21,971	* 673
<b>Mining</b>	* 40,937	* 68,438	* 116,081	<b>2,840,986</b>	<b>1,022,125</b>	* 23,501
Oil and gas extraction	* 20,436	* 382	* 10,305	944,462	240,107	* 247
Coal mining, metal ore mining	* 2,121	* 63,940	* 10,600	* 1,003,695	* 470,369	0
Nonmetallic minerals	0	* 231	0	* 3,476	* 10,127	0
Support activities for mining	* 18,380	* 3,884	* 95,176	* 889,353	* 301,523	* 23,254
<b>Utilities</b>	<b>0</b>	<b>0</b>	* 1,598	* 24,641	* 54,649	<b>0</b>
<b>Construction</b>	* 109	* 7,446	<b>61,737</b>	<b>71,476</b>	<b>21,810</b>	* 101
Construction of buildings	0	* 5	* 34,139	* 45,384	* 1,776	0
Heavy and civil engineering construction	* 109	* 7,387	* 3,127	* 17,292	* 18,338	* 50
Special trade contractors	0	* 53	* 24,471	* 8,800	* 1,695	* 51
<b>Manufacturing</b>	<b>383,599</b>	<b>143,870</b>	<b>700,015</b>	<b>49,533,540</b>	<b>46,096,041</b>	<b>10,906,052</b>
Food manufacturing	* 4	* 2,563	0	4,341,491	1,637,059	103,047
Beverage and tobacco products	* 10,716	* 11	* 2,309	* 2,012,217	2,374,758	* 2,946
Tobacco manufacturing	0	0	0	* 1,320,782	* 13,822	* 1,468
Textile mills and textile product mills	0	0	0	* 56,859	* 28,744	* 13,365
Apparel manufacturing	* 1,763	* 17,088	* 2,727	* 26,697	* 45,122	0
Leather and allied product manufacturing	0	* 21	* 87,932	* 9,721	* 7,936	* 3,710
Wood product manufacturing	0	0	0	* 37,103	* 2,362	* 102
Paper manufacturing	0	* 113	* 778	523,643	768,310	* 270,353
Printing and related support activities	* 54	* 1,711	* 8,344	* 17,605	* 6,937	* 1,961
Petroleum and coal products manufacturing	0	* 1,355	* 25,510	* 14,935,131	2,852,182	* 171,069
Chemical manufacturing	* 11,907	25,498	15,457	9,134,072	9,327,363	4,009,831
Pharmaceutical and medicine manufacturing	0	* 1,203	* 599	6,804,731	5,598,223	3,320,984
Other chemical manufacturing	* 11,907	* 24,295	* 14,859	2,329,341	3,729,140	688,848
Plastics and rubber products manufacturing	* 1,865	* 7,010	* 737	78,189	165,116	12,606
Nonmetallic mineral product manufacturing	0	* 1,670	* 5,706	* 71,774	122,361	* 9,088
Primary metal manufacturing	* 344,479	* 3,638	* 14,176	310,364	863,930	* 11,204
Fabricated metal products	* 5,014	* 996	* 1,979	2,108,671	553,935	99,969
Machinery manufacturing	* 558	* 5,928	122,942	1,750,487	3,888,684	636,044
Computer and electronic product manufacturing	* 116	22,570	341,369	6,195,834	14,983,569	4,751,635
Electrical equipment, appliance and component manufacturing	* 2,846	* 32,573	* 35,923	4,989,769	5,210,272	285,401
Transportation equipment manufacturing	* 4,277	* 10,742	* 23,204	1,637,862	2,287,801	323,206
Motor vehicles and related manufacturing	* 4,277	* 909	* 4,636	1,330,051	1,704,851	164,420
Other transportation equipment manufacturing	0	* 9,833	* 18,568	* 307,810	582,950	158,785
Furniture and related products	* 1	0	* 805	* 47,443	* 24,079	* 2,707
Miscellaneous manufacturing and manufacturing not allocable	0	* 10,381	* 10,117	1,248,609	945,520	197,809
<b>Wholesale and retail trade</b>	<b>33,672</b>	<b>443,182</b>	<b>169,727</b>	<b>6,887,336</b>	<b>2,686,030</b>	<b>70,576</b>
Wholesale trade	29,806	431,630	163,708	5,318,993	2,393,773	67,107
Durable goods	* 2,170	19,727	118,446	1,762,552	569,799	* 10,149
Machinery, equipment, and supplies	* 1,786	* 2,781	* 3,088	73,467	19,129	* 2,072
Other miscellaneous durable goods	* 383	16,946	115,358	1,689,085	550,670	* 8,077
Nondurable goods	27,636	411,903	45,262	3,556,441	1,823,974	56,958
Drugs, chemicals, and allied products	* 584	* 297,091	* 4,043	674,190	598,391	* 10,119
Groceries and related products	* 22,737	* 94,124	* 9,591	* 1,828,394	131,652	* 1,208
Petroleum and petroleum products	0	0	0	* 79,498	* 215,687	0
Other miscellaneous nondurable goods	* 4,314	* 20,689	* 31,026	974,161	877,032	* 45,632

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 1. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Total Assets, Income, Taxes, and Credits, and Foreign Income, Deductions, and Taxes, by Major and Selected Minor Industry—Continued**

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

Major and selected minor industry of U.S. corporation filing return	Foreign income and taxes—continued					
	Deductions—continued					
	Deductions allocable to specific types of income—continued				Deductions not allocable to specific types of income	
	Depreciation, depletion, and amortization	Other expenses	Service expenses	Other definitely allocable deductions	Total	Research and development
(27)	(28)	(29)	(30)	(31)	(32)	
Retail trade	* 3,867	11,552	* 6,019	1,568,343	292,256	* 3,469
Motor vehicle, parts dealers, and gas stations	* 817	* 22	0	* 17,760	* 1,725	0
Building materials, garden equipment, and supplies	0	* 103	* 2	0	* 15,113	0
Food and beverages stores	0	* 3,794	0	* 237	* 537	0
Apparel and accessory stores	* 85	* 1,878	0	188,210	81,116	* 3,316
General merchandise stores	* 1,015	* 2,701	0	* 505,073	* 146,098	0
Miscellaneous retail trade (incl. furniture and home furnishings stores)	1,950	3,054	6,017	857,063	47,667	153
<b>Transportation and warehousing</b>	<b>* 1,719</b>	<b>* 9,004</b>	<b>5,857,822</b>	<b>3,963,160</b>	<b>1,335,443</b>	<b>* 25,432</b>
Air, rail, and water transportation	0	* 2,349	* 19,835	* 929,063	* 1,233,258	0
Water transportation	0	0	* 14,571	* 925,659	* 1,214,200	0
Air and rail transportation	0	* 2,349	* 5,264	* 3,404	* 19,058	0
Other transportation (including pipeline transportation and warehousing)	* 1,719	6,655	5,837,987	3,034,096	102,186	* 25,432
<b>Information</b>	<b>* 225,340</b>	<b>3,140,831</b>	<b>1,378,101</b>	<b>10,419,036</b>	<b>6,660,160</b>	<b>2,145,207</b>
Publishing (except internet), motion picture, and sound recording	* 17,082	237,802	76,575	9,113,505	5,541,133	1,896,444
Broadcasting, internet publishing	* 208,188	* 2,872,149	* 86,174	* 619,210	* 362,841	* 3,902
Telecommunications	0	* [2]	* 443,959	* 93,037	* 315,721	* 17,996
Internet service providers, web search portals, data processing services	* 71	* 30,880	* 758,064	* 366,395	* 330,562	* 217,010
Other information services (includes internet publishing and broadcasting)	0	0	13,329	226,889	109,903	9,856
<b>Finance, insurance, real estate, and rental and leasing</b>	<b>642,443</b>	<b>374,261</b>	<b>3,426,984</b>	<b>19,990,492</b>	<b>23,114,114</b>	<b>* 15,804</b>
Finance and insurance	* 531,452	186,195	3,425,402	19,580,374	23,051,929	* 15,804
Commercial banking and other depository credit agencies	0	* 10	* 106	* 19,398	* 718	0
Nondepository credit intermediation	* 20,231	* 147	* 375,390	3,939,015	1,536,782	* 2,076
Securities, commodity contracts, and other	* 493,254	* 96,735	482,249	4,982,137	9,415,507	* 286
Insurance and related activities	* 17,967	89,268	2,567,657	10,565,698	11,885,881	* 13,441
Insurance agencies and brokerages	0	* 243	* 183,799	* 518,918	* 180,710	* 2,713
Funds, trusts, and other financial vehicles	0	* 34	0	* 74,125	* 213,041	0
Real estate and rental and leasing	110,992	188,067	* 1,582	410,118	62,185	0
Real estate	* 891	* 17,653	* 1,039	25,920	* 8,499	0
Rentals and leasing	* 110,100	* 170,414	* 543	* 384,199	* 53,686	0
<b>Services</b>	<b>532,495</b>	<b>384,418</b>	<b>3,297,859</b>	<b>17,823,989</b>	<b>29,805,044</b>	<b>298,157</b>
Professional, scientific, and technical services	* 44,106	208,114	2,493,586	2,951,847	871,970	130,911
Management of holding companies	* 485,890	13,873	* 214,275	11,101,287	26,797,827	* 132,414
Administrative and support and waste management and remediation	* 58	* 45,187	406,321	551,537	757,059	* 24,655
Education services, health care, and social assistance	0	* 4,133	* 46,025	* 71,236	34,136	* 145
Arts, entertainment, and recreation	* 12	* 62,399	* 119,762	* 247,904	* 74,689	* 7,195
Accommodation and food services	* 2,429	44,277	* 7,913	2,782,065	1,247,604	* 2,836
Accommodation	0	* 8,815	* 42	* 778,241	* 467,968	0
Food services and drinking places	* 2,429	35,462	* 7,871	2,003,823	779,636	* 2,836
Other services	0	* 6,435	* 9,977	* 118,112	* 21,758	0
Repair and maintenance services	0	* 747	* 3,513	* 417	0	0
Personal services	0	* 5,688	* 4,278	* 117,174	* 20,341	0
Religious, grantmaking, civic, professional, and similar organizations	0	0	* 2,186	* 521	* 1,418	0



# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 1. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Total Assets, Income, Taxes, and Credits, and Foreign Income, Deductions, and Taxes, by Major and Selected Minor Industry—Continued**

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

Major and selected minor industry of U.S. corporation filing return	Foreign income and taxes—continued					
	Deductions—continued		Deductions from oil and gas extraction income [5]	Taxable income (less loss) before adjustments	Adjustments to taxable income	Taxable income (less loss) after adjustments
	Deductions not allocable to specific types of income—continued					
	Interest	Other				
	(33)	(34)	(35)	(36)	(37)	(38)
<b>All industries</b>	<b>42,001,568</b>	<b>54,391,211</b>	<b>10,984,748</b>	<b>241,493,136</b>	<b>27,827,198</b>	<b>213,665,938</b>
<b>Agriculture, forestry, fishing, and hunting</b>	<b>* 10,534</b>	<b>* 10,633</b>	<b>0</b>	<b>107,736</b>	<b>* 14,447</b>	<b>93,290</b>
<b>Mining</b>	<b>482,400</b>	<b>482,337</b>	<b>1,132,503</b>	<b>4,418,975</b>	<b>166,142</b>	<b>4,252,833</b>
Oil and gas extraction	* 210,533	* 25,897	1,132,503	1,678,823	* 32,496	1,646,326
Coal mining, metal ore mining	* 174,720	* 295,649	0	* 1,969,574	* 82,265	* 1,887,310
Nonmetallic minerals	0	0	0	* 28,051	0	* 28,051
Support activities for mining	* 97,146	* 160,792	0	742,527	* 51,381	691,146
<b>Utilities</b>	<b>* 29,501</b>	<b>* 25,026</b>	<b>0</b>	<b>* 89,888</b>	<b>0</b>	<b>* 89,888</b>
<b>Construction</b>	<b>* 890</b>	<b>* 20,493</b>	<b>0</b>	<b>108,170</b>	<b>* 2,041</b>	<b>106,129</b>
Construction of buildings	* 122	* 1,654	0	40,162	* 1,621	38,541
Heavy and civil engineering construction	* 220	* 17,998	0	44,707	* 398	44,309
Special trade contractors	* 548	* 841	0	23,300	* 21	23,279
<b>Manufacturing</b>	<b>15,239,527</b>	<b>19,617,336</b>	<b>* 9,612,746</b>	<b>154,593,276</b>	<b>22,769,849</b>	<b>131,823,426</b>
Food manufacturing	1,209,565	324,056	0	7,659,670	423,599	7,236,071
Beverage and tobacco products	* 382,588	* 1,983,550	0	4,018,710	* 32,144	* 3,986,566
Tobacco manufacturing	* 4,428	* 7,925	0	* 292,726	* 2,400	* 290,327
Textile mills and textile product mills	* 11,940	* 3,439	0	* 140,315	[2]	* 140,315
Apparel manufacturing	* 18,770	* 15,052	0	296,745	* 864	295,881
Leather and allied product manufacturing	* 3,006	* 1,220	0	* 65,281	0	* 65,281
Wood product manufacturing	* 326	* 380	0	* 26,937	* 2,519	* 24,418
Paper manufacturing	* 244,229	* 252,044	0	2,501,118	* 45,466	2,455,652
Printing and related support activities	* 1,875	* 2,934	0	74,588	* 910	73,677
Petroleum and coal products manufacturing	1,842,631	* 837,969	* 9,612,746	54,564,499	* 2,159	54,562,340
Chemical manufacturing	2,690,934	2,617,639	0	26,641,599	5,738,969	20,902,629
Pharmaceutical and medicine manufacturing	1,292,949	980,006	0	18,354,656	4,408,505	13,946,151
Other chemical manufacturing	1,397,985	1,637,633	0	8,286,943	1,330,464	6,956,479
Plastics and rubber products manufacturing	109,978	37,810	0	372,922	86,252	286,670
Nonmetallic mineral product manufacturing	80,849	* 23,051	0	206,831	* 469	206,362
Primary metal manufacturing	622,872	* 99,205	0	1,616,502	* 23,479	1,593,023
Fabricated metal products	265,555	155,589	0	3,101,541	118,559	2,982,982
Machinery manufacturing	1,031,758	2,210,052	0	4,237,865	1,049,691	3,188,174
Computer and electronic product manufacturing	809,028	9,332,039	0	26,438,572	8,697,048	17,741,524
Electrical equipment, appliance and component manufacturing	3,891,646	1,027,895	0	10,211,179	151,535	10,059,644
Transportation equipment manufacturing	1,765,578	200,184	0	9,716,365	6,058,329	3,658,036
Motor vehicles and related manufacturing	1,452,575	89,058	0	7,501,181	6,058,277	1,442,904
Other transportation equipment manufacturing	313,003	111,126	0	2,215,183	* 51	2,215,132
Furniture and related products	* 15,624	* 5,089	0	78,565	* 4,710	73,856
Miscellaneous manufacturing and manufacturing not allocable	240,775	488,140	0	2,623,472	333,146	2,290,326
<b>Wholesale and retail trade</b>	<b>1,019,125</b>	<b>1,445,641</b>	<b>* 216,401</b>	<b>11,669,584</b>	<b>1,006,550</b>	<b>10,663,033</b>
Wholesale trade	812,178	1,371,022	* 216,401	8,775,633	969,634	7,805,999
Durable goods	92,295	353,771	0	1,789,173	671,564	1,117,609
Machinery, equipment, and supplies	* 2,694	* 9,301	0	49,933	* 7,895	42,038
Other miscellaneous durable goods	89,601	344,470	0	1,739,241	663,669	1,075,571
Nondurable goods	719,883	1,017,251	* 216,401	6,986,460	298,070	6,688,390
Drugs, chemicals, and allied products	151,822	436,373	0	800,598	* 139,888	660,710
Groceries and related products	* 107,305	* 20,860	0	587,504	* 5,377	582,127
Petroleum and petroleum products	* 154,698	* 60,982	* 216,401	2,062,964	* [2]	2,062,964
Other miscellaneous nondurable goods	304,846	499,036	0	3,517,072	152,605	3,364,467

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 1. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Total Assets, Income, Taxes, and Credits, and Foreign Income, Deductions, and Taxes, by Major and Selected Minor Industry—Continued**

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

Major and selected minor industry of U.S. corporation filing return	Foreign income and taxes—continued					
	Deductions—continued			Taxable income (less loss) before adjustments	Adjustments to taxable income	Taxable income (less loss) after adjustments
	Deductions not allocable to specific types of income—continued		Deductions from oil and gas extraction income [5]			
	Interest	Other				
(33)	(34)	(35)	(36)	(37)	(38)	
Retail trade	206,946	74,619	0	2,893,950	36,917	2,857,034
Motor vehicle, parts dealers, and gas stations	* 648	* 841	0	37,518	* 211	37,308
Building materials, garden equipment, and supplies	* 5,991	* 9,122	0	* 530,444	* [2]	* 530,444
Food and beverages stores	0	0	0	53,992	* 636	53,356
Apparel and accessory stores	40,011	31,430	0	734,694	* 15,105	719,588
General merchandise stores	* 140,407	* 5,691	0	* 1,102,213	* 6	* 1,102,207
Miscellaneous retail trade (incl. furniture and home furnishings stores)	19,889	27,535	0	435,089	20,959	414,131
<b>Transportation and warehousing</b>	<b>8,600</b>	<b>1,295,194</b>	<b>* 221</b>	<b>2,444,326</b>	<b>* 151,153</b>	<b>2,293,173</b>
Air, rail, and water transportation	* 19,741	* 1,213,359	0	697,127	* 148,133	548,994
Water transportation	* 3,068	* 1,211,061	0	* 574,196	* 64,380	* 509,816
Air and rail transportation	* 16,674	* 2,298	0	* 122,931	* 83,753	* 39,177
Other transportation (including pipeline transportation and warehousing)	-11,141	81,835	* 221	1,747,198	3,019	1,744,179
<b>Information</b>	<b>704,809</b>	<b>3,753,108</b>	<b>0</b>	<b>14,580,764</b>	<b>369,440</b>	<b>14,211,324</b>
Publishing (except internet), motion picture, and sound recording	269,003	3,353,370	0	10,531,629	302,398	10,229,231
Broadcasting, internet publishing	* 218,229	* 106,113	0	817,057	* 89	816,968
Telecommunications	* 114,605	* 183,119	0	1,412,420	* 26,755	1,385,665
Internet service providers, web search portals, data processing services	* 95,189	* 18,363	0	* 1,574,769	* [2]	* 1,574,769
Other information services (includes internet publishing and broadcasting)	7,783	92,144	0	244,891	40,198	204,692
<b>Finance, insurance, real estate, and rental and leasing</b>	<b>11,017,958</b>	<b>11,823,907</b>	<b>0</b>	<b>29,584,426</b>	<b>1,922,966</b>	<b>27,661,459</b>
Finance and insurance	10,966,978	11,819,183	0	29,255,358	1,909,289	27,346,069
Commercial banking and other depository credit agencies	* 184	* 1	0	232,129	0	232,129
Nondepository credit intermediation	* 596,929	* 937,773	0	1,430,616	* 10,613	1,420,003
Securities, commodity contracts, and other	7,872,962	1,538,916	0	7,564,239	1,364,756	6,199,483
Insurance and related activities	2,309,061	9,317,294	0	18,493,697	522,747	17,970,950
Insurance agencies and brokerages	* 164,905	* 13,092	0	696,685	* [2]	696,685
Funds, trusts, and other financial vehicles	* 187,842	* 25,199	0	1,534,677	* 11,173	1,523,504
Real estate and rental and leasing	* 50,980	* 4,724	0	329,067	13,677	315,390
Real estate	* 8,431	* 5	0	123,677	* 12,586	111,091
Rentals and leasing	* 42,549	* 4,719	0	205,390	* 1,091	204,300
<b>Services</b>	<b>13,488,225</b>	<b>15,917,537</b>	<b>* 22,877</b>	<b>23,895,992</b>	<b>1,424,609</b>	<b>22,471,383</b>
Professional, scientific, and technical services	168,009	527,775	0	2,332,521	424,968	1,907,552
Management of holding companies	12,699,621	13,952,200	* 22,877	17,942,549	762,826	17,179,723
Administrative and support and waste management and remediation	51,809	648,216	0	968,882	117,151	851,731
Education services, health care, and social assistance	* 22,124	* 6,829	0	97,445	* 18,822	78,623
Arts, entertainment, and recreation	* 21,025	* 46,469	0	250,301	* 77,347	172,954
Accommodation and food services	519,321	722,022	0	2,156,316	* 17,311	2,139,006
Accommodation	* 116,458	* 348,194	0	501,365	* 9,193	492,172
Food services and drinking places	402,864	* 373,828	0	1,654,951	* 8,117	1,646,834
Other services	* 6,315	* 14,026	0	147,977	* 6,184	141,793
Repair and maintenance services	0	0	0	* 11,573	* 6,184	* 5,389
Personal services	* 6,315	* 14,026	0	* 135,105	0	* 135,105
Religious, grantmaking, civic, professional, and similar organizations	0	0	0	* 1,299	0	* 1,299

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 1. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Total Assets, Income, Taxes, and Credits, and Foreign Income, Deductions, and Taxes, by Major and Selected Minor Industry—Continued**

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

Major and selected minor industry of U.S. corporation filing return	Foreign income and taxes—continued						
	Foreign taxes available for credit					Taxes withheld at source on:	
	Total	Reduction for certain foreign taxes	Carryover	Total paid, accrued, and deemed paid	Foreign taxes paid or accrued		
					Total		Dividends
(39)	(40)	(41)	(42)	(43)	(44)		
<b>All industries</b>	<b>73,561,030</b>	<b>4,449,968</b>	<b>16,854,198</b>	<b>61,156,800</b>	<b>28,000,049</b>	<b>1,493,093</b>	
<b>Agriculture, forestry, fishing, and hunting</b>	<b>25,069</b>	<b>* 2</b>	<b>* 13,529</b>	<b>11,542</b>	<b>4,969</b>	<b>82</b>	
<b>Mining</b>	<b>2,226,848</b>	<b>157,893</b>	<b>745,536</b>	<b>1,639,204</b>	<b>1,487,805</b>	<b>160,666</b>	
Oil and gas extraction	648,865	107,332	130,993	625,204	599,771	397	
Coal mining, metal ore mining	* 1,192,630	* 50,561	* 488,612	* 754,579	* 726,471	* 152,420	
Nonmetallic minerals	* 12,609	0	* 6,371	* 6,238	* 1,978	* 46	
Support activities for mining	372,744	0	* 119,561	253,183	159,585	* 7,803	
<b>Utilities</b>	<b>* 32,684</b>	<b>0</b>	<b>* 698</b>	<b>* 31,986</b>	<b>* 8,082</b>	<b>* 2,448</b>	
<b>Construction</b>	<b>26,540</b>	<b>0</b>	<b>4,704</b>	<b>21,836</b>	<b>12,974</b>	<b>2,188</b>	
Construction of buildings	9,074	0	* 1,133	7,941	3,098	880	
Heavy and civil engineering construction	8,353	0	* 677	7,676	6,637	1,290	
Special trade contractors	9,113	0	* 2,894	6,219	3,239	* 17	
<b>Manufacturing</b>	<b>50,847,662</b>	<b>3,991,148</b>	<b>12,420,594</b>	<b>42,418,216</b>	<b>17,538,828</b>	<b>734,004</b>	
Food manufacturing	2,374,824	* 15,267	273,459	2,116,633	419,239	172,970	
Beverage and tobacco products	846,971	* 692	* 8,684	838,980	292,404	* 38,278	
Tobacco manufacturing	* 39,539	0	0	* 39,539	* 33,533	* 1,193	
Textile mills and textile product mills	* 38,719	0	* 5,167	* 33,552	* 3,765	* 1,141	
Apparel manufacturing	72,950	0	* 51	72,898	13,984	* 1,335	
Leather and allied product manufacturing	* 9,580	0	* 3,445	* 6,136	* 5,599	* 31	
Wood product manufacturing	* 9,917	0	* 1,232	* 8,685	* 4,175	* 258	
Paper manufacturing	887,228	* 252	22,458	865,022	162,371	* 52,783	
Printing and related support activities	12,960	0	* 659	12,301	2,525	* 438	
Petroleum and coal products manufacturing	26,412,523	* 3,870,928	7,825,135	22,458,317	12,205,869	38,058	
Chemical manufacturing	7,910,958	* 7,325	1,306,574	6,611,709	1,574,979	178,410	
Pharmaceutical and medicine manufacturing	5,447,594	* 86	896,149	4,551,531	988,745	94,534	
Other chemical manufacturing	2,463,365	* 7,239	410,425	2,060,178	586,234	83,876	
Plastics and rubber products manufacturing	170,828	* 780	60,284	111,324	18,301	3,862	
Nonmetallic mineral product manufacturing	134,365	0	* 95,263	39,102	12,436	* 1,133	
Primary metal manufacturing	635,308	* 65,279	* 89,325	611,262	384,593	* 9,096	
Fabricated metal products	1,138,065	* 135	130,847	1,007,353	231,808	39,611	
Machinery manufacturing	1,866,695	* 11,448	982,504	895,638	314,526	42,102	
Computer and electronic product manufacturing	3,130,024	* 16,412	1,095,865	2,050,571	814,115	71,901	
Electrical equipment, appliance and component manufacturing	2,828,650	* 402	77,505	2,751,546	630,897	21,305	
Transportation equipment manufacturing	1,689,367	0	268,473	1,420,894	306,323	39,237	
Motor vehicles and related manufacturing	987,934	0	48,704	939,230	209,713	28,884	
Other transportation equipment manufacturing	701,433	0	* 219,769	481,665	96,610	10,353	
Furniture and related products	37,359	0	* 16,579	20,779	2,100	* 1,317	
Miscellaneous manufacturing and manufacturing not allocable	640,371	* 2,227	157,084	485,514	138,820	20,736	
<b>Wholesale and retail trade</b>	<b>3,442,478</b>	<b>* 219,016</b>	<b>588,378</b>	<b>3,073,115</b>	<b>635,513</b>	<b>73,312</b>	
Wholesale trade	2,643,033	* 219,016	527,074	2,334,975	435,860	49,584	
Durable goods	441,017	* 13,646	142,574	312,089	111,573	15,091	
Machinery, equipment, and supplies	14,275	0	4,117	10,158	8,605	* 117	
Other miscellaneous durable goods	426,743	* 13,646	138,457	301,931	102,968	14,973	
Nondurable goods	2,202,016	* 205,370	384,500	2,022,886	324,287	34,493	
Drugs, chemicals, and allied products	206,186	* 2,938	68,351	140,774	76,446	6,401	
Groceries and related products	101,250	0	3,097	98,152	32,261	* 3,855	
Petroleum and petroleum products	772,228	* 199,759	* 212,179	759,809	53,751	* 5,008	
Other miscellaneous nondurable goods	1,114,797	* 2,672	100,161	1,017,309	160,326	18,906	

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 1. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Total Assets, Income, Taxes, and Credits, and Foreign Income, Deductions, and Taxes, by Major and Selected Minor Industry—Continued**

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

Major and selected minor industry of U.S. corporation filing return	Foreign income and taxes—continued					
	Foreign taxes available for credit					
	Total	Reduction for certain foreign taxes	Carryover	Total paid, accrued, and deemed paid	Foreign taxes paid or accrued	
					Total	Taxes withheld at source on:  Dividends
(39)	(40)	(41)	(42)	(43)	(44)	
Retail trade	799,445	0	61,304	738,140	199,653	23,727
Motor vehicle, parts dealers, and gas stations	11,353	0	* 3,931	7,422	4,180	37
Building materials, garden equipment, and supplies	* 170,861	0	* 25	* 170,836	* 20,344	* 4
Food and beverages stores	5,660	0	* 781	4,879	* 4,676	* 6
Apparel and accessory stores	129,504	0	* 18,338	111,166	75,917	* 506
General merchandise stores	* 334,979	0	* 4,906	* 330,074	* 46,730	* 11,030
Miscellaneous retail trade (incl. furniture and home furnishings stores)	147,088	0	33,323	113,763	47,806	12,144
<b>Transportation and warehousing</b>	<b>251,844</b>	<b>* 270</b>	<b>45,472</b>	<b>206,642</b>	<b>103,155</b>	<b>6,556</b>
Air, rail, and water transportation	53,147	0	* 25,766	27,381	13,563	* 2,912
Water transportation	* 12,403	0	* 2,386	* 10,017	* 7,527	* 1,894
Air and rail transportation	* 40,744	0	* 23,380	* 17,364	* 6,035	* 1,018
Other transportation (including pipeline transportation and warehousing)	198,697	* 270	19,705	179,262	89,592	3,644
<b>Information</b>	<b>3,272,288</b>	<b>* 60,408</b>	<b>663,405</b>	<b>2,669,290</b>	<b>1,263,860</b>	<b>68,081</b>
Publishing (except internet), motion picture, and sound recording	1,973,111	* 60,408	255,930	1,777,589	1,032,152	45,638
Broadcasting, internet publishing	371,075	0	* 140,603	230,472	160,396	* 9,437
Telecommunications	144,850	0	* 40,517	104,332	10,739	757
Internet service providers, web search portals, data processing services	* 710,851	0	* 206,342	* 504,509	* 49,316	* 8,323
Other information services (includes internet publishing and broadcasting)	72,401	0	20,012	52,388	11,257	3,925
<b>Finance, insurance, real estate, and rental and leasing</b>	<b>6,260,565</b>	<b>* 3,254</b>	<b>1,390,595</b>	<b>4,873,224</b>	<b>3,375,386</b>	<b>195,757</b>
Finance and insurance	6,215,508	* 3,254	1,372,848	4,845,914	3,357,484	195,297
Commercial banking and other depository credit agencies	65,323	0	0	65,323	65,313	* 10
Nondepository credit intermediation	209,436	0	* 15,629	193,807	144,388	* 6,141
Securities, commodity contracts, and other	1,864,020	0	505,653	1,358,367	819,053	80,751
Insurance and related activities	3,537,628	* 3,254	829,975	2,710,907	1,898,793	108,391
Insurance agencies and brokerages	266,899	0	* 23,962	242,937	* 67,750	* 10,288
Funds, trusts, and other financial vehicles	539,099	0	* 21,590	517,510	429,938	* 4
Real estate and rental and leasing	45,057	0	17,747	27,310	17,902	460
Real estate	17,568	0	4,332	13,236	10,491	419
Rentals and leasing	27,489	0	* 13,415	14,074	7,411	* 42
<b>Services</b>	<b>7,175,052</b>	<b>* 17,977</b>	<b>981,286</b>	<b>6,211,742</b>	<b>3,569,477</b>	<b>250,000</b>
Professional, scientific, and technical services	590,187	* 204	145,510	444,881	247,677	4,839
Management of holding companies	5,362,709	* 12,769	594,101	4,781,377	2,854,938	219,874
Administrative and support and waste management and remediation	273,505	* 4,710	49,246	228,970	93,364	3,435
Education services, health care, and social assistance	40,576	0	* 13,820	26,755	22,255	* 14,969
Arts, entertainment, and recreation	65,938	0	* 7,046	58,892	52,802	* 361
Accommodation and food services	802,271	* 261	169,193	633,339	291,354	* 5,809
Accommodation	157,358	* 261	* 51,814	105,806	48,353	* 740
Food services and drinking places	644,912	0	117,379	527,533	243,001	* 5,068
Other services	39,866	* 33	* 2,371	37,528	7,087	* 714
Repair and maintenance services	* 2,811	* 33	* 406	* 2,438	* 1,638	* 217
Personal services	* 36,213	0	* 1,731	* 34,482	* 4,841	* 488
Religious, grantmaking, civic, professional, and similar organizations	* 842	0	* 234	* 608	* 608	* 8

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 1. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Total Assets, Income, Taxes, and Credits, and Foreign Income, Deductions, and Taxes, by Major and Selected Minor Industry—Continued**

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

Major and selected minor industry of U.S. corporation filing return	Foreign income and taxes—continued						Taxes deemed paid
	Foreign taxes available for credit—continued						
	Foreign taxes paid or accrued—continued						
	Taxes withheld at source on—continued		Other taxes paid or accrued on:				
	Interest	Rents, royalties, and license fees	Branch income	Specifically allocable income (section 863(b))	Service income	Other income	
(45)	(46)	(47)	(48)	(49)	(50)	(51)	
<b>All industries</b>	<b>1,017,826</b>	<b>2,678,122</b>	<b>5,734,096</b>	<b>63,225</b>	<b>298,690</b>	<b>16,714,997</b>	<b>33,156,751</b>
<b>Agriculture, forestry, fishing, and hunting</b>	<b>* 147</b>	<b>* 214</b>	<b>* 2,211</b>	<b>0</b>	<b>0</b>	<b>* 2,316</b>	<b>* 6,573</b>
<b>Mining</b>	<b>18,547</b>	<b>9,262</b>	<b>337,998</b>	<b>0</b>	<b>* 11,968</b>	<b>949,363</b>	<b>151,399</b>
Oil and gas extraction	* 185	* 754	* 57,698	0	* 6,287	534,451	* 25,432
Coal mining, metal ore mining	* 16,842	* 4,225	* 135,283	0	* 5,052	* 412,649	* 28,109
Nonmetallic minerals	* 718	* 161	* 223	0	0	* 829	* 4,260
Support activities for mining	* 802	* 4,123	* 144,794	0	* 629	* 1,434	* 93,598
<b>Utilities</b>	<b>* 588</b>	<b>* 722</b>	<b>* 4,324</b>	<b>0</b>	<b>0</b>	<b>* [2]</b>	<b>* 23,904</b>
<b>Construction</b>	<b>* 153</b>	<b>* 1,077</b>	<b>* 3,563</b>	<b>0</b>	<b>5,164</b>	<b>830</b>	<b>8,862</b>
Construction of buildings	* 58	* 438	* 302	0	* 1,375	* 45	* 4,843
Heavy and civil engineering construction	* 90	* 545	* 433	0	* 3,636	* 644	* 1,039
Special trade contractors	* 5	* 94	* 2,828	0	* 153	* 142	* 2,980
<b>Manufacturing</b>	<b>177,638</b>	<b>1,678,418</b>	<b>1,402,748</b>	<b>54,240</b>	<b>64,185</b>	<b>13,427,595</b>	<b>24,879,389</b>
Food manufacturing	9,525	55,553	166,760	* 31	* 221	14,179	1,697,394
Beverage and tobacco products	* 1,548	* 43,123	* 192,190	* 228	* 722	* 16,315	* 546,575
Tobacco manufacturing	0	* 1,012	* 30,832	0	0	* 497	* 6,006
Textile mills and textile product mills	* 6	* 2,497	0	* 122	0	0	* 29,786
Apparel manufacturing	* 210	* 9,380	* 58	* 8	0	* 2,992	* 58,914
Leather and allied product manufacturing	* 25	* 2,740	* 2,740	0	* 52	* 11	* 537
Wood product manufacturing	* 75	* 384	0	0	0	* 3,457	* 4,510
Paper manufacturing	* 326	* 46,153	* 3,590	* 8,092	* 344	* 51,084	702,651
Printing and related support activities	* 180	* 1,192	* 434	0	* 164	* 117	* 9,777
Petroleum and coal products manufacturing	19,213	* 13,584	* 107,708	0	* 202	* 12,027,104	10,252,448
Chemical manufacturing	68,656	468,789	277,398	* 7,103	16,177	558,445	5,036,730
Pharmaceutical and medicine manufacturing	764	355,188	107,083	* 7,103	* 7,822	416,250	3,562,787
Other chemical manufacturing	67,892	113,602	170,315	0	8,355	142,195	1,473,943
Plastics and rubber products manufacturing	1,219	10,422	* 777	* 250	* 603	* 1,269	93,023
Nonmetallic mineral product manufacturing	* 6,175	* 2,838	* 802	0	* 107	* 1,381	26,666
Primary metal manufacturing	8,181	* 289,760	* 64,333	0	* 12,451	* 773	* 226,668
Fabricated metal products	2,894	22,268	143,968	0	* 890	22,177	775,545
Machinery manufacturing	11,161	57,306	160,895	* 822	2,454	39,787	581,112
Computer and electronic product manufacturing	3,112	502,204	140,029	* 20,826	18,226	57,817	1,236,456
Electrical equipment, appliance and component manufacturing	24,169	17,453	18,026	* 291	* 2,405	547,249	2,120,650
Transportation equipment manufacturing	17,618	68,379	81,598	* 14,065	8,664	76,761	1,114,572
Motor vehicles and related manufacturing	17,038	44,362	* 66,443	0	* 2,571	* 50,414	729,517
Other transportation equipment manufacturing	* 580	24,017	* 15,155	* 14,065	* 6,093	* 26,347	385,055
Furniture and related products	* 361	* 360	0	0	0	* 61	* 18,680
Miscellaneous manufacturing and manufacturing not allocable	2,984	64,033	41,443	* 2,402	* 604	* 6,618	346,694
<b>Wholesale and retail trade</b>	<b>29,679</b>	<b>153,804</b>	<b>245,149</b>	<b>* 2,430</b>	<b>14,504</b>	<b>116,635</b>	<b>2,437,602</b>
Wholesale trade	15,230	96,133	155,928	* 2,430	14,312	102,241	1,899,115
Durable goods	8,735	48,543	11,902	0	5,654	21,647	200,516
Machinery, equipment, and supplies	* 936	* 2,415	* 3,661	0	* 876	* 599	* 1,553
Other miscellaneous durable goods	7,799	46,128	8,241	0	4,778	21,048	198,964
Nondurable goods	6,495	47,590	144,026	* 2,430	* 8,658	80,594	1,698,599
Drugs, chemicals, and allied products	* 1,110	17,909	* 46,413	* 1,739	* 1,422	* 1,452	64,328
Groceries and related products	* 1,920	* 3,710	* 6,796	* 691	* 96	* 15,193	* 65,891
Petroleum and petroleum products	* 2	* 10	* 44,404	0	* 3,952	* 376	* 706,057
Other miscellaneous nondurable goods	2,589	25,726	46,344	0	* 3,187	63,573	856,983

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 1. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Total Assets, Income, Taxes, and Credits, and Foreign Income, Deductions, and Taxes, by Major and Selected Minor Industry—Continued**

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

Major and selected minor industry of U.S. corporation filing return	Foreign income and taxes—continued						Taxes deemed paid
	Foreign taxes available for credit—continued						
	Foreign taxes paid or accrued—continued						
	Taxes withheld at source on—continued		Other taxes paid or accrued on:				
	Interest	Rents, royalties, and license fees	Branch income	Specifically allocable income (section 863(b))	Service income	Other income	
(45)	(46)	(47)	(48)	(49)	(50)	(51)	
Retail trade	14,449	57,671	89,221	0	* 191	14,394	538,487
Motor vehicle, parts dealers, and gas stations	* 984	* 231	* 1,342	0	* 6	* 1,580	* 3,243
Building materials, garden equipment, and supplies	* 4,977	* 14,514	0	0	0	* 849	* 150,492
Food and beverages stores	* 32	* 4,639	0	0	0	0	* 203
Apparel and accessory stores	* 4,146	5,942	* 55,043	0	0	* 10,280	35,249
General merchandise stores	* 75	* 26,784	* 8,624	0	* 52	* 165	* 283,343
Miscellaneous retail trade (incl. furniture and home furnishings stores)	4,235	5,561	24,212	0	133	1,520	65,957
<b>Transportation and warehousing</b>	<b>2,809</b>	<b>9,492</b>	<b>* 61,865</b>	<b>* 2</b>	<b>15,410</b>	<b>7,020</b>	<b>103,488</b>
Air, rail, and water transportation	* 166	* 1,029	* 1,446	0	* 5,020	* 2,989	* 13,818
Water transportation	* 49	0	* 1,446	0	* 1,588	* 2,550	* 2,490
Air and rail transportation	* 117	* 1,029	0	0	* 3,432	* 439	* 11,328
Other transportation (including pipeline transportation and warehousing)	2,643	8,462	60,419	* 2	10,390	4,031	89,670
<b>Information</b>	<b>4,612</b>	<b>527,601</b>	<b>483,479</b>	<b>* 749</b>	<b>17,830</b>	<b>161,508</b>	<b>1,405,431</b>
Publishing (except internet), motion picture, and sound recording	1,098	364,087	461,053	* 749	1,890	157,635	745,437
Broadcasting, internet publishing	* 1,335	* 125,338	* 14,304	0	* 9,444	* 539	* 70,076
Telecommunications	* 673	* 8,416	* 227	0	* 640	* 26	* 93,593
Internet service providers, web search portals, data processing services	* 1,468	* 26,128	* 5,137	0	* 5,559	* 2,701	* 455,193
Other information services (includes internet publishing and broadcasting)	38	3,631	2,758	0	297	607	41,132
<b>Finance, insurance, real estate, and rental and leasing</b>	<b>511,445</b>	<b>44,012</b>	<b>1,381,779</b>	<b>* 4,671</b>	<b>70,965</b>	<b>1,166,758</b>	<b>1,497,838</b>
Finance and insurance	510,583	36,761	1,379,316	* 4,671	70,011	1,160,846	1,488,430
Commercial banking and other depository credit agencies	* 65,298	* 1	0	0	0	* 4	* 11
Nondepository credit intermediation	17,377	* 9,584	* 83,175	0	* 12,165	* 15,946	* 49,419
Securities, commodity contracts, and other	12,118	* 26,471	* 90,255	0	3,614	605,843	539,314
Insurance and related activities	33,902	* 706	1,205,886	* 4,671	53,949	491,288	812,115
Insurance agencies and brokerages	* 1,972	* 29	* 52,235	0	* 782	* 2,444	* 175,187
Funds, trusts, and other financial vehicles	* 381,887	0	0	0	* 283	* 47,764	* 87,571
Real estate and rental and leasing	862	7,250	* 2,463	0	* 954	5,912	9,408
Real estate	719	* 3,459	0	0	* 33	5,861	* 2,745
Rentals and leasing	* 143	3,791	* 2,463	0	* 922	* 51	* 6,663
<b>Services</b>	<b>272,208</b>	<b>253,521</b>	<b>1,810,980</b>	<b>* 1,132</b>	<b>98,663</b>	<b>882,972</b>	<b>2,642,265</b>
Professional, scientific, and technical services	1,354	55,649	137,768	* 611	20,981	26,475	197,204
Management of holding companies	242,638	66,791	1,493,606	0	* 61,916	770,112	1,926,439
Administrative and support and waste management and remediation	895	13,549	16,362	0	* 818	* 58,306	135,606
Education services, health care, and social assistance	* 163	* 2,475	* 1,112	0	* 2,887	* 649	* 4,501
Arts, entertainment, and recreation	* 1	6,864	* 18,721	* 521	* 3,046	* 23,288	* 6,090
Accommodation and food services	26,599	106,457	* 141,271	0	* 7,252	3,967	341,985
Accommodation	* 4,908	* 15,340	* 17,816	0	* 6,351	* 3,198	* 57,453
Food services and drinking places	* 21,691	91,116	* 123,455	0	* 901	* 769	* 284,532
Other services	* 558	* 1,737	* 2,139	0	* 1,765	* 175	* 30,441
Repair and maintenance services	0	* 103	0	0	* 1,317	0	* 800
Personal services	* 558	* 1,481	* 2,139	0	0	* 175	* 29,641
Religious, grantmaking, civic, professional, and similar organizations	0	* 153	0	0	* 447	0	0

**Table 1. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Total Assets, Income, Taxes, and Credits, and Foreign Income, Deductions, and Taxes, by Major and Selected Minor Industry—Continued**

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

### Footnotes

\* Data should be used with caution because of the small number of sample returns on which they were based.

[1] Interest-Charge Domestic International Sales Corporation (IC-DISC) and Domestic International Sales Corporation (DISC).

[2] Less than \$500.

[3] In addition to the credits shown in columns 12-14, this is after reduction by other credits, such as the jobs credit and the investment credit, which are not shown separately in this table.

[4] Included in gross income (less loss), columns 16-22. See notes below.

[5] Included in deductions, columns 25-34. See notes below.

NOTES: Detail may not add to totals because of rounding. Columns 2 through 15 present statistics on assets, receipts, income, and taxes reported on Form 1120 (Corporation Income Tax Return) series for corporations claiming a foreign tax credit. Columns 16 through 51 present statistics from Form 1118, Foreign Tax Credit—Corporations. Schedule references indicate the schedule of Form 1118 from which the data were obtained. Columns 16 through 35 present statistics on foreign income (i.e., income from sources outside the United States) and deductions reported primarily on Schedule A, Form 1118. Although the amounts of oil and gas income and deductions (columns 23 and 35, respectively) are contained in the summary columns (i.e., columns 16 through 22 and 25 through 34), these amounts are also reported separately (on Schedule I) because oil and gas income is subject to special rules under Internal Revenue Code section 907, which may result in a reduction of foreign taxes available for credit. Foreign branch income and code section 863(b) income (income partly within and partly without the United States) also are included in the summary amounts reported in columns 16 through 22. Foreign branch income also is reported separately on Schedule F, shown in column 24. Total deductions not allocable to specific types of income (column 31) are equal to the sum of columns 32 through 34 (any differences are due to taxpayer reporting practices). Total foreign-source gross income (column 16) less total foreign deductions (column 25) is equal to foreign-source taxable income (less loss) before adjustments (column 36).

Adjustments to foreign-source taxable income (reported in column 37) include allocations of current-year U.S.-source losses and recapture of foreign losses, as well as other adjustments. These adjustments (reported on Schedule J) affect the numerator of the limitation fraction used to compute the foreign tax credit. The foreign-source taxable income (less loss) after adjustments (the numerator of the limitation fraction) is reported in column 38. The limitation fraction, which represents the ratio of foreign-source taxable income after adjustments to total (U.S. and foreign) taxable income after adjustments, is applied to the total U.S. tax against which the credit is allowed to determine any limitation on the foreign tax credit.

Statistics on foreign taxes are reported in columns 39 through 51. Data on foreign taxes paid, accrued, and deemed paid (through related foreign corporations or their subsidiaries) from Schedule B, Form 1118, are reported in columns 42 through 51. Total foreign taxes paid or accrued (column 43) are the sum of columns 44 through 50. Total foreign taxes paid, accrued, and deemed paid (column 42) are equal to the sum of total taxes paid or accrued (column 43) and taxes deemed paid (column 51). Total foreign taxes paid, accrued, and deemed paid are then adjusted for certain items (e.g., reductions of foreign taxes under Code section 907 related to oil and gas income), which are reported in column 40, as well as carryovers of foreign taxes not credited in prior years, which are reported in column 41. Thus, total foreign taxes available for credit (column 39) are equal to total foreign taxes paid, accrued, and deemed paid (column 42) less certain foreign taxes (column 40), plus any carryover of prior-year foreign taxes (column 41).

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed**

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

Industrial sector and type of foreign income for which separate credit was computed	Number of returns [7]	Foreign income and taxes reported on Form 1118				
		Gross income (less loss)				
		Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees
	(1)	(2)	(3)	(4)	(5)	(6)
<b>ALL INDUSTRIES</b>						
All income types	5,502	485,354,155	86,339,067	33,129,305	57,724,090	79,964,798
Passive income	2,452	12,659,212	6,487,463	514,583	4,061,005	1,138,815
High withholding tax interest	188	1,041,068	15,495	* 7,213	1,018,353	0
Financial services income	282	139,168,194	15,317,667	4,437,429	46,871,349	4,285,536
Shipping income	36	9,021,604	1,160,942	115,513	138,548	* 745,661
Dividends from an IC-DISC or former DISC [1]	45	* 928	* 928	0	0	0
Miscellaneous separately calculated limitation	3	* 39,614	0	0	0	* 29,711
Distributions from a FSC or former FSC [2]	7	* 151,679	* 151,162	* 517	0	0
General limitation income	3,207	322,979,350	63,046,502	28,033,451	5,633,910	73,745,031
Section 901(j) income	20	95,137	56,028	* 486	* 771	* 14,863
Income resourced by treaty	22	176,575	88,454	15,532	* 154	* 3,678
Dividends from each 10/50 PFIC [3]	6	* 6,067	* 4,223	* 1,844	0	0
Dividends from 10/50 corporations	13	14,724	* 10,203	* 2,737	0	* 1,503
<b>AGRICULTURE, FORESTRY, FISHING, AND HUNTING</b>						
All income types	210	176,994	29,340	* 6,573	* 2,556	* 13,425
Passive income	197	1,361	* 401	0	* 439	* 311
High withholding tax interest	0	0	0	0	0	0
Financial services income	0	0	0	0	0	0
Shipping income	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0
Miscellaneous separately calculated limitation	0	0	0	0	0	0
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0
General limitation income	13	175,633	* 28,939	* 6,573	* 2,117	* 13,114
Section 901(j) income	0	0	0	0	0	0
Income resourced by treaty	0	0	0	0	0	0
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0
Dividends from 10/50 corporations	0	0	0	0	0	0
<b>MINING</b>						
All income types	112	8,507,542	731,192	151,399	439,454	169,573
Passive income	66	91,523	42,372	* 3,483	39,344	* 682
High withholding tax interest	d	d	d	d	d	d
Financial services income	4	* 6,271	* 5,733	0	* 538	0
Shipping income	d	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0
Miscellaneous separately calculated limitation	0	0	0	0	0	0
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0
General limitation income	65	8,389,883	664,603	147,917	397,734	168,890
Section 901(j) income	d	d	d	d	d	d
Income resourced by treaty	0	0	0	0	0	0
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0
Dividends from 10/50 corporations	0	0	0	0	0	0
<b>UTILITIES</b>						
All income types	7	* 170,777	* 138,116	* 23,904	* 8,181	* 7,217
Passive income	5	* -11,793	* 18,518	* 210	* 1,083	0
High withholding tax interest	0	0	0	0	0	0
Financial services income	d	d	d	d	d	d
Shipping income	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0
Miscellaneous separately calculated limitation	0	0	0	0	0	0
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0
General limitation income	4	* 180,684	* 119,598	* 23,694	* 5,212	* 7,217
Section 901(j) income	d	d	d	d	d	d
Income resourced by treaty	0	0	0	0	0	0
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0
Dividends from 10/50 corporations	0	0	0	0	0	0

Footnotes at end of table.



# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

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

Industrial sector and type of foreign income for which separate credit was computed	Number of returns [7]	Foreign income and taxes reported on Form 1118				
		Gross income (less loss)				
		Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees
(1)	(2)	(3)	(4)	(5)	(6)	
<b>CONSTRUCTION</b>						
All income types	235	270,747	32,902	8,788	* 1,755	* 49,246
Passive income	88	5,881	1,693	* 121	* 1,370	* 704
High withholding tax interest	d	d	d	d	d	d
Financial services income	d	d	d	d	d	d
Shipping income	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1]	27	* 3	* 3	0	0	0
Miscellaneous separately calculated limitation	d	d	d	d	d	d
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0
General limitation income	122	254,957	31,203	8,667	* 385	* 48,541
Section 901(j) income	0	0	0	0	0	0
Income resourced by treaty	0	0	0	0	0	0
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0
Dividends from 10/50 corporations	0	0	0	0	0	0
<b>MANUFACTURING</b>						
All income types	1,039	251,450,340	55,924,861	24,912,421	8,515,131	49,310,395
Passive income	472	6,346,848	3,349,462	326,933	1,854,853	648,948
High withholding tax interest	51	251,949	* 8,671	* 2,674	240,598	0
Financial services income	40	12,045,648	4,215,073	* 1,289,339	2,389,807	* 488,610
Shipping income	14	1,522,541	349,395	* 52,024	* 71,027	* 568,854
Dividends from an IC-DISC or former DISC [1]	12	* 895	* 895	0	0	0
Miscellaneous separately calculated limitation	d	d	d	d	d	d
Distributions from a FSC or former FSC [2]	d	d	d	d	d	d
General limitation income	792	231,095,689	47,867,786	23,226,479	3,958,075	47,585,442
Section 901(j) income	13	* 64,211	* 46,896	* 449	* 771	* 14,863
Income resourced by treaty	14	111,783	* 78,919	* 11,793	0	* 3,678
Dividends from each 10/50 PFIC [3]	4	* 6,060	* 4,216	* 1,844	0	0
Dividends from 10/50 corporations	6	* 2,976	* 2,326	* 369	0	0
<b>WHOLESALE AND RETAIL TRADE</b>						
All income types	658	21,889,530	6,371,758	2,437,526	550,021	4,460,939
Passive income	251	844,072	417,597	57,989	104,450	158,668
High withholding tax interest	38	48,823	* 223	* 197	48,403	0
Financial services income	9	* 2,400,305	* 230,637	* 86,093	* 130,173	* 2,385
Shipping income	3	* 23,256	* 42,516	* 4,108	* 50	0
Dividends from an IC-DISC or former DISC [1]	d	d	d	d	d	d
Miscellaneous separately calculated limitation	0	0	0	0	0	0
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0
General limitation income	441	18,551,283	5,672,423	2,286,525	266,791	4,299,886
Section 901(j) income	d	d	d	d	d	d
Income resourced by treaty	3	* 20,987	* 7,600	* 2,577	* 154	0
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0
Dividends from 10/50 corporations	d	d	d	d	d	d
<b>TRANSPORTATION AND WAREHOUSING</b>						
All income types	68	13,611,474	727,022	103,691	105,312	180,074
Passive income	14	36,058	* 21,224	* 472	* 5,070	* 7,637
High withholding tax interest	8	* 13,544	* [5]	0	* 13,544	0
Financial services income	d	d	d	d	d	d
Shipping income	9	* 6,455,959	* 581,285	* 57,576	* 55,360	* 102,952
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0
Miscellaneous separately calculated limitation	0	0	0	0	0	0
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0
General limitation income	55	7,077,183	124,513	45,644	31,339	69,485
Section 901(j) income	d	d	d	d	d	d
Income resourced by treaty	0	0	0	0	0	0
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0
Dividends from 10/50 corporations	0	0	0	0	0	0

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

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

Industrial sector and type of foreign income for which separate credit was computed	Number of returns [7]	Foreign income and taxes reported on Form 1118				
		Gross income (less loss)				
		Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees
	(1)	(2)	(3)	(4)	(5)	(6)
<b>INFORMATION</b>						
All income types	607	36,404,233	8,462,463	1,344,901	283,657	17,706,348
Passive income	153	2,700,264	2,252,550	111,585	128,110	133,663
High withholding tax interest	5	* 1,225	0	0	* 1,225	0
Financial services income	d	d	d	d	d	d
Shipping income	d	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0
Miscellaneous separately calculated limitation	0	0	0	0	0	0
Distributions from a FSC or former FSC [2]	d	d	d	d	d	d
General limitation income	482	33,496,442	6,198,490	1,233,037	146,418	17,474,391
Section 901(j) income	d	d	d	d	d	d
Income resourced by treaty	d	d	d	d	d	d
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0
Dividends from 10/50 corporations	d	d	d	d	d	d
<b>FINANCE, INSURANCE, REAL ESTATE, AND RENTAL AND LEASING</b>						
All income types	965	77,132,720	7,956,569	1,497,838	25,242,705	2,254,302
Passive income	505	2,259,788	291,748	3,269	1,841,802	27,039
High withholding tax interest	54	204,753	* 6,472	* 4,122	194,159	0
Financial services income	160	70,569,825	7,153,909	1,422,348	22,895,924	1,727,092
Shipping income	d	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1]	d	d	d	d	d	d
Miscellaneous separately calculated limitation	0	0	0	0	0	0
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0
General limitation income	316	3,267,155	330,235	67,978	306,613	500,171
Section 901(j) income	0	0	0	0	0	0
Income resourced by treaty	d	d	d	d	d	d
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0
Dividends from 10/50 corporations	3	* 1,317	* 1,197	* 121	0	0
<b>SERVICES</b>						
All income types	1,603	75,739,797	5,964,842	2,642,262	22,575,318	5,813,279
Passive income	701	385,209	91,898	10,521	84,484	161,162
High withholding tax interest	30	518,937	* 129	* 220	518,587	0
Financial services income	64	54,088,476	3,712,311	1,639,649	21,453,021	2,043,011
Shipping income	4	* 12,545	* 4,650	* 1,805	0	0
Dividends from an IC-DISC or former DISC [1]	d	d	d	d	d	d
Miscellaneous separately calculated limitation	d	d	d	d	d	d
Distributions from a FSC or former FSC [2]	4	* 139,238	* 139,238	0	0	0
General limitation income	917	20,490,442	2,008,713	986,938	519,225	3,577,893
Section 901(j) income	d	d	d	d	d	d
Income resourced by treaty	3	* 43,714	* 1,936	* 1,162	0	0
Dividends from each 10/50 PFIC [3]	d	d	d	d	d	d
Dividends from 10/50 corporations	d	d	d	d	d	d

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

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

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes reported on Form 1118—continued				
	Gross income (less loss)—continued				Deductions
	Service income	Other income	Oil and gas extraction income [4]	Foreign branch income [4]	Total
	(7)	(8)	(9)	(10)	(11)
<b>ALL INDUSTRIES</b>					
All income types	26,382,011	201,814,884	49,446,665	97,936,689	243,861,018
Passive income	* 4,242	453,103	0	12,550	3,134,217
High withholding tax interest	0	* 7	0	* 4,567	338,953
Financial services income	5,959,833	62,296,381	0	50,935,140	89,910,568
Shipping income	* 129,422	6,731,518	0	* 2,789,325	7,502,883
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	* 46
Miscellaneous separately calculated limitation	0	* 9,904	0	0	* 25,498
Distributions from a FSC or former FSC [2]	0	0	0	0	* 131,025
General limitation income	20,264,684	132,255,773	49,446,665	44,145,304	142,734,190
Section 901(j) income	* 22,212	* 777	0	* 22,089	38,530
Income resourced by treaty	* 1,617	67,140	0	* 27,714	38,457
Dividends from each 10/50 PFIC [3]	0	0	11	0	* 424
Dividends from 10/50 corporations	0	* 281	0	0	* 6,228
<b>AGRICULTURE, FORESTRY, FISHING, AND HUNTING</b>					
All income types	0	125,100	0	* 13,640	69,258
Passive income	0	* 210	0	0	* 319
High withholding tax interest	0	0	0	0	0
Financial services income	0	0	0	0	0
Shipping income	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0
Miscellaneous separately calculated limitation	0	0	0	0	0
Distributions from a FSC or former FSC [2]	0	0	0	0	0
General limitation income	0	124,890	0	* 13,640	* 68,939
Section 901(j) income	0	0	0	0	0
Income resourced by treaty	0	0	0	0	0
Dividends from each 10/50 PFIC [3]	0	0	0	0	0
Dividends from 10/50 corporations	0	0	0	0	0
<b>MINING</b>					
All income types	353,116	6,662,808	2,633,006	2,804,878	4,088,567
Passive income	0	* 5,642	0	* 365	38,592
High withholding tax interest	d	d	d	d	d
Financial services income	0	0	0	0	* 1,722
Shipping income	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0
Miscellaneous separately calculated limitation	0	0	0	0	0
Distributions from a FSC or former FSC [2]	0	0	0	0	0
General limitation income	353,116	6,657,624	2,633,006	2,804,512	4,038,434
Section 901(j) income	d	d	d	d	d
Income resourced by treaty	0	0	0	0	0
Dividends from each 10/50 PFIC [3]	0	0	0	0	0
Dividends from 10/50 corporations	0	0	0	0	0
<b>UTILITIES</b>					
All income types	* 20,360	* -27,002	0	* 17,627	* 80,889
Passive income	0	* -31,605	0	0	* 5,524
High withholding tax interest	0	0	0	0	0
Financial services income	d	d	d	d	d
Shipping income	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0
Miscellaneous separately calculated limitation	0	0	0	0	0
Distributions from a FSC or former FSC [2]	0	0	0	0	0
General limitation income	* 20,360	* 4,603	0	* 17,627	* 73,491
Section 901(j) income	d	d	d	d	d
Income resourced by treaty	0	0	0	0	0
Dividends from each 10/50 PFIC [3]	0	0	0	0	0
Dividends from 10/50 corporations	0	0	0	0	0

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

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

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes reported on Form 1118—continued				
	Gross income (less loss)—continued				Deductions
	Service income	Other income	Oil and gas extraction income [4]	Foreign branch income [4]	Total
	(7)	(8)	(9)	(10)	(11)
<b>CONSTRUCTION</b>					
All income types	95,355	82,702	0	* 33,325	162,578
Passive income	0	* 1,992	0	* 990	* 1,415
High withholding tax interest	d	d	d	d	d
Financial services income	d	d	d	d	d
Shipping income	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0
Miscellaneous separately calculated limitation	d	d	d	d	d
Distributions from a FSC or former FSC [2]	0	0	0	0	0
General limitation income	95,355	70,806	0	* 32,335	153,800
Section 901(j) income	0	0	0	0	0
Income resourced by treaty	0	0	0	0	0
Dividends from each 10/50 PFIC [3]	0	0	0	0	0
Dividends from 10/50 corporations	0	0	0	0	0
<b>MANUFACTURING</b>					
All income types	5,817,481	106,970,051	* 44,744,997	21,703,179	96,857,064
Passive income	* 3,950	162,703	0	-75,428	1,950,146
High withholding tax interest	0	* 7	0	0	86,499
Financial services income	* 545,743	3,117,075	0	* 197,916	5,964,325
Shipping income	* 733	* 480,507	0	0	1,257,337
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	* 46
Miscellaneous separately calculated limitation	d	d	d	d	d
Distributions from a FSC or former FSC [2]	d	d	d	d	d
General limitation income	5,267,054	103,190,852	* 44,744,997	21,554,732	87,566,953
Section 901(j) income	0	* 1,232	0	0	* 9,847
Income resourced by treaty	0	* 17,394	0	* 25,959	* 21,066
Dividends from each 10/50 PFIC [3]	0	0	0	0	* 424
Dividends from 10/50 corporations	0	* 281	0	0	* 420
<b>WHOLESALE AND RETAIL TRADE</b>					
All income types	740,485	7,328,800	* 2,000,154	4,991,158	10,219,946
Passive income	* 292	105,076	0	* 37,645	262,430
High withholding tax interest	0	0	0	* 219	21,055
Financial services income	* 237,234	* 1,713,783	0	* 1,897,054	* 1,916,871
Shipping income	* -23,449	* 31	0	* -23,449	* 26,518
Dividends from an IC-DISC or former DISC [1]	d	d	d	d	d
Miscellaneous separately calculated limitation	0	0	0	0	0
Distributions from a FSC or former FSC [2]	0	0	0	0	0
General limitation income	526,409	5,499,249	* 2,000,154	3,077,934	7,987,195
Section 901(j) income	d	d	d	d	d
Income resourced by treaty	0	* 10,657	0	* 1,755	* 4,854
Dividends from each 10/50 PFIC [3]	0	0	0	0	0
Dividends from 10/50 corporations	d	d	d	d	d
<b>TRANSPORTATION AND WAREHOUSING</b>					
All income types	6,843,294	5,652,080	* 3,023	4,839,547	11,167,148
Passive income	0	* 1,655	0	0	* -961
High withholding tax interest	0	0	0	0	* -3,794
Financial services income	d	d	d	d	d
Shipping income	* 151,882	* 5,506,905	0	* 2,483,884	* 5,265,782
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0
Miscellaneous separately calculated limitation	0	0	0	0	0
Distributions from a FSC or former FSC [2]	0	0	0	0	0
General limitation income	6,662,682	143,520	* 3,023	* 2,355,663	5,873,063
Section 901(j) income	d	d	d	d	d
Income resourced by treaty	0	0	0	0	0
Dividends from each 10/50 PFIC [3]	0	0	0	0	0
Dividends from 10/50 corporations	0	0	0	0	0

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

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

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes reported on Form 1118—continued				
	Gross income (less loss)—continued				Deductions
	Service income	Other income	Oil and gas extraction income [4]	Foreign branch income [4]	Total
	(7)	(8)	(9)	(10)	(11)
<b>INFORMATION</b>					
All income types	1,748,029	6,858,835	0	5,606,565	21,823,468
Passive income	0	74,357	0	* 614	323,871
High withholding tax interest	0	0	0	0	* 1,933
Financial services income	d	d	d	d	d
Shipping income	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0
Miscellaneous separately calculated limitation	0	0	0	0	0
Distributions from a FSC or former FSC [2]	d	d	d	d	d
General limitation income	1,747,905	6,696,200	0	5,605,951	21,340,435
Section 901(j) income	d	d	d	d	d
Income resourced by treaty	d	d	d	d	d
Dividends from each 10/50 PFIC [3]	0	0	0	0	0
Dividends from 10/50 corporations	d	d	d	d	d
<b>FINANCE, INSURANCE, REAL ESTATE, AND RENTAL AND LEASING</b>					
All income types	4,409,215	35,772,090	0	19,629,429	47,548,294
Passive income	0	95,930	0	* 12,201	349,442
High withholding tax interest	0	0	0	* 408	89,107
Financial services income	3,804,455	33,566,097	0	19,005,549	44,031,438
Shipping income	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1]	d	d	d	d	d
Miscellaneous separately calculated limitation	0	0	0	0	0
Distributions from a FSC or former FSC [2]	0	0	0	0	0
General limitation income	604,760	1,457,398	0	288,215	2,201,141
Section 901(j) income	0	0	0	0	0
Income resourced by treaty	d	d	d	d	d
Dividends from each 10/50 PFIC [3]	0	0	0	0	0
Dividends from 10/50 corporations	0	0	0	0	* 143
<b>SERVICES</b>					
All income types	6,354,676	32,389,420	* 65,485	38,297,342	51,843,806
Passive income	0	37,144	0	* 36,163	203,439
High withholding tax interest	0	0	0	* 3,940	143,673
Financial services income	* 1,343,671	23,896,813	0	29,834,622	37,901,475
Shipping income	* 256	* 5,834	0	* 5,834	* 585
Dividends from an IC-DISC or former DISC [1]	d	d	d	d	d
Miscellaneous separately calculated limitation	d	d	d	d	d
Distributions from a FSC or former FSC [2]	0	0	0	0	* 120,321
General limitation income	4,987,043	8,410,631	* 65,485	8,394,694	13,430,739
Section 901(j) income	d	d	d	d	d
Income resourced by treaty	* 1,617	* 38,999	0	0	* 1,506
Dividends from each 10/50 PFIC [3]	d	d	d	d	d
Dividends from 10/50 corporations	d	d	d	d	d

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

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

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes reported on Form 1118—continued					
	Deductions—continued					
	Deductions allocable to specific types of income					Deductions not allocable to specific types of income
	Total	Depreciation, depletion, and amortization	Other expenses	Service expenses	Other definitely allocable deductions	Total
	(12)	(13)	(14)	(15)	(16)	(17)
<b>ALL INDUSTRIES</b>						
All income types	133,043,631	1,860,464	4,571,450	15,009,924	111,601,793	110,817,387
Passive income	1,051,678	15,919	112,402	* 1,935	921,422	2,082,539
High withholding tax interest	44,754	0	* 168	0	44,586	294,199
Financial services income	38,584,622	490,861	187,821	2,866,936	35,039,004	51,325,947
Shipping income	5,906,537	* 531,586	* 91,402	* 126,557	5,156,993	1,596,345
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	* 46
Miscellaneous separately calculated limitation	* 18,135	* 12,842	0	0	* 5,293	* 7,363
Distributions from a FSC or former FSC [2]	* 131,564	0	0	0	* 131,564	* -538
General limitation income	87,263,986	809,248	4,179,658	11,994,807	70,280,273	55,470,204
Section 901(j) income	* 24,622	0	0	* 18,753	* 5,870	13,908
Income resourced by treaty	* 17,588	* 8	0	* 937	* 16,643	* 20,869
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	* 424
Dividends from 10/50 corporations	* 146	0	0	0	* 146	* 6,082
<b>AGRICULTURE, FORESTRY, FISHING, AND HUNTING</b>						
All income types	* 47,287	* 150	0	0	* 47,137	* 21,971
Passive income	* 5	0	0	0	* 5	* 314
High withholding tax interest	0	0	0	0	0	0
Financial services income	0	0	0	0	0	0
Shipping income	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0
Miscellaneous separately calculated limitation	0	0	0	0	0	0
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0
General limitation income	* 47,282	* 150	0	0	* 47,132	* 21,658
Section 901(j) income	0	0	0	0	0	0
Income resourced by treaty	0	0	0	0	0	0
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0
Dividends from 10/50 corporations	0	0	0	0	0	0
<b>MINING</b>						
All income types	3,066,442	* 40,937	* 68,438	* 116,081	2,840,986	1,022,125
Passive income	9,844	* 21	* 45	0	9,777	28,748
High withholding tax interest	d	d	d	d	d	d
Financial services income	0	0	0	0	0	* 1,722
Shipping income	d	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0
Miscellaneous separately calculated limitation	0	0	0	0	0	0
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0
General limitation income	3,050,730	* 40,916	* 68,393	* 116,081	2,825,341	987,703
Section 901(j) income	d	d	d	d	d	d
Income resourced by treaty	0	0	0	0	0	0
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0
Dividends from 10/50 corporations	0	0	0	0	0	0
<b>UTILITIES</b>						
All income types	* 26,240	0	0	* 1,598	* 24,641	* 54,649
Passive income	* 1,269	0	0	0	* 1,269	* 4,255
High withholding tax interest	0	0	0	0	0	0
Financial services income	d	d	d	d	d	d
Shipping income	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0
Miscellaneous separately calculated limitation	0	0	0	0	0	0
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0
General limitation income	* 24,971	0	0	* 1,598	* 23,372	* 48,520
Section 901(j) income	d	d	d	d	d	d
Income resourced by treaty	0	0	0	0	0	0
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0
Dividends from 10/50 corporations	0	0	0	0	0	0

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

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

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes reported on Form 1118—continued					
	Deductions—continued					
	Deductions allocable to specific types of income					Deductions not allocable to specific types of income
	Total	Depreciation, depletion, and amortization	Other expenses	Service expenses	Other definitely allocable deductions	
(12)	(13)	(14)	(15)	(16)	(17)	
<b>CONSTRUCTION</b>						
All income types	140,768	* 109	* 7,446	61,737	71,476	21,810
Passive income	* 1,334	0	* 5	0	* 1,329	* 81
High withholding tax interest	d	d	d	d	d	d
Financial services income	d	d	d	d	d	d
Shipping income	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0
Miscellaneous separately calculated limitation	d	d	d	d	d	d
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0
General limitation income	139,434	* 109	* 7,441	61,737	* 70,147	14,366
Section 901(j) income	0	0	0	0	0	0
Income resourced by treaty	0	0	0	0	0	0
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0
Dividends from 10/50 corporations	0	0	0	0	0	0
<b>MANUFACTURING</b>						
All income types	50,761,023	383,599	143,870	700,015	49,533,540	46,096,041
Passive income	672,867	* 116	4,639	0	668,113	1,277,279
High withholding tax interest	* 24,117	0	0	0	* 24,117	62,383
Financial services income	* 3,369,807	0	0	* [5]	* 3,369,807	2,594,519
Shipping income	1,012,290	0	0	* 1	* 1,012,290	245,047
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	* 46
Miscellaneous separately calculated limitation	d	d	d	d	d	d
Distributions from a FSC or former FSC [2]	d	d	d	d	d	d
General limitation income	45,678,517	383,483	139,231	700,014	44,455,789	41,888,436
Section 901(j) income	* 1	0	0	0	* 1	* 9,846
Income resourced by treaty	* 1,919	0	0	0	* 1,919	* 19,147
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	* 424
Dividends from 10/50 corporations	* 52	0	0	0	* 52	* 367
<b>WHOLESALE AND RETAIL TRADE</b>						
All income types	7,533,917	33,672	443,182	169,727	6,887,336	2,686,030
Passive income	142,634	* 12,215	* 3,670	* 1,071	125,678	119,796
High withholding tax interest	* 22	0	0	0	* 22	21,033
Financial services income	* 1,817,270	0	* 85,907	0	* 1,731,363	* 99,601
Shipping income	* 17,100	0	0	0	* 17,100	* 9,418
Dividends from an IC-DISC or former DISC [1]	d	d	d	d	d	d
Miscellaneous separately calculated limitation	0	0	0	0	0	0
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0
General limitation income	5,553,758	21,457	353,605	168,656	5,010,041	2,433,437
Section 901(j) income	d	d	d	d	d	d
Income resourced by treaty	* 3,132	0	0	0	* 3,132	* 1,722
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0
Dividends from 10/50 corporations	d	d	d	d	d	d
<b>TRANSPORTATION AND WAREHOUSING</b>						
All income types	9,831,704	* 1,719	* 9,004	5,857,822	3,963,160	1,335,443
Passive income	* 818	0	* [5]	0	* 818	* -1,779
High withholding tax interest	0	0	0	0	0	* -3,794
Financial services income	d	d	d	d	d	d
Shipping income	* 3,990,048	0	0	* 126,556	* 3,863,492	* 1,275,734
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0
Miscellaneous separately calculated limitation	0	0	0	0	0	0
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0
General limitation income	5,807,781	* 1,719	* 9,004	5,698,208	98,850	65,283
Section 901(j) income	d	d	d	d	d	d
Income resourced by treaty	0	0	0	0	0	0
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0
Dividends from 10/50 corporations	0	0	0	0	0	0

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

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

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes reported on Form 1118—continued					
	Deductions—continued					
	Deductions allocable to specific types of income					Deductions not allocable to specific types of income
	Total	Depreciation, depletion, and amortization	Other expenses	Service expenses	Other definitely allocable deductions	
(12)	(13)	(14)	(15)	(16)	(17)	
<b>INFORMATION</b>						
All income types	15,163,309	* 225,340	3,140,831	1,378,101	10,419,036	6,660,160
Passive income	105,892	* 124	* 90,066	* 319	15,383	217,979
High withholding tax interest	* [5]	0	0	0	* [5]	* 1,933
Financial services income	d	d	d	d	d	d
Shipping income	d	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0
Miscellaneous separately calculated limitation	0	0	0	0	0	0
Distributions from a FSC or former FSC [2]	d	d	d	d	d	d
General limitation income	14,919,829	* 186,879	3,035,102	1,377,782	10,320,066	6,420,606
Section 901(j) income	d	d	d	d	d	d
Income resourced by treaty	d	d	d	d	d	d
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0
Dividends from 10/50 corporations	d	d	d	d	d	d
<b>FINANCE, INSURANCE, REAL ESTATE, AND RENTAL AND LEASING</b>						
All income types	24,434,181	642,443	374,261	3,426,984	19,990,492	23,114,114
Passive income	78,517	* 3,275	11,379	* 545	63,318	270,925
High withholding tax interest	14,976	0	* 136	0	14,840	74,131
Financial services income	21,967,160	* 17,964	* 91,350	2,831,563	19,026,284	22,064,278
Shipping income	d	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1]	d	d	d	d	d	d
Miscellaneous separately calculated limitation	0	0	0	0	0	0
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0
General limitation income	1,542,385	127,956	195,657	594,876	623,896	658,755
Section 901(j) income	0	0	0	0	0	0
Income resourced by treaty	d	d	d	d	d	d
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0
Dividends from 10/50 corporations	* 93	0	0	0	* 93	* 49
<b>SERVICES</b>						
All income types	22,038,761	532,495	384,418	3,297,859	17,823,989	29,805,044
Passive income	38,498	* 168	2,597	0	35,732	164,941
High withholding tax interest	5,639	0	* 31	0	* 5,608	138,034
Financial services income	11,337,521	* 472,898	* 10,564	* 2,315	10,851,744	26,563,954
Shipping income	0	0	0	0	0	* 585
Dividends from an IC-DISC or former DISC [1]	d	d	d	d	d	d
Miscellaneous separately calculated limitation	d	d	d	d	d	d
Distributions from a FSC or former FSC [2]	* 119,411	0	0	0	* 119,411	* 910
General limitation income	10,499,300	46,579	371,226	3,275,854	6,805,640	2,931,439
Section 901(j) income	d	d	d	d	d	d
Income resourced by treaty	* 1,506	* 8	0	* 937	* 561	0
Dividends from each 10/50 PFIC [3]	d	d	d	d	d	d
Dividends from 10/50 corporations	d	d	d	d	d	d

Footnotes at end of table.



# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

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

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes reported on Form 1118—continued						
	Gross income (less loss)—continued				Deductions from oil and gas extraction income [6]	Taxable income (less loss) before adjustments	Adjustments to taxable income
	Deductions not allocable to specific types of income—continued			Research and development			
	Interest	Other					
(18)	(19)	(20)	(21)	(22)	(23)		
<b>ALL INDUSTRIES</b>							
All income types	13,485,504	42,001,568	54,391,211	10,984,748	241,493,136	27,827,198	
Passive income	101,777	1,410,650	558,323	0	9,524,995	759,397	
High withholding tax interest	* 969	232,328	59,594	0	702,115	-151,717	
Financial services income	140,814	25,849,329	25,089,026	0	49,257,626	3,944,075	
Shipping income	* 4,603	325,660	1,266,012	0	1,518,722	-161,367	
Dividends from an IC-DISC or former DISC [1]	0	0	* 46	0	* 883	* -2	
Miscellaneous separately calculated limitation	* 22	0	* 7,341	0	* 14,117	* -1,700	
Distributions from a FSC or former FSC [2]	0	0	* 914	0	* 20,654	* 223	
General limitation income	13,235,955	14,151,030	27,402,625	10,984,748	180,245,161	23,426,755	
Section 901(j) income	* 116	* 9,468	* 4,324	0	56,607	11,412	
Income resourced by treaty	* 1,094	* 17,023	* 2,738	0	138,118	1,178	
Dividends from each 10/50 PFIC [3]	* 155	* 238	* 31	0	* 5,643	* 4	
Dividends from 10/50 corporations	0	* 5,842	* 239	0	8,496	* -1,060	
<b>AGRICULTURE, FORESTRY, FISHING, AND HUNTING</b>							
All income types	* 673	* 10,534	* 10,633	0	107,736	* 14,447	
Passive income	0	0	* 314	0	1,043	0	
High withholding tax interest	0	0	0	0	0	0	
Financial services income	0	0	0	0	0	0	
Shipping income	0	0	0	0	0	0	
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0	
Miscellaneous separately calculated limitation	0	0	0	0	0	0	
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0	
General limitation income	* 673	* 10,534	* 10,319	0	106,694	* 14,447	
Section 901(j) income	0	0	0	0	0	0	
Income resourced by treaty	0	0	0	0	0	0	
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0	
Dividends from 10/50 corporations	0	0	0	0	0	0	
<b>MINING</b>							
All income types	* 23,501	482,400	482,337	1,132,503	4,418,975	166,142	
Passive income	* 90	* 22,949	* 5,133	0	52,931	1,676	
High withholding tax interest	d	d	d	d	d	d	
Financial services income	* 4	* 1,346	* 372	0	* 4,549	* 40	
Shipping income	d	d	d	d	d	d	
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0	
Miscellaneous separately calculated limitation	0	0	0	0	0	0	
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0	
General limitation income	* 23,291	455,014	476,087	1,132,503	4,351,449	171,552	
Section 901(j) income	d	d	d	d	d	d	
Income resourced by treaty	0	0	0	0	0	0	
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0	
Dividends from 10/50 corporations	0	0	0	0	0	0	
<b>UTILITIES</b>							
All income types	0	* 29,501	* 25,026	0	* 89,888	0	
Passive income	0	* 2,188	* 2,067	0	* -17,317	* -18,157	
High withholding tax interest	0	0	0	0	0	0	
Financial services income	d	d	d	d	d	d	
Shipping income	0	0	0	0	0	0	
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0	
Miscellaneous separately calculated limitation	0	0	0	0	0	0	
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0	
General limitation income	0	* 25,439	* 22,959	0	* 107,193	* 18,157	
Section 901(j) income	d	d	d	d	d	d	
Income resourced by treaty	0	0	0	0	0	0	
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0	
Dividends from 10/50 corporations	0	0	0	0	0	0	

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

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

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes reported on Form 1118—continued						
	Gross income (less loss)—continued				Deductions from oil and gas extraction income [6]	Taxable income (less loss) before adjustments	Adjustments to taxable income
	Deductions not allocable to specific types of income—continued			Research and development			
	Interest	Other					
(18)	(19)	(20)	(21)	(22)	(23)		
<b>CONSTRUCTION</b>							
All income types	* 101	* 890	* 20,493	0	108,170	* 2,041	
Passive income	0	* 9	* 1	0	4,465	* 121	
High withholding tax interest	d	d	d	d	d	d	
Financial services income	d	d	d	d	d	d	
Shipping income	0	0	0	0	0	0	
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	* 3	0	
Miscellaneous separately calculated limitation	d	d	d	d	d	d	
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0	
General limitation income	* 79	* 881	* 13,151	0	101,156	* 1,920	
Section 901(j) income	0	0	0	0	0	0	
Income resourced by treaty	0	0	0	0	0	0	
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0	
Dividends from 10/50 corporations	0	0	0	0	0	0	
<b>MANUFACTURING</b>							
All income types	10,906,052	15,239,527	19,617,336	* 9,612,746	154,593,276	22,769,849	
Passive income	83,445	1,017,333	172,817	0	4,396,702	668,869	
High withholding tax interest	* 433	57,992	3,868	0	165,450	2,135	
Financial services income	9,979	2,535,493	49,046	0	6,081,322	990,656	
Shipping income	* 318	240,422	* 4,307	0	265,204	* -33,933	
Dividends from an IC-DISC or former DISC [1]	0	0	* 46	0	* 849	* -2	
Miscellaneous separately calculated limitation	d	d	d	d	d	d	
Distributions from a FSC or former FSC [2]	d	d	d	d	d	d	
General limitation income	10,811,109	11,364,608	19,381,929	* 9,612,746	143,528,736	21,117,198	
Section 901(j) income	0	* 6,749	* 3,097	0	54,363	18,582	
Income resourced by treaty	* 613	* 16,324	* 2,195	0	90,718	* 8,174	
Dividends from each 10/50 PFIC [3]	* 155	* 238	* 31	0	* 5,636	* 4	
Dividends from 10/50 corporations	0	* 367	0	0	* 2,556	* -360	
<b>WHOLESALE AND RETAIL TRADE</b>							
All income types	70,576	1,019,125	1,445,641	* 216,401	11,669,584	1,006,550	
Passive income	* 3,289	95,868	16,774	0	581,642	42,083	
High withholding tax interest	0	18,711	* 2,007	0	27,768	* 130	
Financial services income	0	* 86,392	* 13,209	0	* 483,434	* 19,762	
Shipping income	0	* 7,691	* 1,727	0	* -3,261	* -41,090	
Dividends from an IC-DISC or former DISC [1]	d	d	d	d	d	d	
Miscellaneous separately calculated limitation	0	0	0	0	0	0	
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0	
General limitation income	66,806	808,766	1,411,357	* 216,401	10,564,088	984,417	
Section 901(j) income	d	d	d	d	d	d	
Income resourced by treaty	* 481	* 699	* 542	0	* 16,133	* 2,172	
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0	
Dividends from 10/50 corporations	d	d	d	d	d	d	
<b>TRANSPORTATION AND WAREHOUSING</b>							
All income types	* 25,432	8,600	1,295,194	* 221	2,444,326	151,153	
Passive income	0	* -2,017	* 237	0	37,019	* 3,209	
High withholding tax interest	0	* -3,969	* 89	0	* 17,338	0	
Financial services income	d	d	d	d	d	d	
Shipping income	* 4,285	* 12,326	* 1,259,052	0	* 1,190,176	* 64,238	
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0	
Miscellaneous separately calculated limitation	0	0	0	0	0	0	
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0	
General limitation income	* 21,147	2,260	35,816	* 221	1,204,120	* 88,033	
Section 901(j) income	d	d	d	d	d	d	
Income resourced by treaty	0	0	0	0	0	0	
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0	
Dividends from 10/50 corporations	0	0	0	0	0	0	

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

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

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes reported on Form 1118—continued								
	Gross income (less loss)—continued				Deductions from oil and gas extraction income [6]	Taxable income (less loss) before adjustments	Adjustments to taxable income		
	Deductions not allocable to specific types of income—continued			Research and development					
	Interest	Other			(18)	(19)	(20)	(21)	(22)
<b>INFORMATION</b>									
All income types	2,145,207	704,809	3,753,108	0	14,580,764	369,440			
Passive income	* 12,333	77,971	127,244	0	2,376,393	53,987			
High withholding tax interest	0	* 1,809	* 109	0	* -709	* -4,564			
Financial services income	d	d	d	d	d	d			
Shipping income	d	d	d	d	d	d			
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0			
Miscellaneous separately calculated limitation	0	0	0	0	0	0			
Distributions from a FSC or former FSC [2]	d	d	d	d	d	d			
General limitation income	2,132,874	605,802	3,625,343	0	12,156,007	279,498			
Section 901(j) income	d	d	d	d	d	d			
Income resourced by treaty	d	d	d	d	d	d			
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0			
Dividends from 10/50 corporations	d	d	d	d	d	d			
<b>FINANCE, INSURANCE, REAL ESTATE, AND RENTAL AND LEASING</b>									
All income types	* 15,804	11,017,958	11,823,907	0	29,584,426	1,922,966			
Passive income	0	180,451	* 89,330	0	1,910,346	3,414			
High withholding tax interest	0	62,583	* 11,016	0	115,646	-18,882			
Financial services income	* 11,655	10,648,650	11,157,682	0	26,538,387	2,168,765			
Shipping income	d	d	d	d	d	d			
Dividends from an IC-DISC or former DISC [1]	d	d	d	d	d	d			
Miscellaneous separately calculated limitation	0	0	0	0	0	0			
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0			
General limitation income	* 4,149	80,251	565,879	0	1,066,014	7,259			
Section 901(j) income	0	0	0	0	0	0			
Income resourced by treaty	d	d	d	d	d	d			
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0			
Dividends from 10/50 corporations	0	* 49	* 1	0	* 1,174	* 244			
<b>SERVICES</b>									
All income types	298,157	13,488,225	15,917,537	* 22,877	23,895,992	1,424,609			
Passive income	* 2,619	15,897	144,407	0	181,771	4,195			
High withholding tax interest	* 536	94,724	42,505	0	375,264	-130,547			
Financial services income	* 119,176	12,575,575	13,868,717	0	16,187,001	802,582			
Shipping income	0	* 7	* 577	0	* 11,960	* 2,559			
Dividends from an IC-DISC or former DISC [1]	d	d	d	d	d	d			
Miscellaneous separately calculated limitation	d	d	d	d	d	d			
Distributions from a FSC or former FSC [2]	0	0	* 910	0	* 18,917	0			
General limitation income	175,826	797,475	1,859,785	* 22,877	7,059,703	744,275			
Section 901(j) income	d	d	d	d	d	d			
Income resourced by treaty	0	0	0	0	* 42,209	* 1,854			
Dividends from each 10/50 PFIC [3]	d	d	d	d	d	d			
Dividends from 10/50 corporations	d	d	d	d	d	d			

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

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

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes reported on Form 1118—continued							
	Taxable income (less loss) after adjustments	Foreign taxes available for credit					Foreign taxes paid or accrued	
		Total	Reduction for certain foreign taxes	Carryover	Total paid, accrued, and deemed paid	Total	Dividends	
	(24)	(25)	(26)	(27)	(28)	(29)	(30)	
<b>ALL INDUSTRIES</b>								
All income types	213,665,938	73,561,030	4,449,968	16,854,198	61,156,800	28,000,049	1,493,093	
Passive income	8,765,598	1,140,348	* 4,631	129,146	1,015,833	542,356	40,725	
High withholding tax interest	853,833	194,665	[5]	59,327	135,338	128,124	* 247	
Financial services income	45,313,551	12,134,903	* 2,748	1,824,380	10,313,270	5,875,832	383,912	
Shipping income	1,680,089	204,775	0	* 15,025	189,750	74,277	* 3,541	
Dividends from an IC-DISC or former DISC [1]	* 884	* 7	0	* [5]	* 6	* 6	* 6	
Miscellaneous separately calculated limitation	* 15,817	* 153	0	0	* 153	* 153	0	
Distributions from a FSC or former FSC [2]	* 20,431	* 517	0	0	* 517	0	0	
General limitation income	156,818,406	59,848,136	4,442,589	14,819,418	49,471,306	21,369,272	1,064,464	
Section 901(j) income	45,195	* 3,035	0	* 1	* 3,033	* 2,547	* 8	
Income resourced by treaty	136,939	26,010	0	* 3,247	22,763	* 7,231	0	
Dividends from each 10/50 PFIC [3]	* 5,639	* 3,162	0	* 1,300	* 1,862	* 18	* 18	
Dividends from 10/50 corporations	* 9,556	5,319	0	* 2,352	* 2,968	* 231	* 171	
<b>AGRICULTURE, FORESTRY, FISHING, AND HUNTING</b>								
All income types	93,290	25,069	* 2	* 13,529	11,542	4,969	82	
Passive income	1,043	78	0	* 1	77	77	* 41	
High withholding tax interest	0	0	0	0	0	0	0	
Financial services income	0	0	0	0	0	0	0	
Shipping income	0	0	0	0	0	0	0	
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0	0	
Miscellaneous separately calculated limitation	0	0	0	0	0	0	0	
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0	0	
General limitation income	92,247	24,992	* 2	* 13,528	11,466	4,893	* 40	
Section 901(j) income	0	0	0	0	0	0	0	
Income resourced by treaty	0	0	0	0	0	0	0	
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0	0	
Dividends from 10/50 corporations	0	0	0	0	0	0	0	
<b>MINING</b>								
All income types	4,252,833	2,226,848	157,893	745,536	1,639,204	1,487,805	160,666	
Passive income	51,255	5,269	0	* 157	5,113	1,630	719	
High withholding tax interest	d	d	d	d	d	d	d	
Financial services income	* 4,509	* 49	0	0	* 49	* 49	0	
Shipping income	d	d	d	d	d	d	d	
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0	0	
Miscellaneous separately calculated limitation	0	0	0	0	0	0	0	
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0	0	
General limitation income	4,179,897	2,221,492	157,893	745,380	1,634,005	1,486,088	159,947	
Section 901(j) income	d	d	d	d	d	d	d	
Income resourced by treaty	0	0	0	0	0	0	0	
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0	0	
Dividends from 10/50 corporations	0	0	0	0	0	0	0	
<b>UTILITIES</b>								
All income types	* 89,888	* 32,684	0	* 698	* 31,986	* 8,082	* 2,448	
Passive income	* 841	* 342	0	0	* 342	* 132	* 22	
High withholding tax interest	0	0	0	0	0	0	0	
Financial services income	d	d	d	d	d	d	d	
Shipping income	0	0	0	0	0	0	0	
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0	0	
Miscellaneous separately calculated limitation	0	0	0	0	0	0	0	
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0	0	
General limitation income	* 89,035	* 31,626	0	0	* 31,626	* 7,932	* 2,426	
Section 901(j) income	d	d	d	d	d	d	d	
Income resourced by treaty	0	0	0	0	0	0	0	
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0	0	
Dividends from 10/50 corporations	0	0	0	0	0	0	0	

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

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

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes reported on Form 1118—continued							
	Taxable income (less loss) after adjustments	Foreign taxes available for credit					Foreign taxes paid or accrued	
		Total	Reduction for certain foreign taxes	Carryover	Total paid, accrued, and deemed paid	Total	Dividends	
	(24)	(25)	(26)	(27)	(28)	(29)	(30)	
<b>CONSTRUCTION</b>								
All income types	106,129	26,540	0	4,704	21,836	12,974	2,188	
Passive income	4,345	2,055	0	* 610	1,445	1,324	240	
High withholding tax interest	d	d	d	d	d	d	d	
Financial services income	d	d	d	d	d	d	d	
Shipping income	0	0	0	0	0	0	0	
Dividends from an IC-DISC or former DISC [1]	* 3	* 1	0	0	* 1	* 1	* 1	
Miscellaneous separately calculated limitation	d	d	d	d	d	d	d	
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0	0	
General limitation income	99,237	24,325	0	4,089	20,236	11,496	1,947	
Section 901(j) income	0	0	0	0	0	0	0	
Income resourced by treaty	0	0	0	0	0	0	0	
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0	0	
Dividends from 10/50 corporations	0	0	0	0	0	0	0	
<b>MANUFACTURING</b>								
All income types	131,823,426	50,847,662	3,991,148	12,420,594	42,418,216	17,538,828	734,004	
Passive income	3,727,832	477,589	* 4,631	102,862	379,358	93,653	25,399	
High withholding tax interest	163,315	40,129	0	5,353	34,777	32,103	* [5]	
Financial services income	5,090,666	1,604,724	0	* 16,651	1,588,073	298,724	* 3,473	
Shipping income	299,137	* 69,695	0	* 10,920	* 58,775	* 6,751	0	
Dividends from an IC-DISC or former DISC [1]	* 851	* 1	0	0	* 1	* 1	* 1	
Miscellaneous separately calculated limitation	d	d	d	d	d	d	d	
Distributions from a FSC or former FSC [2]	d	d	d	d	d	d	d	
General limitation income	122,411,538	48,633,629	3,986,517	12,282,142	40,338,004	17,103,339	705,094	
Section 901(j) income	35,781	* 2,902	0	* 1	* 2,901	* 2,452	0	
Income resourced by treaty	82,544	15,145	0	* 1,583	13,561	* 1,768	0	
Dividends from each 10/50 PFIC [3]	* 5,632	* 2,576	0	* 715	* 1,861	* 17	* 17	
Dividends from 10/50 corporations	* 2,916	* 755	0	* 366	* 389	* 20	* 20	
<b>WHOLESALE AND RETAIL TRADE</b>								
All income types	10,663,033	3,442,478	* 219,016	588,378	3,073,115	635,513	73,312	
Passive income	539,559	83,537	0	5,154	78,382	20,393	1,159	
High withholding tax interest	27,639	5,470	* [5]	* 288	5,183	4,985	0	
Financial services income	* 463,672	* 109,172	0	* 712	* 108,460	* 22,367	* 517	
Shipping income	* 37,828	* 6,885	0	0	* 6,885	* 2,777	0	
Dividends from an IC-DISC or former DISC [1]	d	d	d	d	d	d	d	
Miscellaneous separately calculated limitation	0	0	0	0	0	0	0	
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0	0	
General limitation income	9,579,672	3,233,282	* 219,016	582,224	2,870,073	583,473	71,625	
Section 901(j) income	d	d	d	d	d	d	d	
Income resourced by treaty	* 13,960	* 3,996	0	0	* 3,996	* 1,420	0	
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0	0	
Dividends from 10/50 corporations	d	d	d	d	d	d	d	
<b>TRANSPORTATION AND WAREHOUSING</b>								
All income types	2,293,173	251,844	* 270	45,472	206,642	103,155	6,556	
Passive income	33,810	2,310	0	* [5]	2,310	1,839	* 1,253	
High withholding tax interest	* 17,338	* 1,384	0	* 19	* 1,365	* 1,365	0	
Financial services income	d	d	d	d	d	d	d	
Shipping income	* 1,125,938	* 118,134	0	* 185	* 117,949	* 60,414	* 3,541	
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0	0	
Miscellaneous separately calculated limitation	0	0	0	0	0	0	0	
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0	0	
General limitation income	1,116,087	130,015	* 270	45,267	85,018	39,537	1,762	
Section 901(j) income	d	d	d	d	d	d	d	
Income resourced by treaty	0	0	0	0	0	0	0	
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0	0	
Dividends from 10/50 corporations	0	0	0	0	0	0	0	

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

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

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes reported on Form 1118—continued							
	Taxable income (less loss) after adjustments	Foreign taxes available for credit					Foreign taxes paid or accrued	
		Total	Reduction for certain foreign taxes	Carryover	Total paid, accrued, and deemed paid	Total	Dividends	
	(24)	(25)	(26)	(27)	(28)	(29)	(30)	
<b>INFORMATION</b>								
All income types	14,211,324	3,272,288	* 60,408	663,405	2,669,290	1,263,860	68,081	
Passive income	2,322,406	136,676	0	11,417	125,259	13,552	719	
High withholding tax interest	* 3,855	* 315	0	* 175	* 140	* 140	0	
Financial services income	d	d	d	d	d	d	d	
Shipping income	d	d	d	d	d	d	d	
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0	0	
Miscellaneous separately calculated limitation	0	0	0	0	0	0	0	
Distributions from a FSC or former FSC [2]	d	d	d	d	d	d	d	
General limitation income	11,876,509	3,132,936	* 60,408	649,732	2,543,612	1,250,167	67,362	
Section 901(j) income	d	d	d	d	d	d	d	
Income resourced by treaty	d	d	d	d	d	d	d	
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0	0	
Dividends from 10/50 corporations	d	d	d	d	d	d	d	
<b>FINANCE, INSURANCE, REAL ESTATE, AND RENTAL AND LEASING</b>								
All income types	27,661,459	6,260,565	* 3,254	1,390,595	4,873,224	3,375,386	195,757	
Passive income	1,906,932	406,212	* [5]	4,527	401,686	398,416	9,202	
High withholding tax interest	134,528	49,060	0	25,459	23,601	19,479	* 246	
Financial services income	24,369,622	5,596,792	* 2,748	1,322,523	4,277,017	2,854,669	179,505	
Shipping income	d	d	d	d	d	d	d	
Dividends from an IC-DISC or former DISC [1]	d	d	d	d	d	d	d	
Miscellaneous separately calculated limitation	0	0	0	0	0	0	0	
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0	0	
General limitation income	1,058,756	201,688	* 506	32,910	169,285	101,307	6,731	
Section 901(j) income	0	0	0	0	0	0	0	
Income resourced by treaty	d	d	d	d	d	d	d	
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0	0	
Dividends from 10/50 corporations	* 930	* 1,482	0	* 1,291	* 192	* 71	* 71	
<b>SERVICES</b>								
All income types	22,471,383	7,175,052	* 17,977	981,286	6,211,742	3,569,477	250,000	
Passive income	177,575	26,281	0	4,419	21,862	11,341	1,971	
High withholding tax interest	505,811	98,263	0	* 28,028	70,235	70,015	0	
Financial services income	15,384,419	4,823,448	0	483,796	4,339,652	2,700,003	200,416	
Shipping income	* 9,401	* 4,733	0	* 35	* 4,698	* 2,894	0	
Dividends from an IC-DISC or former DISC [1]	d	d	d	d	d	d	d	
Miscellaneous separately calculated limitation	d	d	d	d	d	d	d	
Distributions from a FSC or former FSC [2]	* 18,917	0	0	0	0	0	0	
General limitation income	6,315,429	2,214,150	* 17,977	464,147	1,767,980	781,040	47,531	
Section 901(j) income	d	d	d	d	d	d	d	
Income resourced by treaty	* 40,354	* 5,257	0	* 51	* 5,205	* 4,043	0	
Dividends from each 10/50 PFIC [3]	d	d	d	d	d	d	d	
Dividends from 10/50 corporations	d	d	d	d	d	d	d	

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

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

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes reported on Form 1118—continued						
	Foreign taxes available for credit—continued						
	Foreign taxes paid or accrued—continued						Taxes deemed paid
	Interest	Rents, royalties, and license fees	Branch income	Specifically allocable income [section 863(b)]	Service income	Other income	
(31)	(32)	(33)	(34)	(35)	(36)	(37)	
<b>ALL INDUSTRIES</b>							
All income types	1,017,826	2,678,122	5,734,096	63,225	298,690	16,714,997	33,156,751
Passive income	284,311	35,532	4,841	0	* 55	176,892	473,477
High withholding tax interest	127,871	0	0	0	0	* 7	* 7,213
Financial services income	382,780	102,516	2,898,799	0	111,505	1,996,320	4,437,438
Shipping income	* 1,053	* 5,627	* 49,680	0	* 398	* 13,979	115,472
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0	0
Miscellaneous separately calculated limitation	0	0	0	0	0	* 153	0
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0	* 517
General limitation income	221,811	2,531,567	2,779,488	63,225	186,727	14,521,989	28,102,034
Section 901(j) income	0	* 2,452	0	0	0	* 87	* 486
Income resourced by treaty	0	* 368	* 1,287	0	* 6	* 5,570	15,532
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0	* 1,844
Dividends from 10/50 corporations	0	* 60	0	0	0	0	* 2,737
<b>AGRICULTURE, FORESTRY, FISHING, AND HUNTING</b>							
All income types	* 147	* 214	* 2,211	0	0	* 2,316	* 6,573
Passive income	0	* 15	0	0	0	* 21	0
High withholding tax interest	0	0	0	0	0	0	0
Financial services income	0	0	0	0	0	0	0
Shipping income	0	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0	0
Miscellaneous separately calculated limitation	0	0	0	0	0	0	0
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0	0
General limitation income	* 147	* 199	* 2,211	0	0	* 2,296	* 6,573
Section 901(j) income	0	0	0	0	0	0	0
Income resourced by treaty	0	0	0	0	0	0	0
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0	0
Dividends from 10/50 corporations	0	0	0	0	0	0	0
<b>MINING</b>							
All income types	18,547	9,262	337,998	0	* 11,968	949,363	151,399
Passive income	* 175	* 144	* 35	0	0	* 557	* 3,483
High withholding tax interest	d	d	d	d	d	d	d
Financial services income	* 49	0	0	0	0	0	0
Shipping income	d	d	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0	0
Miscellaneous separately calculated limitation	0	0	0	0	0	0	0
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0	0
General limitation income	18,285	* 9,118	337,963	0	* 11,968	948,806	147,917
Section 901(j) income	d	d	d	d	d	d	d
Income resourced by treaty	0	0	0	0	0	0	0
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0	0
Dividends from 10/50 corporations	0	0	0	0	0	0	0
<b>UTILITIES</b>							
All income types	* 588	* 722	* 4,324	0	0	* [5]	* 23,904
Passive income	* 109	0	0	0	0	* [5]	* 210
High withholding tax interest	0	0	0	0	0	0	0
Financial services income	d	d	d	d	d	d	d
Shipping income	0	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0	0
Miscellaneous separately calculated limitation	0	0	0	0	0	0	0
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0	0
General limitation income	* 460	* 722	* 4,324	0	0	0	* 23,694
Section 901(j) income	d	d	d	d	d	d	d
Income resourced by treaty	0	0	0	0	0	0	0
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0	0
Dividends from 10/50 corporations	0	0	0	0	0	0	0

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

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

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes reported on Form 1118—continued						
	Foreign taxes available for credit—continued						
	Foreign taxes paid or accrued—continued						Taxes deemed paid
	Interest	Rents, royalties, and license fees	Branch income	Specifically allocable income [section 863(b)]	Service income	Other income	
(31)	(32)	(33)	(34)	(35)	(36)	(37)	
<b>CONSTRUCTION</b>							
All income types	* 153	* 1,077	* 3,563	0	5,164	830	8,862
Passive income	* 148	* 436	* 433	0	0	* 67	* 121
High withholding tax interest	d	d	d	d	d	d	d
Financial services income	d	d	d	d	d	d	d
Shipping income	0	0	0	0	0	0	0
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0	0
Miscellaneous separately calculated limitation	d	d	d	d	d	d	d
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0	0
General limitation income	* 5	* 641	* 3,130	0	5,164	* 609	8,741
Section 901(j) income	0	0	0	0	0	0	0
Income resourced by treaty	0	0	0	0	0	0	0
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0	0
Dividends from 10/50 corporations	0	0	0	0	0	0	0
<b>MANUFACTURING</b>							
All income types	177,638	1,678,418	1,402,748	54,240	64,185	13,427,595	24,879,389
Passive income	5,055	10,464	865	0	* 54	51,815	285,705
High withholding tax interest	32,100	0	0	0	0	* 2	* 2,674
Financial services income	* 3,299	* 1,270	* 38,015	0	* 3,265	* 249,403	* 1,289,348
Shipping income	0	0	0	0	* 212	* 6,539	* 52,024
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0	0
Miscellaneous separately calculated limitation	d	d	d	d	d	d	d
Distributions from a FSC or former FSC [2]	d	d	d	d	d	d	d
General limitation income	137,184	1,663,864	1,362,958	54,240	60,654	13,119,347	23,234,665
Section 901(j) income	0	* 2,452	0	0	0	0	* 449
Income resourced by treaty	0	* 368	* 911	0	0	* 489	* 11,793
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0	* 1,844
Dividends from 10/50 corporations	0	0	0	0	0	0	* 369
<b>WHOLESALE AND RETAIL TRADE</b>							
All income types	29,679	153,804	245,149	* 2,430	14,504	116,635	2,437,602
Passive income	3,795	7,856	* 581	0	0	7,002	57,989
High withholding tax interest	4,985	0	0	0	0	0	* 197
Financial services income	* 2,312	0	* 12,991	0	0	* 6,548	* 86,093
Shipping income	0	0	0	0	0	* 2,777	* 4,108
Dividends from an IC-DISC or former DISC [1]	d	d	d	d	d	d	d
Miscellaneous separately calculated limitation	0	0	0	0	0	0	0
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0	0
General limitation income	18,588	145,948	231,224	* 2,430	14,504	99,154	2,286,600
Section 901(j) income	d	d	d	d	d	d	d
Income resourced by treaty	0	0	* 353	0	0	* 1,067	* 2,577
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0	0
Dividends from 10/50 corporations	d	d	d	d	d	d	d
<b>TRANSPORTATION AND WAREHOUSING</b>							
All income types	2,809	9,492	* 61,865	* 2	15,410	7,020	103,488
Passive income	* 101	* 247	0	0	0	* 237	* 472
High withholding tax interest	* 1,365	0	0	0	0	0	0
Financial services income	d	d	d	d	d	d	d
Shipping income	* 1,053	* 5,627	* 46,786	0	* 185	* 3,221	* 57,535
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0	0
Miscellaneous separately calculated limitation	0	0	0	0	0	0	0
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0	0
General limitation income	* 290	3,617	* 15,079	* 2	15,224	* 3,562	45,481
Section 901(j) income	d	d	d	d	d	d	d
Income resourced by treaty	0	0	0	0	0	0	0
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0	0
Dividends from 10/50 corporations	0	0	0	0	0	0	0

Footnotes at end of table.



# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 2. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes, by Industrial Sector and by Type of Foreign Income for Which Separate Credit Was Computed—Continued**

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

Industrial sector and type of foreign income for which separate credit was computed	Foreign income and taxes reported on Form 1118—continued						Taxes deemed paid
	Foreign taxes available for credit—continued						
	Foreign taxes paid or accrued—continued						
	Interest	Rents, royalties, and license fees	Branch income	Specifically allocable income [section 863(b)]	Service income	Other income	
(31)	(32)	(33)	(34)	(35)	(36)	(37)	
<b>INFORMATION</b>							
All income types	4,612	527,601	483,479	* 749	17,830	161,508	1,405,431
Passive income	* 2,035	* 9,566	0	0	* [5]	* 1,232	111,706
High withholding tax interest	* 140	0	0	0	0	0	0
Financial services income	d	d	d	d	d	d	d
Shipping income	d	d	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1]	0	0	0	0	0	0	0
Miscellaneous separately calculated limitation	0	0	0	0	0	0	0
Distributions from a FSC or former FSC [2]	d	d	d	d	d	d	d
General limitation income	2,437	518,035	483,479	* 749	17,830	160,276	1,293,444
Section 901(j) income	d	d	d	d	d	d	d
Income resourced by treaty	d	d	d	d	d	d	d
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0	0
Dividends from 10/50 corporations	d	d	d	d	d	d	d
<b>FINANCE, INSURANCE, REAL ESTATE, AND RENTAL AND LEASING</b>							
All income types	511,445	44,012	1,381,779	* 4,671	70,965	1,166,758	1,497,838
Passive income	272,184	1,600	* 122	0	0	115,308	3,269
High withholding tax interest	19,228	0	0	0	0	* 5	* 4,122
Financial services income	206,633	* 35,009	1,359,127	0	53,547	1,020,849	1,422,348
Shipping income	d	d	d	d	d	d	d
Dividends from an IC-DISC or former DISC [1]	d	d	d	d	d	d	d
Miscellaneous separately calculated limitation	0	0	0	0	0	0	0
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0	0
General limitation income	13,399	7,403	22,529	* 4,671	17,419	29,155	67,978
Section 901(j) income	0	0	0	0	0	0	0
Income resourced by treaty	d	d	d	d	d	d	d
Dividends from each 10/50 PFIC [3]	0	0	0	0	0	0	0
Dividends from 10/50 corporations	0	0	0	0	0	0	* 121
<b>SERVICES</b>							
All income types	272,208	253,521	1,810,980	* 1,132	98,663	882,972	2,642,265
Passive income	707	5,204	* 2,806	0	0	653	10,521
High withholding tax interest	70,015	0	0	0	0	0	* 220
Financial services income	170,469	* 66,237	1,488,667	0	* 54,693	719,521	1,639,649
Shipping income	0	0	* 2,894	0	0	0	* 1,805
Dividends from an IC-DISC or former DISC [1]	d	d	d	d	d	d	d
Miscellaneous separately calculated limitation	d	d	d	d	d	d	d
Distributions from a FSC or former FSC [2]	0	0	0	0	0	0	0
General limitation income	31,017	182,020	316,591	* 1,132	43,964	158,785	986,940
Section 901(j) income	d	d	d	d	d	d	d
Income resourced by treaty	0	0	* 23	0	* 6	* 4,014	* 1,162
Dividends from each 10/50 PFIC [3]	d	d	d	d	d	d	d
Dividends from 10/50 corporations	d	d	d	d	d	d	d

\* Data should be used with caution because of the small number of sample returns on which they were based.

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

[1] Interest-Charge Domestic International Sales Corporation (IC-DISC) and Domestic International Sales Corporation (DISC).

[2] Foreign Sales Corporation (FSC).

[3] Passive Foreign Investment Company (PFIC).

[4] Included in gross income (less loss) shown in columns 2-8.

[5] Less than \$500.

[6] Included in deductions shown in columns 11-20.

[7] Number of returns for all income types may not equal the sum of number of returns by type of income because a given return could have more than one type of income.

NOTE: Detail may not add to totals because of rounding.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 3. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country to Which Foreign Taxes Were Paid**

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

Selected country	Number of returns	Foreign income and taxes reported on Form 1118				
		Gross income (less loss)				
		Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees
(1)	(2)	(3)	(4)	(5)	(6)	
<b>All geographic areas</b>	<b>5,502</b>	<b>485,354,155</b>	<b>86,339,067</b>	<b>33,129,305</b>	<b>57,724,090</b>	<b>79,964,798</b>
<b>Canada</b>	<b>2,046</b>	<b>42,232,089</b>	<b>15,245,435</b>	<b>6,379,958</b>	<b>4,856,144</b>	<b>5,165,583</b>
<b>Latin America, total</b>	<b>1,001</b>	<b>36,598,523</b>	<b>7,263,509</b>	<b>2,429,032</b>	<b>6,584,244</b>	<b>5,824,507</b>
Mexico	691	9,349,703	1,337,796	721,979	1,405,431	2,250,949
Central America, total	246	1,696,398	674,033	55,420	270,672	134,701
Belize	30	10,721	* 3,729	* 391	* 622	* 3
Costa Rica	140	420,968	257,894	18,378	28,646	37,618
El Salvador	106	216,386	70,674	3,417	38,955	23,446
Guatemala	115	162,856	11,080	* 3,475	25,896	24,287
Honduras	95	250,979	111,206	* 435	8,543	13,323
Nicaragua	63	60,315	* 105	* 74	* 3,327	4,321
Panama (including Canal Zone)	167	554,060	219,345	29,251	162,895	31,702
Central America not allocable	4	* 20,113	0	0	* 1,789	0
Caribbean countries, total	319	8,703,893	2,976,831	738,382	2,378,472	432,543
Cayman Islands (British)	182	6,064,416	2,550,118	694,738	2,094,967	313,764
Dominican Republic	156	389,672	116,394	* 2,837	159,597	10,247
Haiti	31	35,389	* 182	* 151	* 7,814	* 414
Jamaica	87	163,739	* 2,131	* 1,086	51,182	26,822
Trinidad	112	1,574,818	* 53,872	* 25,239	57,833	25,409
Other Caribbean countries	96	475,859	254,134	* 14,331	7,078	55,888
South America, total	663	16,064,455	2,274,849	913,251	2,525,499	3,003,847
Argentina	318	2,120,818	148,510	155,566	266,577	301,129
Bolivia	77	82,694	* 5,032	* 1,280	6,694	2,696
Brazil	454	4,891,672	988,816	533,322	1,104,534	904,249
Chile	256	2,663,953	421,592	33,497	586,251	204,174
Colombia	226	1,079,352	75,763	44,292	117,400	98,351
Ecuador	180	605,981	23,299	6,221	30,901	37,895
Paraguay	68	37,048	* 8,294	* 6,853	11,960	1,550
Peru	201	1,949,963	57,172	* 6,750	100,778	1,235,636
Uruguay	100	152,472	61,175	8,289	41,503	9,497
Venezuela	228	2,275,004	467,310	107,466	254,971	206,488
Other South American countries	39	205,498	* 17,886	* 9,715	* 3,929	2,182
Latin America not allocable	13	784,074	0	0	* 4,170	* 2,466
<b>Other Western Hemisphere, total</b>	<b>276</b>	<b>13,357,496</b>	<b>6,988,146</b>	<b>444,386</b>	<b>943,346</b>	<b>2,501,589</b>
Bahamas	116	1,738,757	288,010	9,251	390,139	34,532
Bermuda	201	11,142,806	6,503,379	409,540	428,346	2,432,018
Netherlands Antilles	78	184,901	65,734	* 5,398	67,589	10,744
Other British West Indies	101	223,640	123,427	20,197	37,991	16,385
All other Western Hemisphere	58	67,393	* 7,597	0	19,282	7,909
<b>Europe, total</b>	<b>2,141</b>	<b>194,470,817</b>	<b>40,458,448</b>	<b>17,240,767</b>	<b>23,535,763</b>	<b>32,616,144</b>
European Union, total	2,074	158,176,322	35,591,180	13,968,190	19,050,367	25,608,620
Austria	207	976,454	137,179	53,596	38,862	479,974
Belgium	291	5,098,836	719,435	263,974	227,750	762,815
Denmark	220	2,396,993	874,964	515,021	95,105	262,149
Finland	234	603,647	59,789	18,099	106,111	152,276
France (including Andorra)	597	10,054,005	1,756,396	593,753	1,021,609	3,031,162
Germany	622	17,749,415	1,592,506	874,925	1,550,986	3,625,620
Greece	160	581,356	154,509	77,678	18,056	83,373

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 3. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country to Which Foreign Taxes Were Paid—Continued**

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

Selected country	Number of returns	Foreign income and taxes reported on Form 1118				
		Gross income (less loss)				
		Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees
(1)	(2)	(3)	(4)	(5)	(6)	
<b>Europe, total—continued</b>						
European Union, total—continued						
Ireland	282	16,909,251	6,860,822	364,821	323,763	6,907,071
Italy (including San Marino)	406	6,255,624	954,242	777,108	484,609	1,459,627
Luxembourg	159	6,920,627	3,696,775	2,048,585	462,015	286,695
Netherlands	787	17,564,014	7,466,139	2,184,199	1,340,674	1,984,875
Portugal	199	641,582	247,952	49,684	32,587	161,832
Spain	401	6,571,753	1,909,224	2,420,792	170,366	887,423
Sweden	287	1,587,737	235,088	72,059	214,947	455,452
United Kingdom	1,305	64,240,474	8,926,104	3,653,881	12,962,928	5,047,807
European Union not allocable	6	* 24,553	* 56	* 15	0	* 20,469
Other West European countries, total	431	26,130,501	3,652,754	2,805,927	3,913,779	4,266,755
Liechtenstein	11	236,973	* 11,775	* 668	* 299	* 224,217
Monaco	16	3,177	0	0	* 1,445	* 1,418
Norway	197	10,814,114	571,140	2,000,488	719,394	107,361
Switzerland	356	11,639,546	2,919,418	760,040	448,285	3,835,047
Turkey	181	3,356,722	143,617	43,940	2,738,468	85,511
Other West European countries not allocable	83	79,970	* 6,804	* 790	5,889	13,202
East European countries, total	362	9,862,631	1,201,585	460,683	506,809	2,535,912
Romania	82	195,224	25,016	* 10,627	5,559	53,589
Former Soviet Union	237	4,870,537	104,756	29,133	321,942	361,265
Other East European countries	281	4,796,869	1,071,813	420,923	179,308	2,121,059
Europe not allocable	23	301,363	* 12,929	* 5,967	* 64,808	* 204,856
<b>Africa, total</b>	<b>407</b>	<b>12,015,047</b>	<b>1,467,980</b>	<b>764,983</b>	<b>551,633</b>	<b>482,087</b>
North Africa, total	156	1,566,318	18,673	5,294	126,812	66,518
Algeria	33	42,953	* 43	0	* 15,657	* 807
Egypt	126	1,356,463	16,115	* 5,061	89,553	52,287
Libya	14	1,828	* 1,546	* 1	* 1,150	* 31
Morocco	67	92,057	* 508	* 230	4,195	13,199
Other North African countries	48	73,016	* 461	* 2	16,257	* 194
East Africa, total	122	447,552	63,834	34,987	24,100	15,694
Ethiopia	22	71,019	0	0	* 38	0
Kenya	50	64,285	* 7,851	* 4,469	* 9,102	4,288
Tanzania	21	4,048	* 116	* 31	* 1,498	* 110
Uganda	16	32,437	* 9,443	* 4,845	0	* 24
Other East African countries	95	275,763	46,423	25,642	13,462	11,272
West and Central Africa, total	171	7,740,322	999,831	562,652	72,168	31,516
Gabon	19	83,311	* 1,447	* 750	* 6,859	* 74
Ghana	25	6,399	* 1,460	* 648	* 2,533	* 29
Liberia	32	151,714	* 138,565	* 2,392	9,747	0
Nigeria	96	3,054,710	* 89,074	* 44,350	23,311	11,479
Zaire	13	178,516	* 38,240	* 42,603	* 6	0
Other West and Central African countries	116	4,265,672	731,045	* 471,911	29,711	19,934
Southern Africa, total	262	2,260,096	385,642	162,050	328,554	368,359
Malawi	9	* 451	* 309	* 119	0	* 7
South Africa (including Namibia)	28	23,337	* 9,859	* 2,323	* 278	* 123
Zambia	257	2,223,127	370,381	156,940	327,683	364,946
Zimbabwe	25	6,449	* 1,725	* 1,305	* 457	* 2,728
Other Southern African countries	23	6,732	* 3,368	* 1,364	* 136	* 555
Africa not allocable	6	* 759	0	0	0	0

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 3. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country to Which Foreign Taxes Were Paid—Continued**

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

Selected country	Number of returns	Foreign income and taxes reported on Form 1118				
		Gross income (less loss)				
		Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees
(1)	(2)	(3)	(4)	(5)	(6)	
<b>Asia, total</b>	<b>1,319</b>	<b>96,725,155</b>	<b>10,885,940</b>	<b>4,758,454</b>	<b>6,218,821</b>	<b>21,467,661</b>
Middle East, total	333	9,783,840	384,369	80,960	379,596	476,136
Bahrain	74	214,706	* 6,731	* 110	* 123,002	11,489
Iran	24	23,757	* 7,059	* 24	* 9	* 16,615
Iraq	36	453,911	* 128	* 1	* 36	* 1,026
Israel	225	661,059	117,639	28,026	137,226	94,766
Kuwait	80	195,978	* 6,243	* 178	* 361	13,809
Lebanon	74	18,111	* 1,586	* 76	* 4,951	8,439
Qatar	73	1,021,564	0	0	21,147	9,780
Saudi Arabia	131	4,261,810	53,112	27,714	7,594	112,488
United Arab Emirates	122	1,564,597	97,137	* 18,199	89,117	150,314
Other areas of Arabian Peninsula	50	1,013,123	* 16,880	* 3,906	* -40,574	11,779
Other Middle East countries	111	355,224	77,853	2,726	36,726	45,629
Southern and Southeast Asia, total	700	27,037,865	3,364,660	1,279,998	2,677,359	7,556,672
Bangladesh	32	90,618	0	0	* 19,459	503
India	342	2,102,658	119,103	99,273	627,440	199,319
Indonesia	212	5,170,066	926,741	534,284	325,398	90,108
Malaysia	293	3,301,575	268,311	37,210	138,276	936,101
Pakistan	80	435,765	16,539	13,799	58,957	5,710
Philippines	228	2,276,368	318,496	92,057	360,061	720,739
Singapore	419	10,928,975	1,015,175	146,338	755,851	5,366,219
Sri Lanka	48	64,410	* 4,214	* 2,587	* 10,250	1,169
Thailand	314	2,391,485	692,018	354,046	363,592	200,192
Vietnam	63	109,988	* 50	0	13,496	8,153
Other Southern and Southeast Asian countries	63	165,957	* 4,014	* 402	4,580	28,459
Eastern Asia, total	1,119	58,382,576	7,136,911	3,397,496	3,152,189	13,399,526
China	409	7,777,952	779,409	106,156	259,306	4,077,841
Hong Kong	364	6,768,095	442,068	116,403	793,879	574,607
Japan (including Okinawa and Ryukyu Islands)	395	7,037,735	1,668,424	175,183	716,077	497,357
South Korea, Republic of	844	32,157,645	3,532,102	2,707,680	721,284	7,014,662
Taiwan	407	4,594,891	714,907	292,074	656,736	1,216,008
Other Eastern Asian countries	40	46,257	0	0	* 4,906	* 19,052
Asia not allocable	19	1,520,875	0	0	* 9,677	* 35,327
<b>Oceania, total</b>	<b>633</b>	<b>15,801,575</b>	<b>2,198,783</b>	<b>822,016</b>	<b>2,977,792</b>	<b>1,611,537</b>
Australia	598	13,549,477	1,565,989	702,197	2,220,950	1,474,825
New Zealand	275	1,720,960	224,391	118,537	750,330	132,328
Other countries of Oceania	64	531,139	* 408,403	* 1,283	6,512	4,384
<b>Puerto Rico and U.S. Possessions, total</b>	<b>2,197</b>	<b>37,535,019</b>	<b>1,201,725</b>	<b>118,635</b>	<b>11,089,584</b>	<b>4,536,108</b>
Puerto Rico	425	10,800,751	469,411	167,980	935,563	5,722,092
U.S. Possessions, total	382	10,137,915	445,722	165,229	787,698	5,710,462
American Samoa	149	662,836	23,689	* 2,751	147,865	11,629
Guam	19	2,033	* 35	* 14	* 6,830	* 378
Virgin Islands, U.S.	108	269,945	* 5,460	* 2,287	116,188	6,684
Other U.S. Possessions	79	314,167	* 17,452	* 384	8,697	3,722
<b>Country not stated</b>	<b>22</b>	<b>76,691</b>	<b>* 741</b>	<b>* 65</b>	<b>* 16,150</b>	<b>* 845</b>
<b>Section 863(b) income</b>	<b>262</b>	<b>25,654,294</b>	<b>0</b>	<b>0</b>	<b>* 31,045</b>	<b>* 37,038</b>
<b>Foreign Sales Corporation dividends [1]</b>	<b>7</b>	<b>* 151,679</b>	<b>* 151,162</b>	<b>* 517</b>	<b>0</b>	<b>0</b>
<b>Interest-Charge Domestic International Sales Corporation dividends [1]</b>	<b>45</b>	<b>* 928</b>	<b>* 928</b>	<b>0</b>	<b>0</b>	<b>0</b>

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 3. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country to Which Foreign Taxes Were Paid—Continued**

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

Selected country	Foreign income and taxes reported on Form 1118—continued					
	Gross income (less loss)—continued				Total deductions	Deductions from oil and gas extraction income [3]
	Service income	Other income	Oil and gas extraction income [2]	Foreign branch income [2]		
(7)	(8)	(9)	(10)	(11)	(12)	
<b>All geographic areas</b>	<b>26,382,011</b>	<b>201,814,884</b>	<b>49,446,665</b>	<b>97,936,689</b>	<b>243,861,018</b>	<b>10,984,748</b>
<b>Canada</b>	<b>2,672,920</b>	<b>7,912,050</b>	<b>9,189,560</b>	<b>5,896,449</b>	<b>13,913,939</b>	<b>715,722</b>
<b>Latin America, total</b>	<b>1,403,457</b>	<b>13,093,774</b>	<b>3,996,559</b>	<b>5,919,075</b>	<b>16,639,247</b>	<b>* 1,291,995</b>
Mexico	515,022	3,118,526	* 70	1,740,995	4,344,528	* 16
Central America, total	56,195	505,375	0	191,923	1,085,376	0
Belize	* 129	5,846	0	* 56	2,678	0
Costa Rica	24,516	53,915	0	27,343	247,753	0
El Salvador	9,949	69,945	0	11,958	259,510	0
Guatemala	4,973	93,146	0	21,427	100,460	0
Honduras	9,877	107,594	0	7,256	226,159	0
Nicaragua	* 797	51,690	0	* 361	42,868	0
Panama (including Canal Zone)	5,954	104,913	0	123,107	194,556	0
Central America not allocable	0	* 18,325	0	* 414	* 11,393	0
Caribbean countries, total	167,255	2,010,410	* 1,586,426	687,451	2,697,082	* 426,562
Cayman Islands (British)	54,438	356,391	* 634,022	338,813	1,432,813	* 29,511
Dominican Republic	4,229	96,367	0	91,972	302,286	0
Haiti	* 400	26,428	0	* 14,217	24,823	0
Jamaica	32,087	50,432	0	50,634	118,594	0
Trinidad	58,642	1,353,824	* 952,404	171,197	670,894	* 397,014
Other Caribbean countries	17,460	126,969	0	20,618	147,671	* 37
South America, total	558,373	6,788,637	2,410,063	3,233,320	7,709,075	* 865,416
Argentina	66,571	1,182,465	* 545,612	655,630	1,464,755	* 296,985
Bolivia	2,614	64,378	0	18,819	75,135	* 403
Brazil	201,367	1,159,385	* 55,632	618,104	2,280,876	* 18,439
Chile	18,267	1,400,173	-* 551	453,219	1,146,748	0
Colombia	46,058	697,488	* 387,927	163,403	548,216	* 139,146
Ecuador	30,649	477,016	* 398,062	55,941	322,765	* 195,483
Paraguay	* 1,403	6,988	0	* 14,947	41,992	0
Peru	55,176	494,450	* 24,525	440,899	873,327	* 15,570
Uruguay	* 4,909	27,098	0	54,169	75,588	0
Venezuela	118,934	1,119,834	* 998,855	682,180	712,780	* 199,391
Other South American countries	* 12,424	159,362	0	* 76,009	166,893	0
Latin America not allocable	* 106,612	* 670,826	0	* 65,387	803,187	0
<b>Other Western Hemisphere, total</b>	<b>109,583</b>	<b>2,370,445</b>	<b>* 150,496</b>	<b>85,508</b>	<b>2,157,046</b>	<b>* 10,236</b>
Bahamas	1,972	1,014,853	* 86	48,583	696,534	* 28
Bermuda	92,905	1,276,617	* 150,411	4,683	1,332,380	* 10,209
Netherlands Antilles	* 7,580	27,856	0	* 10,629	59,725	0
Other British West Indies	3,942	21,697	0	6,584	44,487	0
All other Western Hemisphere	* 3,183	29,422	0	* 15,029	23,920	0
<b>Europe, total</b>	<b>10,751,837</b>	<b>69,867,858</b>	<b>* 19,414,427</b>	<b>44,687,861</b>	<b>95,509,981</b>	<b>* 5,016,087</b>
European Union, total	10,339,148	53,618,817	* 10,376,371	37,829,256	83,590,810	* 3,327,100
Austria	38,825	228,019	* 7	218,452	888,362	* 3
Belgium	98,810	3,026,052	* 15	1,251,232	3,614,961	0
Denmark	18,044	631,710	* 1,274,300	416,787	745,714	* 60,585
Finland	39,335	228,038	* 55	125,709	335,162	* -1
France (including Andorra)	882,622	2,768,463	* 4,847	1,624,729	5,632,498	* 4,763
Germany	2,543,673	7,561,704	* 319	7,346,573	11,881,918	* -8
Greece	142,271	105,470	0	121,908	295,923	0

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 3. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country to Which Foreign Taxes Were Paid—Continued**

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

Selected country	Foreign income and taxes reported on Form 1118—continued					
	Gross income (less loss)—continued				Total deductions	Deductions from oil and gas extraction income [3]
	Service income	Other income	Oil and gas extraction income [2]	Foreign branch income [2]		
(7)	(8)	(9)	(10)	(11)	(12)	
<b>Europe, total—continued</b>						
European Union, total—continued						
Ireland	822,112	1,630,661	* 884	133,751	7,564,271	* 1,060
Italy (including San Marino)	817,148	1,762,891	* 1,884	1,778,409	3,738,500	* -14
Luxembourg	* 3,604	422,954	* 425,831	56,944	751,676	0
Netherlands	345,889	4,242,239	* 219,573	1,382,661	5,235,735	* 114,052
Portugal	19,467	130,059	* 24	155,918	358,905	* -1
Spain	322,456	861,492	* 703,585	743,355	1,865,938	* -7
Sweden	80,204	529,987	0	440,661	990,216	* 2
United Kingdom	4,165,533	29,484,220	* 7,745,046	22,033,003	39,676,871	* 3,146,667
European Union not allocable	* -844	* 4,858	0	* -835	* 14,160	0
Other West European countries, total	245,222	11,246,063	* 6,823,789	4,245,280	7,448,028	* 1,433,368
Liechtenstein	0	* 15	0	* 15	* 240	0
Monaco	* -9	* 323	* 29	* 1,659	2,896	* -1
Norway	58,131	7,357,601	* 6,823,609	2,168,861	2,591,048	* 1,433,286
Switzerland	157,960	3,518,795	* 93	1,704,189	4,288,073	* 24
Turkey	27,533	317,653	* 58	325,994	453,932	* 51
Other West European countries not allocable	* 1,608	51,677	0	* 44,560	111,840	* 8
East European countries, total	166,866	4,990,775	* 2,214,267	2,525,625	4,319,495	* 255,620
Romania	5,046	95,388	0	124,559	131,945	0
Former Soviet Union	64,300	3,989,141	* 2,213,870	1,624,781	2,084,462	* 255,605
Other East European countries	97,520	906,247	* 397	776,286	2,103,087	* 15
Europe not allocable	* 600	* 12,203	0	* 87,700	151,649	0
<b>Africa, total</b>	<b>837,008</b>	<b>7,911,355</b>	<b>* 6,697,005</b>	<b>2,199,166</b>	<b>4,564,552</b>	<b>* 1,674,619</b>
North Africa, total	130,678	1,218,343	* 689,484	434,292	979,402	* 354,832
Algeria	* 816	25,631	* 21	* 33,230	26,389	* 26
Egypt	117,467	1,075,980	* 653,574	273,294	822,396	* 346,378
Libya	* 21	* -920	* -484	* -466	8,140	* 833
Morocco	* 12,073	61,851	0	* 70,319	88,586	0
Other North African countries	* 300	55,801	* 36,372	* 57,916	33,890	* 7,594
East Africa, total	56,903	252,035	0	265,720	288,039	0
Ethiopia	* 48,258	22,723	0	* 62,416	61,109	0
Kenya	* 3,662	34,914	0	* 35,761	44,933	0
Tanzania	* 331	* 1,961	0	* 1,754	1,114	0
Uganda	* 274	* 17,852	0	* 17,671	726	0
Other East African countries	* 4,379	174,585	0	* 148,117	180,158	0
West and Central Africa, total	246,585	5,827,570	* 6,007,511	596,022	1,915,969	* 1,319,787
Gabon	* 56,562	17,619	* 56,471	* 54,797	31,932	* 19,269
Ghana	* 228	1,501	0	* 457	1,135	0
Liberia	* 151	* 859	0	0	8,552	0
Nigeria	35,197	2,851,299	* 2,100,047	242,110	555,795	* 317,643
Zaire	* 18,941	* 78,726	* 154,102	* 81,224	70,765	* 53,168
Other West and Central African countries	135,506	2,877,565	* 3,696,891	217,433	1,247,790	* 929,707
Southern Africa, total	402,747	612,744	* 9	903,133	1,380,602	0
Malawi	* 4	* 12	0	0	* 139	0
South Africa (including Namibia)	* -1,547	12,301	0	* 769	3,433	0
Zambia	404,233	598,943	* 9	901,543	1,373,408	0
Zimbabwe	* 13	222	0	* 45	2,490	0
Other Southern African countries	* 44	1,265	0	* 775	1,133	0
Africa not allocable	* 96	* 663	0	0	* 541	0

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 3. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country to Which Foreign Taxes Were Paid—Continued**

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

Selected country	Foreign income and taxes reported on Form 1118—continued					
	Gross income (less loss)—continued				Total deductions	Deductions from oil and gas extraction income [3]
	Service income	Other income	Oil and gas extraction income [2]	Foreign branch income [2]		
(7)	(8)	(9)	(10)	(11)	(12)	
<b>Asia, total</b>	<b>4,312,124</b>	<b>49,082,154</b>	<b>7,749,103</b>	<b>31,597,770</b>	<b>50,856,146</b>	<b>* 1,713,531</b>
Middle East, total	599,334	7,863,445	* 2,502,937	1,698,792	3,972,912	* 551,282
Bahrain	15,701	57,672	-* 7,086	181,403	173,057	* 3,515
Iran	* 29	21	0	* 198	5,358	0
Iraq	285,289	167,430	0	* 196,071	484,211	0
Israel	87,376	196,026	0	232,183	439,382	0
Kuwait	75,967	99,420	* 33,520	64,448	144,709	* 22,193
Lebanon	* 323	2,736	0	12,417	21,848	0
Qatar	28,599	962,037	* 536,498	* 19,275	211,811	* 64,107
Saudi Arabia	42,032	4,018,869	* 1,061,620	164,022	788,258	* 101,496
United Arab Emirates	40,473	1,169,357	* 225,055	562,825	1,136,581	* 125,195
Other areas of Arabian Peninsula	* 2,606	1,018,526	* 653,330	119,524	368,655	* 234,765
Other Middle East countries	20,939	171,351	0	146,425	199,043	* 12
Southern and Southeast Asia, total	797,184	11,361,992	4,884,680	5,408,019	11,490,954	1,054,969
Bangladesh	* 1,975	68,681	0	* 57,140	68,541	0
India	170,448	887,076	* 38	1,054,057	1,323,075	* -1
Indonesia	45,914	3,247,620	* 2,551,483	677,278	2,247,966	* 646,269
Malaysia	34,820	1,886,857	* 973,517	195,297	841,563	* 198,025
Pakistan	3,298	337,461	* 202,898	111,589	227,152	* 77,964
Philippines	51,899	733,117	* 148,230	665,572	865,533	* 16,834
Singapore	342,256	3,303,137	* 28,584	2,007,768	4,763,334	* 1,727
Sri Lanka	* 6,791	39,398	0	* 23,864	45,618	0
Thailand	63,505	718,132	* 950,899	540,909	941,636	* 114,820
Vietnam	8,032	80,257	* 29,031	22,085	61,171	* -668
Other Southern and Southeast Asian countries	68,247	60,255	0	52,459	105,366	0
Eastern Asia, total	2,029,487	29,266,966	* 361,485	24,488,062	34,319,570	* 107,280
China	313,538	2,241,702	* 352,920	1,474,037	2,823,944	* 103,190
Hong Kong	305,861	4,535,277	0	4,803,176	5,197,033	0
Japan (including Okinawa and Ryukyu Islands)	531,684	3,449,009	* 62	1,986,664	4,823,629	* -2
South Korea, Republic of	652,412	17,529,504	* 5,561	14,756,615	18,903,810	* 4,167
Taiwan	211,865	1,503,301	* 2,943	1,467,570	2,555,822	* -75
Other Eastern Asian countries	* 14,126	8,173	0	0	15,331	0
Asia not allocable	* 886,119	* 589,752	0	* 2,897	1,072,710	0
<b>Oceania, total</b>	<b>1,554,168</b>	<b>6,637,279</b>	<b>* 1,599,133</b>	<b>3,778,425</b>	<b>9,021,586</b>	<b>* 258,815</b>
Australia	1,522,664	6,062,852	* 1,510,308	3,481,894	7,991,159	* 247,508
New Zealand	29,929	465,446	* 11,583	257,793	972,359	* 1,704
Other countries of Oceania	1,575	108,981	* 77,241	* 38,738	58,069	* 9,602
<b>Puerto Rico and U.S. Possessions, total</b>	<b>3,584,494</b>	<b>17,004,472</b>	<b>* 650,382</b>	<b>1,555,786</b>	<b>29,677,084</b>	<b>* 302,894</b>
Puerto Rico	566,033	2,939,672	0	2,213,763	5,477,644	* 849
U.S. Possessions, total	476,908	2,551,895	0	1,893,520	5,023,519	0
American Samoa	89,125	387,777	0	320,243	454,125	* 849
Guam	-* 5,989	* 765	0	* 5,919	-1,510	0
Virgin Islands, U.S.	40,627	98,698	0	192,763	196,542	* 849
Other U.S. Possessions	5,801	278,111	0	96,082	197,717	0
<b>Country not stated</b>	<b>* 48,686</b>	<b>* 10,203</b>	<b>0</b>	<b>* 25,478</b>	<b>61,375</b>	<b>0</b>
<b>Section 863(b) income</b>	<b>590,386</b>	<b>24,995,825</b>	<b>0</b>	<b>* 2,885</b>	<b>15,863,760</b>	<b>0</b>
<b>Foreign Sales Corporation dividends [1]</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>* 131,025</b>	<b>0</b>
<b>Interest-Charge Domestic International Sales Corporation dividends [1]</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>* 46</b>	<b>0</b>

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 3. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country to Which Foreign Taxes Were Paid—Continued**

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

Selected country	Foreign income and taxes reported on Form 1118—continued					
	Taxable income (less loss) before adjustments	Foreign taxes paid, accrued, and deemed paid—continued				
		Total	Foreign taxes paid or accrued—continued			
			Total	Dividends	Interest	Rents, royalties, and license fees
(13)	(14)	(15)	(16)	(17)	(18)	
<b>All geographic areas</b>	<b>241,493,136</b>	<b>61,198,066</b>	<b>28,000,049</b>	<b>1,493,093</b>	<b>1,017,826</b>	<b>2,678,122</b>
<b>Canada</b>	<b>28,318,150</b>	<b>8,262,038</b>	<b>1,820,958</b>	<b>237,808</b>	<b>104,430</b>	<b>173,704</b>
<b>Latin America, total</b>	<b>19,959,275</b>	<b>5,338,955</b>	<b>2,909,920</b>	<b>266,073</b>	<b>118,968</b>	<b>724,697</b>
Mexico	5,005,175	1,202,052	480,073	2,826	39,063	155,727
Central America, total	611,021	98,971	43,551	2,889	522	18,338
Belize	8,043	* 1,646	* 1,255	* 750	* 7	0
Costa Rica	173,215	22,414	4,035	* 820	* 53	1,927
El Salvador	-43,124	8,108	4,690	0	* 149	2,237
Guatemala	62,396	15,683	12,209	* 113	* 73	7,083
Honduras	24,820	7,460	7,025	* 141	* 126	2,610
Nicaragua	17,447	3,937	3,863	0	* 5	908
Panama (including Canal Zone)	359,504	39,724	10,473	* 1,065	* 109	3,573
Central America not allocable	* 8,720	0	0	0	0	0
Caribbean countries, total	6,006,811	1,154,074	415,690	6,721	* 1,553	5,572
Cayman Islands (British)	4,631,602	694,840	* 101	* 17	0	0
Dominican Republic	87,386	15,791	12,954	* 654	* 680	1,950
Haiti	10,566	* 5,730	* 5,579	0	* 2	* 2
Jamaica	45,145	8,554	7,468	* 303	* 827	1,183
Trinidad	903,924	411,190	385,951	* 4,948	* 42	1,524
Other Caribbean countries	328,188	17,970	3,637	* 799	* 3	* 913
South America, total	8,355,381	2,883,155	1,969,903	253,637	77,829	544,357
Argentina	656,063	329,165	173,599	* 995	9,053	28,073
Bolivia	7,559	4,020	2,740	* 81	* 116	224
Brazil	2,610,796	1,011,473	478,151	64,101	53,375	138,757
Chile	1,517,205	455,197	421,701	172,146	3,607	25,451
Colombia	531,135	213,383	169,091	4,317	* 3,137	32,114
Ecuador	283,217	91,767	85,546	* 184	* 866	8,887
Paraguay	-4,943	8,883	2,030	* 18	* 3	241
Peru	1,076,636	447,886	441,136	11,569	2,355	301,971
Uruguay	76,884	14,483	6,194	* 4	0	1,553
Venezuela	1,562,224	274,299	166,833	* 221	5,316	6,878
Other South American countries	38,606	32,598	* 22,883	* 1	0	* 207
Latin America not allocable	-19,112	* 703	* 703	0	0	* 703
<b>Other Western Hemisphere, total</b>	<b>11,200,450</b>	<b>464,327</b>	<b>19,932</b>	<b>* 688</b>	<b>* 4,159</b>	<b>* 1,318</b>
Bahamas	1,042,222	12,543	* 3,292	* 138	* 3,088	* 1
Bermuda	9,810,426	410,641	* 1,092	* 2	* 1,004	0
Netherlands Antilles	125,176	7,809	* 2,410	* 124	* 41	* 38
Other British West Indies	179,153	31,761	11,565	* 424	* 26	* 166
All other Western Hemisphere	43,472	* 1,573	* 1,573	0	0	* 1,113
<b>Europe, total</b>	<b>98,960,836</b>	<b>27,877,895</b>	<b>10,633,215</b>	<b>594,621</b>	<b>547,844</b>	<b>313,338</b>
European Union, total	74,585,512	19,850,585	5,880,320	400,995	544,384	267,700
Austria	88,092	82,114	28,519	6,176	* 68	* 1,488
Belgium	1,483,875	319,175	55,178	10,042	631	1,100
Denmark	1,651,279	801,252	286,230	3,791	* 53	* 2,326
Finland	268,485	30,639	12,540	2,770	* 80	2,757
France (including Andorra)	4,421,507	909,854	316,100	43,721	27,138	53,480
Germany	5,867,497	1,316,126	441,201	24,171	212	9,187
Greece	285,433	106,179	28,502	* 95	* 51	* 1,113

Footnotes at end of table.



# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 3. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country to Which Foreign Taxes Were Paid—Continued**

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

Selected country	Foreign income and taxes reported on Form 1118—continued					
	Taxable income (less loss) before adjustments	Foreign taxes paid, accrued, and deemed paid—continued				
		Total	Foreign taxes paid or accrued—continued			
			Total	Dividends	Interest	Rents, royalties, and license fees
(13)	(14)	(15)	(16)	(17)	(18)	
<b>Europe, total—continued</b>						
European Union, total—continued						
Ireland	9,344,980	654,342	289,483	1,035	* 421	* 526
Italy (including San Marino)	2,517,125	1,028,714	251,606	19,585	15,064	87,246
Luxembourg	6,168,951	2,087,828	37,229	13,115	* 14	* 237
Netherlands	12,328,278	2,461,356	277,165	48,473	* 1,773	* 448
Portugal	282,677	99,891	50,207	4,939	8,932	12,393
Spain	4,705,816	2,613,472	192,680	34,402	35,102	49,486
Sweden	597,521	107,201	35,142	3,150	* 104	0
United Kingdom	24,563,603	7,231,970	3,578,081	185,527	454,741	45,914
European Union not allocable	* 10,393	* 473	* 458	* 4	0	0
Other West European countries, total	18,682,473	6,767,751	3,959,986	165,656	814	9,559
Liechtenstein	236,734	* 1,247	* 579	* 476	0	0
Monaco	281	0	0	0	0	0
Norway	8,223,066	5,684,375	3,683,888	9,452	* 94	* 11
Switzerland	7,351,473	991,176	230,980	147,749	* 153	* 3,861
Turkey	2,902,790	88,272	44,332	7,979	* 566	5,688
Other West European countries not allocable	-31,869	* 2,680	* 208	* 1	0	0
East European countries, total	5,543,136	1,249,332	788,649	27,967	2,647	35,025
Romania	63,279	29,275	18,648	3,594	* 33	2,847
Former Soviet Union	2,786,075	715,811	686,678	7,584	* 2,360	2,862
Other East European countries	2,693,782	504,247	83,324	16,789	254	29,315
Europe not allocable	149,715	* 10,226	* 4,259	* 3	0	* 1,054
<b>Africa, total</b>	<b>7,450,494</b>	<b>3,313,491</b>	<b>2,548,508</b>	<b>9,135</b>	<b>661</b>	<b>11,103</b>
North Africa, total	586,916	232,010	226,717	* 387	* 451	3,255
Algeria	16,564	* 31,686	* 31,686	0	0	* 112
Egypt	534,067	178,924	173,864	0	* 448	2,799
Libya	-6,311	* 9	* 8	* 8	0	0
Morocco	3,471	8,992	8,761	* 379	* 2	* 286
Other North African countries	39,125	* 12,400	* 12,398	* 1	0	* 58
East Africa, total	159,513	55,439	20,453	* 1,892	* 139	1,222
Ethiopia	9,911	* 1,170	* 1,170	0	0	0
Kenya	19,352	12,911	8,443	* 657	* 136	* 819
Tanzania	2,934	* 43	* 12	0	0	0
Uganda	31,711	* 6,340	* 1,495	* 740	0	* 1
Other East African countries	95,605	34,974	9,332	* 495	* 3	* 402
West and Central Africa, total	5,824,353	2,807,541	2,244,889	* 5,096	* 43	* 1,059
Gabon	51,379	* 17,429	* 16,679	* 32	0	0
Ghana	5,264	* 917	* 269	0	0	* 3
Liberia	143,162	* 2,392	0	0	0	0
Nigeria	2,498,915	1,896,644	1,852,295	* 4,380	* 4	* 455
Zaire	107,751	* 53,900	* 11,298	* 334	0	0
Other West and Central African countries	3,017,882	836,259	364,348	* 350	* 39	* 601
Southern Africa, total	879,494	218,500	56,449	* 1,759	* 28	5,566
Malawi	* 312	* 151	* 32	0	0	0
South Africa (including Namibia)	19,904	* 4,074	* 1,751	* 862	* 27	* 25
Zambia	849,719	206,240	49,300	* 651	* 1	726
Zimbabwe	3,959	* 1,560	* 255	* 246	0	* 4
Other Southern African countries	5,599	* 6,474	* 5,110	0	0	* 4,812
Africa not allocable	* 219	* 1	* 1	0	0	* 1

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 3. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country to Which Foreign Taxes Were Paid—Continued**

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

Selected country	Foreign income and taxes reported on Form 1118—continued					
	Taxable income (less loss) before adjustments	Foreign taxes paid, accrued, and deemed paid—continued				
		Total	Total	Taxes withheld at source on:		
				Dividends	Interest	Rents, royalties, and license fees
(13)	(14)	(15)	(16)	(17)	(18)	
<b>Asia, total</b>	<b>45,869,009</b>	<b>11,999,230</b>	<b>7,237,126</b>	<b>250,436</b>	<b>55,273</b>	<b>874,204</b>
Middle East, total	5,810,928	1,982,039	1,901,080	11,014	1,175	16,890
Bahrain	41,649	* 170	* 60	0	* 50	* 6
Iran	18,400	* 34	* 10	0	0	0
Iraq	-30,300	* 1	0	0	0	0
Israel	221,677	56,491	28,465	4,194	1,063	8,438
Kuwait	51,270	26,384	26,206	0	0	* 3,684
Lebanon	-3,737	1,772	1,696	0	0	94
Qatar	809,753	171,349	171,349	* 24	0	* 19
Saudi Arabia	3,473,552	1,423,607	1,395,892	* 6,556	* 61	4,458
United Arab Emirates	428,015	75,728	57,529	* 209	* 1	0
Other areas of Arabian Peninsula	644,468	215,974	212,068	0	0	* 33
Other Middle East countries	156,181	10,529	7,803	* 30	0	* 157
Southern and Southeast Asia, total	15,546,911	3,605,189	2,321,654	70,300	38,733	170,179
Bangladesh	22,078	* 13,486	* 13,486	0	0	0
India	779,584	341,331	242,058	15,670	1,174	19,216
Indonesia	2,922,100	1,419,777	885,493	11,605	16,222	6,920
Malaysia	2,460,012	565,219	527,408	1,478	448	35,388
Pakistan	208,613	72,977	59,177	708	* 15	* 261
Philippines	1,410,835	272,413	180,356	29,312	9,003	13,106
Singapore	6,165,641	392,213	242,939	830	1,907	71,790
Sri Lanka	18,793	6,231	* 3,644	* 115	0	* 21
Thailand	1,449,849	515,530	161,483	10,582	9,936	22,659
Vietnam	48,817	2,008	2,008	0	0	564
Other Southern and Southeast Asian countries	60,591	4,004	3,602	0	* 29	* 254
Eastern Asia, total	24,063,005	6,411,773	3,014,163	169,123	15,362	687,057
China	4,954,008	373,343	267,390	* 3,447	494	185,269
Hong Kong	1,571,062	509,551	393,072	64,388	5,858	111,590
Japan (including Okinawa and Ryukyu Islands)	2,214,105	470,751	295,446	592	* 3,253	12,947
South Korea, Republic of	13,253,835	4,371,340	1,663,988	52,768	3,490	212,771
Taiwan	2,039,069	684,307	391,786	47,929	2,267	161,998
Other Eastern Asian countries	30,926	* 2,480	* 2,480	0	0	* 2,480
Asia not allocable	448,165	* 230	* 230	0	* 3	* 79
<b>Oceania, total</b>	<b>6,779,989</b>	<b>1,795,608</b>	<b>973,592</b>	<b>27,943</b>	<b>64,973</b>	<b>53,578</b>
Australia	5,558,318	1,559,612	857,416	19,298	44,697	43,415
New Zealand	748,601	192,481	73,944	8,645	20,276	9,980
Other countries of Oceania	473,070	43,515	42,232	0	0	* 183
<b>Puerto Rico and U.S. Possessions, total</b>	<b>7,857,935</b>	<b>1,261,708</b>	<b>1,143,059</b>	<b>83,186</b>	<b>119,886</b>	<b>97,775</b>
Puerto Rico	5,323,107	819,227	651,247	23,196	1,633	428,405
U.S. Possessions, total	5,114,395	785,130	619,902	23,124	1,467	427,737
American Samoa	208,711	34,097	31,346	* 72	* 165	* 668
Guam	3,543	* 15	* 1	0	0	0
Virgin Islands, U.S.	73,403	23,539	21,251	* 10	0	0
Other U.S. Possessions	116,449	6,324	5,940	* 62	* 165	* 615
<b>Country not stated</b>	<b>15,316</b>	<b>* 4,218</b>	<b>* 4,153</b>	<b>0</b>	<b>0</b>	<b>* 53</b>
<b>Section 863(b) income</b>	<b>9,790,534</b>	<b>62,486</b>	<b>62,486</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Foreign Sales Corporation dividends [1]</b>	<b>* 20,654</b>	<b>* 517</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Interest-Charge Domestic International Sales Corporation dividends [1]</b>	<b>* 883</b>	<b>* 6</b>	<b>* 6</b>	<b>* 6</b>	<b>0</b>	<b>0</b>

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 3. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country to Which Foreign Taxes Were Paid—Continued**

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

Selected country	Foreign income and taxes reported on Form 1118—continued				
	Foreign taxes paid, accrued, and deemed paid—continued				
	Foreign taxes paid or accrued—continued				Taxes deemed paid
	Other taxes paid or accrued on:				
	Branch income	Specifically allocable income [section 863(b)]	Service income	Other income	
(19)	(20)	(21)	(22)	(23)	
<b>All geographic areas</b>	<b>5,734,096</b>	<b>63,225</b>	<b>298,690</b>	<b>16,714,997</b>	<b>33,198,017</b>
<b>Canada</b>	<b>547,654</b>	<b>0</b>	<b>37,217</b>	<b>720,144</b>	<b>6,441,080</b>
<b>Latin America, total</b>	<b>504,417</b>	<b>0</b>	<b>51,679</b>	<b>1,244,087</b>	<b>2,429,035</b>
Mexico	195,299	0	7,425	79,734	721,979
Central America, total	5,952	0	1,047	14,803	55,420
Belize	* 1	0	0	* 497	* 391
Costa Rica	* 270	0	* 318	* 647	18,378
El Salvador	* 134	0	* 94	* 2,077	3,417
Guatemala	* 764	0	* 360	* 3,815	* 3,475
Honduras	* 266	0	* 51	* 3,832	* 435
Nicaragua	* 46	0	* 13	* 2,891	* 74
Panama (including Canal Zone)	* 4,471	0	* 211	* 1,045	29,251
Central America not allocable	0	0	0	0	0
Caribbean countries, total	10,617	0	* 677	390,550	738,385
Cayman Islands (British)	* 4	0	* 15	* 66	694,738
Dominican Republic	* 944	0	* 123	* 8,603	* 2,837
Haiti	* 14	0	0	* 5,561	* 151
Jamaica	* 508	0	* 227	* 4,421	* 1,086
Trinidad	* 8,742	0	* 223	* 370,472	* 25,239
Other Caribbean countries	* 406	0	* 88	* 1,428	* 14,333
South America, total	292,549	0	42,530	759,001	913,251
Argentina	25,601	0	3,874	106,002	155,566
Bolivia	* 1,645	0	* 7	* 666	* 1,280
Brazil	94,137	0	17,479	110,302	533,322
Chile	15,708	0	* 1,901	202,888	33,497
Colombia	11,669	0	1,132	116,722	44,292
Ecuador	3,479	0	* 3,839	68,291	6,221
Paraguay	* 337	0	0	* 1,431	* 6,853
Peru	109,538	0	7,634	8,069	* 6,750
Uruguay	* 2,182	0	* 1,430	* 1,025	8,289
Venezuela	6,075	0	* 5,155	143,188	107,466
Other South American countries	* 22,178	0	* 78	* 418	* 9,715
Latin America not allocable	0	0	0	0	0
<b>Other Western Hemisphere, total</b>	<b>* 11,910</b>	<b>0</b>	<b>* 100</b>	<b>* 1,757</b>	<b>444,395</b>
Bahamas	* 1	0	0	* 64	9,251
Bermuda	* 1	0	0	* 85	409,549
Netherlands Antilles	* 840	0	* 32	* 1,335	* 5,398
Other British West Indies	* 10,621	0	* 58	* 270	20,197
All other Western Hemisphere	* 447	0	* 10	* 3	0
<b>Europe, total</b>	<b>1,549,007</b>	<b>0</b>	<b>85,091</b>	<b>7,543,313</b>	<b>17,244,680</b>
European Union, total	1,290,853	0	80,324	3,296,065	13,970,265
Austria	19,532	0	* 19	* 1,235	53,596
Belgium	35,119	0	* 653	7,634	263,997
Denmark	27,159	0	* 73	* 252,830	515,021
Finland	6,665	0	* 4	* 263	18,099
France (including Andorra)	119,892	0	3,010	68,859	593,753
Germany	268,214	0	42,666	96,751	874,925
Greece	25,193	0	* 1,535	* 515	77,678

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 3. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country to Which Foreign Taxes Were Paid—Continued**

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

Selected country	Foreign income and taxes reported on Form 1118—continued				
	Foreign taxes paid, accrued, and deemed paid—continued				
	Foreign taxes paid or accrued—continued				Taxes deemed paid
	Other taxes paid or accrued on:				
	Branch income	Specifically allocable income [section 863(b)]	Service income	Other income	
(19)	(20)	(21)	(22)	(23)	
<b>Europe, total—continued</b>					
European Union, total—continued					
Ireland	8,012	0	* 462	* 279,027	364,859
Italy (including San Marino)	76,284	0	* 3,603	49,823	777,108
Luxembourg	21,629	0	0	* 2,234	2,050,599
Netherlands	114,033	0	* 136	112,303	2,184,190
Portugal	21,612	0	* 61	* 2,270	49,684
Spain	26,443	0	* 1,098	46,150	2,420,792
Sweden	24,758	0	0	* 7,129	72,059
United Kingdom	496,154	0	27,004	2,368,741	3,653,889
European Union not allocable	* 155	0	0	* 299	* 15
Other West European countries, total	69,002	0	* 1,543	3,713,412	2,807,765
Liechtenstein	* 103	0	0	0	* 668
Monaco	0	0	0	0	0
Norway	* 3,733	0	* 11	* 3,670,587	2,000,488
Switzerland	45,344	0	* 669	33,204	760,196
Turkey	19,615	0	* 864	* 9,621	43,940
Other West European countries not allocable	* 207	0	0	0	* 2,472
East European countries, total	189,153	0	3,224	530,635	460,683
Romania	* 11,966	0	* 36	* 172	* 10,627
Former Soviet Union	146,615	0	* 540	526,717	29,133
Other East European countries	30,571	0	2,648	3,746	420,923
Europe not allocable	0	0	0	* 3,202	* 5,967
<b>Africa, total</b>	<b>189,398</b>	<b>0</b>	<b>2,783</b>	<b>2,335,429</b>	<b>764,983</b>
North Africa, total	73,496	0	* 322	148,807	5,294
Algeria	* 30,233	0	0	* 1,340	0
Egypt	* 24,355	0	* 51	* 146,211	* 5,061
Libya	0	0	0	0	* 1
Morocco	* 6,825	0	* 270	* 999	* 230
Other North African countries	* 12,083	0	* 1	* 255	* 2
East Africa, total	* 4,607	0	* 418	12,175	34,987
Ethiopia	* 619	0	0	* 551	0
Kenya	* 3,480	0	* 286	* 3,065	* 4,469
Tanzania	0	0	* 1	* 11	* 31
Uganda	0	0	0	* 754	* 4,845
Other East African countries	* 508	0	* 130	* 7,794	25,642
West and Central Africa, total	73,554	0	* 1,967	* 2,163,170	562,652
Gabon	* 4,372	0	0	* 12,275	* 750
Ghana	0	0	0	* 266	* 648
Liberia	0	0	0	0	* 2,392
Nigeria	* 23,589	0	* 1,645	* 1,822,221	* 44,350
Zaire	* 10,486	0	0	* 478	* 42,603
Other West and Central African countries	* 35,107	0	* 322	* 327,930	* 471,911
Southern Africa, total	37,742	0	* 77	11,278	162,050
Malawi	0	0	0	* 32	* 119
South Africa (including Namibia)	* 235	0	0	* 602	* 2,323
Zambia	37,507	0	* 77	10,339	156,940
Zimbabwe	0	0	0	* 5	* 1,305
Other Southern African countries	0	0	0	* 299	* 1,364
Africa not allocable	0	0	0	0	0

Footnotes at end of table.

# Corporate Foreign Tax Credit, 2004

Statistics of Income Bulletin | Summer 2008

**Table 3. U.S. Corporation Income Tax Returns with a Foreign Tax Credit, 2004: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country to Which Foreign Taxes Were Paid—Continued**

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

Selected country	Foreign income and taxes reported on Form 1118—continued				Taxes deemed paid
	Foreign taxes paid, accrued, and deemed paid—continued				
	Foreign taxes paid or accrued—continued				
	Other taxes paid or accrued on:				
	Branch income	Specifically allocable income [section 863(b)]	Service income	Other income	
(19)	(20)	(21)	(22)	(23)	
<b>Asia, total</b>	<b>2,315,854</b>	<b>* 134</b>	<b>67,306</b>	<b>3,673,918</b>	<b>4,762,105</b>
Middle East, total	167,991	0	2,042	1,701,969	80,960
Bahrain	0	0	0	* 4	* 110
Iran	0	0	0	* 10	* 24
Iraq	0	0	0	0	* 1
Israel	6,564	0	* 333	7,872	28,026
Kuwait	14,406	0	* 530	* 7,586	* 178
Lebanon	* 1,571	0	* 26	* 6	* 76
Qatar	* 988	0	* 207	* 170,111	0
Saudi Arabia	* 106,352	0	* 975	* 1,277,491	27,714
United Arab Emirates	* 22,689	0	0	* 34,630	* 18,199
Other areas of Arabian Peninsula	* 7,949	0	* -97	* 204,183	* 3,906
Other Middle East countries	* 7,472	0	* 68	* 76	2,726
Southern and Southeast Asia, total	556,053	* 134	17,906	1,468,348	1,283,535
Bangladesh	* 12,837	0	0	* 650	0
India	164,590	0	6,602	34,806	99,273
Indonesia	* 90,480	* 0	* 5,852	754,414	534,284
Malaysia	5,680	0	909	483,505	37,811
Pakistan	* 18,308	0	* 55	39,831	13,799
Philippines	79,050	0	* 389	49,496	92,057
Singapore	126,095	* 134	1,293	40,890	149,274
Sri Lanka	* 3,263	0	0	* 245	* 2,587
Thailand	51,272	0	2,727	64,307	354,046
Vietnam	* 1,203	0	* 65	* 176	0
Other Southern and Southeast Asian countries	* 3,277	0	* 13	* 29	* 402
Eastern Asia, total	1,591,809	0	47,359	503,453	3,397,610
China	34,891	0	2,896	40,392	105,953
Hong Kong	174,032	0	4,219	32,986	116,479
Japan (including Okinawa and Ryukyu Islands)	73,902	0	* 3,540	201,211	175,305
South Korea, Republic of	1,198,715	0	3,818	192,426	2,707,352
Taiwan	110,269	0	32,885	36,437	292,522
Other Eastern Asian countries	0	0	0	0	0
Asia not allocable	0	0	0	* 148	0
<b>Oceania, total</b>	<b>331,073</b>	<b>0</b>	<b>8,243</b>	<b>487,782</b>	<b>822,016</b>
Australia	307,075	0	8,086	434,845	702,197
New Zealand	14,525	0	* 139	20,380	118,537
Other countries of Oceania	* 9,474	0	* 18	* 32,558	* 1,283
<b>Puerto Rico and U.S. Possessions, total</b>	<b>149,225</b>	<b>* 605</b>	<b>29,004</b>	<b>663,377</b>	<b>118,649</b>
Puerto Rico	135,557	0	17,267	45,190	167,980
U.S. Possessions, total	109,778	0	15,987	41,809	165,229
American Samoa	25,779	0	* 1,281	3,380	* 2,751
Guam	0	0	0	* 1	* 14
Virgin Islands, U.S.	18,883	0	* 1,164	* 1,195	* 2,287
Other U.S. Possessions	* 2,913	0	* 116	2,068	* 384
<b>Country not stated</b>	<b>* 3,983</b>	<b>0</b>	<b>0</b>	<b>* 117</b>	<b>* 65</b>
<b>Section 863(b) income</b>	<b>0</b>	<b>62,486</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Foreign Sales Corporation dividends [1]</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>* 517</b>
<b>Interest-Charge Domestic International Sales Corporation dividends [1]</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

\* Data should be used with caution because of the small number of sample returns on which they are based.

[1] Dividends from an Interest-Charge Domestic International Sales Corporation or a Foreign Sales Corporation were not reported for specific foreign countries.

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

[3] Included in total deductions, column 11.

NOTE: Detail may not add to totals because of rounding.